

Policy and Regulation Team
Vantage House
Washingley Road
Huntingdon
Cambs
PE29 6SR



23 September 2018

Dear Madam/Sir

Re: PR0480

Proposed Residents' Permit Parking Scheme- Victoria Road Area, Cambridge

I am writing to say that I strongly support the proposed scheme.

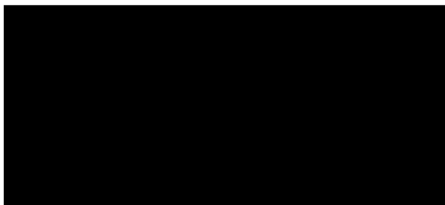
My preference would be for a **city-wide approach**: as the enclosed document "On-Street Parking" by Smarter Cambridge Transport argues, this is:

- More effective in reducing congestion
- Less divisive
- Proven to have worked in other cities (including Oxford, Bristol and Edinburgh- *"despite initial resistance, parking controls have proved to be popular with residents and beneficial to those cities"*)

However, in the absence of a proposal for a city-wide approach, as a resident of [REDACTED] I support the implementation of the Victoria Road Area scheme.

On a technical point, I am unsure why the restricted period has been proposed as 9am-5pm Monday to Saturday when the adjacent residents' permit parking scheme (Castle East) is 9am – 6pm Monday-Saturday. It seems more logical and easier to enforce if it is the same in both areas.

Yours faithfully





<https://www.smartertransport.uk/street-parking/>

On-Street Parking

- Four new residents' parking zones have achieved the 50% level of support needed to proceed to go forward as Traffic Regulation Orders: Accordia, Staffordshire, Newnham, Coleridge West.
- A new residents' parking zone in the Morley area of Queen Edith's was launched in November 2017.

Overview

On-street parking is not just about residents being able to park close to their homes: it's about safety, fair access to a limited communal asset, and the right to clean air. Free commuter parking contributes to congestion and pollution. It also undermines public transport, including park-and-ride and rural bus services.

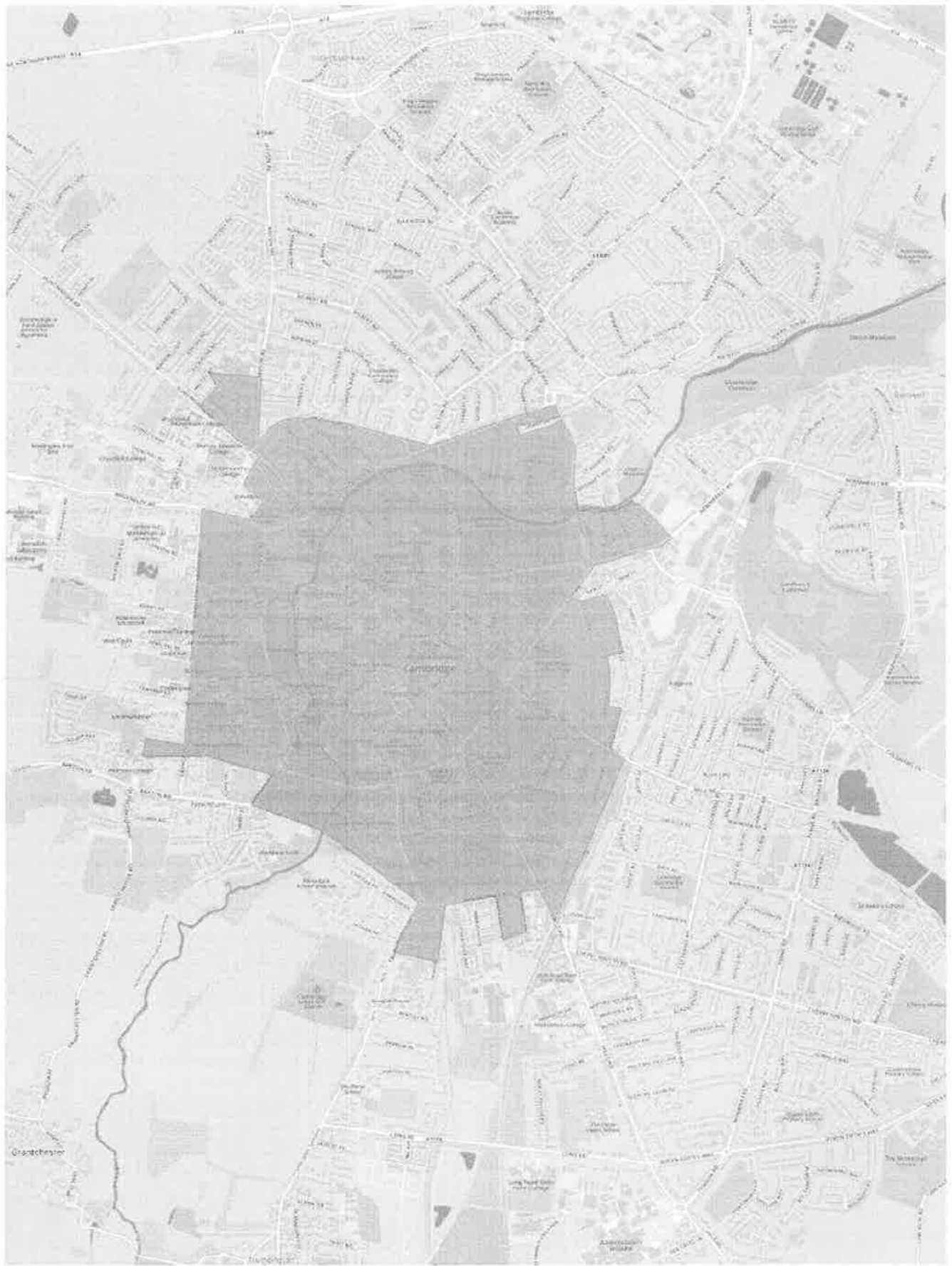
If we get parking controls right, we will reduce congestion and pollution; there will be less justification for building new bus lanes; more car drivers will be contributing to the costs of managing and maintaining city roads and car parks; and more people will use alternative modes of transport. Inconvenience to city residents and businesses can be minimised by tailoring neighbourhood parking schemes to local circumstances.

This paper sets out a menu of parking controls that could be used, and a new process for implementing them that allows people to experience and adjust the controls before being committed to them.

The current situation

There are currently fourteen residents' parking zones in central Cambridge. These limit parking to residents between the hours of 9am and either 5pm or 8pm, and either six or seven days a week. The cost (2015-16) ranges from £52 to £81 per vehicle per year, with day permits for visitors costing £1.60. These zones typically include some pay-and-display parking bays and other controls limiting the hours or duration of free parking.

Extending residents' parking requires the majority support of residents within a viable zone. Some areas have, over a number of years, tried repeatedly and failed to garner the required majority support, especially from those who do not believe they will benefit because they have off-street parking.



Approximate extent of existing parking controls in the city (residents parking, pay-and-display and yellow lines)

This process of iterative expansion of residents' parking, common to most UK cities, invariably pushes a problem onto a new set of residents and only marginally reduces congestion. A city-wide approach is more effective and less divisive. Some cities have already demonstrated that this approach works, including Oxford, Bristol and Edinburgh: despite initial resistance, parking controls have proved to be popular with residents and beneficial to those cities.

The problem of commuter parking is now acute in many parts of the city, so a co-ordinated rather than piecemeal response is needed urgently.

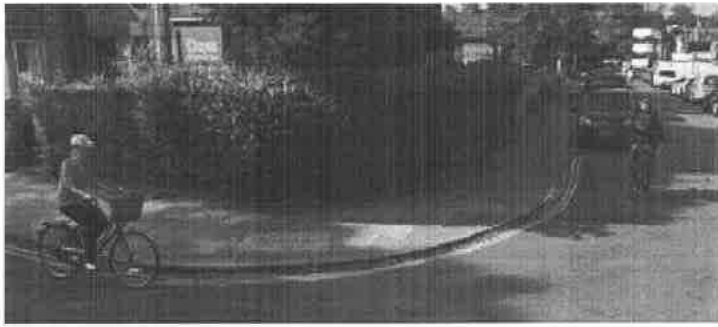
Parking as a transport issue

Any review of parking controls needs to be set in the context of transport within the city, and people's transport choices:

- The availability of free parking attracts cars into city, contributing to congestion and pollution.
- This has become more evident since the introduction in 2014 of a £1 charge to park at Park & Ride sites. According to the County Council Traffic Monitoring Report 2015, Park & Ride passenger journeys in 2015 numbered 3,183,708, a 17.6% decrease on the 2011 peak of 3,862,927. That fall equates to an average of 1,860 customer journeys per day, most of which are now being made by driving and parking in the city instead.
- All wards that do not currently have residents parking restrictions are affected, especially those within walking distance of the city centre, Addenbrooke's, Cambridge train station and, from May 2017, Cambridge North train station.
- No figures have been published for the numbers of commuter vehicles parking on residential streets, but extrapolating from anecdotal figures it is likely to be in the low thousands.
- 'Cruising' in search of parking spaces adds vehicle mileage, also contributing to congestion and pollution.
- Free commuter parking competes with bus services and park-and-ride. In the worst case it makes services unviable for a commercial bus operator without public subsidy.
- Free parking also competes with council-run car parks. Nobody likes to pay to park, but city roads are expensive to manage and maintain: paying for parking is a fair way for road users to contribute to those costs.

Reducing or eliminating free commuter parking will therefore **reduce congestion and pollution**, and **create demand for public transport**. Reduced congestion in the city will make bus services more reliable. The net effect will be to start a virtuous circle of more convenient and reliable bus services attracting more passengers, creating demand for an expansion in services.

Making roads safer for all



Cyclists rounding the corner from

Glisson Rd into Gresham Rd are forced out into the path of oncoming traffic by cars parked close to the corner.

Parking close to junctions and corners creates a hazard for all road users, especially people on foot or cycle, a fact that is recognised in Highway Code Rule 243 ("Do not stop or park opposite or within 10 metres of a junction ..."). Therefore all parking provision within ten metres of a junction, blind corner or pedestrian crossing should be reviewed for removal.

This is also the 'dooring' danger where an inattentive occupant of a parked car opens their door in the path of someone cycling past. This is especially dangerous on busy routes where people are forced by overtaking traffic to cycle close to parked cars. All parking on busy roads, especially on the signed primary cycle network, should be reviewed for possible removal.

Types of parking controls



Example of a limited-wait notice

- Double yellow lines – *easy to identify infringements.*
- Single yellow lines (no parking between specified hours) – *easy to identify infringements and cheaper to monitor than double yellow lines.*
- Time-limited waiting with no return within a specified number of hours* – *most suitable for retail and amenity parking.* Davy Road in Cambridge has bays limiting parking to four hours for the benefit of visitors to Coleridge Recreation Ground; the rest of the road fills with commuter cars.
- Disc parking – *same as time-limited waiting but drivers display a disc showing their time of arrival.* Harrogate Borough Council and Scarborough Borough Council operate this scheme.
- Residents-only parking between specified hours (can be a one-hour restriction) – *see below.*
- Pay-and-display.

- No parking on one side of the road in the morning, the other in the afternoon – *easy to identify infringements*.
- No loading/unloading at any time or between specified hours.
- Restricted-use bay (e.g. for loading or buses) – *see below*.



Disc parking

*This can be challenging to monitor because the enforcement officer has to record all the vehicles parked on each pass, and identify any that were there on a previous pass. Disc parking offers a practical solution, where drivers must display their arrival time, either using a cardboard disc issued by the council or simply by writing on a piece of paper.

Restricted-use bays

- Loading bay – needed for commercial and home (parcel and supermarket) deliveries; also desirable for residents when their nearest available parking is some distance from their homes (an issue if parking is removed from arterial roads).
- Car club bay – for Zipcar or other car-sharing service.
- Bus bay – for local bus services to stop.
- Coach bay – for coaches to load/unload.

Parking in residential streets

There are essentially three approaches to giving residents priority access to on-street parking:

1. Reserve spaces exclusively for permit holders during the day. The hours chosen depend on when there is a demand for parking from commuters, shoppers and other visitors.
2. Reserve spaces exclusively for permit holders for just an hour or two during the day. This is sufficient to deter all-day parking by commuters. Wandsworth Borough Council uses this approach.
3. Apply general restrictions (e.g. limited wait or pay-and-display), but grant permit holders an exemption. Oxford City Council permits residents in some zones outside the city centre (e.g. Marston South) to park without limit in 1, 2 or 3-hour limited-wait bays.

One-hour residents-only

Reserving parking for residents for a single hour offers two advantages for residents:

1. Visitors and contractors do not need a permit if they can avoid parking during the restricted hour.
2. Permits can be cheaper because enforcement is easier.

The cost of enforcement is roughly proportional to the number of times a zone is patrolled. A one-hour restriction need only be patrolled once, which requires far fewer person-hours than existing eight- and eleven-hour restrictions, which may need to be patrolled hourly. If contiguous one-hour zones have sequential hour restrictions (Zone A: 10-11am, Zone B: 11am-noon, Zone C: noon-1pm, etc.), a single Civil Enforcement Officer can easily cover several zones in a day. It is therefore reasonable to believe that a permit in a one-hour residents parking zone would cost significantly less than a city centre permit.

Visitor permits

If residents could register their visitors online (see *Virtual permits* below), they could be offered a range of prices for short to long stays, and could be valid in any or all of the following types of bays: residents-only, pay-and-display or limited-wait.

Pricing of permits

The Parking Policy Review in 2016 introduced ways that pricing of residents' parking permits could incentivise desirable change:

- Tiered pricing for second and third cars would disincentivise owning multiple cars and could encourage greater usage of car-sharing and Zipcar-type services. Could the council signal their intention to Zipcar so that they might increase the number of cars available?
- Offering a reduced rate for low-polluting* vehicles may make sense in the short term, but could undermine efforts to reduce car ownership and usage, especially as hybrid and electric vehicles become ever more affordable.
- Consideration should be given to charging a higher rate for long or heavy vehicles.

*CO₂ emission figures are not a good measure of how polluting a vehicle is as they create a bias toward diesel engines, which emit high levels of particulates, nitrous oxides and other noxious pollutants, especially on short runs.

In setting tiered permit pricing, consideration needs to be given to the growing number of Houses in Multiple Occupation (HMOs).

Business permits

Permits are typically valid within a single zone so that residents and their visitors cannot park for free in other parts of the city. Businesses and self-employed workers that fall into a defined list of categories (builders and other tradesmen, estate agents, health and care workers, etc.) should be able to purchase permits that are valid city-wide. These would be more expensive than residents' permits and would only be valid while work was being carried out. Business permits should be a distinctive colour and clearly show a contact number to report suspected abuse. (A business vehicle might also carry a resident permit if the owner lives in a residents' parking zone.)

Virtual permits

At least two companies offer outsourced administration of parking controls using paperless ('virtual') permits, which could potentially save money for the council, and hence residents:

- RingGo (which already administers online and phone payments for the city's pay-and-display parking)
- MiPermit (used by Chelmsford, Colchester, Harlow, and many other local authorities)

Enforcement officers use a smartphone running an app that scans number plates and looks them up in real time against a database of permitted vehicle registration numbers; non-matches are flagged to the officer, who then issues a ticket and takes evidentiary photographs (as now). It should be noted that the app does not give enforcement officers access to the DVLA database, only the council's database of registered vehicles.

Developing neighbourhood parking schemes

Parking controls should be tailored closely to local requirements, balancing:

- safety for all road users
- convenience for residents
- convenience for businesses and their customers
- impact on traffic flows

Any new parking controls or increases in the cost of parking for residents and their visitors requires engagement by local councillors and a clear explanation of the benefits, locally and for the city. Councils must recognise that a one-size-fits-all solution is not appropriate and will not receive popular support; they must instead guide residents in defining the appropriate mix of measures for their neighbourhoods.

People typically find it easier to imagine the negative impacts of new parking controls than the positive. As parking controls are relatively cheap to implement (changing road markings and signage), it can be simpler and cheaper to try things out and let people experience the impacts before being committed to any changes.

This can be achieved using Experimental Traffic Regulation Orders (see below), and we therefore propose the following implementation process:

1. Council officers, in consultation with councillors, define the area within which to consider introducing new parking controls. (The City local authority boundary is not necessarily suitable because it bisects Cherry Hinton and excludes Orchard Park.)
2. Council officers, in consultation with councillors, define the parking zones, aiming to achieve a balance in each zone between the number of residences without off-street parking and the availability of on-street parking spaces.
3. Councils consult residents on the proposed zone boundaries, using the opportunity to engage with residents and explain the over-all plan. Residents can be reassured that the boundaries can be tweaked at a later stage.

4. Councillors consult residents on what parking controls (if any) should be applied on a street-by-street basis in their parking zone. Council officers provide guidelines on what options are available, and the pros and cons of each (see below).
5. Councillors consult residents and local businesses on the location of bays for commercial vehicles (see below).
6. Introduce all new controls on a seven-month trial basis using an Experimental Traffic Regulation Order (TRO).
7. Make any minor modifications to the new controls needed to address unexpected issues, in consultation with local communities.
8. Hold a referendum after six months on all parking controls (other than double-yellow lines introduced for safety reasons).
9. In zones where a majority vote for continued controls, convert the Experimental TRO into a permanent TRO (and allow other TROs to lapse).

Administration and enforcement costs

Accounts for residents parking in 2014–15 were reported by the council as follows:

Revenue	£458,387
On-street/IT	-
Enforcement Cost	£333,638
Back Office Staffing	-
Costs	£136,878
Overhead Costs	-£76,418
Net profit/loss	-£88,547

There is a lack of clarity over how costs have been apportioned to residents parking, and it seems that revenue from penalty notices issued to vehicles parked in residents parking bays has not been included. Since by law (tested in 2013 in The Queen v The London Borough of Barnet) the revenue and costs for residents parking revenue must be ring-fenced, clarity is needed in order to determine what the true cost of permits needs to be to balance the books.

The council should budget for more civil enforcement officers in future to:

- Enforce new residents parking schemes and waiting restrictions.
- Enforce more rigorously existing waiting restrictions (yellow lines and limited wait zones) and loading restrictions, especially on arterial roads, where poor enforcement contributes to congestion. It is reasonable for residents parking permits to fund this enforcement, even in areas that do not have residents parking bays.

Alternative proposals

It has been suggested that administration and enforcement of residents parking should be funded from Council Tax rather than by the sale of permits. This would be unfair and regressive, forcing non-car owners to subsidise car owners. It would also make it difficult to incentivise residents not to own cars, or to own smaller and greener vehicles; and to incentivise residents' visitors to use park-and-ride.

The Parking Policy Review in 2016 suggested that visitor parking could be covered by an annual permit (costing £86), limited to one per household. This would be unworkable for a few reasons:

- Anyone having building work done requires more than one permit at least some of the time.
- £86 would penalise those who have only occasional visitors.
- City residents would be incentivised to offer unlimited free parking to friends and family, or (illegally) to charge for use of their permit. Not only would this create additional competition for parking spaces, it would draw more car traffic into the city.

Visual impact

Careful thought should go into minimising the visual impact of parking controls, using no more yellow paint and signage than absolutely necessary. This can be achieved through compliance with only the most current Traffic Signs Regulations and General Directions and appropriate use of Controlled and Restricted Zones. The Department for Transport guide Know Your Traffic Signs (p39) states, “In environmentally sensitive areas, a pale shade of yellow may be used and the width of the lines may be reduced.” See English Heritage’s paper on Parking restrictions without yellow lines for more detail.

Enforcement

In Cambridge, enforcement of parking and loading offences is performed by Civil Enforcement Officers (sometimes referred to as ‘traffic wardens’), employed by the County Council. In the rest of Cambridgeshire, it is the responsibility of police officers.

Police can rarely justify making parking enforcement a priority: they have insufficient resources, and police fines go to HM Treasury, not the local constabulary. This is in contrast to fines levied by Civil Enforcement Officers, which go to the local authority. Civil enforcement therefore has the potential to be self-funding. On this basis, we strongly recommend district councils in Cambridgeshire to adopt civil enforcement powers – like most of the rest of the country.

Enforcement of ‘moving-vehicle offences’ such as speeding, driving in a bus or mandatory cycle lane, or performing a banned turn, is the exclusive responsibility of the police. However they have neither the resources nor incentives to perform this enforcement. Enablement of Part 6 of the Traffic Management Act 2004 would allow civil enforcement of many of these offences, which could help reduce congestion, and improve safety for people walking and cycling.

A review of parking controls needs to check that all Traffic Regulation Orders (TROs) and signage are in order so that Penalty Charge Notices cannot be contested. One area in particular that needs checking is that zigzag lines outside schools are all covered by a valid TRO.

Traffic Regulation Orders

Experimental Traffic Regulation Orders (TROs) are designed for situations where a scheme's impact is difficult to predict, or where people who will be affected are unsure or unclear about the benefits. It provides an opportunity for people to experience and tweak a scheme before it is either made permanent or withdrawn.

Paragraph 2.2 of Parliamentary Standard Note [SN6013](#) on Traffic Regulation Orders states:

Making an experimental order as a precursor to a permanent order can have material benefits, specifically it can truncate the requirements as to consultation, notice of proposals and objections, providing other requirements have been met (see [Regulation 23](#)). This can be a more cost effective and flexible approach (allowing e.g. for immediate feedback and minor changes) than a permanent order or a temporary order (which cannot be converted into a permanent order).

Legislation

Traffic Regulation Orders (TROs) are governed by [The Local Authorities' Traffic Orders \(Procedure\) \(England and Wales\) Regulations 1996](#).

[Regulation 22](#) (Experimental orders) disapplies the usual consultation process for a TRO covered by [Regulation 7](#) (Publication of proposals). [Regulation 23](#) (Orders giving permanent effect to experimental orders) sets out how the Experimental TRO may be made permanent without further consultation, providing that all details about the order, and any subsequent modifications, have been duly documented and published.

Civil enforcement of traffic contraventions (as happens in Cambridge) is governed by [Part 6 of the Traffic Management Act 2004](#).

23 September 2018

Mr Graham Hughes
Executive Director, Place and Economy
Cambridgeshire County Council
Highways Service
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PE29 6SR

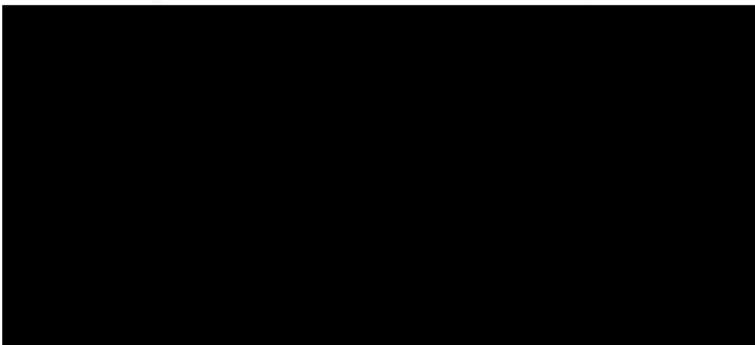
Dear Mr Hughes

Objection to proposed Victoria Area Resident Parking Scheme and TRO
Reference number PR0480

Please find enclosed a document (four pages) setting out my objection to the above scheme and Order, and fully specifying the grounds on which the objection is made.

Please acknowledge safe receipt.

Yours sincerely

A large black rectangular redaction box covering the signature and any accompanying text or stamp.

Objection to proposed Victoria Road Area Resident Parking scheme

I object to the above Resident Parking scheme and proposed Traffic Regulation Order (ref PR0480) on the following grounds:

1. The County Council's decision to take the proposed scheme forward to the Statutory Consultation stage was not in line with its own stated objectives.

According to the letter about the scheme from the Policy and Regulation Team (3 September 2018), the Council '*wants to introduce a scheme that is supported by a majority of those who live in [the] area*'.

The letter informs residents about the outcome of the (non-statutory) public consultation conducted earlier this year. Support for the proposed scheme came from only 76 of the 472 households in the area, i.e. from a small minority (16%) of households.

Far from providing '*positive feedback*', as the letter claims, these results show little enthusiasm for the scheme. It is barely endorsed by those who responded to the consultation, and certainly not supported by '*a majority of those who live in the area*'.

The Council should not take the scheme forward on the basis of such weak support.

2. In the (non-statutory) public consultation, both the questionnaire and supporting information were biased in favour of the scheme.

In the consultation leaflet, the advantages and disadvantages of the scheme for residents were not set out in a clear and balanced way.

The survey itself embodied two questionable assumptions: first, that residents currently experience parking problems; and second, that the situation would be improved by the introduction of a Resident Parking scheme.

On the first of these, the questionnaire did not ask whether (or to what extent) residents had, in fact, experienced parking difficulties. Instead, difficulties were presumed, as in Question 6: '*Do you feel the proposed hours best reflect the times of the day you experience parking problems?*'

On the second, the supporting information clearly implied that the scheme would deliver benefits for residents, making it easier for them to park near their homes. In the FAQs, it was stated unequivocally that a Resident Parking Scheme '*directly benefits residents that live in the streets covered by the ... scheme*'. (See also point 3 below.)

Therefore both the questionnaire and supporting information introduced bias in favour of the proposed scheme. This alone would invalidate the results.

3. The proposed scheme is unlikely to deliver the stated benefits for residents.

There are 472 households in the Victoria Road area. The current proposals allow for 177 resident parking spaces (including disabled).

The plans show that the number of spaces available to residents would be substantially reduced as compared with those currently in use.

The data imply that the Council would be prepared to issue up to 944 resident permits (two per household) for 177 spaces. While this is an upper limit, it is reasonable to assume that at any one time there would be at least three times as many permits as parking spaces in the area.

Residents will not benefit overall from the introduction of such a scheme. In some streets they will be markedly worse off, while in others the 'overspill' resident parking is likely to exceed any gains from the exclusion of commuters.

4. The rationing of Visitor Permits is unreasonable and inequitable.

The rationing of visitor permits to 20 per annum (100 visits) per applicant allows for a little under two visits per week.

This is an inappropriate and intrusive aspect of the proposed scheme. It is also inequitable, since (as Councillors have previously acknowledged) any restriction on visitor permits has a disproportionate impact on certain groups (including, for example, the elderly, the vulnerable, those who live alone, and those who do not have a car but whose visitors will nevertheless be restricted).

The Council appears to believe that limiting the number of visitor permits, like increasing the price, will 'encourage consideration of the use of sustainable transport alternatives such as walking, cycling and public transport' (Agenda Item 5, Highways and Community Infrastructure Committee, 14.11.17).

Whilst the wider aim is laudable, not all visitors are able to make their journey by foot or bicycle, and public transport in Cambridge is profoundly inadequate. Victoria Road has one, infrequent and unreliable, bus service (Citi 8), which has deteriorated with every change imposed by Stagecoach in recent years. It should be noted that Victoria Road is not directly accessible by public transport from any of the Park and Ride schemes that serve the city.

While some groups will be particularly badly affected, accommodating visitors will become difficult for many residents. These difficulties would be compounded by any extension of the proposed operational hours of the scheme (9am–5pm, Monday to Saturday), and therefore pressures for such extension should be resisted.

5. Since any eventual scheme may differ in material detail from those set out in the public and statutory consultations, the level of support for a scheme cannot reliably be ascertained from these consultations.

The public consultation described the proposed scheme in terms of the type of parking controls (shown on the maps); the proposed operational hours/days; and the conditions and prices of permits.

The outcome of the consultation was expressed (in the letter from the Policy and Regulation team) in terms of simple numbers and percentages supporting or opposing 'the proposed scheme'. It seems that respondents also supported the operational hours of 9am to 5pm, Monday to Saturday.

Now, at the Statutory Consultation stage, the details of the scheme have been altered as compared with those presented in the public consultation (with significantly reduced parking in Primrose Street, for example). The details might change again in response to representations received by 28 September.

It cannot be claimed that support for a scheme has been ascertained when 'the scheme' itself is a moving target. A resident who supported the scheme in June might not do so now on the basis of the current plans—and these might change again in any scheme that is eventually implemented. Thus the already flimsy premise for proceeding with the scheme is weakened further.

This is a serious flaw in the process.

Any further changes to the scheme (including changes to operational hours, permit conditions, or the nature of the proposed parking controls) must be the subject of renewed advertisement and consultation.

6. Information provided at the Statutory Consultation stage is inadequate and insufficiently accessible.

The Statutory Consultation does little to encourage active engagement. Whilst a letter from the Policy and Regulation team (dated 3 September 2018) was delivered to addresses in the Victoria Road area, no maps or updated information were included with the letter.

Instead, and despite the significant implications of the removal of free on-street parking in their area, residents are required to take the initiative to find information on the Council's website or go in person to Shire Hall. No provision appears to have been made for those residents who might be unable to access information in these ways.

The website itself is not easy to navigate. It requires considerable time and effort to find all the relevant information, and critical elements are not easily printed to allow for detailed scrutiny. The new plans are less clear, and more difficult to interpret, than those made available at the public consultation stage.

Overall, therefore, it is challenging even for residents with the requisite facilities to discover and fully understand the details of the scheme that is now proposed. (And even

if they do, they cannot be confident that this is the scheme that will eventually be implemented—see point 5 above.)

7. The Public Notice dated 5th September 2018 provides inadequate and misleading information about Visitor Permits.

In the Public Notice, it is stated that “*visitor permits cost £12 for 5 days’ parking (£2.40 per day)*”.

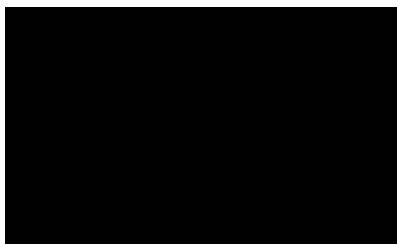
It is difficult to find unambiguous information about visitor permits. However, the above statement would seem to be correct only in the unusual case where each of the five visits allowed by a permit lasts for a whole day.

The Public Notice should have made it clear that each visitor permit (costing £12) allows for five separate visits of *up to* one day, and that the cost of each *visit* (not each day on which visitors park) is £2.40. The implications are materially different.

The Public Notice also omits the crucial information that visitor permits are rationed, so that applicants may apply for no more than 20 permits per year (see point 4 above).

It is unacceptable that the Public Notice misleads residents by understating the costs and inconvenience involved in providing parking for their visitors, and omitting the fact that they will be unable to do so at all once they have used their limited quota of visitor permits.

[REDACTED]
23 September 2018



12th September, 2018

Re: **PR0480**

Dear Sir,

I am the owner of [REDACTED]

I write to object to the proposed Residents' Parking Scheme for Garden Walk, Cambridge, because:

- 1) The problem of day parking by non-residents, who work in Cambridge, has already been solved more cheaply by Bateson Road and Garden Walk being designated "Access Only". That regulation should be enforced.
- 2) My house is let to [REDACTED] University students, who need motor vehicles to travel to their attachments. They already incur tuition fee and loan debts approaching £100,000 and it is unreasonable to ask them to pay for parking permits for themselves and their visitors. Rightly, they do not pay Council Tax and this scheme is an unjustifiable method of extracting money from them.
- 3) The designation of the wider northern part of Garden Walk as yellow-lined appears to prevent contractors' vehicle parking outside No. [REDACTED] hindering their ability to do essential building and garden maintenance.
- 4) My access to the property for inspection and maintenance purposes is also impaired.
- 5) The limited number of parking spaces makes it inevitable that those who pay for them may not find a vacant space. That is a recipe for disaffection.
- 6) The main outcome of the scheme is to raise revenue for the Council from hard-pressed groups, for whom tax reductions are more appropriate.

Consequently, I trust that the plan for Garden Walk will be withdrawn.

[REDACTED]

[REDACTED]

[REDACTED]