

HIGH SPEED RAIL (LONDON - WEST MIDLANDS)

Equality impact assessment update
CFA2 – CFA26

Summary report of responses

March 2016



Department for Transport

High Speed Two (HS2) Limited has been tasked by the Department for Transport (DfT) with managing the delivery of a new national high speed rail network. It is a non-departmental public body wholly owned by the DfT.

High Speed Two (HS2) Limited,
One Canada Square,
Canary Wharf,
London E14 5AB

Telephone: 020 7944 4908

General email enquiries: HS2enquiries@hs2.org.uk

Website: www.gov.uk/hs2

High Speed Two (HS2) Limited has actively considered the needs of blind and partially sighted people in accessing this document. The text will be made available in full on the HS2 website. The text may be freely downloaded and translated by individuals or organisations for conversion into other accessible formats. If you have other needs in this regard please contact High Speed Two (HS2) Limited.

© High Speed Two (HS2) Limited, 2016, except where otherwise stated.

Copyright in the typographical arrangement rests with High Speed Two (HS2) Limited.

This information is licensed under the Open Government Licence v2.0. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/version/2 **OGL** or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gsi.gov.uk. Where we have identified any third-party copyright information you will need to obtain permission from the copyright holders concerned.



Printed in Great Britain on paper containing at least 75% recycled fibre.

Contents

Executive summary	3
1 Background to the consultation process	4
2 Notification, material and engagement	5
2.1 Notification	5
2.2 Material	5
3 Approach to analysis	5
4 Participation rates	6
5 Summary of responses	7
Appendix A - Coding framework	10
Appendix B - Organisation respondent list	15

Executive summary

The *High Speed Rail (London - West Midlands) Equality impact assessment: CFA2 Camden Town - CFA26 Washwood Heath to Curzon Street* consultation was launched on 11 December 2015 and closed on 22 January 2016. The consultation sought views on a document – the Equality Impact Assessment (EQIA) – which provides a route-wide update of the EQIA (2013), covering all potential equality effects arising from the construction and operation of the Phase One route CFA2 – CFA26, excluding Euston (CFA1).

As explained in the document, the EQIA update included the following equality effects:

- those reported in the EQIA (2013) which remain unchanged;
- those reported in the EQIA (2013) which have now been removed due to changes resulting from the revised scheme or from specific measures or Assurances;
- those reported in the EQIA (2013), which are changed and/or reduced in extent or severity, due to changes and amendments to the scheme or from specific measures or Assurances
- those newly arising from the revised scheme; and
- those which are due to the original scheme but which were not identified in the EQIA (2013) and which remain potential effects under the revised scheme.

The aim of the consultation was to enhance HS2 Ltd's approach to identifying and addressing equality issues along the Phase One route, by seeking views on the accuracy and appropriateness of its EQIA update. One consultation question was asked:

"What are your views on the EQIA update for CFA2 Camden Town - CFA26 Washwood Heath to Curzon Street? Please provide as much detail as possible, and let us know if you think anything has been missed from the assessment."

A total of 18 responses were submitted during the consultation period. Of those, five were sent by representative organisations, including Turweston Parish Council and the London Borough of Camden. There were also responses from Wendover Cricket Club, the Allison House Hostel and a joint response from Transport for London and the Greater London Authority. The remainder were submitted by individual members of the public, with no stated affiliation to an organisation or group.

The EQIA update explained that responses would be summarised in a report that would inform Parliament's consideration of the hybrid Bill for high speed rail between London and the West Midlands.

This is the summary report of responses. It provides some background information to HS2 Ltd's delivery of the consultation and then an overview of the key issues and themes that emerged from the consultation responses.

1 Background to the consultation process

- 1.1.1 An EQIA was produced for Phase One of HS2 in November 2013, when detailed proposals for the scheme were first submitted to Parliament for consideration. This was in line with the Equality Act 2010, which requires public authorities to adhere to the Public Sector Equality Duty by – among other things – promoting equality of opportunity through its works between people who share a relevant protected characteristic and those who do not.
- 1.1.2 Protected characteristics, under the terms of the Equality Act, include age, disability, race and sex. In total there are nine protected characteristics.
- 1.1.3 The 2013 EQIA described all of the known equality effects on those protected characteristics groups resulting from the construction and operation of Phase One, as it was then intended. Since 2013 and the deposit of the Bill in Parliament, HS2 Ltd has made various amendments to that original scheme, and submitted those changes to Parliament in the form of 'Additional Provisions' (APs).
- 1.1.4 In September 2015, HS2 Ltd published for consultation a report updating the EQIA (2013) specifically to take account of scheme changes and amendments in the Euston station and approach community forum area 1 (CFA1). A separate consultation summary report was produced to report on the comments raised in relation to Euston.
- 1.1.5 This EQIA report provides an update of the EQIA (2013) covering all potential equality effects arising from the construction and operation of the Phase One route (CFA2–CFA26), excluding Euston (CFA1). It takes account of the amendments and changes outside CFA1, as reported in the four SESs and five AP ESs. The original scheme as altered by the amendments and changes is referred to in this report as 'the revised scheme'. This definition refers to the entire Phase One route and therefore includes the parts of the original scheme that have not been changed. It assesses the extent to which people with protected characteristics would be affected disproportionately or differentially by the construction and operation of the scheme between CFA2-CFA26.
- 1.1.6 A disproportionate equality effect occurs where an environmental, economic or social impact has a greater impact on people sharing a protected characteristic than on other members of the general population in that location.
- 1.1.7 A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs or a recognised sensitivity or vulnerability associated with that protected characteristic.
- 1.1.8 The EQIA update considered the potential impacts of the revised scheme between CFA2-CFA26 – as they had been described in documents associated with 'APs' – in the light of HS2 Ltd's understanding of the social make-up of the affected area. Information derived from the 2011 Census, as well as the stakeholder engagement along the line of route, enabled HS2 Ltd to identify and assess the various equality impacts outlined in its EQIA update. The update also includes information about how HS2 Ltd proposes to avoid or reduce those impacts.
- 1.1.9 The purpose of the consultation was to test the appropriateness of HS2 Ltd's approach to assessing equality impacts, and the accuracy of its results. The information received through

the consultation will inform how HS2 Ltd works with its stakeholders along the Phase One route to minimise negative impacts of the project and maximise its benefits.

2 Notification, material and engagement

2.1 Notification

2.1.1 The EQIA consultation sought views from all interested and affected parties, and there were no restrictions on who could respond. HS2 Ltd organised a mail-out to stakeholders identified in the EQIA report and the local authorities along the Phase One route. Libraries and parish councils were also included in this mail-out, and were asked to display copies of our consultation material in their reference collections.

2.1.2 Advertisements were placed in 25 regional newspapers along the Phase One route. Newspapers carried the advert on two occasions: once at the start of the consultation and again mid-way through, raising awareness of the report and encouraging interested parties to submit a response.

2.1.3 A page of the HS2 section of www.gov.uk was dedicated to the consultation, which was a main feature on the landing page for the duration of the consultation.

2.2 Material

2.2.1 The EQIA formed the basis of all the material produced for this consultation. It explained in as much detail as available how HS2 Ltd had assessed the equality impacts of the proposed scheme in CFA 2 to CFA 26, affecting Phase One of the project, and how the organisation intends to reduce or avoid those impacts. The document runs to over 120 pages, including maps and diagrams. To make this information more accessible to stakeholders, HS2 Ltd produced a 22-page executive summary of the main document, explaining the purpose of the consultation and some of the basic concepts of the EQIA update.

2.2.2 'Easy Read' is a way of translating complex information into a format – combining words and pictures – that will be accessible to people who, for a variety of reasons, find it easier to receive information in that format. HS2 Ltd considered it possible that some people who would take an interest in this particular consultation would prefer to read about it in Easy Read, and so a version of the EQIA report was produced in that format. It was advertised on our website to make sure any person or organisation with an interest could use it. The executive summary was transcribed into Braille and produced as an audio CD, so that people with visual impairments would find it easier to participate in the consultation.

3 Approach to analysis

3.1.1 Three response channels – a Freepost address, an email account and an online response form – were each set up for this consultation. An independent response analysis company, Dialogue by Design, undertook the receipt of email and hard-copy responses; a dedicated online response form logged any submissions made via the consultation responses website.

3.1.2 Once delivered to one of the three channels, every response was logged and added to a single database so that it could be read and analysed. The format of a response (i.e. hard copy, email

or online submission) or the type of respondent who had submitted it (e.g. an elected official or a member of the public) had no bearing on the type of analysis it received, which was consistent across all formats and types.

- 3.1.3 The approach taken towards analysis of responses was to carefully read each one and apply specific 'codes' to the different issues and assertions they contained. A preliminary set of codes was produced to begin this process, but new ones could be created throughout the analysis process whenever an issue arose in a response that could not be adequately covered by an existing code.
- 3.1.4 There was a phased process of checking and rationalising this list of codes so that the issues they categorised did not become unhelpfully granular or specific. It was possible to amalgamate codes if it became clear to the analysis team that two or more separate codes were being used to cover the same issue.
- 3.1.5 Codes were organised in groups that related to a general unifying theme – for example, one of the 'impacts' reported in the EQIA update – and then by a more specific sub-theme. So, if a response contained a comment along the lines of 'air quality effects will be worse for people living near construction sites', then the following code would have been applied: 'Impacts – pollution – proximity to construction'. In this example, 'Impacts - pollution' is the theme and 'proximity to construction' is the sub-theme.
- 3.1.6 It is important to note that the purpose of applying codes in a qualitative report such as this is not to quantify issues or sentiments within a set of responses. Its primary purpose is to help an analysis team to structure their preliminary and subsequent reading of responses, in a way that enables them to produce a summary report that gives a neutral, balanced and useful overview of consultation feedback. Wherever numbers are used in this report, the purpose is not to rank sentiments or the importance of issues, but to provide the reader with context and to demonstrate the transparency of the analysis process.
- 3.1.7 This is an accepted approach to qualitative analysis and is appropriate to a consultation such as this – one that received a relatively small number of responses.
- 3.1.8 Quality assurance exercises were carried out at different phases of this project to ensure that the receipt, coding and reporting of responses was consistent and fair.

4 Participation rates

- 4.1.1 The Phase One EQIA update, CFA2 – CFA26, consultation received 18 responses. Of these, five were from organisations and 13 were from individual respondents not affiliated with an organisation or group. In all, nine responses were received via the online response form on the dedicated consultation responses website, eight email responses were received and one hard-copy letter was received via the dedicated Freepost address set up for the consultation. There were no late responses received for the consultation.

5 Summary of responses

What are your views on the EQIA update for the Phase One route (CFA2 – CFA26)? Please provide as much detail on your reasoning as possible.

- 5.1.1 This was the only question posed in the EQIA update consultation for CFA2 Camden Town – CFA26 Washwood Heath to Curzon Street. Respondents chose to address the question in several ways and a number of different topics were discussed, with respondents referring to various locations along the complete Phase One line of route, including CFA1.
- 5.1.2 Some respondents structured their responses around the particular themes highlighted in the summary document, others focused more on how their own personal situation might be affected during and after construction, while others concentrated on the potential mitigation discussed in the EQIA report.
- 5.1.3 The nature of the consultation encouraged respondents to focus on the protected characteristic groups, as defined in the Equality Act 2010, and how these groups in particular would be impacted by the proposed plans for CFA2 Camden Town – CFA26 Washwood Heath to Curzon Street.
- 5.1.4 A large number of respondents expressed concern regarding the general disruption, as a whole, that the construction of the railway will have on the communities along the Phase One line of route and, in particular, on the protected characteristic groups that the EQIA report depicts.
- 5.1.5 Most notably, respondents expressed apprehension that people of a vulnerable age would be adversely impacted during the construction period, and that HS2 Ltd should ensure that anything impacting young children and the elderly has suitable mitigation in place.
- 5.1.6 A response was received from Wendover Cricket Club describing the potential impacts that relocating the club could have on the different age groups that play cricket. The response explained that the club has been identified for purchase by HS2 Ltd, therefore a new permanent ground is required. The response declared that members of the club are at risk of being impacted if “a new site does not replicate the ease of access that the existing cricket ground enjoys.” Wendover Cricket Club suggested a re-wording of a paragraph in the EQIA report to incorporate the potential for acquiring a temporary cricket ground to ensure the continuity of playing cricket for the different age groups.
- 5.1.7 One response, from an elderly couple living in London, expressed concern over the potential noise levels resulting from proximity to construction, explaining that “excess noise levels outside core hours combined with excess noise levels in inside core hours will necessitate affected residents such as ourselves being 'temporarily' rehoused.” The response continued to describe a level of uncertainty in relation to the type of accommodation that will be made available to those residents needing temporary housing, and requested further information from HS2 Ltd on the prospective mitigation.
- 5.1.8 Another response asked for consideration of schoolchildren situated near to construction sites for long periods, stating that “everyone is aware that high noise levels destroy people's lives: children won't be able to concentrate at school.” The response does not suggest a form of

mitigation to address the impacts identified in the response, yet refers to an altogether alternative scheme to the HS2 project.

- 5.1.9 A number of respondents articulated their concerns about impacts to accessibility during the construction period, with a general worry shared that local roads will be blocked by construction traffic without solution. A short response from the Allison House Hostel in Birmingham calls the mitigation insufficient and requests more to be done to tackle the “negative equality effect on the residents of the hostel” resulting from construction traffic passing by on the immediate roads.
- 5.1.10 Some responses mentioned the potential impacts on the emergency services in terms of hindering their access to operate business as usual. A shared concern is that the amount of construction traffic expected on the roads could result in a level of chaos unaddressed by the EQIA report: “Traffic problems caused by them will substantially affect school children being late or missing school completely, shops being closed because of the lack of business, employees will lose their jobs, the emergency services will not be able to operate efficiently and it will cost people’s lives.”
- 5.1.11 One respondent writes about projected obstacles to routine journeys to/from “pre-school and work” and worries that the increased pollution and noise levels could seriously disrupt their current way of life. The closure of a local equestrian centre is used to illustrate further inconvenience caused to the respondent, describing the impact that construction of the railway will have on the “planned riding lessons in the future for myself and young daughter”.
- 5.1.12 Turweston Parish Council submitted a consultation response focusing on the potential impacts to their Queen Elizabeth II Diamond Jubilee Playing Field, which is “used extensively by individuals, groups and communities”, and explains that the provision of a new playing field is not the council’s preferred option. The council hopes to work with HS2 Ltd and believes that “with the right mix of mitigation, Turweston Playing Field will retain almost 90% of the current area once the line is operational”.
- 5.1.13 A number of respondents expressed their concern over the rise in pollution levels and the impact on air quality that both the construction and operation of the railway could cause. One respondent asks how HS2 Ltd plans to monitor the rising levels of pollution in their community, and demands that the air quality is tested in their immediate area. The respondent states: “When construction begins, it is a known fact that the NO₂ will greatly increase, and when that combines with the Particulate Matter many fragile and vulnerable people’s lungs will greatly suffer.”
- 5.1.14 A small number of responses refer to an “electro-magnetic radiation” claimed to be emitted from tunnel boring machines (TBMs) and request more information on the potential impacts that are associated with TBMs. One respondent writes about their apprehension of living in such a polluted environment and questions the further detrimental effects it could have on their own health and wellbeing, stating “I already had cancer once.”
- 5.1.15 The London Borough of Camden (LBC) comments on the removal of the HS1-HS2 link from the proposals and reiterates a number of avoided impacts on the protected characteristic groups now that the link is no longer included. LBC’s response calls for reassurance that adequate mitigation is in place to address the impacts on Adelaide Road Medical Centre as a

result of the proximity to a vent shaft: “This is a large general practice with around 12,000 patients on its list, and those attending to see a doctor or nurse are likely to be more vulnerable than the general population.” LBC references the Code of Construction Practice and stresses the importance of minimising anything that could have an impact on the operation of the centre.

- 5.1.16 The LBC response expresses concern over the potential impacts to Alexandra College, which opened in September 2015 and is specifically for “16-25 year olds with profound and multiple learning difficulties or severe learning difficulties”. LBC refers to the college’s proximity to the vent shaft on Alexandra Road estate and highlights the importance of HS2 Ltd working with the school to mitigate any significant effects to its pupils, ensuring its continued operation going forward.
- 5.1.17 The LBC response also refers to the Jamestown Mental Health Centre, explaining that the centre has closed and has been replaced by residential flats.
- 5.1.18 Transport for London and the Greater London Authority submitted a joint response to the consultation, in which they also note the differential impacts to protected characteristic groups when removing the HS1-HS2 link. The response refers to TfL’s consultation responses to the Additional Provisions (2, 3 and 4) consultations and highlights specific concerns as “accessibility of sites as well as noise and air quality effects during construction” for the local communities. On addressing potential mitigation, the response concluded: “In order to minimise these impacts, TfL and the GLA are eager to work with HS2 Ltd. on reducing the amount of HS2 related construction traffic on the road and to maximise the use of rail.”
- 5.1.19 While some respondents underlined that the removal of the HS1-HS2 link helped to avoid impacts to protected characteristic groups, one response received focused solely on the removal of the link, calling it “a serious error which will have to be rectified at some point in the future.” The response criticised the lack of connectivity that will result from passengers having to alight the train and walk to a different station to continue a journey on HS1, inferring that pedestrians will be at risk passing Euston Road “at its busiest and most dangerous point”.
- 5.1.20 Some responses did not specifically mention the EQIA update, nor its supporting documents, and chose instead to focus on HS2 in general. Such responses made statements referring to a lack of economic benefits for HS2 and criticised the Government for spending money on “vanity projects”.

Appendix A - Coding framework

A coding framework was developed as a way of identifying and categorising the various different issues raised in responses to the consultation. A coding framework such as this helps the writers of a summary report to organise and logically present issues in a way that will be most useful to readers.

Codes:

Consultation - documentation - criticise
Consultation - engagement - criticism
Consultation - process - criticise
EQIA document - challenge
EQIA document - demographics - challenge
General - documentation - challenge
General - opposition to HS2
General - opposition to the Government
General - question raised
General - suggestion - other
Impacts - access
Impacts - access to services
Impacts - air quality
Impacts - community cohesion
Impacts - construction
Impacts - construction - working hours
Impacts - construction period duration
Impacts - construction traffic
Impacts - crime
Impacts - dirt
Impacts - disruption
Impacts - dust
Impacts - education
Impacts - elderly/vulnerable
Impacts - emergency services
Impacts - employment
Impacts - environment
Impacts - equality

Impacts - health/wellbeing
Impacts - hospitals
Impacts - housing
Impacts - livelihood/business
Impacts - local people
Impacts - loss of green space
Impacts - mitigation - criticise
Impacts - mitigation - flood management
Impacts - mitigation - learning from other projects
Impacts - mitigation - local involvement
Impacts - mitigation - monitoring
Impacts - mitigation - noise
Impacts - mitigation - suggestion
Impacts - mitigation - surveys
Impacts - more HGVs on the roads
Impacts - noise
Impacts - peace/tranquillity
Impacts - places of worship
Impacts - pollution
Impacts - poverty
Impacts - property
Impacts - protected characteristics
Impacts - public transport
Impacts - quality of life
Impacts - rehousing
Impacts - road closures
Impacts - safety
Impacts - schools
Impacts - social connection
Impacts - social housing
Impacts - sport
Impacts - stress/anxiety/uncertainty
Impacts - subsidence

Impacts - time period - over 10 years
Impacts - traffic
Impacts - utilities
Impacts - vibration
Location - Adelaide Road
Location - Ainsworth Way
Location - Alexandra Road estate
Location - Arya Samaj Vedic Mission
Location - Bermondsey
Location - Birmingham
Location - Bordesley Street
Location - Bucks
Location - Camden
Location - Camden Gardens
Location - Camden Road
Location - Camden Town
Location - Chalfont St Giles
Location - Chalk Farm
Location - Ellesborough Road
Location - Europe
Location - Euston
Location - Euston Road
Location - Grand Union Canal
Location - Hertfordshire
Location - Ickenham
Location - Kilburn
Location - London
Location - Middlesex
Location - Mornington Terrace
Location - New Bartholomew Street
Location - Northolt
Location - Old Oak Common
Location - Oval Road

Location - Park Village East
Location - Primrose Hill
Location - Queen Elizabeth II Diamond Jubilee Playing Field
Location - Regent's Canal
Location - Regent's Park
Location - Ruislip
Location - Somerset
Location - St Mary's Primary School
Location - St Pancras Station
Location - The Roundhouse Theatre
Location - Tring Road
Location - Turweston Playing Fields
Location - Wells House Road
Location - Wendover
Location - West Ruislip
Location - Westminster
Opportunities - employment - challenge
Protected characteristic - age
Protected characteristic - disability
Protected characteristic - pregnancy and maternity
Protected characteristic - race
Protected characteristic - religion
Protected characteristic - sex
Reference - Adelaide Road Medical Centre
Reference - Alexandra College
Reference - Allison House Hostel
Reference - AP2
Reference - AP3
Reference - AP4
Reference - AP5
Reference - BME groups
Reference - Camden and Islington Public Health

Reference - Camden Council
Reference - CFA2
Reference - CoCP
Reference - Electromagnetic Radiation
Reference - Equalities Act 2010
Reference - Equestrian centre
Reference - ES
Reference - EU Environmental Impact Assessment Directive
Reference - Euston Tunnel
Reference - GLA
Reference - Global Rail News
Reference - Harefield Hospital
Reference - Hawley Wharf Primary School
Reference - HS2/HS1 link
Reference - Hybrid Bill
Reference - Independent review panel
Reference - Jamestown Mental Health Centre
Reference - London Education Authority
Reference - Network Rail
Reference - NO ₂
Reference - Other consultation response
Reference - Other projects - impacts
Reference - Personal situation - impact
Reference - PSED
Reference - Residents' charter
Reference - Residents' Commissioner
Reference - Royal Assent
Reference - Second Reading
Reference - Select Committee
Reference - SES2
Reference - SoS
Reference – TfL
Reference - Thames Water

Reference - Tunnel boring machine

Reference - Turweston Parish Council

Reference - Wendover Cricket Club

Appendix B - Organisation respondent list

It is important to note that respondent type had no bearing on the level of analysis a response received in order to produce this report. All responses were analysed in the same way, with no weighting given to one type of response over another.

Organisation:

Allison House Hostel

London Borough of Camden

TfL and GLA joint response

Turweston Parish Council

Wendover Cricket Club
