

LTC Task Force Paper

Project: Lower Thames Crossing, Thurrock
Date: 5th October 2020
Prepared By: Stantec, on behalf of Thurrock's Public Health Team
Subject: Lower Thames Crossing Task Force – Health Update

1. Introduction

- 1.1. This paper has been prepared by the Council's Public Health Team to provide an update to the LTC Task Force on the current position and potential impacts on public health associated with the Lower Thames Crossing (LTC).
- 1.2. This note covers the following items:
 1. Where we are in the process to date, in terms of consultations, draft technical documents received from Highways England and the Community Impacts and Public Health Advisory Group.
 2. What concerns have been raised by the Council's health team in response to the LTC consultations so far and draft technical documents.

2. Where we are in the process to date

Public LTC consultations

- 2.1. The Public Health Team have provided responses to the Statutory, Supplementary and Design Refinement consultations, which have in the Council's. A summary of the Public Health Team's response to these consultations is summarised in section three of this paper.

Draft technical documents for the LTC Development Consent Order

- 2.2. As part of its technical engagement relating to the LTC Development Consent Order (DCO), Highways England has issued a raft of draft technical documents to the Council for their comments. These documents have not been made public and have only been shared with the local authorities potentially affected by the LTC scheme. The Council's Public Health Team have provided responses to these documents where relevant. A summary of the Public Health Team's response and concerns is summarised in section three of this paper.
- 2.3. The Health and Equalities Impact Assessment (HEqIA) is one of the technical documents that will form part of the LTC DCO submission. The Council were previously advised by Highways England that the HEqIA would not be shared prior to the submission of the DCO application. However, on the 3rd August 2020 Highways England provided the HEqIA in a working draft format.
- 2.4. It is not currently possible to share/ discuss the contents of the HEqIA as it is in working draft format and has been shared in confidence with the Public Health Team. The Public Health Team have completed a high-level review of the draft HEqIA and prepared a response to Highways England, highlighting any concerns that the Team have and any information that is still missing. These comments are summarised in section three of this paper.
- 2.5. The response to Highways England regarding the HEqIA is caveated with the fact that the comments serve as initial feedback on the assessment, as a detailed review with input from all relevant professionals has not been possible at this time. It states that the Council reserves the right to undertake a detailed quality assurance review of the draft report at later stages and/ or when it is completed for submission of the DCO.

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The Community Impacts and Public Health Advisory Group

- 2.6. The Community Impacts and Public Health Advisory Group (CIPHAG) was established by Highways England for the LTC and comprises: an external chairperson; members of the LTC team; representatives from each of the local authorities potentially affected by the LTC scheme; and Public Health England. The purpose of this group is to meet regularly to discuss topics which include health, well-being, and equalities.
- 2.7. Nine CIPHAG meetings have been held since November 2018. The last CIPHAG meeting was in July 2020 and there are currently no further meetings scheduled prior to the LTC DCO submission.

3. Concerns raised by the Council's Public Health Team in response to the LTC consultations and draft technical documents

Statutory Consultation - October 2018 to December 2018

- 3.1. The key points raised by the Public Health Team in response to the Statutory Consultation in 2018 were as follows:
- Request for standalone Health Impact Assessment.
 - Significant information gaps and potential under reporting of potential impacts, such that the effects of the scheme have not been and cannot be properly considered. Further engagement required, particularly in relation to the assessment of health impacts.
 - Consider proposed physical design mitigation to address potential adverse effects on the Borough's residents e.g. bunds, cut and cover tunnels or lowering vertical alignment particularly where it is close to residential areas.
 - Consider and assess suitable alternative locations for the Traveller site at Gammon Field which will be affected by the LTC.
 - It is not clear how vulnerable or 'hard to reach' groups have been engaged – the elderly, those with disabilities, those who may not be able to read or read English.
 - The Preliminary Environmental Information Report (PEIR) refers to lower life expectancy, higher rates of cardiovascular deaths and worse levels of excess weight in the Borough relative to the England average. While some of this information is clearly sourced, other elements appear more as anecdotes. Given the severity of the issues, for the impacts of the proposal to be understood, the submission will need to deal with these points more comprehensively.

Supplementary Consultation - January 2020 to March 2020 (extending to 2nd April 2020)

- 3.2. The key points raised by the Public Health Team in response to the Supplementary Consultation at the beginning of 2020 were as follows:
- Highways England confirmed that a combined Health and Equalities Impact Assessment (HEqIA) would be prepared, however no detail has been provided in order to consider the potential effects of the scheme and any associated mitigation and it is understood that that no detailed information will be provided by Highways England until the DCO application is submitted. This approach would not allow the Council to properly consider and respond to the potential effects of the scheme on health and equalities.
 - Further meaningful engagement is required, particularly in relation to any proposed mitigation, compensation, and legacy benefits.

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- In relation to assessment of air quality and related human health effects, no further consideration has been given to assessing key pollutants (PM2.5) with known health effects, recommended by the World Health Organisation (WHO). It is considered that a Borough-wide air quality assessment should be undertaken which considers the changes in PM2.5 and PM10 concentrations to ensure that all potential likely significant air quality effects on human health are identified and that appropriate mitigation measures are considered.
- The proposed LTC would give rise to adverse effects during its construction and operation which would significantly affect Thurrock's communities and environment, in particular in relation to effects on air quality, noise, health and severance.
- Highways England proposes two potential sites for the relocation of the Gammon Field Travellers' site. The Council is concerned that its engagement with Highways England is not being adequately taken into account and is concerned that neither option proposed by Highways England is a viable solution for the community it seeks to relocate.

Design Refinement Consultation - July 2020 to August 2020

3.3. The key points raised by the Public Health Team in response to the Design Refinement Consultation were as follows:

- The Council remains concerned that, without seeing the HEqIA, it is not possible to consider what the overall health impacts are for Thurrock's communities. It is also not possible to understand how the HEqIA is influencing the design of the LTC route and the proposed mitigation.
- As no preliminary HEqIA is included in this consultation and, to date, has not been shared with the Council, it is not possible to comment on the potential health impacts nor any proposed mitigation measures.
- A significant number of noise barriers are being erected in the Borough as a result of noise assessment outcomes and the visual impact of these noise barriers on local communities should be assessed. There is no information on material or design of the proposed noise barriers. In relation to effects on health and well-being, the barriers give rise to an enhanced sense of segregation. However, in the absence of elevation drawings, it is difficult to understand what these effects could be.
- Although it is noted that the number of properties within the application boundary has decreased from 270 to 150, this is still a high number of affected residents and local businesses. Of the 70 residential and business properties within the boundary that do not need to be purchased, they will be greatly affected. Impacts such as a potential decrease in property value combined with an environmental impact could also carry significant health concerns. The Council has evidence of this already affecting people in the Borough and would be keen to discuss further with Highways England.
- Highways England's efforts to find a suitable relocation site for the traveller community at Gammon Field is acknowledged. It is understood that further design and mitigation work is needed and the Design Refinement Consultation information states that "...[HE] will continue to engage with our stakeholders to refine this proposal". Understanding the potential environmental and health impacts of the scheme and proposed relocation must be considered in the assessment work for this group which experiences inequalities in health and wellbeing outcomes, and it must be ensured that these inequalities will not be widened by this change.

Draft technical documents (including the HEqIA)

3.4. The following concerns have been raised by the Public Health Team during the course of the CIPHAG meetings and in response to the draft technical documents that have been shared with the Council so far:

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- The Council has raised concerns to Highways England's with regards to the programme, the adequacy of technical engagement to date, and the time now available to enable a period of meaningful technical review and engagement to address stakeholder comments and explore and agree appropriate mitigation, prior to the submission of the DCO application, which we now understand to be October 2020. These concerns are exacerbated by the challenges experienced by the Council, and other public bodies, in relation to the Covid-19 pandemic.
- Detailed baseline data has not been shared with the CIPHAG to enable an iterative discussion and agreement on the baseline conditions that have been used for the HEqIA.
- Stakeholders attending the CIPHAG have not been invited to be included in discussions on the assessment of impacts. This is fundamental in stakeholder engagement in having discussion on the potential impacts and review of these assessments and the associated mitigation.
- The draft HEqIA was issued without the associated appendices and a number of documents referenced, which presents further challenges to the Council in reviewing the draft HEqIA.
- The Health and Equalities Impact Assessment (HEqIA) needs to consider the magnitude, severity and likelihood of the various relevant health and equalities impacts, which the assessment does not currently undertake, and it should do.
- Assessments in the HEqIA should be broken down by geographical area and for vulnerable/sensitive populations identified for clarity of reporting and to enable specific mitigation to be developed.
- The HEqIA appears to under report on opportunities (or lack specifics) in areas such as green infrastructure and the report lacks clarity as to what is actually proposed. Non-specific terms are used such as greening, woodlands, landscaping but quality, scale and magnitude of improvements are not made clear at this stage.
- There is no section for monitoring and evaluation of impacts or details of how the information will be used.
- The HEqIA lacks clear recommendations against the impacts identified to either:
 - a. Prevent or mitigate potential negative impacts/unintended consequences
 - b. Maximise the benefits and opportunities for positive impacts
- There should be a proposed plan for monitoring the implementation of the recommendations identified'.
- Good practice and essential mitigation are to be included in the Code of Construction Practice (CoCP). A working draft of the CoCP and Register of Environmental Actions and Commitments (REAC) was received on the 18th August. Initial comments are that the CoCP does not provide any details of the mitigation measures proposed, and the REAC, which forms a critical part of the CoCP in understanding the propose mitigation, is limited in information.