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Yet another of the many issues ignored by the Council, in its obsession with an Eastern Park and Ride, has been the impact on the setting and outstanding universal values of the City of Bath World Heritage Site. The site is immediately outside, and adjacent to, the WHS eastern boundary, and an intimate and important part of its setting. Protection of the setting of the WHS is integral to the protection of the WHS itself.

In its adopted policy and guidance documents, the council commits itself to "Maintain and enhance the Outstanding Universal Values of the City of Bath World Heritage Site".

Pertinent among these Values, one stands out in the present context:

The green setting of the City in a hollow in the hills.

Priorities for action in the WHS management plan include:

- Continuing to explore ways to preserve the setting of the World Heritage Site.
- And to ensure new development does not harm the values for which the site was inscribed.

UNESCO has further recommended:

- ... enhancement of the protection of surrounding landscape to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the property;

BaNES Plan Policy BH4 says.

- ***There is a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, its authenticity or integrity. This presumption applies equally to development within the setting of the World Heritage Site. Where***

development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against the level of harm to the Outstanding Universal Value of the World Heritage Site.

You have consistently and signally failed to demonstrate any kind of benefit to weigh against the very considerable harm that would result from this proposal, or that a Park and Ride would constitute sustainable development. As to mitigating or adapting to climate change, Park and Rides are now known to increase car usage overall, and reduce local bus service usage. In this and damaging ground water regimes, such development is in clear breach of such aspirations.

In your own settings SPD you acknowledge:

'that 'Substantial harm to, or loss of, designated heritage assets of the highest significance, notably...World Heritage Sites, should be wholly exceptional'

In the your own World Heritage Management Plan endorsed on 15th September 2016, you commit yourselves to

"ensure that the outstanding universal value of the site and its setting is understood, protected and sustained...Whilst the boundary of the site covers the whole city, it also includes the setting of the site in the countryside immediately beyond.

Objectives and actions of the plan identify, *inter alia*, the need to "work to control traffic growth and harm, and encourage and promote less car use, especially in the city centre".

and to "support actions to reduce air pollution, primarily caused by petrol/diesel powered vehicles, which is a direct risk to people & historic fabric within the WHS"

None of these aims and or objectives can be met by a Park and Ride

Not only have you failed to show that this can be sustainable development, but you have ignored all academic and government research and advice showing that Park and Ride is an out of date concept which can be shown to be, and indeed is, unsustainable.

This supports the view many observers now take, that the cabinet merely wishes, by any means possible, and on any spurious grounds it can find, to export city centre parking spaces, destroyed by its own developments, into the countryside.