



By Email
Greater Cambridge Council

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

localplan@greatercambridgeplanning.org

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Our Ref Reg18CG/ZM

**Draft Greater Cambridge Local Plan 2024 – 2045 Regulation 18 Consultation
(December 2025 – January 2026)
East of England Ambulance Service NHS Trust Response**

Thank you for consulting the East of England Ambulance Service NHS Trust (EEAST) regarding Draft Greater Cambridge Local Plan 2024 – 2045 Regulation 18 Consultation (December 2025 – January 2026).

EEAST broadly supports the Regulation 18 document. Please find below our comments for considerations.

Cambridge Biomedical Campus Page 19

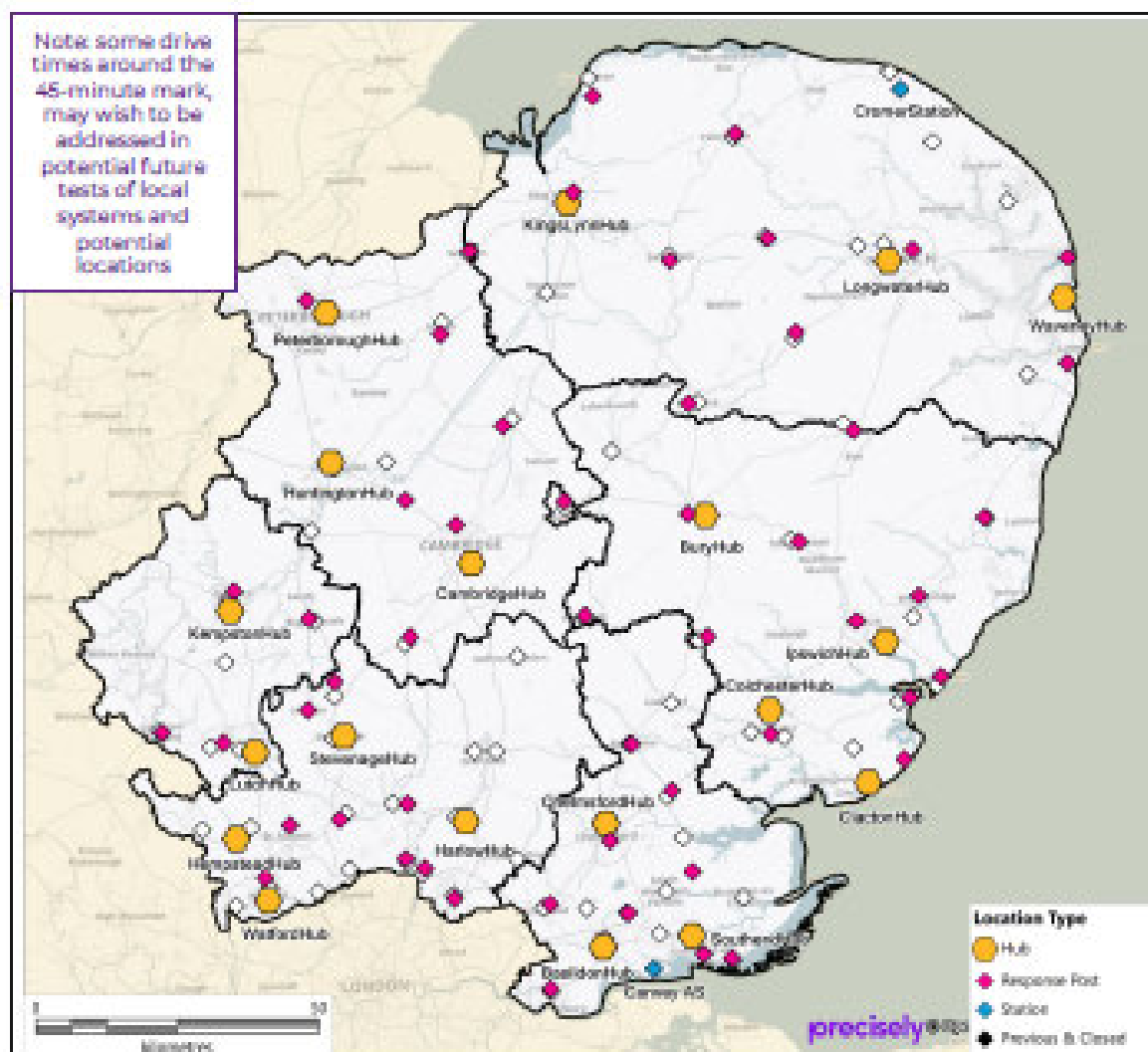
A new purpose-built **ambulance hub** is required for Cambridge and the surrounding areas, ideally in the area of green belt south of the Cambridge Biomedical campus. The right infrastructure would include 1 ha of land to build the ambulance hub with close access to nearby main roads. The new ambulance hub would be designed to enable expansion to allow for population growth for the next 30 years.

A new Ambulance Hub would cost around **£20-£22m** (including land purchase, EV charging infrastructure requirements) (this is the identified cost (each) we have submitted to NHS England for Basildon, King's Lynn and Kempston). This

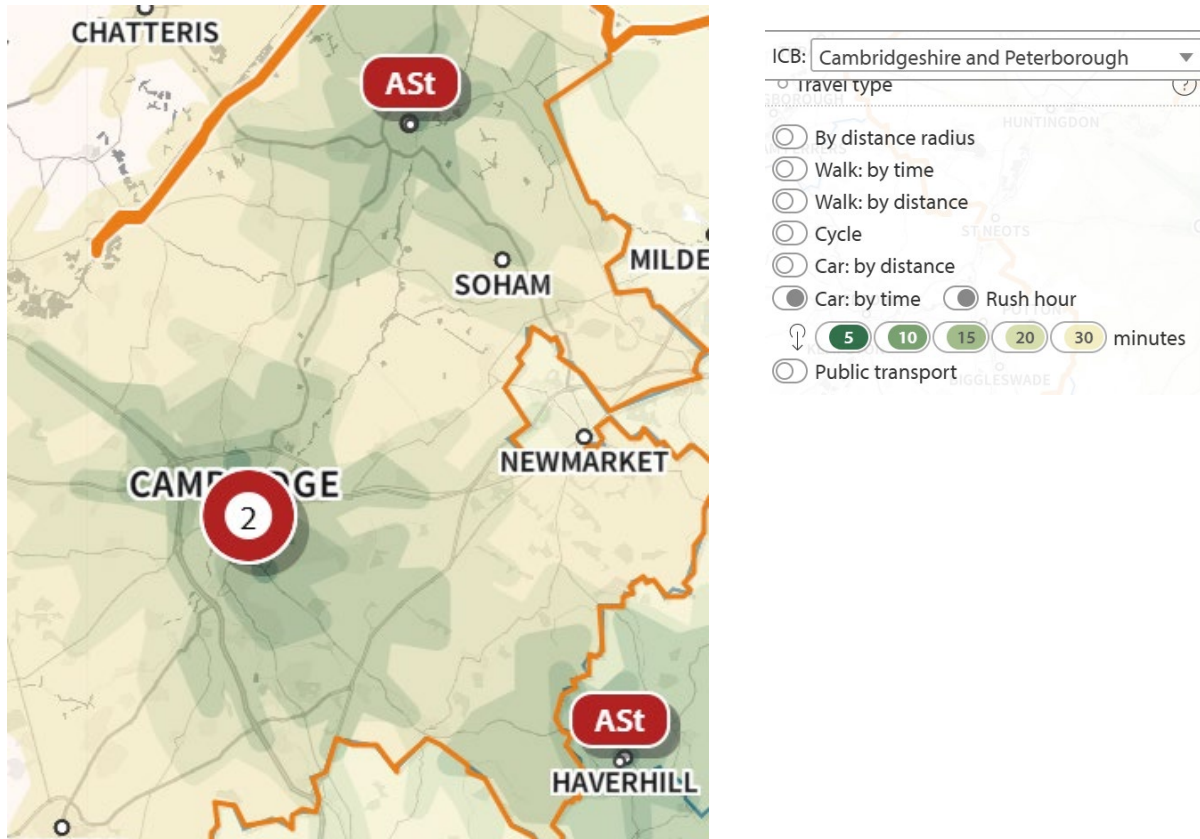
Hub would supply ambulances that would support the following response posts: Witham, Braintree, South Chelmsford, Maldon/South Woodham.

Attached is the recommend locations for new Hubs arising out of the commissioned Eeast Demand & Capacity Review from ORH. This configuration is depending on Eeast moving to a full Central Reporting (Hub and Spoke Model). Hubs would hold all the ambulances for the designated area including EV charging provision at the start of each shift. Response posts are where staff can access rest facilities 24/7 and strategically located to enable response times). Additional EV charging should be available to at hospitals (eg vehicles charged during patient handover) and if required use of rapid public charging bays.

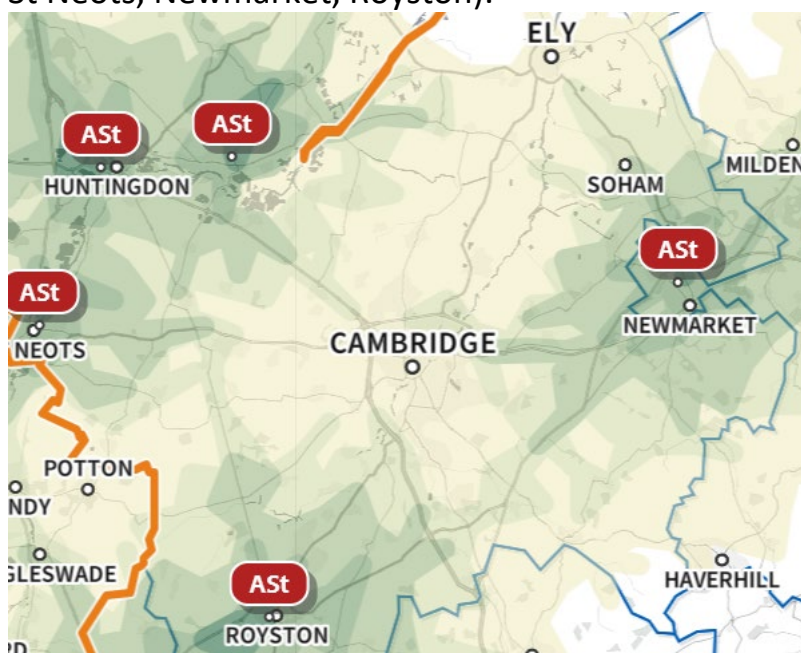
Figure 11-1: Recommended Estates Configuration



Using the ShapeAtlas and locations of current ambulance stations operating from Cambridge Hub and its response posts (North Cambridge, Ely and Haverhill), distances covered within 30 minutes (rush hour traffic) is provided below (NB this is not the exact locations identified in the ORH report):



The following map shows the ambulance stations that will also support Greater Cambridge area, but not likely from the Cambridge Hub (Huntingdon, St Ives, St Neots, Newmarket, Royston).



Policy S/JH: New jobs and homes

48,195 new homes will impact on Health & Emergency Ambulance Services: new development places increased demand on primary care, acute hospitals, mental health services, community care, and particularly emergency ambulance services.

Ambulance response standards are explicitly defined nationally:

- Category 1: average under 7 minutes, 90% of responses within 15 minutes
- Category 2: average under 18 minutes, 90% of responses within 40 minutes.

Research shows emergency demand increases with population growth, especially in areas of deprivation, with millions of unscheduled ambulance contacts annually. Healthcare infrastructure is further stressed by climate-related pressures affecting hospitals, urgent care, primary care and transport links. Specialist housing is welcomed but can further increase demand on health and emergency ambulance services.

Community facilities and infrastructure need to include all emergency services (ambulance, fire and police) and s106/CIL made available to mitigate population growth.

EEAST welcomes the proposal to work with the health sector, and this should include emergency ambulance services. The ICS Estates Strategy does not provide many details of the estate and other requirements for emergency ambulance hubs as this is managed by the lead commissioning ICS. Therefore, direct communication with EEAST is required.

EEAST would request:

- A full Health Impact Assessment covering all NHS services including ambulance capacity
- Assessment of travel time from ambulance stations to the site during peak congestion, as this directly affects Category 1 and 2 compliance.

Transport Strategy 2.88 Page 75

Given that emergency service access is highly dependent on a safe road environment, EEAST supports Vision Zero principles. Health infrastructure

resilience depends partly on safe transport routes, which flooding and poor design can disrupt.

EEAST requests:

- Clear sightlines at junctions and crossings
- Sufficient road width to enable emergency vehicles to pass parked vehicles
- Designing road/rail infrastructure to reduce incidents and
- Speed-reducing design features (gateways, lighting, junction tightening)
- Safe, accessible cycle parking for all cycle types (e-bikes, trikes, reclining, mobility scooters) and also need that disabled or older people may not have the strength to lift cycles onto racks
- Permeable surfaces that can be used by wheelchairs, mobility scooters, pushchairs, walking aids) and reduce localised flooding
- Lighting designed to reduce crime and improve perceived safety whilst supporting nocturnal habitats.

EEAST would advise speed humps/cushions can create issues for emergency ambulance services when responding under blue light conditions. This includes issues such as hindering delivery of clinical care and may contribute to damage to emergency ambulance vehicles and staff.

Emergency Response Times, Transport Network & Blue-Light Access

Congestion is one of the most significant contributors to ambulance delay. Evidence shows:

- Each 1% increase in congestion adds one second to ambulance response times.
- During COVID-19 lockdown (when congestion fell dramatically), London ambulance response times improved by 47 seconds to 2 minutes 39 seconds, depending on call type.

EEAST requests:

- A transport assessment explicitly modelling blue-light travel times
- No design element should obstruct emergency access (eg parked vehicles, pinch points, shared surfaces, traffic calming measures as these impact time taken to traverse a speed hump - each hump can add 8–16 seconds, driver behaviour to divert avoid Interfere with CPR and life-saving treatments, Increase pain and risk for patients with spinal injuries, fractures or trauma)

- Full swept-path analysis demonstrating unrestricted ambulance movement for all ambulance types including bariatric, multi-victim and standard van ambulances.
- Connectivity between locations – any pedestrianised areas need to ensure there are refuge places for pedestrians to safely stand to allow transit of emergency vehicles. Connectivity between housing and industrial estates for emergency services is also vital as every seconds delay could adversely affect life, long-term health outcomes and property.

Universal Studios site in Bedfordshire

EEAST would recommend consideration of the impact of additional car travel arising from visitors travelling to the proposed Universal Studios site in Bedfordshire. More traffic is expected on major routes, including A14, A421/A428. Increased rail usage may also arise as a result of this development.

Meeting the needs of older people and people with disabilities

Fully support policy and would seek further strengthening of the policy to ensure accommodation is designed with ergonomics in mind and garages/storage facilities meets principles for that can support a wide variety of wheelchairs and mobility scooters. Lifts should be fire insulated to enable effective entry and egress.

The needs of adults, children and older people with disabilities but not wheelchair users should also be considered. This might include provision of seating at regular intervals to allow people to sit and rest before continuing with their journey, provide mental health benches and benches at different height levels for children and those who have difficulty lowering/rising.

Street play areas should integrated facilities for disabled children (physical and/or mental health) and be accessible for adults who may be disabled (physical and/or mental health) who are supervising children.

The number of people living with dementia in the UK is expected to double between 2025 and 2050 to almost 2 million. This is a significant challenge for the NHS and is forecast to cost the UK economy £42bn in 2024, rising to £90bn in 2040. The council should consider developing dementia ready housing as

part of its IDP. West Yorkshire Combined Authority has created a guidance document on dementia ready housing: [Dementia-ready housing](#).

As part of the NHS Plan is to enable people to live in their own homes for longer, where new homes or apartments are being built, consideration should be given to those who maybe already be disabled or have difficulty climbing stairs so people can live in their home for longer (eg due to aging or acquired injury/disability).

Ensuring new builds have some ground floor bedrooms as standard or have sufficient space to retro fit an internal lift (rather than a stair lift) so upper floors can be accessed would support residents remaining in their home for longer.

Consideration that not all disabled people are wheelchair users but may still have difficulty negotiating stairs/accessing outdoor or communal spaces.

Public Space Page 105

EEAST supports the proposals and in addition to the points raised under *Transport Strategy 2.88 Page 75*, would encourage the development of dementia friendly streets, shared space design to promote inclusive access and safety.

Secondary streets: provide sufficient road width to enable emergency vehicles to pass parked vehicles.

Car-free Zones: provide easy access and egress for emergency services in pedestrianised areas which include sufficient space for public to stand clear of moving emergency vehicles.

Access for Helicopter Emergency Medical Services (HEMS)

HEMS support EEAST in delivering high level critical care and transportation to specialist hospitals for patients that have severe or life-threatening injuries and medical conditions. To accommodate the different airframes that operate in this region, an equivalent size of a football field would be required to support both day and night landings. This space needs to be free of overhead and ground level obstacles eg trees and overhead cables and ideally be centrally located within

the development with easy road access to and from. It would be preferable if lighting was available for the helipad, but as a minimum could easily be included in developers existing plans for open, leisure or sport space.

10 Spaces for community food growing, informal play, and health-focused green spaces within every neighbourhood.

Green space improves resilience to environmental stress, supports mental wellbeing and mitigates the health impacts of climate-related hazards. Evidence shows flooding and environmental change can worsen mental health, reinforcing the value of natural and restorative environments.

In addition to the points in the IDP, EEAST recommends for both physical and mental health and wellbeing:

- Community gardens, orchards, allotments and wildlife corridors
- Seating areas for those with limited mobility
- Consideration of sensory planting (sight, touch, smell, sound, taste) to promote wellbeing.

Wider Connectivity Requirements Page 107

Ensure transport corridors need to ensure access for emergency services in and between neighbourhoods. Provision of access for emergency services at regular intervals to access the Guided Busway/Railways in the event of an incident.

Design of bridges should consider the use of curved walls to increase safety and reduce the ability of death by suicide. Underpasses should be well lit and feel safe for uses at all times of day and night. Use of bright colours and designs can also improve mental and physical health.

There needs to be awareness that not all health and emergency services can be provided locally due to capital and revenue cost implications. The NHS 10-Year Plan aims to provide more health service in communities and this will require a strategic change for health facilities and where services are provided from outside of the acute setting. This may be in a community hub or existing health care facility.

For emergency ambulance services, the 10-Year NHS Plan commits to only conveying to hospital where necessary and increase the volume of “Hear and Treat” which are provided from regional Emergency Operations Centres (EOC) which EEAST aims to provide from 2 centres in Norwich and Chelmsford.

Car Parking Strategy Page 108

To support move to Carbon Net Zero EEAST would request an EV charging strategy is developed to enable public organisations to have access to centralised EV charging locations. Local authority, health, social and emergency vehicles should maximise usage of each other’s charging resources such as those provided by private providers and bus companies. They would need to be of sufficient width to accommodate these vehicles and be without penalty for repeated usage.

Policy CC/FM: Managing flood risk

Flooding significantly affects residents physical and mental health in both the short and long term. Systematic reviews show consistent increases in PTSD, depression and anxiety after flooding events.

Evidence that flooding disrupts healthcare systems and emergency access, damaging infrastructure and increasing demand.

EEAST therefore requests:

- Sustainable Urban Drainage Systems (SUDS)
- Permeable paving accessible to mobility aids
- Greywater harvesting via water butts or underground attenuation
- Swales and flood-protection features in Zones 2 and 3
- Care homes should NOT be located in Flood Zones 2 or 3 unless they include a fully independent evacuation plan that does not require emergency service intervention
- Community centres should not be built in Flood Zones 2 or 3 as they are often used as places of refuge
- Health and emergency services buildings should not be built in Flood Zone areas 2 and 3.

Managing flood water

Consider that as areas become more built up, the risk of localised flooding is likely to increase above the 1% annual flood risk probability.

Emergency ambulance services have to use specialised vehicles (including onboard equipment such as life jackets) and trained staff to support flood/water related incidents and these sites are strategically located around the region and may not be local to Greater Cambridge area.

Policy CC/RE: Renewable energy projects and infrastructure

Should any data centres be built in or adjacent to the Greater Cambridge to utilise capture of heat generated to support industry or domestic heating.

Policy GP/QD: Achieving high quality development

EEAST fully supports the proposals as quality design which builds in nature conservation helps the physical and health and well-being of residents eg interesting and varied roof lines, mental health benches, places for those with mobility issues to rest and enjoy the views (both blue and green). Include as part of residential and commercial design places for nature to be incorporated into the buildings (eg Swift nesting boxes), fencing (eg hedgehog shelters/gaps, planted living walls instead of fencing). All of these help residents to enjoy nature and provide nature corridors.

Scooter/mobility scooter parking also needs to be included (and not just in care homes/specialist housing) with safe charging options to prevent the potential risk for fires. Similar issues should be considered for electric wheelchairs which are used indoors and provision of charging facilities.

Ensure sufficient parking spaces/road width and design to enable emergency vehicles to pass safely without delaying attendance on a call. Similar issues exist for refuse lorries.

EEAST recommend building all homes and commercial buildings to BREEAM standard or PASSIVHAUS. As a minimum EEAST recommends the proposed 40% affordable/social housing are built to Passivhaus or BREEAM Excellent

standards, as this would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.

EEAST would also request ensuring modern building construction does not impinge on phone/broadband signals – thereby requiring boosters which use more energy. A policy which supports homes and commercial premises are built for modern connectivity as the more equipment requires the use of internet/WiFi.

Modern Methods of Construction are able to utilise schemes such as Prisoners Build Homes which have successfully reduced reoffending rates, provide skills and employment post release. Similar schemes exist for those preventing and entering the justice system.

Defibrillator (AED) Provision

Given the national push toward early intervention and the ambulance sector's expanding role in community public health, defibrillator installation is a critical feature.

EEAST would request:

- S106 funding for community AEDs, including:
 - AED device
 - Heated, outdoor-rated cabinet
 - 10-year consumables and maintenance
- Placement near power sources and high-footfall areas
- An AED every **800 meters** (best-practice community resuscitation standard).

Open Space for Landing of Helicopter Emergency Medical Services (HEMS)

Helicopter Emergency Medical Services (HEMS) support EEAST in delivering high level critical care and transportation to specialist hospitals for patients that have severe or life-threatening injuries and medical conditions. To accommodate the different airframes that operate in this region, an equivalent size of a football field would be required to support both day and night landings. This space needs to be free of overhead and ground level obstacles eg trees and overhead cables and ideally be centrally located within the development with easy road access to and from. It would be preferable if ground lighting was available for the

helicopter to land, but is not essential. As a minimum helicopter landing could easily be included in developers existing plans for open, leisure or sport space. Ambulances and critical care vehicles are often used to transport patients to the helicopter landing site.

Policy H/AH: Affordable housing

Whilst the EEAST understands affordable rented housing should be prioritised, we think identifying NHS and emergency services staff (both clinical and administrative) as key workers. Key worker housing is a very important part of staff retention in and around NHS properties

Policy I/DT: Digital and telecommunications infrastructure

EEAST would highlight the need for increasing demand for digital connectivity for emergency services and direct links to hospitals.

The ability for rural areas to have access to superfast broadband as this will help farm/rural live diversification and building of business that will help keep employment local to smaller villages, hamlets and individual farms.

EEAST looks forward to liaising with Greater Cambridgeshire and further developments of the local plan.

