

## Response Form

### Luton Local Plan Community Involvement Paper – Issues & Options (Regulation 18 Document)

#### YOUR DETAILS

To make a valid response, please fill in the details below.

<b>Your name and title (Required):</b> Miss Zoë May
<b>Organisational (Optional):</b> East of England Ambulance Service NHS Trust (EEAST)
<b>Address including post code (Required):</b> East of England Ambulance Service NHS Trust [REDACTED] Bedford [REDACTED]
<b>Email address (Optional):</b> [REDACTED]

Please tick if you wish to be added to our database to be updated on the progress of the new Local Plan (Optional).	<input checked="" type="checkbox"/>
Please review the PRIVACY NOTICE and tick that you agree to it in order for us to process and publish your responses and hold your contact details privately which won't be published (Required).	<input checked="" type="checkbox"/>

## Response Box

### Topic Heading: Duty to Cooperate

#### Question Number: 1

Is there anything you consider important we have not mentioned about Luton and its surroundings?

#### Answer:

##### *Duty to Cooperate*

##### *Health*

Apart from mentioning the Luton and Dunstable Hospital, the Local Plan has not identified the other key health and emergency services – these are important to Luton. This should include primary care facilities (GP practices, pharmacy and opticians), emergency ambulance services, mental and community health provision. Emergency Service (police and fire & rescue services should also be mentioned.

This should include Bedford, Luton and Milton Keynes Integrated Care System (BLMK ICS), emergency ambulance services (EEAST commissioned on behalf of BLMK ICS by Suffolk and North East Essex ICB (SNEE ICB).

LBC is a partner at the ICS Board and holds joint responsibility under the Health & Social Care Act.

##### *Emergency Services*

Emergency Services - police and fire & rescue services should also be included in strategic planning matters and cross boundary matters. All emergency services (including emergency ambulance services) are also major infrastructure partners and should be recognised as such.

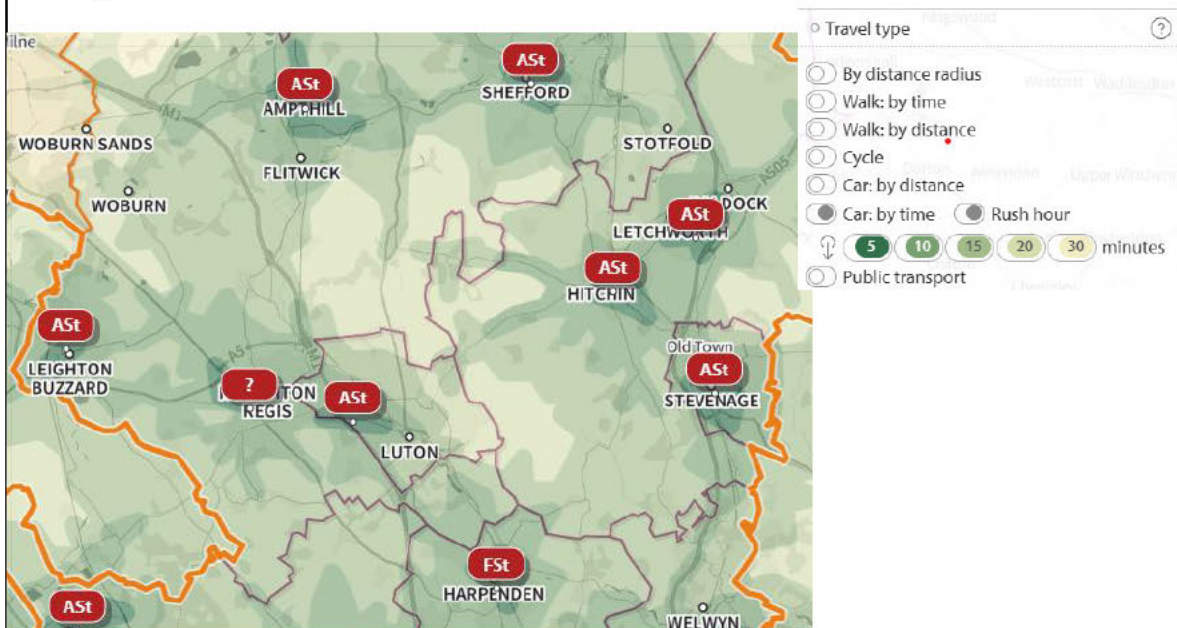
*NPPF requirement to consider the infrastructure plans of relevant organisations and providers.*

This requirement should include significant infrastructure users specifically mentioning health and emergency services.

Luton is already a key location for one of EEAST's 18 Ambulance Hubs across the East of England. The Luton Hub serves Luton and surrounding areas as is too small

for the planned housing growth. A new Ambulance Hub is required in the Luton area: a site with 1 ha (2 acres) of vacant land or appropriate existing buildings which could be converted to provide an Ambulance Hub is required which could contain up to 34 ambulances and 4 rapid response vehicles, relevant staff accommodation and parking. EV charging infrastructure will also be required.

The Map below shows the locations of ambulance stations and response posts which support residents in the Luton area (Source Shape Atlas with drive time in rush hour traffic)



### *Issues and Challenges*

LBC is a partner at the ICS Board and holds joint responsibility under the Health & Social Care Act. An aging population, poor health outcomes require additional public health initiatives and provision of health services infrastructure. Housing and population growth can lead to sever strain on existing, at capacity health services and more infrastructure is required.

Recognition of requirement to expand health facilities through utilisation of s106/CIL funding is essential.

LBC has an opportunity support development of skills required in the NHS, with over 200 different careers available in the NHS. Luton's local plan can support this by identifying existing facilities: local hospital, GP, emergency ambulance services needing more staff across a range of roles.

**Topic Heading:** Developing our Vision and Objectives

**Question Number:** 2 What do you think of our draft Vision?

**Answer:** Support draft vision in principle.

Whilst BLMK ICB is a statutory body as defined under Health and Care Act 2022, with responsibility for commissioning NHS health services, BLMK ICB and partner NHS Trusts (including EEAST and Luton and Dunstable Hospital) work in collaboration with local Health and Wellbeing Boards to arrange and provide NHS services to:

- improve the general health and wellbeing of Luton residents and improve health care services in the area
- tackle the inequalities which affect people's physical and mental health, such as their ability to get the health services they need, and the quality of those services help tackle health and wider inequalities
- get the most out of local health and care services and make sure that they are good value for money
- help the NHS support social and economic development.

EEAST is supportive of the Vision which recognises that the way places are planned, designed, built and managed will have a significant influence over whether communities are able to live healthy lives. EEAST is also supportive of the importance given to health and wellbeing, addressing health inequalities in the Borough, and the importance of meeting the needs of an ageing population and residents with disabilities and with specialist needs which recognises the way places are planned, designed, built and managed will have a significant influence over whether communities are able to live healthy lives.

However, there is a need to ensure health infrastructure including emergency ambulance services will facilitate growth.

Emergency services infrastructure and service requirements need to be supported. Reducing anti-social behaviour impacts police and emergency ambulance services.

**Topic Heading:** Developing our Vision and Objectives

**Question Number:** 3 What do you think of our draft Objectives?

**Answer:**

EEAST supports the draft Objectives in principle.

*Objective 2 Identify sufficient land in sustainable locations to meet needs and enable sustainable sites to come forward to encourage regeneration and renewal*

*Objective 8 Allocate sufficient land and enable sustainable sites to come forward to meet our needs including for housing and employment*

*Objective 20 Provide sufficient accessible, well maintained good quality services, facilities and infrastructure to meet health, education, transport, open space, sport, recreation, cultural, social and other community needs*

The Local Plan can support relocation and expansion of EEAST's requirement for a new ambulance Hub

Luton is already a key location for one of EEAST's 18 Ambulance Hubs across the East of England. The Luton Hub serves Luton and surrounding areas as is too small for the planned housing growth. A new Ambulance Hub is required in the Luton area: a site with 1 ha (2 acres) of vacant land or appropriate existing buildings which could be converted to provide an Ambulance Hub is required which could contain up to 34 ambulances and 4 rapid response vehicles, relevant staff accommodation and parking. EV charging infrastructure will also be required.

*Objective 10 Provide for education needs, including working with the University and colleges to raise the level of skills and ensure that local companies invest in the local workforce, embedding social value*

LBC has an opportunity support development of skills required in the NHS. with over 200 different careers available in the NHS. Luton's local plan can support this by identifying existing facilities: local hospital, GP, emergency ambulance services needing more staff across a range of roles.

**Topic Heading:** Developing our Vision and Objectives

**Question Number:** 4 What period do you think our Local Plan should cover?

**Answer:**

EEAST supports Local Plan to 2045 in principle.

However, the Plan needs to consider that not all partners can currently operate a strategic plan to 2045 and provide sufficient details as to exact requirements as where future ambulance response posts should be located. EEAST is currently developing a strategic estates plan for the next 3 years.

**Topic Heading:** Developing our Vision and Objectives

**Question Number:** 5. Do you have any views on what our future strategy should where we should identify new sites for development and what factors and information we should consider?

**Answer:**

EEAST supports the draft future strategy in principle.

EEAST's purpose-built Ambulance Hubs require circa 1 ha of land and parking space for up to 50 ambulances/rapid response vehicles and support/operational staff (approx 200 staff working 24/7), close to the local hospital and good road networks. The estates infrastructure can include fuel (including Electric Vehicle Charging). Services may include a local workshop (currently 8 across EEAST) to ensure patient facing vehicles are serviced every 6-weeks to ensure they remain

road worthy during the 5-year life of the vehicle. Each workshop also services and repairs essential capital medical equipment required in each ambulance in order to provide mobile emergency health diagnostic and patient care services. Pharmacy and Digital Technology equipment are also provided from each Hub.

The new Ambulance Hub, requiring circa 1 ha, needs to have access to good local roads and be near to the hospital and significant power to enable the future charging of electric ambulances. This will require the right levels of electrical power to the site and also sufficient digital infrastructure. Ambulance stations cannot be located in Flood Zone 2 or 3.

In addition to the Hub, a number of ambulance responses posts are likely to be required in and around Luton to ensure EEAST can meet the mandated response times. These can be shared with other organisations (fire stations are ideal) or standalone.

The current Local Plan target is to deliver a minimum of 8,500 new homes will generate in the region of 20,400 additional residents, (assuming 2.4 residents per dwelling) and on the basis of an ambulance for every 10,000 people, an additional 2 ambulance vehicles and associated estate infrastructure will be required to support the population growth.

**Topic Heading:** Providing suitable and sustainable homes

**Question Number:** *Q11 How should we provide housing for older people and those with specialist needs?*

Care homes can have a significant impact on emergency services. EEAST data analysis has identified (where coded to an MPDS Description) the impact the older age group has on our face-to-face interactions with patients in the Luton area, with falls accounting for 1,680 incidents between 1<sup>st</sup> April 2023 – to 31<sup>st</sup> March 2024. This is followed by Breathing/Respiratory issues (1,207) and then by Chest Pain (798).

Care Homes (including Extra Care and other Older People's accommodation)

Care homes should not be built in Flood Zone 2 or 3 areas unless effective flood proofing and evacuation plans which do not rely on emergency services are in place.

Lifts - should be of a suitable size to enable a patient to be safely transported by stretcher and accompanied by 2 medical personnel alongside the stretcher (a minimum internal of 2.6m x 1.6m is required). The lift should be fire-proofed to the appropriate standard to ensure evacuation during a fire or other emergency situation.

Parking space - for at least one emergency ambulance and one patient transport vehicle is provided close to the entrance (minimum 10.6m in length and 4m in width) ideally with 2 EV charging points.

Emergency lifting device - at least one with a preference of one per floor. These inflating devices are designed to lift the frailest individual up to a bariatric patient from the floor in a safe and dignified manner minimising the risk of injury to both the fallen individual and the person lifting them. This device will enable care home staff to aid uninjured residents back into their chair/bed and thereby reduce the number of attendances from ambulance service.

Corridor Space - turning points into room/stairs transferring patient by stretcher and accompanied by 2 medical personnel alongside

Automated External Defibrillator – at least one per building with a preference of one per floor.

**Topic Heading:** Providing suitable and sustainable homes

**Question Number:** 12 What should we consider in ensuring that new homes and outside spaces are the right size?

**Answer:**

EEAST recommends the following elements in support physical, mental health and wellbeing and help develop community cohesion:

- Since the COVID-19 pandemic more people are likely to work from home for at least part of the week, the room size and layout should be sufficient to facilitate at least one person working from home in a suitable environment as this supports both physical and mental health and well-being. Access to fresh air is also recommended.
- Developers' inclusion of community gardens, allotments, orchards, meadow flower and woodland planting areas. Balconies, roof gardens and terraces also provide green space opportunities in apartment buildings. Replacing fencing with living walls also provided additional green space. Consideration of all senses (sight, hearing, touch, smell, taste) should be addressed by the developer in the planting plan and use of local flora and fauna and wildlife corridor connection.
- In central open space developers should establish of seating in open spaces and along walkways to provide the opportunity for residents to meet and supports those who have limited mobility to rest and enjoy the surrounding green space. Ideally some of the seating should include Mental Health Benches to support those in need.

Cycle parking/storage should allow for different types of cycles (eg trike, electric bike or mobility scooter) to be stored, covered, secure and well lit.

**Topic Heading:** Providing suitable and sustainable homes

**Question Number:** 7 How can we provide affordable housing for Luton and what information should we consider?

**Answer:**

EEAST supports in principle affordable homes are provided for certain groups such as key workers and local people first.

*Option 7*

*Should we require affordable homes to be provided for certain groups such as key workers and local people first and on which type of schemes?*

The definition of health key workers needs to include anyone health worker not just medical/clinical roles.

**Topic Heading:** Supporting economic development

**Question Number:** 16 How should we develop Luton's economy going forward?

**Answer:**

EEAST would support revisions to the local plan to include policies specifically related to social value and local wealth building.

The opportunity to work with the University, colleges, schools and other organisations to devise planning policies to help improve the diverse range skills required. There are over 200 different careers available in the NHS, in addition to in clinical roles, other administrative and practical skills include accounting, digital, sustainability, estates and contract management.

**Topic Heading:** Town centres & retail

**Question Number:** 24 How can Luton town centre be improved and what retail, leisure and employment opportunities should we encourage?

**Answer:**

*Option 6 How could we improve public spaces, and introduce new spaces, trees and planting in the town to improve the public realm and help reduce the effects of heat?*

EEAST supports the follow as they support health and wellbeing of residents, employees and visitors to Luton Borough:

- Developers' inclusion of community gardens, allotments, orchards, meadow flower and woodland planting areas. Balconies, roof gardens and terraces also provide green space opportunities in apartment buildings. Replacing fencing with living walls also provided additional green space. Consideration of all senses

(sight, hearing, touch, smell, taste) should be addressed by the developer in the planting plan and use of local flora and fauna and wildlife corridor connection.

- In central open space developers should establish of seating in open spaces and along walkways to provide the opportunity for residents to meet and supports those who have limited mobility to rest and enjoy the surrounding green space. Ideally some of the seating should include Mental Health Benches to support those in need.

**Topic Heading:** Town centres & retail

**Question Number:** 25 Should we seek to further restrict the type of development in certain areas of central Luton?

**Answer:**

*Option 2 Is there scope for community-based enterprise, including healthy, diverse and local farmer food markets? If so, where?*

A community hub which includes health, library/museum and access to advise from emergency services would be beneficial. When health services such as mental health and sexual health services are located in community hubs this can support removing the stigma in visiting these locations.

Health and emergency services would be willing to work with LBC to discuss the room design/layout requirements.

**Topic Heading:** Health and Wellbeing

**Question Number:** 27 What should we do to address deprivation and improve life outcomes in Luton and what health facilities are required?

**Answer:**

*Option 1 What can the Local Plan do to help deliver Luton's Healthy Framework's objectives for a healthy place?*

EEAST would request the Local Plan ensures any health impact assessments include the needs of emergency ambulance services. Infrastructure for ambulance services includes the physical estate and the vehicles from which health services are provided.

EEAST would request consideration of access by emergency services, as poor design/access to local of infrastructure could cause delays which could significantly impact on patient care / property damage outcomes. All emergency services measure travel delays in minutes and would request transport planners take this into consideration (a 15-minute delay may acceptable for commuter traffic) whilst for all emergency services each minute can be critical.

*Option 2 Can the new Local Plan do more through placemaking policies to help reduce deprivation, create healthy integrated communities and improve accessibility to health services? If so, how?*

EEAST would support the Local Plan to promote developers' inclusion of community gardens, allotments and orchards as these can provide free/low cost access to food, support community cohesion and help improve mental health and wellbeing by encouraging people to be outdoors.

*Option 3 Should the new Local Plan policies and strategy focus investment and delivery of health and facilities such as doctors surgeries within the town based on the current spatial strategy of Town Centre district and Neighbourhood Centres?*

Town based health and emergency services facilities would be beneficial. When health services such as mental health and sexual health services are located in community hubs this can support removing the stigma in visiting these locations.

Health and emergency services would be willing to work with LBC to discuss the room design/layout requirements.

*Option 6 How can the Local Plan help improve skills and job opportunities to deliver improvements in health and wellbeing?*

EEAST would support revisions to the local plan to include opportunity to work with the University, colleges, schools and other organisations to devise planning policies to help improve the diverse range skills required. There are over 200 different careers available in the NHS, in addition to in clinical roles, other administrative and practical skills include accounting, digital, sustainability, estates and contract management.

*Option 7 Should we use design codes to ensure that placemaking includes provision for high quality homes, active travel, green space, quality environments, designing out crime and improved community safety?*

Yes, design codes should be used for these purposes.

EEAST is working with blue light partners in Essex to establish an updated Emergency Services Supplementary Guidance and Planning Protocol for working with developers.

EEAST would welcome the opportunity to work blue light services in Bedfordshire and Luton, with local planning colleagues and housing developers to ensure a similar approach is adopted in Luton.

*Option 8 How can we protect existing services and infrastructure important for health and wellbeing and for reducing deprivation and inequality?*

The Local Plan can support protecting existing services and infrastructure important for health by including the need to relocate and expand of EEAST's requirement for a new Ambulance Hub.

Luton is already a key location for one of EEAST's 18 Ambulance Hubs across the East of England. The Luton Hub serves Luton and surrounding areas as is too small for the planned housing growth. A new Ambulance Hub is required in the Luton area: a site with 1 ha (2 acres) of vacant land or appropriate existing buildings which could be converted to provide an Ambulance Hub is required which could contain up to 34 ambulances and 4 rapid response vehicles, relevant staff accommodation and parking. EV charging infrastructure will also be required.

Health commissioners and providers (hospital, ambulance services, primary care etc) will require significant electric power supplies to enable the future charging of electric ambulances/vehicles as well as sufficient digital/Artificial Intelligence infrastructure. The new NPPF (2024) establishes a requirement to consider infrastructure provider's investment plans and for a consistent approach to be taken to planning the delivery of major infrastructure.

**Topic Heading:** Health and Wellbeing

**Question Number:** 28 How could a new Local Plan protect against negative impacts from noise, light pollution and hazardous substances?

**Answer:**

The Local Plan should make provision to reduce light pollution as this would support development of nighttime wildlife which in turn can support residents' health and wellbeing.

However, a balance in supporting the reduction and fear of crime is required. Clear lines of sight should be retained close to properties and walkways.

**Topic Heading:** Addressing and adapting to Climate change

**Question Number:** 31 How can we adapt to and mitigate against the impacts of climate change? This includes flooding from rivers and rainfall and temperature extremes.

**Answer:**

Establish Public Sector EV Charging Central Facility/Facilities

EEAST would request rapid EV charging facilities for vehicles used by public sector are made available. This should be in a dedicated area(s) which are located in a secure area which can be accessed by health and social care, emergency services and other local authority vehicles. This will allow for the future of EV ambulances and other emergency services vehicles. This use of the EV charging asset by supporting multi-organisational use of the EV charging facility.

Passivhaus / BREEAM Excellent for Public Sector Buildings

EEAST would request LBC policies require all new public buildings/major refurbishments to aim for Passivhaus or BREEAM Excellent standards. Access to additional s106/CIL funding for health and emergency services would support the potential capital funding gap there is likely to be from central funding in order to reach these building standards.

Passivhaus / BREEAM Excellent for Housing, Commercial / Industrial Buildings

EEAST would request LBC policies require all new buildings/major refurbishments to aim for Passivhaus or BREEAM Excellent standards. As a minimum this should exist for social housing to support those who have lower incomes to reduce the volume of spend on heating/lighting.

PV panels /battery storage should also retrofitted where possible/appropriate on existing commercial / industrial buildings when requesting alterations as part of the planning policy.

**Topic Heading:** Addressing and adapting to Climate change

**Question Number:** 32 How can the Local Plan help Luton be more resilient and adaptive to flood risk?

**Answer:**

EEAST supports the Options outlined in the Local Plan as the effects of suffering from flooding can significantly affect residents physical and mental health in both the short and long term.

Emergency services, including emergency ambulance services, are often called out to support residents in the event of a flood. For emergency ambulance services, specialist Hazardous Area Response Team (HART) are activated as staff must wear a life jacket 3 meters from water and these are not provided on standard ambulances/rapid response vehicles. HART vehicles are located in a couple of locations across the East of England. The nearest HART locations to LBC area are at Melbourn, Hertfordshire and Peterborough, Cambridgeshire.

EEAST would request planning policy ensures care homes are not to be built in Flood Zone 2 or 3 areas unless effective flood proofing and evacuation plans are in place which do not rely on emergency services are in place.

Emergency ambulance stations cannot be located in Flood Zone 2 or 3.

Policies / availability of advice which support homes and businesses at risk of flooding should be retrofitted / designed with flood prevention measures in place.

EEAST would request developers fully utilise rainwater harvesting via underground storage tanks or use multiple water butts (ie garage and house) to help reduce the

risk of localised flooding post development. There is the potential for residents to reuse water for gardens, car washing and in community gardens instead of entering main sewers.

Design of commercial / industrial building should be encouraged to collect rainwater and reuse appropriately or to ensure mitigation measures preventing entry into sewage pipes by diverting to attenuation ponds (which can become wildlife friendly) and stormwater drains.

The use of sustainable urban drainage through permeable paving in driveways and parking areas to accommodate surface water run-off is welcomed and should be suitable for use by wheelchairs, mobility scooters and pushchairs.

In Flood Zones 2 and 3 EEAST request the appropriate the use of swales and other drainage measures to absorb any flood waters and would urge developers ensure measures are taken to minimise the risk of flooding in surrounding areas as well as flood proofing homes, garages and other infrastructure. Attenuation ponds should be designed to become wildlife friendly.

**Topic Heading:** Protecting and enhancing our natural environment

**Question Number:** 36 How can green and blue infrastructure in Luton be improved and enhanced?

**Answer:**

EEAST supports the Options outlined in the Local Plan. The opportunity to support residents' physical, mental health and wellbeing by improving both green and blue infrastructure. The following initiatives can support is approach.

The Local Plan should encourage developers' inclusion of community gardens, allotments, orchards, meadow flower and woodland planting areas. Balconies, roof gardens and terraces also provide green space opportunities in apartment buildings.

Replacing fencing with living walls can also provide additional green space and support wildlife corridor connections.

Design guides and policy could include residential, public sector, commercial and industrial building design to provide access for wildlife (eg hedgehogs) to enter/exit gardens/car parks and incorporating a variety of bird boxes in rooflines.

Consideration of all senses (sight, hearing, touch, smell, taste) should be addressed by the developer in the planting plan and use of local flora and fauna and wildlife corridor connection.

In central open space developers should establish of seating in open spaces and along walkways to provide the opportunity for residents to meet and supports those who have limited mobility to rest and enjoy the surrounding green space. Ideally some of the seating should include Mental Health Benches to support those in need

Attenuation ponds should be designed to become wildlife friendly. Appropriate seating could also be located close to the ponds to enable residents to enjoy the wildlife utilising these features.

**Topic Heading:** Community Facilities and Indoor Sport and Recreation

**Question Number:** 44 Are there any Issues or Options you think we have not considered in this Chapter?

**Answer:**

The National Planning Policy Framework requires the planning system to provide for sustainable development through local authority plan making and development management processes, which should aim to achieve healthy, inclusive and safe places.

The NPPF requires authorities to recognise health services which includes emergency ambulance Service as an 'essential social infrastructure' provider who contribute to the creation of sustainable new communities.

LBC is a partner at the ICS Board and holds joint responsibility under the Health & Social Care Act and should recognise this in the Local Plan by expanding on the PPS (2024) requirement to consider infrastructure provider's investment plans and for a consistent approach to be taken to planning the delivery of major infrastructure.

The Local Plan will need to show how new developments will support health and emergency services infrastructure. For emergency services improvements to highway infrastructure consideration of response times should be made, as every minute is critical to the outcomes of individuals and property.

EEAST would request Paragraph 5.277 is amended to:

The Local Plan will need to show how new developments will be supported by existing and new infrastructure including highway infrastructure if required, public transport, walking and cycling, waste, and utilities infrastructure (gas, water, electricity, telecommunications) as well as **health**, social, **emergency services** and community infrastructure such as schools and community facilities.

EEAST would ask the Planning Obligations SPD are updated to include health and emergency services within the scope of developer funded infrastructure and facilities provision. Mitigation is essential to manage via s106/CIL is essential as the impact of planned housing and population growth on service capacity and outcomes.

EEAST would also request recognition of Emergency Ambulance Services either under the Health Care or Emergency Services Sections of **Infrastructure Needs Study** and in the **Health Impact Assessment**.

A new Ambulance Hub to replace the existing Hub in Luton is required as it is at capacity and with no room for expansion to deliver the services required for Luton residents and neighbouring local authorities.

**Topic Heading:** Placemaking and design

**Question Number:** 47 How can we improve the public realm and the design of buildings in Luton and where should this be focussed?

**Answer:**

EEAST supports placemaking and design in principle.

*Option 3 In addition to design codes, should the new Local Plan also incorporate Building for a Healthy Life in the planning policies?*

EEAST fully supports Option 3 and would advise in order to support physical, mental health and wellbeing, buildings/infrastructure are designed with features of interest, especially at roof lines as this encourages people to look up. Urban design can hold exciting potential in population mental health - there is already clear evidence urban design can help promote good mental health, help prevent mental illness and help support people with mental health problems.

Research into design of open spaces and interesting building features has demonstrated they facilitate positive social with opportunities for natural, daily social interaction. Mixed-land use, welcoming shopfronts and amenities, enable browsing and interaction rather than drive site to site. Long, monotonous and featureless walls prolong negative thoughts and reduce interest in social interaction. Street benches and interactive installations, use of colour, and areas where people can get together for cooperative community events are known to be more important than quantity of good public open spaces.

EEAST is working with blue light partners in Essex to establish an updated Emergency Services Supplementary Guidance and Planning Protocol for working with developers.

EEAST would welcome the opportunity to work blue light services in Bedfordshire and Luton, with local planning colleagues and housing developers to ensure a similar approach is adopted in Luton.

**Topic Heading:** Placemaking and design

**Question Number:** 48 Do you think that we should encourage tall buildings in Luton and where should these be located?

**Answer:**

EEAST would request that tall buildings are supplied with lifts and be of should be of a suitable size to enable a patient to be safely transported by stretcher and accompanied by 2 medical personnel alongside the stretcher (a minimum internal of 2.6m x 1.6m is required. Lifts should be fire-proofed to the appropriate standard to ensure evacuation during a fire or other emergency situation.

Internal corridor space should ensure sufficient turning provision when entering dwellings/ room/stairs to accommodate transferring patient by stretcher and accompanied by 2 medical personnel alongside.

**Topic Heading:** Connectivity and Transport

**Question Number:** 54 Are there any Issues or Options you think we have not considered in this Chapter?

**Answer:**

EEAST supports the suggestions around Connective and Transport in the Local Plan in principle.

*Option 2 Is there an opportunity to create 10 or 15 minute neighbourhoods where District and Neighbourhood centres are accessible to their population catchments and all communities by public transport, walking and cycling within these journey times?*

EEAST would request access for emergency services access between neighbourhoods is maintained. Where access between neighbourhoods is via cycle/footpaths, that emergency vehicles can utilise these under blue light conditions and ensure users safety is maintained by have locations to safely move out of the path of emergency vehicles.

EEAST would request consideration of access by emergency services, as poor design/access to local of infrastructure could cause delays which could significantly impact on patient care / property damage outcomes. All emergency services measure travel delays in minutes and would request transport planners take this into consideration (a 15-minute delay may acceptable for commuter traffic) whilst for all emergency services each minute can be critical.

**Topic Heading:** Sustainable infrastructure and funding

**Question Number:** 55 What infrastructure is required in Luton and how should this be provided for?

**Answer:**

LBC is a partner at the ICS Board and holds joint responsibility under the Health & Social Care Act. An aging population, poor health outcomes require additional public health initiatives and provision of health services infrastructure. Housing and population growth can lead to sever strain on existing, at capacity health services and more infrastructure is required.

Specific recognition in the Local Plan of requirement to expand health facilities and emergency services through utilisation of s106/CIL funding is essential.

The Local Plan will need to show how new developments will support health and emergency services infrastructure. For emergency services improvements to

highway infrastructure consideration of response times should be made, as every minute is critical to the outcomes of individuals and property.

EEAST would request Paragraph 5.277 is amended to:

The Local Plan will need to show how new developments will be supported by existing and new infrastructure including highway infrastructure if required, public transport, walking and cycling, waste, and utilities infrastructure (gas, water, electricity, telecommunications) as well as **health**, social, **emergency services** and community infrastructure such as schools and community facilities.

EEAST would ask the Planning Obligations SPD are updated to include health and emergency services within the scope of developer funded infrastructure and facilities provision. Mitigation is essential to manage via s106/CIL is essential as the impact of planned housing and population growth on service capacity and outcomes.

EEAST therefore, would request CIL/ section 106 contributions are used to mitigate the impacts arising from proposed developments in the Local Plan.

**Topic Heading: Evidence for the Local Plan**

**Question Number:** 58 Is there any other evidence or information we should be collecting to inform the Local Plan? Do you have any suggestions on the scope of the evidence outlined and what it should include?

**Answer:**

Background Information about East of England Ambulance Service (EEAST) which may be useful

East of England Ambulance Service NHS Trust (EEAST) provides both emergency and non-emergency services across Hertfordshire, Bedfordshire, Essex, Norfolk, Suffolk and Cambridgeshire.

EEAST currently has 130 sites across the East of England and is establishing the Lord Carter recommendation to provide a Hub and Spoke Network. Eighteen Hubs are strategically placed near each of 17 local hospitals with good access to the surrounding road network. The Spokes (Ambulance Response Posts) need to be based at strategic locations from the Hub in order to meet the expected demand and meet NHS Contract Quality Indicator Response Times to incidents.

EEAST's purpose-built Ambulance Hubs require circa 1 ha of land and parking space for up to 50 ambulances/rapid response vehicles and support/operational staff (approx 200 staff working 24/7), close to the local hospitals and good road networks. The estates infrastructure can include fuel (including Electric Vehicle Charging). Services may include a local workshop (currently 8 across EEAST) to ensure patient facing vehicles are serviced every 6-weeks to ensure they remain road worthy during the 5-year life of the vehicle. Each workshop also services and

repairs essential capital medical equipment required in each ambulance in order to provide mobile emergency health diagnostic and patient care services. Pharmacy and Digital Technology equipment are also provided from each Hub.

Significant parts of EEAST's ambulance estates are no longer in the right place or of the right size/structure to meet modern ambulance service needs. Optimising the use of the current estate is integral to EEAST's Clinical and Sustainable Strategies to reduce unwarranted variation and make the best use of available resources.

EEAST is an essential social infrastructure provider and has an important role to play in contributing to the achievement of sustainable new places (and along with its health and blue light partners). Given the increasing demands on emergency services and the importance and timeliness required for emergency responses, new developments and Infrastructure Delivery Plans must consider the accessibility and adequacy of all emergency services.

Planned housing, population increases, along with deprivation, age and the increasing number of people living for longer with more complex long-term conditions, all impact on the level of ambulance service demand, in respect of both emergency and non-emergency patient transport services.

Age profile is a key factor, as people at both ends of the age spectrum consume a disproportionately large quantity of healthcare services and resource. Those aged over 75 years are most likely to have multiple long-term conditions and complex care needs.

Analysis of EEAST activity from 2023/24 indicates residents aged 65 years and over account for over 1/3 (35%) of Category 1 ambulance activity and 52% of all activity. Those aged 2-18 years account for 15% of Category 1 activity and 8% of all activity.

Planned development in Luton of a minimum of 8,500 new homes will generate in the region of 20,400 additional residents, (assuming 2.4 residents per dwelling) and on the basis of an ambulance for every 10,000 people, an additional circa 2 ambulance vehicles and associated estate infrastructure will be required to support the population growth.

Luton Ambulance Hub is already at capacity and unable to be expanded to deliver modern paramedic science-based services. Ideally new purpose-built

In addition, more ambulance stations, response posts will be required in the Borough to ensure EEAST can meet the Category 1 (life-threatening) incidents - a response arriving Mandated Mean Target of 7 Minutes. Our target is to get to the incident location ideally within 4 minutes.

Planned housing growth will therefore impact on EEAST's operations within the local area, which are already operating at capacity. Development in Luton and neighbouring areas would therefore lead to an increased draw on ambulance service capacity from the Luton Hub.

EEAST therefore requires CIL/ section 106 contributions to mitigate the impacts arising from proposed development in the Local Plan.

The range of infrastructure and facilities (ambulance facilities) required to mitigate and manage the impacts arising from planned growth are summarised below:

- An relocated and expanded ambulance station within the Luton
- Additional Ambulance Station Response Posts at strategic locations in order to meet population growth and mandated ambulance response times.
- An increase in the number & type of ambulances.

Indicative build costs are set out in the table below. However, please note, these build costs are currently being updated.

<b>Type of Service Development</b>	<b>£/m2</b>
Ambulance Hub cost per £/m2	£5,047 (Cost excludes land purchase, fees, VAT)
Ambulance Vehicle cost per vehicle/ 5-year period	£140,000 (Cost excludes maintenance, servicing, repairs, fees, VAT)