

Objection by Bristol Walking Alliance to Planning Application: 18/04977/P UHB Transport Hub

The UHB Transport Hub planning application is based on an inadequate assessment of future travel needs. In particular, despite its 'Transport Hub' branding, it is dominated by provision for the private car – a mode of transport that must be of lesser importance in urban areas in the future. Bristol Walking Alliance (BWA) would like to see more emphasis on sustainable travel and better use of public transport as well as better provision for those accessing UHB hospitals on foot.

Sustainable Travel

In planning application 18/04977/P, University Hospitals Bristol NHS Foundation Trust (UHB) proposes a new multi-storey car park to replace residential flats. This is motivated by the existing problems for those travelling to the BRI, mainly by private car.

If Bristol City is to meet its agreed goal of becoming carbon neutral by 2030, there must be a much greater emphasis on sustainable travel, including walking, cycling, public transport and shared use of private transport.

The proposals offer better facilities for cyclists, and claim that they will encourage walking as well, but we can see few signs of the benefits for pedestrians.

BWA would like to see the following:

- Much better pedestrian access to, through and around the UHB hospitals.
- Better connectivity to public transport, especially bus services.
- A people-focused transport interchange, without excessive car parking.

In the following sections we look at the proposals contained in the planning documents in more detail.

Planning Statement

In 2.1.1 it says that UHB currently has 300 car park spaces for patients and visitors. In 2.1.15 it says that whilst 820 car parking spaces are being proposed, 192 spaces will be lost through the development proposals, giving a net increase of 628 spaces. In 2.1.26 it says that the proposed 820 new car parking spaces would only be available for patients, visitors and a proportion of staff and that technology could be used to restrict access to those with appointment letters.

We believe that the needs of patients travelling to and from the hospital should be put before those of staff and visitors. This is because patients are more likely to be frail and so require more time and care when travelling, and also because the effects of patients missing appointments can be detrimental to the effective operation of the health service.

We object to the proposed excessive increase in the number of car parking spaces, due to the additional emissions the cars would create that will have a detrimental impact on climate change and on air pollution and hence on health for those living and working in the city and for those coming to the hospital. Rather, we would encourage the use of technology, as proposed in 2.1.26, to limit access to car parking spaces to those with hospital appointments who cannot travel by public

transport, or to those who use electric vehicles and therefore do not contribute to city centre pollution, or to blue badge holders.

We disagree with the point made in 2.1.23 that the car parking element would not result in any more vehicles on the network than currently exist. It is inevitable that, if more parking spaces are provided, more cars will try to enter the city centre, contributing to increased congestion and emissions.

Travel Plan

The Updated Travel Plan that accompanies the application has a number of shortcomings. The section on **Access by Walking** does not mention any of the drawbacks of trying to access the site on foot. These include:

- The hilly nature of the location (acknowledged in Design & Access Statement page 2.07: “Existing steep topography & poor permeability restricts movement across the site”).
- The uphill walk from the centre.
- The limited number of entrances to the main hospital.
- The complex pedestrian routes through the buildings.

The sections on **Access by Bus** and **Access by Rail** do not cover the problem of getting to the site from bus stops or railway stations.

- Very few bus services pass directly by the site in Upper Maudlin Street.
- For many services the nearest bus stops are in Lewins Mead / Rupert Street / Haymarket, which are at least 450m away from the main BRI entrance.
- The free shuttle bus service only operates 2 trips per hour at the maximum, it stops running before visiting hours end, and it does not operate on weekends.

The Travel Plan states (4.13) “it is considered impractical to provide quantitative visitor / patient targets to measure the effectiveness of the Travel Plan”. This undermines any attempt to model the travel behaviours that would allow evaluation of the current proposals or of alternative measures.

The goal of the Travel Plan (4.14) is therefore only “to provide information to visitors and patients over the lifespan of the Travel Plan, to encourage regular trips to be undertaken by walking, cycling and by public transport through effective user based journey planning”.

Sustainability Statement

The Sustainability Statement does not consider the impact on climate change and on health of providing more car parking spaces in the city centre.

No account has been taken of the effect of a potential Clean Air Zone or of potential congestion charges that the City Council may introduce in the city centre to limit the harmful effects of traffic on those who live or work in the area.

Transport Assessment

We accept the need to provide for patients who are frail and unwell, and we accept that public transport for these patient groups is often inappropriate and inconvenient. The Transport Assessment (in 1.8) states that 32% of those who drive to the hospital do so for medical reasons.

However, we challenge the calculations of the number of new car parking spaces needed.

The evidence given in the planning documents does not seem internally consistent. For instance:

1) The parking standards set out in Table 2.1 (section 2.21) show that at most one visitor vehicle parking space should be provided for every 3 bed spaces. The number of bed spaces is declared (in 6.11) to be 899. Therefore at most 300 visitor parking spaces would be required, with an additional 10% (i.e. 30 spaces) to accommodate disabled users.

2) The Transport Assessment (in 5.21) states that “UHB currently has 300 car park spaces for patients and visitors.” It also (in 6.31) states that “The 2018 Travel Survey recorded that a quarter of patients and visitors who drive to UHB facilities fail to find a space in UHB car parks.” In other words, by providing an additional 100 UHB car park spaces, all patients and visitors would be able to find a space on the assumption that their visits were evenly spaced through the day.

3) It says (in 6.10) that 2,135 patients per day travel to UHB facilities by car, and (in 6.13) that 507 visitors do the same. So if priority were given to patients, the number of spaces could be reduced by almost 20%.

4) The forecast vehicle trip generation profile (in 6.19) estimates 257 patients will check into their appointments during the peak of 8am-9am. However, Appendix E shows that in 2017/18 the maximum number of patient appointment arrivals in this interval was 136 (and average was only 59). This reason for this large over-estimation in the forecast trips is not explained.

Based on the conflicting evidence presented, we do not accept the proposition that an additional 628 car parking spaces are required to meet the needs of patients.

The parking standards of Table 2.1 suggest 10% of spaces should be available for disabled users. If additional spaces are to be provided, and given the need to prioritise access for those with frailties or disabilities, **we do not accept that the 34 spaces allocated to blue badge holders would be sufficient.**

Pedestrian Access

The existing pedestrian environment around the UHB site is very poor. In addition, proposed improvements to the pedestrian access to the Transport Hub are totally inadequate.

The proposals suggest most hub users must walk from the Transport Hub, down Marlborough Hill Steps, along Marlborough Street and Upper Maudlin Street to reach the main entrance of the BRI. This so-called 'Healthcare Corridor' is a distance of at least 200m without shelter, along a pavement next to the noise and air pollution of constant high flows of motor traffic.

The steps make this route inaccessible to those using wheelchairs and mobility scooters, as well as very challenging for those with other mobility issues. The alternative without steps would be to proceed along Eugene Street, Montague Hill South, Dighton Street, Marlborough Street and Upper Maudlin Street, a total distance of at least 400m over hilly terrain without shelter, and with a steep incline on Montague Hill South.

Whilst we accept the need to provide for patients who are frail and unwell, the proposed car park leaves them with a long, difficult and unpleasant route to access the hospital itself. The planning

application documents do not explain why the east side of the BRI site could not be adapted to provide for direct public pedestrian access from the proposed car park.

The shuttle bus stop is on the far, uphill side of the proposed car park, so adding at least a further 100m walk over inclined roads for passengers to reach the top of Marlborough Hill Steps. No shelter is indicated for those waiting for the shuttle bus.

The proposal that Eugene Street should be a shared space between pedestrians, cars accessing the car park and delivery vehicles is unacceptable. Shared space is problematic for pedestrians and especially those who are frail, disabled or have visual impairments. It seems especially irresponsible to propose shared space around a hospital.

Conclusions

Bristol Walking Alliance believes that, as far as possible, travel to the hospital should be made more sustainable and convenient by:

- Enhancing the pedestrian environment around and within the hospital.
- Providing a transport interchange where pedestrians can catch buses, taxis and future on-demand transport services in a sheltered environment that has direct, sheltered, level access to the hospital buildings.
- Offering more frequent modern shuttle buses to and from key bus stops and railway stations, extending coverage to evening and weekend visiting hours.
- Limiting car parking to those with most need.

We **do not** oppose the following aspects of the proposals:

- Improvements to Marlborough Steps.
- Providing facilities for cyclists and cycle parking.
- Replacing existing car parking spaces with the equivalent in a better serviced location.
- Limiting parking to those with the greatest need, such as patients and the disabled.

However, we **do oppose the overall planning application** because we believe that the proposed net increase of 628 parking spaces cannot be justified, either on the basis of need, or on the consequent increase in pollution affecting climate change and health.

In addition, the proposals do not adequately address other aspects that would be expected to be part of a 'Transport Hub', namely:

- Flat, sheltered access to and through the hospital buildings.
- Sheltered bus stops for single and double-decker service buses.
- Pick-up and drop-off points for taxis and other future on-demand transport services.

Bristol Walking Alliance
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