

**Statement to B&NES Cabinet on East of Bath Park and Ride, 25 January 2017**

*[I am Caroline Kay, Chief Executive, Bath Preservation Trust, a charity whose remit covers both the City of Bath and the green countryside around it].*

Others will speak convincingly about unproven need and environmental harm - points BPT agrees with. Instead I will tell you a cautionary tale from history.

In 1934, the then Bath Corporation promoted the 'Bath Bill', proposing various radical alterations to the City. A letter to the Times drew attention to the way the Bill had been passed by the Corporation through reading a summary of information, rather the details of the proposal. A national scandal ensued, the Bath Bill fell, and the Bath Preservation Trust was born.

You risk falling into your predecessors' trap with the report before you. It is misleading, and incomplete and inaccurate. I will give you just some examples of each.

**First, misleading.** Paragraph 8.1 says that the Inspector of the Placemaking Plan accepted that a need was established. The Inspectorate has since confirmed that (I quote) '**this is the Council's interpretation**'. What the Inspector did accept was that convincing **proof of need** would be required for any planning application.

It is also misleading to suggest that mature deciduous trees can screen the development, given light spill, all-round views from high points and the winter setting.

**Secondly, incomplete.** Amazingly, in the list of adopted policies, your own World Heritage Site Setting SPD is not mentioned. Also, there is no reference to the adopted 2009 UNESCO mission report. That report recommended that

- *the State Party (ie UK government) act on the reinforced protection of the surrounding landscape to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the property.*

In its response to UNESCO, the Government agreed that the green countryside was an essential part of the OUV, that key views were defined from the ridgelines around the City, and that the protection of this countryside - which includes sites B&F- from harmful development was a responsibility of the planning process.

**Thirdly, inaccurate.** The map in Appendix 1 shows sites B&F outside a red line described as the boundary of the World Heritage Site setting. In fact, the red line is the boundary of the World Heritage Site itself. Map 2 in the WHS Setting SPD shows the indicative boundary of the SETTING - and sites B & F are well within it.

There is a positive end to the Bath Bill story. In 1937, the Bath Corporation Act was passed, which is now quoted as a visionary and trend-setting piece of legislation establishing the principle of identifying heritage assets which should be protected, 10 years before the introduction of the national listing system.

The solution you have here is not, as B&NES' tagline has it, 'beautifully inventive'. It is unbeautiful, ill-founded and retrograde, looking at a 1970s solution to a 21<sup>st</sup> century problem. It potentially risks referral to UNESCO, following hard on the heels of the possible referral of B&NES's South Quays development.

So my question to you is, do you want to base your decision on a flawed, incomplete report which promises much but will not actually deliver? Or do you want to learn from history, be innovative, and think again?

Caroline Kay  
[ckay@bptrust.org.uk](mailto:ckay@bptrust.org.uk)

 @bathprestrust

Personal mobile 07947 027 308