East of England Ambulance Service NHS Trust

By Email Only:
LongfieldSolarFarm@planninginspectorate.gov.uk

East of England Ambulance Service NHS Trust
Hammond Road
Bedford
MK41 0RG

Date: 10th June 2022

Our Ref: LSEF/ZM

Dear Sirs

Longfield Solar Energy Farm
APPLICATION REFERENCE No. EN010118

Application by Longfield Solar Energy Farm Ltd for an Order Granting Development Consent for the construction, operation (including maintenance) & decommissioning of the Longfield Solar Farm – Relevant Representation by The East of England Ambulance Service NHS Trust (EEAST) Pursuant To Section 56 of The Planning Act 2008

We write in response to the Secretary of State for Business, Energy & Industrial Strategy's Notice following Acceptance of the above application on 28th March 2022, advising a deadline for the making of relevant representations by 23:59 on 2nd June 2022.

EEAST has reviewed the DCO application documentation and wishes to raise a non-statutory **HOLDING OBJECTION** on the following basis:

- Insufficient scoping work has been undertaken to date - to identify a suitable study area, baseline assessment & approach to identify the likely environmental, social & cumulative effects of the development on EEAST's operations

- Insufficient measures are proposed to avoid, reduce, mitigate & compensate for the likely Scheme impacts on EEAST's operations (summarised below) during the construction phase of the development

- Omission to include suitable Heads of Terms of Agreement, either via a Section 106 planning obligation or Deed of Obligation - to provide funding & new facilities provision, as required, to increase the capacity, response capability and Project Preparedness for EEAST's staff, vehicle fleet and estate assets to mitigate & manage the impacts arising

- Omission to include suitable Terms of Reference, Membership or a Communications Strategy for a Transport, Community Safety, Health & Wellbeing Working Group to be set up - to inform & assist the management of relevant aspects of the Scheme requiring

a coordinated response from health and blue light partners, including EEAST, Cambridgeshire and Peterborough Clinical Commissioning Group (C&PCCG) and Suffolk and North East Essex Clinical Commissioning Group (SNEECCG) (or their successor organisations).

EEAST, together with the CCGs (Cambridgeshire and Peterborough Clinical Commissioning Group (C&PCCG) and Suffolk and North East Essex Clinical Commissioning Group (SNEE) affected by the DCO Order limits/ Project impacts), is therefore keen to work with Longfield Solar Energy Farm Ltd (LSEF) to address these omissions and agree and secure suitable mitigation and management measures as part of a Section 106 planning obligation (or Deed of Obligation), and reflect this position within a Statement of Common Ground by commencement of (or at an early stage during) the forthcoming Examination.

East of England Ambulance Service NHS Trust

EEAST is commissioned by Suffolk and North East Essex CCG on behalf of all CCGS to provide emergency and urgent care services throughout Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk, and transports patients to 17 acute hospitals amongst other healthcare settings, including within the Chelmsford City and Braintree District Council areas covering the location of the Longfield Scheme.

EEAST covers an area of approximately 7,500 sq miles with a resident population of over six million people and employs approximately 4,000 staff operating from 130 sites who are supported by dedicated volunteers.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2
- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions
- Patients may be passed to 999 via other NHS health care systems, including NHS 111
- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) is a commissioned service providing an essential lifeline for people unable to use public or other transport due to their medical condition. Currently this service is provided by EEAST for Cambridgeshire & Peterborough Clinical Commissioning Group. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics

- Being admitted to or discharged from hospital wards

- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

Further details of EEAST's service remit, priorities, staff, vehicle fleet and estate assets, service targets, and co-working relationship with other healthcare and blue light partners are set out for information at **Annex 1**.

Longfield Scheme Proposals – Location & Overview

Longfield Solar Energy Farm Ltd's DCO Application is for the construction, operation (including maintenance) and decommissioning of a photovoltaic (PV) array electricity generating facility exceeding 50 megawatts (MW) capacity, with associated battery storage facility and connection to the UK electricity transmission system at Longfield Energy Farm 'the Scheme'.

The 'Order Limits' comprise an area of approximately 453 ha of land for Solar PV Arrays, Battery Energy Storage Systems (BESS), the Longfield Substation, Grid Connection Route, Bulls Lodge Substation Extension, Site Access Works, Ancillary Infrastructure (including landscaping and biodiversity measures, cabling, access tracks and fences) along with Habitat Management Areas - the Order Limits is therefore formed by the Solar Farm Site, the Grid Connection Route, the Bulls Lodge Substation Site and Site Access Works.

Scheme Components

The scheme would comprise of the following components;

- PV Panels (known as modules) - which convert sunlight into electric current & PV mounting structures which combine to form 'PV Tables': The maximum height of the panels would be 3m above ground level;

- BESS containers – designed to provide grid balancing services to the electricity grid, by storing excess electricity generated by the Panels within batteries, with containers being up to 4.5m in height;

- Two fenced BESS compounds – located either side of the Longfield Substation north of Toppinghoehall Wood with a total area of up to 5.2 ha, & height of 4.5m, along with security lighting & cameras up to a height of 5m;

- The Longfield substation – located adjacent to the BESS compound with a maximum height of 13m;

- The Solar PV Arrays (PV Tables set out in rows with groupings of PV Tables forming PV Arrays) – connected by underground cable feeding into larger cables through a junction box, string inverter or transformer;

- Bulls lodge Substation extension – including electricity switching station & temporary overhead line alterations;

- Electricity generated by the Scheme exported to the National Grid via the Grid Connection Route, & via a connection between the Longfield Substation & the Bulls Lodge Substation extension;

- Ancillary development comprising – electrical cabling works, boundary treatment, means of access including permissive paths, security infrastructure, landscaping/ biodiversity measures, earthworks, drainage & overhead line diversion works;

- Temporary & secondary construction compounds, incorporating laydown areas for the Bulls Lodge Substation & Grid Connection Route;

- PV Mounting Structures – comprising galvanised steel or anodised aluminium poles driven into the ground to an indicative depth of 2m;

- Balance of Solar System (BoSS) – comprising inverters, transformers & switchgear to manage the electricity generated by the PV Panels, with a maximum height of 3.5m for the BoSS plant;

- Ancillary buildings – including offices, warehouse & plant storage building up to 60,000m2 floor space;

- Works to facilitate site access to the Solar Farm Site & the Bulls Lodge Substation Extension;

- Fencing & security measures;

- Internal access roads, car parking, construction laydown areas & drainage;

- Landscaping - incorporating advanced mitigation planting, Construction Day 1 & residual mitigation planting (post construction) along with habitat management areas;

The Scheme has three distinct phases incorporating construction, operation and decommissioning, and the principal development and associated activities arising at each stage are summarised below:

Construction Phase

The 'Scheme Description' contained at Volume 1, Chapter 2: The Scheme of the Environmental Statement (ES) envisages a construction phase of approximately 24 months, commencing in the first quarter of 2024 and completed not earlier than the first quarter of 2026.

The construction of the scheme is intended to be built in one phase, with the exception of the BESS, which may be constructed in two phases – with phase 1 built alongside the Solar PV and phase 2 after 5 years of operation.

Enabling & Civil Engineering Works

The principal enabling and civil engineering works are summarised below;

- Preparation of land for construction, including localised site levelling, where required;
- Import of construction materials, plant & equipment;
- Establishment of the perimeter fence & construction compounds;
- Construction laydown areas – comprising areas for the receipt, temporary storage, & assembly of construction equipment & other supplies, as required, along with access, parking & welfare facilities & utilities;
- Construction of the internal access roads;
- Marking out the location of the Scheme infrastructure;

Construction Activities

The principal construction activities and works associated with the Scheme are summarised below:

Enabling Works

- Construction of site entrance & construction vehicle delivery holding area;
- Establishment of main temporary construction compound, including site offices/ welfare & parking areas;
- Upgrade, modification or improvement of highways where required for site construction purposes;
- Preparation of land for construction, including localised site levelling & vegetation clearance;
- Import of construction materials, plant & equipment to the site;
- Phased establishment of the construction area fence;
- Establishment of the Secondary temporary Construction Compounds – up to 10 x locations within the Solar Farm Site;
- Construction of the internal access roads & marking out of the operational infrastructure locations;

Installation of Solar PV Panels

- Import of components to the site;
- Piling & erection of module mounting structures, with foundations to an expected depth of 2m;

- Trenching & installation of electric cabling;
- Transformer, inverter & switchgear foundation excavation & construction & installation utilising cranes;
- Installation of control systems, monitoring & communication;

Construction of Electrical Infrastructure

- Site preparation & civils for the 3 x onsite substations & control building;
- Trenching & installation of electric cabling;
- Pouring of concrete foundations & plinths for the electrical equipment;
- Import of components to site with cranes utilised to lift components into position;
- Installation of the solar inverter stations;

Construction of Cable Routes

- Site preparation & civils for the substation;
- Trenching & installation of electric cabling;
- Installation of the substation;

BESS Construction

- Installation of electric cabling & construction of foundations;
- Import of components to the site & installation of transformers, battery, inverters & switchgear;

Fencing, Security & Lighting

- Establishment of permanent deer fencing & security system across 24 x enclosed works areas;

The 'Scheme Description' contained at Volume 1, Chapter 2: The Scheme, Transport & Access (Volume 1, Chapter 13) and Framework Construction Traffic Management Plan (Volume 2, Appendix 13b) provide information on the construction phase impacts as summarised below.

Construction Staff, Hours of Work, Traffic, Plant & Access

Construction Staff & Working Hours

Construction is expected to start no earlier than 2024, and at the peak of construction in 2025 it is estimated that that up to 600 workers would be required, with an average of 533

workers per day during the peak period, comprising 500 on the solar farm site and 33 associated with the Bulls Lodge Substation Extension.

Construction working hours on the Solar Farm Site would run from 07:00 to 19:00 Monday to Saturday, working a single 12-hour shift.

Construction working hours on the Bulls Lodge Substation Extension would run from 07:00 to 19:00 Monday to Saturday, with the exception of overhead line works which would run from 07:00 to 19:00 Monday to Sunday.

Construction Traffic

The following 'daily impacts' are envisaged;

- A maximum of 50 x HGV arrivals/ departures (100 x trips) associated with the Solar Farm Site – travelling to/from the proposed access on Waltham Road via Cranham Road, Wheelers Hill & the A130 Essex Regiment Way;

- A maximum of 46 x HGV arrivals/ departures (96 x trips) associated with the extension to Bulls Lodge Substation – travelling to/from the substation via the A12T, Radial Distributor Road (RDR) & a private road;

- A maximum of 143 x car arrivals/ departures (286 trips) & 22 x shuttle bus arrivals/ departures (44 x trips) associated with the Solar Farm Site;

- A maximum of 26 x arrivals/ departures (52 x trips) & 22 x shuttle bus arrivals/ departures (44 x trips) associated with the Bulls Lodge Substation Site;

- A combined impact of 215 x HGV/LGV/staff construction vehicle arrivals/ departures (430 x trips) associated with the Solar Farm Site & 94 x HGV/LGV/staff construction vehicle arrivals/departures (188 x trips) associated with the Bulls Lodge Site;

Vehicle Types

The following vehicle types are expected to serve the Scheme - cars, small vans, 10m rigid vehicles, Box vans, 8-wheeler rigid lorries, concrete mixers and flatbed low loaders.

Articulated Indivisible Loads (AILs)

At the time of the publication of the Framework Construction Management Plan in February 2022, the following levels of AIL's are predicted;

- A maximum of 3 x AIL's associated with the Longfield Substation & 2 x AIL's associated with the Bulls Lodge Substation Site (excluding mobile cranes) & related to substation components such as transformers & cable drums;

- A specialised haulage service would co-ordinate this form of transportation, liaising with highway & police authorities to arrange any permits & police escort required – the ES assumes at this stage that the abnormal categorisation would relate to the weight of the loads rather than other features of the HGV;

- All AIL's & mobile cranes would follow an agreed HGV routing strategy when travelling to/ from the Order Limits;

Plant & Machinery

The plant and machinery requirements for the construction works are outlined below;

- Piling Rigs;
- Mini Excavators (8t max);
- Excavators (8t-30t);
- Mobile Cranes (14.5m long x 2.85 m wide) – these would be 'visiting cranes' driving into the Order limits to undertake construction tasks;
- 50t Crane for Grid Connection Route;
- Transformers, pre-assembled battery arrays, structural steel work;
- Crawler Dozers;
- Telehandlers;
- Mobile platforms/ Cherry Pickers;
- Drilling equipment;

Site Access

During the construction phase the Scheme would be served by a proposed Solar Farm Site access on Waltham Road, with the Bulls Lodge Substation Extension served by two proposed accesses on the private road.

The existing access to the Bulls Lodge Substation would continue to be operational during the construction phase of the scheme, but not utilised by the Scheme.

The proposed access for the Solar Farm Site and the proposed western access for Bulls Lodge Substation would both be utilised during the operational phase, however the proposed eastern access for Bulls Lodge would be removed towards the end of the construction as it would not be required for the operational phase.

Spoil & Waste

Volume 1, Chapter 16: Other Environmental Topics of the ES - sets out information in relation to the anticipated spoil and waste effects, as summarised below.

Spoil

Topsoil, subsoil and spoil is only expected to be generated from cable trenches, temporary and permanent compounds, internal roads, BESS phases 1 and 2 and substation compounds.

During construction the topsoil, subsoil and spoil would be stored temporarily within designated areas adjacent to the cable route, and within the construction compounds.

The material would be used to backfill and reinstate the soil profile in the cable trenches, temporary construction compounds and construction roads. Any excess material would be utilised across the Order limits in accordance with the Outline Soils Resource Management Plan, and no removal of material from the Order limits is anticipated.

Waste

Given the nature of the scheme, significant quantities of waste are not anticipated and a Construction Resource Management Plan (CRMP) and Decommissioning Resource Management Plan (DRMP) would be prepared for the construction and decommissioning phases.

The waste materials and vehicles associated with the construction phase (such as metals, cables, plastic, paper, carboard, wood, absorbents, aerosol sprays, stones, empty containers, used oils & oil filters) would be transported off site by licensed waste carriers to licensed receiving sites.

Solid waste materials generated would be stored on site in 30m3 containers.

During the 'construction phase', removal of waste is expected to generate approximately 330 HGV loads over a period of 12 months, equating to around 1 load per day.

During the 'operational phase' there would be 8 x permanent staff plus maintenance personnel, with waste arisings anticipated to be minimal comprising – welfare facility waste, replacement equipment, waste metals and general waste (paper, cardboard & wood etc), and would be managed by a licensed waste carrier.

During the 'decommissioning phase' (from 2066) the following waste streams are envisaged - solar panels/ mounts, waste materials from foundations, electrical equipment, batteries, cables, welfare waste facility, waste chemicals, fuels/ oils, metals and waste water.

Equipment and ancillary infrastructure would be removed and recycled or disposed of in accordance with good practice and market conditions at the time.

All waste transported off site would be undertaken by a licensed waste carrier and delivered to licensed receivers/ sites.

Waste removal is estimated to require approximately 2,457 HGV loads over a period of 12 months, equating to 6 x loads per day.

Construction Traffic Management Measures

Carriageway Widening

A significant level of carriageway widening works are envisaged along Wheelers Hill, Cranham Road and Waltham Road, to accommodate the construction traffic, comprising widening the existing carriageway to 6m where feasible, or a minimum width of 5.5m.

Verge clearance and hedge cutting works would also be undertaken as necessary.

A detailed schedule is outlined below.

- Wheelers Hill – with widening measures at the following locations;
    - Kingswood;
    - East of Kingswood;
    - Shuttleworth Hall;
    - West of Shuttleworth Hall;
    - Shouderstick Haul;
    - West of Domsey Lane;
- Cranham Road;
    - East of Domsey Lane;
    - East of Caravan Park – 2 x sections;
    - West of Combe – 2 x sections;
    - Combe & Boscombe;
    - East of Boscombe;
    - West of War Memorial;
    - East of War Memorial – 2 x sections;
    - West of Waltham Road;
- Waltham Road;
    - South of Cranham Road;

Vehicle Routing

The intention is for construction vehicles to travel to/from the Solar Farm Site via the Strategic Route Network (SRN) utilising either the A12T from the south, or A120/ A131 from the north, including the RDR if travelling to/from the A12T. Traffic would then proceed along Wheelers Hill, Cranham Road and Waltham Road.

This route would avoid utilising any Protected Lanes or transit through the villages of Boreham and Hatfield Peverel to the south, and avoid 'local classification roads' such as Terling Hall Road to/ from the east, and Braintree Road to/from the north.

Details of proposed 'road closures' anticipated at this stage indicate that the provision of the Cranham Road/ Drakes Lane overbridge to accommodate the Chelmsford North Eastern Bypass (CNEB) is likely to require the temporary closure of Cranham Road.

A temporary alternative route would therefore need to agreed for construction traffic pending the reopening of Cranham Road, albeit the ES provides no details concerning the nature, duration or programme for the closure, and diverted construction traffic.

Construction vehicle routing to the Bulls Lodge Substation Site envisages access via the A12T J19 (Boreham Interchange) and the RDR, which is to form a new roundabout with the private road which currently serves the substation to the east. The RDR is currently under construction and programmed for completion in May 2023.

Construction Vehicle Crossing Point

A construction vehicle crossing point is proposed on Waltham Road approximately 600m north of the junction with B1137 Main Road as part of the works to construct the Grid Connection Route.

Temporary traffic signals are proposed at each arm of the crossing (4 x signals) and would be operated on a 'demand-based system' only activated when construction vehicles need to cross Waltham Road, with 3-4 crossing movements per hour predicted.

The temporary traffic management measures are envisaged for a period of up to 30 weeks, and in addition, a lane closure would be required to install the Grid Connection Route across Waltham Road itself, with further details of the duration and methodology to be devised at such a time as a contractor is appointed.

50 tonne cranes would need to utilise the route, although the ES does not expect these to constitute AIL's.

Management Measures & Controls

A range of management measures would be implemented to manage HGV deliveries to the Order limits, relating to both the Solar Farm and Bulls Lodge Substation Sites;

- Delivery management system;
- Traffic management & monitoring;
- Suitable/ agreed HGV routes;
- HGV timing restrictions;
- Banksmen & site management;
- Communications strategy;
- Appropriate site access arrangements;
- Necessary escort, permits & traffic management for AIL's;
- Avoiding any Protected Lanes;
- Interactions with pedestrians & cyclists;

Compliance and enforcement measures are also envisaged as part of the Construction Traffic Management Plan (CTMP) incorporating Best Practice, Contractual Conditions, Information Packs and Communications initiatives, along with monitoring report and

Enforcement Procedures, implementable by the local highway and planning authorities, as necessary.

Major Accidents & Disasters

Volume 1, Chapter 16: Other Environmental Topics of the ES - sets out information in relation to the effects related to major accidents and disasters, as summarised below.

The approach focuses on the significant effects of the development on the 'environment' deriving from the vulnerability of the development from risks of major accidents and disasters referable to the Project.

Accidents are defined as "an occurrence resulting from uncontrolled developments in the course of construction, operation and decommissioning, such as a major emission, fire or explosion".

Disasters are defined as "naturally occurring extreme weather events or ground related hazard events, such as subsidence, landslide or earthquake".

It is noted that the 'construction worker receptor group' is *excluded* from the assessment, due to existing legal protection being considered sufficient to minimise any risk from major accidents and disasters to a reasonable level, and as referenced in the following legislation;

- Health & Safety at Work Act 1974;
- The Management of Health & Safety at Work Regulations 1999;
- The Workplace (Health, Safety & Welfare) Regulations 1992;
- Construction (Design & Management) (CDM) 2015 Regulations;

All Project related works would be subject to risk assessments as set out in the Outline Construction Environmental Management Plan (OCEMP) and the Decommissioning Strategy, which would be secured by requirements within the DCO and managed by the contractor.

As respects fire, an Outline Battery Safety Management Plan (BSMP) accompanies the proposals, and would be secured by requirements within the DCO and managed by the contractor.

The BSMP and Decommissioning Strategy include measures to reduce the risk of fire during construction and decommissioning.

During the operational phase an Outline Operational Environmental Management Plan (OEMP) would manage the risks during operation, which would be secured by requirements within the DCO and managed by the contractor.

Any failure arising from the battery energy storage system/ lithium iron equipment, including the potential release of toxic gases/ smoke (hydrogen fluoride) a fire event or explosion, would be addressed in an Emergency Response Plan (post consent) to put protocols in

place for notifying local residents – the precise procedure and response time for the emergency response would also be finalised post consent.

A Fire Service Site Specific Risk Assessment has been produced for the battery energy storage system, and would be secured by requirements within the DCO.

The risk of fire and explosion is considered by the ES to be very low, and with a focus on the prevention of major accidents and disasters - the overall residual effects for these events is assessed as low, with significant effects on the environment not anticipated.

Human Health

Volume 1, Chapter 15: Human Health of the ES - sets out information in relation to the effects related to health and wellbeing, as summarised below.

The assessment of human health effects considers the following health and well-being determinants of relevance, as guided by the Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool 2019;

- Access to healthcare services & other social infrastructure;
- Air quality, noise & neighbourhood amenity;
- Accessibility & active travel;
- Access to work & training;
- Social cohesion & neighbourhoods;

In terms of 'Access to Healthcare Services & Other Social Infrastructure' the ES focuses on severance between local residents and the healthcare facilities or other social infrastructure which they use during the construction, operation or decommissioning phases.

It is stated that the additional construction, operation and decommissioning traffic flow would not exceed the future baseline traffic flows (without the Scheme) with no 'Scheme specific' road closures anticipated during the Scheme's lifespan. It is noted that the road closure at Cranham Road is linked to the Chelmsford North Eastern Bypass works.

The ES assesses the Scheme impact as 'neutral' requiring no additional mitigation beyond the embedded design mitigation measures outlined in Chapter 15.

Potential Impacts on EEAST Service Areas & Capacity

Scheme Environmental & Social Effects

Review of the Longfield Solar Energy Farm Ltd (LSEF - Applicant's) environmental impact assessment and related DCO documentation, indicates that the Scheme's potential effects (impacts) on EEAST's operational capacity, staff, vehicle fleet and estate assets have not been baselined or sufficiently assessed to date.

EEAST is therefore keen to work with the Applicant to ensure this omission is addressed by further information being prepared to inform a robust DCO Application for examination.

In particular, EEAST wishes to agree and secure suitable mitigation and management measures as part of a Section 106 planning obligation (or Deed of Obligation) and reflect this position within a Statement of Common Ground by commencement (or at an early stage) of the forthcoming Examination. EEAST's principal areas of interest and concern are summarised below.

EEAST Principal Areas of Interest & Concern

Information for Inclusion Within Scope of the DCO Application Documents & Related Mitigation & Management Measures

The principal areas of Scheme interest which are likely to significantly impact on EEAST's operations requiring necessary and appropriate mitigation measures and management - are outlined below in light of the information and assumptions presented in the DCO Application.

Traffic & Transport

It is evident that a new highway access point (and intensified existing access point) serving a significant level of construction phase HGV's, including slow moving low loaders, mobile cranes and light traffic movements, requiring a range of road improvements, verge clearance/ hedge cutting and traffic management measures are envisaged - leading to highway network impact, likely delay and potential pressure for route diversions.

Information to determine the effect of the Scheme traffic and transport management measures and works, and its impact on EEAST's operational resources, capacity and efficiency is currently absent from the DCO documentation.

The impact of Scheme traffic and transport effects on EEAST's operational resources, capacity and efficiency therefore needs to be presented and assessed, with any necessary and appropriate mitigation and management measures secured and implemented within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Articulated Indivisible Loads (AIL)

It is evident that the Scheme would generate AIL movements (additional to the HGV movements above) requiring road widening measures, including verge clearance and hedge cutting along Wheelers Hill, Cranham Road and Waltham Road - to accommodate both HGV and AIL transit routes incorporating up to 50 tonne cranes.

It is noted that a Framework Construction Management Plan is proposed, however information to determine the effect of Scheme AIL, HGV and LGV movements, along with highway related disruption and delay and its effect on EEAST's operational resources, capacity and efficiency is currently absent from the DCO documentation.

The impact of AIL, HGV and LGV highway and transport effects on EEAST's operational resources, capacity and efficiency therefore needs to be presented and assessed, with any necessary and appropriate mitigation and management measures secured and

implemented within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Major Accidents & Disasters

It is evident that a significant level and duration of construction phase work, operating across a number of sites requiring the use of large-scale plant, heavy and specialist machinery/ equipment, added to construction noise, vibration and dust, with work carried out during potentially adverse weather conditions - is likely to present construction site hazards and dangers.

Working on uneven ground, with moving machinery lifting and transporting materials, and working at depth, including the potential for trench collapse, for example, underlines the risks associated with the construction related activities – requiring both urgent and other medical interventions and transport conveyance to be appropriately planned for and provided.

Indeed, HSE's construction publications (for Great Britain) indicate that work related incidents involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the 'all industry' rate.

Information to determine the effect of the construction phase and its impact on EEAST's operational resources, capacity and efficiency is currently absent from the DCO documentation.

In the event of a construction phase accident, appropriate procedures would need to be put in place for emergency access, on-site triage, medical assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting.

The processes and procedures developed by LSEF, and any outsourced construction organisations, should refer to legislation and technical guidance which places a duty on LSEF to have its own response and medical mitigation to take the patient to a place of 'normal access' and handover to EEAST crews. EEAST would expect any trench collapse to fall under the confined space regulations and LSEF, the construction company and/or contractor(s) should have access to a confined space trained team that could extricate a casualty safely.

Plans and contingencies for facilitating emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders, whilst sustaining operationally optimal attendance times (noting the likely delay factors above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS) access, is therefore considered to be necessary.

The incidence and impact of major accidents (and disasters) on EEAST and its HEMS partner operational resources, capacity and efficiency (including EEAST hazardous area response teams - HART) needs to be presented and assessed, with appropriate mitigation and management measures secured and implemented within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

Population Increase, Health & Wellbeing

It is evident that during the anticipated 2-year construction period, a significant number of workers are required to implement the construction stages of the Project.

Information to determine the nature of the construction workforce, their home origin, health status, clinical dependencies, location of any temporary accommodation, which are factors likely to directly impact on EEAST's operational resources, capacity and efficiency, including its co-ordinated response with healthcare partners, is currently insufficiently dealt with in the DCO documentation.

This information therefore needs to be presented and assessed, with appropriate impact mitigation and management measures secured and implemented within a Section 106 planning obligation or Deed of Obligation, as required, and as part of any Development Consent Order approval.

Joint Working With EEAST, Health & Blue Light Partners

Transport, Community Safety, Health & Wellbeing Working Group

In the light of the above, EEAST recommend that appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety Health and Wellbeing Working Group is established, potentially in advance of the Examination.

This would help to inform and assist the management of relevant aspects of the Scheme requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, Suffolk and North East Essex and Cambridgeshire & Peterborough Clinical Commissioning Groups (CCG's) Essex Constabulary and Essex Fire and Rescue Services.

Concluding Remarks

EEAST is pleased to respond to the Longfield Solar Energy Farm Scheme and following review of the DCO and related documentation wishes to raise a non-statutory **HOLDING OBJECTION,** due to its omission to address EEAST's principal areas of interest and concern outlined above.

EEAST considers that the Scheme is likely to give rise to significant effects on its operational capacity, staff, vehicle fleet and estate assets which have not been baselined or sufficiently assessed by Longfield Solar Energy Farm to date.

The Scheme is therefore considered to adversely impact on EEAST's ability to meet and deliver its targets and priorities (statutory duties) as a key healthcare and emergency services provider.

Identified impacts of the development are therefore likely to require necessary and appropriate mitigation and management measures to be secured and implemented, as part of a Section 106 planning obligation or Deed of Obligation – to be reflected in a Statement of Common Ground to clarify the position reached and inform the forthcoming Examination process.

The measures ought to include a process to assist EEAST and its health and blue light partners to plan for and implement co-ordinated responses to construction phase (and any

other) Scheme impacts and incidents, to optimise patient outcomes.

We trust this is of assistance, and look forward to working with Longfield Solar Energy Farm Ltd to satisfactorily address the points outlined above, which would enable EEAST to lift its holding objection.

Yours faithfully

[redacted]

Zoë May
Head of Business Relationships

cc: info@longfieldsolarfarm.co.uk James Pateman, Director, Pershing Consultants
Lucy MacLeod, Cambridgeshire & Peterborough CCG
Jane Taylor, Suffolk and North East Essex CCG
Cath Bicknell, Mid & South Essex CCG

ANNEX 1

EEAST KEY FACTS & SERVICE INFORMATION

This section summarises EEAST's service remit, priorities, staff, vehicle fleet and estate assets, and co-working relationship with other healthcare and blue light partners and service targets

Service Remit & Priorities

The East of England Ambulance Service NHS Trust provide accident and emergency services and non-emergency patient transport services across the East of England.

The Trust Headquarters is in Melbourn, Cambridgeshire and there are Ambulance Operations Centres (AOC) at each of the three locality offices in Bedford, Chelmsford and Norwich who receive over 1 million emergency calls from across the region each year, as well as 800,000+ calls for patients booking non-emergency transport.

The 999 service is part of the wider NHS system providing integrated patient care. Provision of 999 services is aligned closely with national and regional initiatives driven by:

- Sustainability and Transformational Partnerships
- Integrated Care System
- Integrated Urgent Care systems, i.e. NHS 111, Clinical Assessment Services, Urgent Treatment Centres, GP Out of Hours Services.

Additionally, regional Ambulance Trusts may collaborate closely with other ambulance services, the wider emergency services or wider system providers to deliver appropriate patient care.

To support the service transformation agenda, the key requirements are:

- To deliver the core response and clinical outcome standards as defined by the Ambulance Response Programme
- To fulfil statutory duties relating to emergency preparedness, resilience and response (EPRR)
- Optimisation of call handling and appropriate responses through virtual alignment of NHS 111/999 and call/CAD transfer between ambulance services
- Increase the percentage of lower acuity calls managed through "hear and treat" and "see and treat" options
- Utilise a virtual delivery model to support wider workforce integration for paramedics, call handlers and specialist staff with local urgent care delivery models
- Facilitate cross boundary working and the flexible use of ambulance service resources to support the development of regional Sustainability and Transformational Plans and Integrated Care Systems.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2
- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions
- Patients may be passed to 999 via other NHS health care systems, including NHS 111
- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) provide an essential lifeline for people unable to use public or other transport due to their medical condition. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics or other healthcare location
- Being admitted to or discharged from hospital wards
- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

Service Assets

EEAST clinicians:

- Emergency Care Support Workers
- Emergency Medical Technicians
- Paramedics
- Specialist Paramedics
- Critical Care Paramedics.

Types and models of response:

- Community First Responder (CFR) (volunteers)
- Patient Transport Service (PTS)
- Clinical See and Treat
- Clinical Hear and Treat (telephone triage)
- Early Intervention Team (EIT)
- Rapid Response Vehicle (RRV)
- Double Staff Ambulance (DSA)
- Hazardous Area Response Team (HART)
- Specialist Operations Response Team (SORT)

- Helicopter Emergency Medical Service (HEMS), EEAST utilise 5 aircraft across 3 charities within the region

    - Magpas – 1 x aircraft from RAF Wyton
    - East Anglian Air Ambulance – 2 x aircraft form Cambridge and Norwich Airport
    - Essex and Herts Air Ambulance – 2 x aircraft form North Weald and Earls Colne

Ambulance Operations Centre (AOC) staff:

- 999 Call Handlers
- Emergency Medical Dispatchers
- Tactical Operations Staff.

EEAST support services staff cover all other corporate and administrative functions across the region.

Estates

The Trust is rolling out a Hub and Spoke network with up to 18 hubs to provide regional premises for delivery of operational responses to calls, flow of ambulance preparation via the Make Ready function (cleaning and restocking of ambulances) and despatch of ambulances to local spokes (reporting posts/response posts/standby locations). Support services such as workshop facilities, clinical engineering (medical equipment store and workshop), consumable product stores and support office accommodation are also provided from Hubs.

- Ambulance Station Central Reporting Post - A 24/7 - Permanent reporting base for staff and primary response location for one or more vehicles. Provision of staff facilities.
- Ambulance Station Response Post - A primary response location, which includes staff facilities but is not a reporting base for staff.
- Standby Location - Strategic locations where crews are placed to reach patients quickly. Facilities used by staff are provided on an informal basis only by agreement with the relevant landowner.

Ambulance Stations in the Longfield Solar Farm project area include:

Cambridge x 3
Bury St Edmunds x 2
Ely
Mildenhall
Newmarket

Vehicle Fleet

- 387 front line ambulances
- 178 rapid response vehicles
- 175 non-emergency ambulances (PTS and HCRTs vehicles)
- 46 HART/major incident/resilience vehicles located at 2 x Hazardous Area Response Team (HART) bases with a number of specialist vehicle resources.

Workforce & Equipment

Approximately 4,000 staff and 800+ volunteers across 120 sites. Each resource has equipment specific to the operational function of the vehicle and skill level of the staff.

Specialisms

EEAST works collaboratively across our blue light partners and have joint working groups with Police and Fire Services across the region, working in partnership managing responses to incidents and undertaking joint exercises with our dedicated resources to prepare for specialist rescue, major incidents and mass casualty incidents.

EEAST is a Category 1 Responder under the Civil Contingencies Act, 2004, playing a key role in developing multi-agency plans against the county and national risk registers. EEAST also works closely with the Military, US Air Force, Royal Protection Service, Stansted Airport and the Port of Felixstowe Police, Fire and Ambulance services.

EEAST's Emergency Preparedness Resilience Response (EPRR) team lead on the Joint Emergency Services Interoperability Principles (JESIP) working in close partnership with all blue light agencies, the Coastguard and Local Authorities. Specialist resources work with the Police in counter terrorism and developing response plans in the event of a major incident.

EEAST are an integral part of the locality's resilience response sitting on a number of safety advisory groups, east coast flood working groups and hospital emergency planning groups.

Co-working Relationship with other Blue-Light and Healthcare Partners

EEAST is an integral part of the wider healthcare system working closely with the North Essex Integrated Care System (ICS) and Clinical Commissioning Groups (CCGs) to deliver emergency and urgent care and are key stakeholders in supporting wider healthcare initiatives.

Within North Essex, EEAST work with the CCGs in delivering additional care pathways focussing on hospital admission avoidance, this is a partnership with the local acute providers and local authorities. EEAST operate Early Intervention Response vehicles and a Rapid Intervention Vehicle. These resources work collaboratively within the system to offer holistic care to patients whilst reducing pressure on Emergency Departments.

This is EEAST's response to the requirements of the NHS Long Term Plan, with the clear narrative that in order to bring the NHS into financial balance all NHS providers must find mechanisms to treat patients in the community and out of the most expensive care setting, which are acute hospitals. This not only saves the NHS critical funding, but it also improves patient outcomes.

EPRR and Specialist Operations teams routinely train with other blue light agencies in preparedness for major incidents such as terrorist attacks and major incidents with statutory training obligations to respond to local and national incidents.

In continuing to respond to the COVID-19 Pandemic, EEAST is working collaboratively with Private Ambulance providers, the Military, volunteer Ambulance Services (such as St John Ambulance and British Red Cross) and local Fire and Rescue Services, to increase its capacity and maintain service delivery to meet the additional demand.

EEAST Service Targets

All NHS organisations are required to report against a set of Core Quality Indicators (CQIs) relevant to their type of organisation. For ambulance trusts, both performance and clinical indicators are set as well as indicators relating to patient safety and experience.

NHS organisations are also required to demonstrate their performance against these indicators to both their commissioners and Regulators (NHS England/Improvement).

It is important to note that EEAST is also measured on how quickly a patient is transported to an appropriate location for definitive care, often in time critical circumstances.

Failure to deliver against these indicators will result in a Contract Performance Notice and could result in payment being withheld, as prescribed in NHS Standard Contract 20/21 General Conditions (Full Length) GC9 9.15.

EEAST Operational Standards & Thresholds
Ambulance Service Response Times

Operational Standards	Threshold	Consequence of Breach
Category 1 (life-threatening) calls – proportion of calls resulting in a response arriving within 15 minutes	Operating standard that 90th centile is no greater than 15 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 15 minutes, £2.50 per 1,000 Category 1 calls received in the Quarter
Category 1 (life-threatening) calls – mean time taken for a response to arrive	Mean is no greater than 7 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9
Category 2 (emergency) calls – proportion of calls resulting in an appropriate response arriving within 40 minutes	Operating standard that 90th centile is no greater than 40 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 40 minutes, £2.50 per 1,000 Category 2 calls received in the Quarter
Category 2 (emergency) calls – mean time taken for an appropriate response to arrive	Mean is no greater than 18 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9
Category 3 (urgent) calls – proportion of calls resulting in an appropriate response arriving within 120 minutes	Operating standard that 90th centile is no greater than 120 minutes	Issue of a Contract Performance Notice and subsequent in process accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 120 minutes, £2.50 per 1,000 Category 3 calls received in the Quarter
Category 4 (less non-urgent "assess, treat, transport" calls only) – proportion of calls resulting in an appropriate response arriving within 180 minutes	Operating standard that 90th centile is no greater than 180 minutes	Issue of a Contract Performance Notice and subsequent process in accordance with GC9. For each second by which the Provider's actual 90th centile performance exceeds 180 minutes, £2.50 per 1,000 Category 4 calls received in the Quarter

For All Indicators:

Method of Measurement:	See AQI System Indicator Specification at: https://www.england.nhs.uk/statistics/statistical-work-areas/ambulance-quality-indicators/ Review of Service Quality Performance Reports
Timing of Application of Consequence	Quarterly for all indicators
Application	AM