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FAO The Examining Authority – Bramford to Twinstead Reinforcement Project

Date: 11th January 2024
Our Ref: BTR/ZM/RR 030

By Email Only: bramfordtotwinstead@planninginspectorate.gov.uk

Dear Members of the Examining Authority

DCO APPLICATION REFERENCE EN020002

EAST OF ENGLAND AMBULANCE SERVICE NHS TRUST (EEAST) - POSITION STATEMENT

Application by National Grid Electricity Transmission for an Order Granting Development Consent for the Bramford to Twinstead Reinforcement Project

This Position Statement outlines the stage reached with National Grid (NG) concerning EEAST's engagement in the Bramford to Twinstead Reinforcement Project to date.

It aims to provide the basis for the preparation of a Statement of Common Ground (SoCG) with NG - to assist the Examining Authority's (ExA) consideration of the Project's impact upon EEAST, along with appropriate mitigation measures.

It is noted that a finalised SoCG is required by ExA Deadline 9 (23rd February 2024).

EEAST is an **INTERESTED PARTY** in this planning process, operating in close association with the Suffolk & North East Essex Integrated Care Board (ICB), and blue light partner organisations, namely Essex Police, Suffolk Constabulary and Essex and Suffolk Fire & Rescue Services.

EEAST's record of engagement and NG's current position is summarised below.

Pre-Application & Post DCO Submission Engagement

21st March 2022 – submission made to NG in response to the Statutory Consultation outlining the impacts arising on EEAST's operations & proposed mitigation;

14 July 2023 – relevant representation submitted to PINS, cc to NG, outlining the impacts arising on EEAST's operations & proposed mitigation;

National Grid Response to EEAST Engagement

25 September 2023 – NG's comments on Relevant Representations (Volume 8: Examination Submissions, Document 8.3.3: Applicant's Comments on Relevant Representations - Table 3.19: Healthcare Trusts & Emergency Services).

This document has since been reviewed and the following concerns are noted:

- The summary of EEAST's position is incomplete, with a key omission made in relation to the procedural mechanism for the mitigation and management measures sought – which principally envisage a DCO Requirement, as opposed to a planning obligation;
- Temporary construction traffic, including Articulated Indivisible Loads (AIL's), road closures & diversions – NG/ the Traffic Assessment has not considered these impacts;
 - in the context of EEAST's statutory duties & the National Quality Requirements (NQR) for ambulance response & handover times;
 - in the context of NQR Category 1 'life threatening' calls - the effects of which are likely to be substantial & potentially critical, or major adverse in Project EIA terms;
- Construction phase accidents & emergency access – employing standard Health & Safety measures through the Code of Construction Practice (CoCP), including reference to an Emergency Action Plan & Construction Traffic Management Plan would not;
 - be sufficient in the absence of EEAST & its Helicopter Emergency Service Partner (HEMSP) specialist input in relation to plans & procedures for emergency land/ air ambulance access;
 - be sufficient in the absence of EEAST & its HEMSP specialist input into plans & procedures for on-site triage, medical assessment & patient identification, stabilisation, clinical information & safe/ efficient handover to EEAST/HEMSP responders - for transfer to an appropriate healthcare setting;

NG's position in respect of EEAST's representations is therefore **NOT AGREED**.

These points are, however, capable of being addressed through NG/EEAST liaison and preparation of a SoCG as outlined below.

EEAST Summary of Key Project Impacts & Proposed Mitigation

Key Project Impacts

EEAST's principal areas of interest & concern (PAIC) relate to the Project's likely impacts on its operational capacity, efficiency and resources, which are set out fully in its Relevant Representations (Ref 030) **enclosed** and summarised below;

- Traffic & transport impacts & highway network delay;
- Articulated Indivisible Loads (AIL's);
- Major accidents & disasters – this area specifically relates to construction phase accidents of a major, moderate & minor nature;
- Population increase, health & wellbeing;

Proposed Mitigation Sought – DCO Requirement *

EEAST consider that its PAIC can be mitigated through a DCO Requirement, and specifically by appropriate recognition within a Construction Environmental Management Plan (CEMP) incorporating a Code of Construction Practice (CoCP) and Emergency Action Plan (EAP) within the 'Management Plans' Section of the draft Development Consent Order at Clause 4.

For these Management Plans to be effective, however, EEAST consider that the following consultation and engagement parameters should be included within the Construction Environmental Management Plan, incorporating the Code of Construction Practice/ Emergency Action Plan;

- EEAST's advanced notification of road closures & diversions;
- EEAST's advanced notification of AIL routeing, movements & timing;
- EEAST's consultation on the draft CEMP/CoCP/EAP – contractor(s) to implement plans & procedures for emergency land/ air ambulance access, on-site triage, medical assessment & patient identification, stabilisation, clinical information & safe/ efficient handover to EEAST/HEMSP (as agreed with EEAST in consultation with Helicopter Emergency Medical Service Partners) for transfer to an appropriate healthcare setting;
- EEAST's notification of the nature of the construction stage workforce, their home origin, health status, clinical dependencies & location of temporary/ permanent accommodation;
- Establishment & inclusion of EEAST & its health & blue light partners within a Transport, Community Safety, Health & Wellbeing Working Group for the

construction phase – EEAST & relevant partners to be consulted on appropriate Terms of Reference, membership & a communications strategy;

We trust this Position Statement is of assistance to the ExA and look forward to liaising with NG at an early stage this month to progress a SoCG – to be submitted in a finalised form by Deadline 9 on 23rd February 2024.

Yours sincerely



Zoë May
Head of Business Relationships

Encs – EEAST Relevant Representation 030

Cc John Bevan: Senior Project Manager - National Grid Electricity Transmission
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East of England Ambulance Service NHS Trust
Hammond Road
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MK41 0RG

Date: 14th July 2023

Our Ref: BTR/ZM/RIN20038332

Dear Sir

BRAMFORD TO TWINSTEAD REINFORCEMENT PROJECT DCO APPLICATION REFERENCE EN020002

Application by National Grid Electricity Transmission for an Order Granting Development Consent for the Bramford to Twinstead Reinforcement Project – 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 Planning Inspectorates decision to Accept this application for an Order granting Development Consent on 23 May 2023, and note the timeline for registering as an 'interested party' and the making of relevant representations by 23:59 on 18 July 2023.

EEAST is an **INTERESTED PARTY** in this planning process, operating in close association with the Suffolk & North East Essex Integrated Care Board (ICB), along with blue light partner organisations, such as Suffolk Constabulary, Essex Police and Suffolk and Essex Fire & Rescue Services.

EEAST has reviewed the DCO Application documentation and raises a non-statutory **HOLDING OBJECTION** on the following basis:

- Insufficient scoping work has been undertaken to date - to determine 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 Project impact on EEAST's operations (summarised below) during the construction phase of the development
- Omission to include suitable DCO Requirements &/or Heads of Terms of Agreement, either via a Section 106 planning obligation or Deed of Obligation - to provide funding, new facilities provision &/ or other measures, as required, to increase the capacity, response capability & 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 construction, operational and decommissioning phases of the Scheme requiring a coordinated response from health & blue light partners, including EEAST, Suffolk & North East Essex Integrated Care Board (ICB) Suffolk Constabulary, Essex Police and Suffolk and Essex Fire & Rescue Services.

EEAST, together with the ICB, Police and Fire & Rescue Services is therefore keen to work with National Grid (NG) to address these omissions, and secure and implement suitable mitigation and management measures either as DCO Requirements and/ or a Section 106 planning obligation (or Deed of Obligation).

EEAST proposes that an agreed position be reflected in 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 ICB on behalf of all ICSs 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 area covering the location of the BTR Project.

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.

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, along with its National Quality Requirements 2023-24, are set out for information at [Annex 1 & Annex 2](#).

Bramford to Twinstead Proposals – Location & Project Overview

Location

The Bramford to Twinstead Reinforcement Project (BTRP) is located within three local authority areas in both Suffolk (Babergh DC & Mid Suffolk DC) and Essex (Braintree DC).

Project Overview – Scheme Components Summary

It is noted following review of NG's Environmental Statement (ES) that the BTRP involves the reinforcement of the electricity transmission network between Bramford Substation in Suffolk and Twinstead Tee in Essex.

This would be achieved by the construction and operation of a new 400kV electricity transmission line over a distance of approximately 29km, incorporating the following main elements:

- Demolition & removal of approximately 27km of existing 123kV (25km) & 400kV (2km) overhead lines & associated pylons
- A grid supply point (substation) comprising 2 x super grid transformers, replacement pylons, circuit sealing end compound & underground cables
- Modifications to & realignment of sections of the existing 400kV overhead line
- 50 x new steel lattice pylons, approximately 50m in height – 18km length route
- Aluminium conductors (lines) between each pylon
- 20 x underground cables – forming a cable system up to 11km in length
- 4 x cable sealing ends containing electrical equipment, support structures & a control building, each within a compound accessed via a permanent access track

- Temporary land to facilitate construction activities – including working areas for construction equipment & machinery, site compounds accommodating site offices, welfare, storage & access facilities
- Temporary infrastructure to facilitate construction activities – including highway works to form/ improve access points for pylon & overhead line diversions, scaffolding to safeguard existing crossings, watercourse crossings & diversions to Public Rights of Way
- Diversion of third-party assets & land drainage from the construction phase & operational phase areas
- Land for environmental mitigation, compensation & enhancement.

Construction Phase Summary

The implementation of BTRP would involve major construction processes, incorporating complex and specialised activities and equipment working in challenging locations and at height, including under floodlights during the hours of darkness and during periods of low lighting levels within a range of weather conditions.

The EIA and associated DCO documentation makes the following project design and construction assumptions in relation to the construction programme, construction workforce, construction access, materials/ waste and plant/ machinery, construction traffic/ routeing, off site highway works locations and major accident and disaster considerations:

Construction Programme/ Workforce

- A construction phase of up to 5.5 years, incorporating the provision of the GSP Substation previously consented under the Town & Country Planning Act
- For EIA purposes the construction would commence in 2023 & be completed in 2028
- Up to 350 workers would be deployed at the peak (Qtr 3/ 2025) with an average of 180 workers on site across the entire construction schedule
- Majority (90%) of employment activities would require trained specialists qualified to work on National Grid infrastructure sourced from an existing pool of approved contractors – 10% of workers to be sourced from the local labour market, including apprentices, security workers & delivery drivers
- % of 'home based' workers (living within a 60-minute drive time of the site) to be determined following contract award
- Core construction working hours of 07:00 - 19:00 Mondays to Fridays, & 08:00 – 17:00 on Saturdays, Sundays & Bank Holidays

- Certain activities to take place outside of the core working hours (with occasional night time working) in respect of specified operations including:
 - Trenchless crossing operations beneath highways, railway lines, woodlands or watercourses
 - Installation/ removal of conductors, pilot wires & associated protective netting across highways, railway lines & watercourses
 - Jointing of underground cables
 - Completion of operations that can't be safely stopped
 - Any highway works requested by the Highway Authority to be carried out outside of core working hours
 - Testing/commissioning of electrical plant
 - Completion of works delayed by severe weather conditions
 - Activities necessary in the instance of an emergency where there is a risk to persons or property
 - Security monitoring & surveys.

Construction Access & Materials/Waste/Equipment

- 126 x temporary access points (4 x types) across the area of the Order Limits serving the following functions:
 - AP – an access point serving the main construction works, eg construction of the 400kV overhead/ underground line#
 - DAP – an access point associated with the removal of the 132kV overhead line
 - EAP – an access point associated with environmental mitigation/ enhancement
 - YLAP – an access point associated with minor modifications to sections of the existing 400kV overhead line
- Temporary clear span bridges to cross the Rivers Brett, Box & Stour – with the River Stour stopped up (closed for navigation) during the installation/ removal of the temporary bridge for up to 1 week
- 20 x minor water courses & ditches to be crossed by the temporary access routes

- A main site compound accessed via the A134 at Leavenheath accommodating site offices, storage areas, parking & welfare facilities with 11 x satellite construction compounds along the route
- Construction materials with approximate quantities as below:
 - Concrete for pylon foundations – 600 m³
 - Cement bound sand for underground cables – 7,000m³
 - Protective tiles – 180,000
 - Steel pylons – 50
 - Overhead line conductors (aluminium) – 20km
 - Underground cables (aluminium) – 60km
- Waste materials arising, with approximate quantities as below:
 - 132kV & 400kV steel pylons – 450 tonnes
 - 132kV & 400kV conductors – 126,000 m³
 - Removed foundations of 132kV/ 400kV pylons – 940 m³
 - Low voltage wooden poles – 13 tonnes
 - Excavated spoil from road crossings – 1,500 tonnes
 - Displaced soil from pylon bases – 6,720 tonnes
- Use/deployment of specialist plant, equipment & machinery - including mobile cranes, cable drums, earth handling/ scraping equipment, horizontal directional drilling equipment, drill/piling rigs, percussive piling & steel cutting equipment, fuel oils & chemical storage.

Traffic & Transport Impacts & Highway Network Delay

Abnormal Indivisible Loads (AIL's)

The BTRP would require the use of abnormal indivisible loads (AIL's) travelling along routes approved by the local Highway Authorities, and would also require a police escort while on the public highway.

ALL deliveries would be made to the following access points:

- D-AP2 (Millwood Road) – serving Dedham Vale East CSE compound
- F-AP5 (A134) – serving Dedham Vale West CSE compound
- G-AP4 (B1508) – serving Stour Valley East CSE compound
- H – AP20 (A131) – serving Stour Vally west CSE compound
- H-AP-1 (A131) – serving the GSP substation

ALL's would be required for delivery of the following components:

- super grid transformers to the GSP substation - 2 x deliveries
- cable drums – approximately 200 x deliveries
- shunt reactors & works within Bramford Substation – approximately 8 x deliveries
- A low-loader to deliver a 160 tonne & 250 tonne crane for the installation & removal of pylons is also envisaged – the low loader would fall within the criteria of the 'Special Types General Orders Regulations'.

HGV Construction Traffic

The ES (Chapter 12 – Traffic & Transport) sets out the daily construction traffic forecasts, with the peak month identified as August 2025.

The forecast assumes that there would be 350 staff on site per day during peak periods with an average of 180 workers at other times.

The strategic road network affected by construction traffic is outlined below:

- A12/A14 Copdock junction
- A14 Claydon interchange
- A12 junctions 26, 28 & 31
- A131/A120 Marks Farm roundabout

The local road network affected by construction traffic, with forecasted daily impacts (2025) shown in descending order of % traffic increase, are summarised below:

- Church Road, Twinstead (Eastern Segment) – 10 HGV's/ 107% increase
- Rands Road - 23 HGV's/68% increase
- Church Road, Twinstead (Western Segment) – 62 HGV's/22%

- Henny Street – 111 HGV's/17%
- Henny Road – 125 HGV's/16%
- Lamarsh Hill – 98 HGV's/13%
- The Street, Assington – 169 HGV's/12%
- Springett's Hill – 116 HGV's/12%
- Bell Hill – 116 HGV's/12%
- Cuckoo Hill – 136 HGV's/9%
- Stackwood Road – 61 HGV's/6%.

Road Closures, Diversions & Traffic Management

The construction phase of the BTRP would necessitate a wide-ranging level of road closures, diversions and management across the full length of the intended route from Bramford in Suffolk to Twinstead in Essex.

Document 2.7 of the ES: Access, Rights of Way & Public Rights of Navigation Plans, illustrates the extent of effect and disruption to the highway network arising as a result of the following management measures/ status:

- Street management temporary closure points
- Street management temporary stopped up
- Street management temporary stopped up (managed)
- Street management temporary diversions
- Public rights of way & street management temporary diversions.

Key parts of the primary route network would be affected including the A131, A134 and A1071, along with inter linking classified (ie the B1068/ B1508) and other classified and unclassified routes.

Reference is made to the Code of Construction Practice (CoCP) which incorporates good practice measures relating to traffic and transport, incorporating a Construction Traffic Management Plan (CTMP) to identify measures to reduce route and journey mileage to/from the site, and to prevent nuisance arising from parking, vehicle movements and access restrictions.

Reference is made to the CTMP also providing suitable control for the means of access/ egress to the public highway and identifying access for emergency vehicles.

The ES (Chapter 12 Traffic & Transport) concludes that there are no likely significant residual effects in relation to traffic and transport receptors during the construction phase.

Major Accidents & Disasters

The ES Appendix 5.3 – Major Accidents & Disasters Scoping document states that it is a requirement of the Environmental Impact Assessment (EIA) process to consider major accidents and disasters in relation to an application for Development Consent under the Planning Act 2008.

The legislative requirement for an EIA is for it to consider the following assessment context for potential accidents and disasters, as summarised in the document referenced above;

“A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the Project concerned . . . Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies”

The assessment presented in Appendix 5.3 considers the vulnerability of BTRP to a major accident, and the potential for the Project to cause a major accident.

The scoping assessment concludes that the existing design features, legal requirements, codes and standards adequately control the potential for a major accident and/or disaster.

The scoping assessment considers that BTRP is unlikely to result in a significant effect during construction, operation or decommissioning, both in terms of the vulnerability of the Project to a major accident, and also when considering the potential for the Project to cause a major accident.

Potential Impacts on EEAST Service Areas

Project Environmental & Social Effects

Review of the BTRP (Applicant’s) Environmental Statement and related DCO documentation, indicate that the Scheme’s potential impacts (effects) on EEAST’s operational capacity, efficiency and resources (staff, vehicle fleet and estate assets) have not been baselined or sufficiently assessed or mitigated to date.

EEAST is therefore keen to work with National Grid to ensure this omission is addressed by further information being prepared to address EEAST’s concerns and inform a Statement of Common Ground - to provide a robust basis for assessment of the DCO Application, and to assist the Examination.

In particular, EEAST wishes to agree and secure suitable mitigation and management measures as part of the DCO Requirements and/or via 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 Project interest which are likely to significantly impact on EEAST's operational capacity, efficiency and resources requiring necessary and appropriate mitigation and management measures are outlined below - in light of the information and assumptions presented in the DCO Application and associated DCO documentation.

Traffic & Transport Impacts & Highway Network Delay

It is evident that a major level of demolition and construction phase work involving large scale plant, equipment and machinery deployment/ use, engineering operations, waste material arisings/deposition, import of construction material, HGV traffic generation along with wide-ranging road closures, route diversion and management measures are envisaged - leading to significant highway network impacts and delay from EEAST's perspective.

Information to determine the effect of increased HGV traffic, wide-ranging road closures, route diversion measures and transport/ road network management and its impact on EEAST's operational capacity, efficiency and resources is currently absent from the EIA and associated DCO documentation.

These impacts on EEAST's operational capacity, efficiency and resources therefore need to be presented and assessed, and reflected in an agreed Statement of Common Ground setting out appropriate mitigation and management measures to be secured/ implemented through DCO Requirements, and/ or 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 a significant level of AIL and low loader movements (incorporating police escort) are required to deliver construction phase components to 5 x separate access points related to BTRP.

Information to assess the nature, frequency, route management, reliance on police escort and expected time delays associated with AILs and low loaders, which are likely to directly impact on EEAST's operational capacity, efficiency and resources therefore needs to be further clarified within the EIA and/or associated DCO documentation.

This information should be presented and assessed, and reflected in an agreed Statement of Common Ground setting out appropriate mitigation, management and monitoring measures to be secured/ implemented through DCO Requirements, and/ or

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

Major Accidents & Disasters

A significant level and duration of demolition and construction phase work is envisaged, involving large scale plant, equipment and machinery deployment/use, hazardous and non - hazardous waste material handling, import of construction material, specialist construction/engineering operations and processes, and product storage across the 5.5-year construction period.

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

HSE's construction statistics and 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.

In the event of a construction phase accident or incident, appropriate procedures would therefore 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.

In addition, plans and contingencies for emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders within operationally optimal attendance times (noting the delay risks above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS) access, are considered necessary.

The incidence and impact of any potential significant or major accident (and any disaster) on EEAST and its HEMS partner operational capacity, efficiency and resources (including EEAST hazardous area response teams - HART) needs to be presented and assessed, and reflected in an agreed Statement of Common Ground, with appropriate mitigation and management measures secured/ implemented through DCO Requirements and/or 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 construction phase a significant number of construction workers are required to implement the demolition and 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 impact on EEAST's operational capacity, efficiency and resources, including its logistical response with healthcare partners, is currently incomplete and insufficiently assessed within the EIA and associated DCO documentation.

This impact information therefore needs to be presented and assessed, and reflected in an agreed Statement of Common Ground, with appropriate mitigation and management

measures secured/ implemented through DCO Requirements and/ or within a Section 106 planning obligation or Deed of Obligation, 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 Project requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, Suffolk & North East Essex Integrated Care Board (ICB), Suffolk Constabulary, Essex Police, Suffolk and Essex Fire & Rescue Services.

Concluding Remarks

EEAST is an **INTERESTED PARTY** in this planning process, operating in close association with the Suffolk & North East Essex Integrated Care Board (ICB), along with blue light partner organisations such as Suffolk Constabulary, Essex Police and Suffolk and Essex Fire & Rescue Services.

EEAST is pleased to respond to the Bramford to Twinstead Reinforcement Project which has been Accepted for Examination, and following review of the DCO documentation raises 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 Project is likely to give rise to significant effects on its operational capacity, efficiency and resources (incorporating its staff, vehicle fleet and estate assets) which have not been baselined or sufficiently assessed or mitigated and managed by the Project to date.

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

Identified impacts arising from the development should therefore be addressed by employing appropriate mitigation and management measures - to be secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.

This approach ought 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 operational/ decommissioning phase) Project impacts and incidents, to optimise

patient outcomes.

We trust this is of assistance, and look forward to working with National Grid to satisfactorily address the points raised above, which would enable EEAST to lift its holding objection.

Yours sincerely

[Redacted signature]

Zoë May
Head of Business Relationships

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ANNEX 1

EEAST KEY FACTS and SERVICE INFORMATION

This section summarises EEAST's service remit, priorities, staff, 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, ie 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 Suffolk and Essex are currently located at:

Basildon	Clacton	Harlow	South Woodham Ferrers
Billericay	Colchester (Hub)	Harwich, Dovercourt	Southend-On-Sea (Hub)
Braintree	Greenstead, Colchester	Loughton	Stansted
Great Notley, Braintree	Corringham	Maldon	Thurrock Grays
Brentwood	Dunmow	Ongar	Waltham Abbey
Burnham on Crouch	Epping	Rayleigh	Weeley
Canvey	Frinton	Saffron Walden	Wickford
Chelmsford	Halstead	Shoeburyness	Witham
Bury St Edmunds x 2	Haverhill	Martlesham Heath	Stowmarket
Beccles	Ipswich x 2	Mildenhall	Sudbury

Felixstowe	Lowestoft x 2	Saxmundham	
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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 and 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 and the Stansted Airport, port authorities, 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 & Healthcare Partners

EEAST is an integral part of the wider healthcare system working closely with the Suffolk & North East Essex Integrated Care Board (ICB) to deliver emergency and urgent care and are key stakeholders in supporting wider healthcare initiatives.

Within Suffolk and Essex, EEAST work with the ICBs 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).

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 (see next page for summary details).

Annex 2

EEAST National Quality Requirements 2023-24 Ambulance Service Response and Handover Times

Ambulance Service Response Times

National Quality Requirement	Threshold
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
Category 1 (life-threatening) calls – mean time taken for a response to arrive	Mean is no greater than 7 minutes
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
Category 2 (emergency) calls – mean time taken for an appropriate response to arrive	Mean is no greater than 30 minutes
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
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

For All Ambulance Service Response Times Indicators:

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

Ambulance Service Handover Times

National Quality Requirement	Threshold
Following handover between ambulance and A+E, ambulance crew should be ready to accept new calls within 15 minutes and no longer than 30 minutes	>0

Guidance Dn definition:	See Contract Technical Guidance Appendix 2 at https://www.england.nhs.uk/nhsstandard-contract/
Timing of Application of Consequence	Ongoing