

**PROPOSED MILTON ROAD AREA RESIDENTIAL PARKING SCHEME**

**REPRESENTATIONS RECEIVED FROM RESIDENTS OF (AND OTHERS ASSOCIATED WITH) HAVENFIELD, ARBURY ROAD, CAMBRIDGE**

I am writing to express grave concerns on behalf of the residents of Havenfield CB4 2JY regarding the proposed resident parking scheme in our area ref no PR0998 . As the elected representative, I must advocate for the best interests of our constituents, and the proposed scheme presents significant challenges and oversights that cannot be ignored.

During the consultation process, it appears that there was a critical oversight in accurately representing the parking needs of Havenfield's elderly residents, comprising 52 individuals. Despite their substantial presence within the community and their proximity to the proposed parking scheme, their specific needs were not adequately considered. The failure to include their input and accommodate their requirements in the initial drawing is deeply concerning and reflects a fundamental flaw in the consultation process.

Furthermore, it is important to note that out of the 52 elderly residents in Havenfield, only 13 individuals have access to online resources. The majority of our population, comprising a significant number of residents, lacks online access and therefore cannot participate effectively in online consultations. This digital divide disproportionately affects the elderly population, who may already face barriers to technology adoption.

We should be grateful for these elderly residents who have made significant contributions to the society where we stand now. Their experiences and needs deserve the utmost consideration and respect. It is imperative that their voices are heard and their concerns addressed in any decisions affecting their quality of life.

Given these glaring deficiencies in the consultation process and the disproportionate impact the proposed scheme would have on Havenfield residents, I hereby lodge a formal objection to the implementation of the resident parking scheme. This proposal mustn't proceed until a comprehensive reassessment is conducted, taking into account the needs of all affected residents, including those of Havenfield.

I urge the relevant authorities to reconsider the proposed scheme and engage in meaningful dialogue with Havenfield residents to address their concerns and ensure that any future decisions regarding parking regulations are equitable and inclusive.

Thank you for your attention to this matter. I look forward to your prompt response and a resolution that prioritizes the well-being of our community.

Councillor Delowar Hossain  
Cambridge City Council

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I am writing to express my concerns of the proposed scheme and the impact it will have on the residents and the development. Havenfield is a development of 68 flats for the over 60s. We have limited parking with only 21 spaces.

Alternative parking for residents, carers, nurses, family members and trades persons is critical to all concerned with Havenfield.

Please re-consider the exclusion of Havenfield in this proposed scheme.

Myself and the residents would welcome a visit from yourself, so that you can see for yourself the problems exclusion from the above is going to cause.

Development Manager  
Havenfield  
FirstPort Group Limited

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### **The Order:**

The proposed order grants resident parking to households on the southern side of Arbury Road and excludes those, including Havenfield Retirement Flats, on the northern side of Arbury Road.

### **The Objection:**

This objection is not merely a formality; it is a vehement and resolute denouncement of a proposal that blatantly disregards the welfare and fundamental rights of Havenfield residents.

It is unashamedly long. It is detailed and thorough, based on the assumption that the proposal's designer overlooked the complexities and nuances, and that there are unintended consequences. Either this, or the inconceivable alternative is that the council knew of the lack of transparent and democratic policies and procedures, and the insurmountable problems it was creating for Havenfield residents, and yet still took the political decision to exclude Havenfield from the parking scheme.

### **Context:**

Havenfield has 68 retirement flats, of single and double occupancies, of predominantly 70, 80 and 90-year-old residents, many of whom rely on their vehicles for essential mobility and access to vital services. They are dependent on their cars and being able to park close to their homes. There are 21 parking spaces. These can often be full, as there is a constant stream of carers (sometimes four a day to the same person), other ancillary services such as doctors, nurses, providers of end-of-life care, pharmacy deliverers, meals-on-wheels, gardeners and maintenance contractors.

Havenfield residents also receive far more visits than the general population, and others on the boundary line of the parking scheme, from service providers such as optometrists, audiologists, podiatrists, hairdressers, cleaners, and others, many of whom arrive by car. In addition, to support their independence, and when they are unwell, Havenfield residents frequently require visits from family and friends who need to be able to park close by.

### **The Proposed Parking Scheme Means:**

Any overflow from Havenfield car park, which to date has been readily accommodated on Arbury Road and in the side streets opposite, will no longer be available.

Once Havenfield's car park is full, residents and visitors will have no on-road parking short of Campkin Road, a minimum distance of 0.4 of a mile in one direction, and Union Lane, a minimum distance of 0.3 of a mile, in the other. There are no side streets off the northern side of Arbury Road from Union Lane to Campkin Road. The tiny cul-de-sac Maio Road (often fully parked) which looks like a public Road, is an unadopted road, and is private property.

The public car park in Campkin Road, the first available parking, has lost many parking spaces to electric charging points and is often full from its use by the community centre next door. At half-a-mile away from Havenfield there are two lay-bys, for three cars each, and a small cul-de-sac.

Union Lane has double yellow lines for some distance, and then is heavily parked, often for most of the road. If the scheme goes ahead, it will be inundated with vehicles displaced from Arbury Road.

It is true to say, therefore, that, the scheme's implications are dire. Depending on availability in these roads, there is the likely possibility of Havenfield residents and visitors being unable to park for half a mile.

### **The Grounds for Objection:**

are both moral and technical and are:

## UNREASONABLE AND UNFAIR

It is unreasonable and unfair:

### **1) for the council to strip any citizens of their right to on-road parking within such a significant distance from their homes, let alone elderly residents.**

Havenfield retirement flats are probably the furthest away from any on street parking that will be available to those outside the scheme. They are situated almost equidistant between Campkin Road and Union Lane. The council has failed to consider viable alternatives.

Havenfield elderly residents and their visitors may be left stranded with nowhere even within half-a-mile. It is not reasonable to expect people in their 80s who are able to remain independent by virtue of having their own transport, to walk that distance (many with mobility issues simply can't walk, or carry shopping, that far).

In addition, parking in Union Lane would entail Havenfield residents having to cross Milton Road at the 4-way junction when walking home.

The inevitable consequence is that Havenfield residents, fearing to lose their car park space will choose not to go out at all. Their visitors will feel similarly deterred if they have to park a great distance away, and for many living on a state pension the frequent cost in pay and display meters would be prohibitive. With the loss of reasonable access to their homes, and support from family and friends, independence will diminish for Havenfield residents and mental and physical well-being will decline. Therefore we are looking at exclusion and isolation - quite the opposite to your word 'Inclusion' in your 'Quality, Diversity and Inclusion' statement.

### **2) it is absurd that Cambridgeshire County Council is proposing to divide a community by splitting a road in two and giving the residents and their visitors on one side of the road exclusive parking while withdrawing parking to the residents and visitors on the other side of the road, including the vulnerable residents of Havenfield.**

This reason is expressed in the Greater Cambridge Partnership's (GCP) letter to Cllr Delowar Hossain on 28.02.24, Quote, *'The rationale for not including properties north side of the street in the scheme (as consulted upon) is that would introduce many additional vehicles eligible to apply for parking permits within the zone which would be likely to lead to the scheme being oversubscribed and potentially ineffective. At the same time, most of the north side properties have access to off street private parking. This includes Havenfield although, as you have noted, the private parking they provide is not allocated to specific flats, and is not sufficient for all of their residents and visitors.'*

NB

i. *'The rationale for not including properties north side of the street in the scheme (as consulted upon) is that would introduce many additional vehicles eligible to apply for parking permits within the zone which would be likely to lead to the scheme being oversubscribed and potentially ineffective.'*

In its boundary for Milton Road Resident Parking Scheme the council has here created 'haves' and 'have-nots' on separate sides of the same street. Further, the 'have-nots' have been told that this is their fate in order that the privileged may have an exclusive zone not overrun by them.

The implications of this are not merely inconvenient, they are unconscionable. By arbitrarily dividing our community and privileging one side of the road over the other, the council is sowing discord and resentment among neighbours, whereas its policies should be designed to foster good relations within a community.

All stakeholders must be treated equally fairly and they clearly are not here. There is one set of favourable rules for the south side of Arbury Road, and a set of injurious rules for the north side.

ii. *'This includes Havenfield although, as you have noted, the private parking they provide is not allocated to specific flats, and is not sufficient for all of their residents and visitors.'*

Here the GCP totally acknowledges that Havenfield residents have insufficient parking, and, therefore all the problems that this will cause, and effectively says, 'tough luck!'

### **3) that the council has drawn a bizarre boundary line (we know of no other in Cambridge where the road is similarly split and favours one side at the expense of the other).**

Had the council followed the electoral division of West Chesterton boundary line there would have been no problem.

With the proposed scheme, however, parking for Havenfield residents will be permitted in Union Lane in East Chesterton Ward or Campkin Road in Arbury Ward. With no access to roads behind Havenfield, properties on the northern side of Arbury Road are in no-man's land (just one side of a road entirely on its own). The GCP has made no secret of the fact that it regards resident parking schemes as 'quick wins' in its effort to reduce cars in Cambridge and it wants them extended across the city. So when residents in Union Lane and Campkin Road want parking schemes because of the knock-on effect from prohibiting parking in Arbury Road, not only will it be anomalous in the extreme for the council to include Havenfield in with Campkin Road or Union Lane, it will be pointless for Havenfield residents because both are just too far away!

#### **4) for the council to 'unnecessarily' refuse parking permits to Havenfield residents.**

Excluding Havenfield residents from parking close to their homes in Arbury Road, Leys Road, and the beginning of Leys Avenue with the junction of Leys Road, cannot be justified or supported by the evidence. Data in the consultation cannot confirm that Havenfield would **'introduce many additional vehicles eligible to apply for parking permits'** as Havenfield use was not assessed.

There are often few cars in these roads during the parking scheme hours of 09.30-15.00 and there are always spaces available. There may be pressure on parking near the dentist's surgery in Hurst Park Avenue, and in other roads in the scheme that are not near Havenfield.

There are not many additional vehicles from Havenfield. They are not a problem; they only park in adjoining roads as a temporary overflow when their car park is full. To date their few cars have been readily accommodated and there is no need to change this.

The evidence says X and yet the council has concluded Y.

#### **5) for the GCP and council to propose taking a course of action which would mean going ahead and implementing an inequitable and ill-conceived scheme rather than reviewing and changing it before enactment.**

The GCP have proposed excluding Havenfield, and then a review after 6 months of hardship for Havenfield residents: Quotation from the GCP letter to Cllr Delowar Hossain on 28.02.24 - **'A review after 6 months to consider a boundary change, providing it shows there has been concerns with Havenfield following install and that capacity is available to absorb boundary change.'**

We are therefore required at the end of this 6-month trial, during which we will surely experience the inevitable awful effects of this scheme, to then write again to oppose a council decision already executed. For you to do this would show a callous disregard of the situation, which is that Havenfield's residents have been consistently marginalised and ignored by the council. Their objections, originally made in March 2022, long before the public consultation, were ignored and, therefore, discredited.

#### **We are aware that the Objections under the TRO are looked at carefully by the council; we are thankful for this and it is why we have fully laid out our case here, in the hope of exerting an influence now, at the time of the TRO.**

It is unreasonable for the council to say, in effect, 'write more letters in six months time', when Havenfield residents have written letters for the past year, the vast majority of which have not been replied to or even acknowledged (see Procedural Irregularities Point 2). It is, therefore, also unreasonable to expect Havenfield residents to have any confidence that protestations in 6 months time will be effectual as no heed has been paid to their collaborative objections thus far.

It is unreasonable to say write more letters when the majority of residents are frail, have limited spare capacity, and almost half have no internet access or the ability to write emails.

Such a review is also an unreasonable waste of Council time, resources, and taxpayers money:

i Who would carry out a study to prove that, 'there has been concerns with Havenfield following install'?

ii How will the GCP, or will they be expecting 70-90 year olds to, log times that visitors to Havenfield find they cannot park and then leave?

- iii What will the metrics be, and who will carry out investigations during the 6 months that will show that, *'capacity is available to absorb boundary change'*?
- iv Who will verify the data?
- v How costly to the taxpayer will this process, and a change to the completed parking scheme, be?

**6) for the GCP to have given as a reason for why it would not include Havenfield residents in the scheme as (Quote, Letter to Cllr. Delowar Hossain, 28.02.24) *'It might also be helpful for you to be aware as a point of process that amending the scheme boundary as you suggest could not be done without a further public consultation.'***

The perception from this is that the council has backed into a morally indefensible bureaucratic corner, whereby the process dominates and prevails despite it having been shown to have been based on faulty and unjust reasoning and not fit for purpose.

If the council's process demands it, have a further consultation. This time include Havenfield residents, and all those on the northern side of Arbury Road who will be hugely and adversely affected (see Procedural Irregularity Point 8).

**7) for the council to listen to, and accede to the wishes of, local associations without having ascertained whether the associations have sought the wishes of the majority of local residents, or whether they represent them.**

In its answers to Questions from Arbury Road East Resident Association (ARERA) 28.03.24, the council states (Quote) *'There has however been an interest for the introduction of Residents Parking within this area for some time'* and *'The proposed RPS would also ensure much needed prioritised parking for residents as part of this process.'*

Neither ARERA or Hurst Park Estate Residents' Association (HPERA) knew that the boundary of the proposed scheme had been altered from the original proposal for the Hurst Park Resident Parking Scheme which, when it was unveiled, included the whole of the northern side of Arbury Road. They therefore did not canvass Havenfield, or residents on the northern side of Arbury Road. They did not seek a mandate to speak for us and have not represented us.

The council's proposed parking scheme shows that they have acceded to the wishes of HPERA for residents' parking, and ARERA for parking outside the houses at the Milton Road traffic lights, where the road severely narrows, and where the original scheme showed there would be no parking.

Simultaneously, the council has discriminated against, and failed, our elderly group of residents ignoring their written and telephoned efforts to engage and be consulted. In not having been represented by groups the council approves of, Havenfield have not had the same power to affect change.

Since the advertising of the TRO, ARERA has written to the GCP, county and city councillors, and to our MP, to endorse the letter Havenfield had sent to councillors and the MP, and to express their shared concerns for residents on the northern side of Arbury Road.

**8) for the GCP to have given as a reason, for why it would not include Havenfield residents in the scheme, elderly people can get blue badges (Quote letter to Cllr Delowar Hossain, 28.02.24):**

***'It is worth being aware that any residents of Havenfield (or any property just outside the zone boundary) that is eligible for a blue badge will not be affected by the scheme – they will still be able to park within the Milton Road area scheme irrespective of where they live, as they can in any such zone across the city.'***

The council's reliance on blue badges as a solution, with the implication that there is, therefore, no problem, is not only inadequate but insulting. It fails to acknowledge the stringent eligibility criteria and overlooks the fact that many of our residents may not qualify for blue badges despite facing significant mobility issues.

In order to qualify for a disabled parking permit one must not be able to walk more than 50m. Some of the residents can walk more than 50m, so wouldn't qualify. There are no temporary blue badges for disabilities that do not last three years. Therefore, a resident who has had a hip or knee replacement (unless over three years ago and still suffering), any surgery, or a fall, although unable to walk the significant distance to parking that the scheme demands of them, would be ineligible for a blue badge. Further, there are no blue badges for elderly people, with age-related disabilities, who are forced to walk half-a-mile, or more, to their homes by a council scheme that takes away their on-road parking.

The Manager of Havenfield, [REDACTED] will confirm that there are very few car-owning residents with blue badges.

**9) that Havenfield residents' safety will be compromised.**

The proposed scheme, with its disregard for the parking needs of Havenfield residents would force our residents into untenable situations, jeopardising their safety, independence, and well-being.

Elderly people are particularly vulnerable walking such a long distance home at night, or in the winter when it is dark by 4pm and cold.

Should they try to avoid this and decide to park in the parking scheme zone overnight then the proposal to exclude them from the scheme means they will have to move their car by 9.30am. When they move their car they may still find that Havenfield car park is full and they cannot park within half a mile distance. This is unreasonable for 70 and 80 year olds.

**10) for the council to impose a parking scheme which will inevitably mean that vehicles, deprived of parking in Arbury Road, will park in Havenfield car park.**

Vehicles that encroach in Havenfield car park, further exacerbating the situation for residents and visitors, will do so because of Havenfield's exclusion from the scheme. The council will provide traffic enforcement officers to control its proposed parking zone for those on the other side of the road. Havenfield elderly residents will be left entirely on their own to deal with this, the fall-out from the council's decision to exclude us from the scheme. The final point in 'Unreasonable and Unfair', is that it is a legitimate expectation of Havenfield residents to be able to continue parking on-road beside their near neighbours. The council is frustrating this because it has failed to ask themselves the right questions, has failed to take into account all of the relevant considerations, and has failed to respond to feedback. The council have given residents on the southern side of Arbury Road, and in the Hurst Park Estate, exclusive parking on the backs of the elderly residents in Havenfield. There is a lack of social and environment justice, with a very likely harmful outcome to very elderly residents.

A forensic analysis of the reasons given by the county council for their decision is required before implementation of the scheme.

Havenfield residents should not have to prove innocent people will be hurt. The Council should prove that its scheme will not hurt innocent people.

**EQUALITY AND ILLEGALITY**

The Cambridgeshire County Council's non-consultative stance of not including our over 60s residents despite repeated email messages - without reply from you - is taken as being a discriminatory action against elderly and disabled people (protected characteristics) which you, as the Authority in charge of transport, have a duty to protect under the Equality Act 2010. One of the most important aspects of the Act is the Public Sector Equality Duty – a duty for public bodies to consider and apply fairness and equality, especially in making decisions or policies.

We cite case law 'the due regard' duty must be fulfilled before and at the time that a particular policy that will, or might, affect people with a protected characteristic is being considered by the public authority in question. It involves a conscious approach and state of mind; it is not enough to justify a decision after it has been made." For example, we can liken your decision to exclude us by looking at an example taken from a fact sheet to explain the Act, quote: "If a public body is considering cancelling a local bus service but the service is used a lot by older people to get to local health services, the impact on older people should be pro-actively considered before, and at the time, a decision is made".

In your Scheme, you have not taken into account the fact that, for temporary periods, the residents of Havenfield use the on-road parking of the streets which will no longer be available to them. We could therefore consider that you have deliberately excluded the north side of Arbury Road to avoid this aspect of non-duty.

Your aim with the scheme is to facilitate owners of houses/cars to park near to where they live.

Your scheme concerning us will do the exact opposite as, whilst it is agreed that we have limited off-road parking, we also have many carers/nurses/visitors/delivery vehicles which require parking during mornings and afternoons.

It should be pointed out that the residents of Havenfield who have cars will be adversely affected by the lack of flexibility to leave their cars as close to their homes as possible to unload provisions and themselves. (It should be understood that our inability to walk long distances does not necessarily qualify us for disabled blue badges). We trust that your department updates its equality objectives at least every 4 years.

- **No adequate Equality Assessment of the scheme has been published.**

Your attention is drawn to specific actions and omissions of Cambridgeshire County Council:

In the Highway and Transport Committee (HTC) meeting papers, 12th July 2022, we find (inter alia) under paragraph 4.4: 'Equality and Diversity implications' that, *'The equality impacts relating to the change in Resident Parking Policy is being assessed along with the Integrated Parking Strategy, and an equality impact assessment will be brought to this committee in due course'*. We have been unable to locate an Equality Assessment corresponding to that statement.

A limited Equality Impact Assessment forms 'Appendix 5". Under 'Section 2: Scope of Equality Impact Assessment' out of eleven headings, arranged as boxes to be marked with a cross, only two are marked. They are: 'Disability' and 'Poverty'. Among the headings left blank is 'Age'. As far as we are concerned at Havenfield, 'Age' is a glaring omission. In failing to properly assess the Scheme in relation to our protected characteristics, the council would seem to be in breach of the Equality Act 2010, (Section 149 in particular) **and** in breach of its own 'Equality, Diversity and Inclusion Strategy 2023-2027 (page 10).

'Disability' is mentioned in the limited Assessment presented to the HTC meeting (12.07.22), but the fact that many Havenfield residents are disabled to either a lesser or a greater degree, and the problems the parking scheme, or our exclusion from it, are certain to cause them, is treated summarily. It is mentioned that one negative impact that might be anticipated is that **'Reduced visitor permit number could impact those who use this type of permit for carer visits and could increase isolation'**. It is not clear what this means, but it is clear that if Havenfield were to continue to be excluded from the scheme, the significant number of residents who rely on carers would not have the right to apply for carer's permits at all. This situation is so significant, that it would appear to be a potential breach of the Equality Act 2010, and therefore illegal under the law of the United Kingdom. At the very least, it contravenes the County council's 'Equality, Diversity and Inclusion Strategy 2023-2027'.

An Equality Impact assessment that is a standard Council Form completed by the filling of a few boxes by Council staff, is wholly inadequate in the present context. It seems the impact on 'residents' within the Proposed Milton Road Resident Parking Scheme zone only was considered. No consideration whatsoever seems to have been given to the impact on residents living nearby, but excluded from the scheme, such as the owners or tenants of the 68 Havenfield residences. Equality legislation refers to 'equality analysis' rather than 'equality impact assessment'. The terminology is intended to focus attention on the quality of the analysis and how it is used in decision-making, and less on the production of a document as above.

An Equality Analysis on Havenfield was not carried out. It would have worked.

- **Your actions go completely against your own objectives with regard to the Equality Act 2010:**

You have subjugated your 'duty in regard to' (see page 11 of your 24-page long booklet Equality, Diversity and Inclusion Strategy 2023-2027) in your desire to create a parking zone which includes the roads most used by the elderly persons living in Havenfield, having categorically excluded them from your scheme. We justifiably question your statement on page 12 of the booklet where you congratulate yourselves on "Cambridgeshire County Council has made significant progress in advancing equality, diversity and inclusion in recent years. Whilst our work to tackle inequality, discrimination and exclusion has progressed, there is much more to do". You may well have up-dated the previous plan – but you ignore it when it suits you to do so, in other words you only 'pay lip service' to the Equality Act, which is one of the Laws of the land, as you propose to put in a scheme which then radically changes elderly peoples' lives for the worst.

Your booklet further states, “Ensuring piloted initiatives are evaluated effectively before rolling out further”. You did not do this in relation to Havenfield or if you have, it has not been circulated. One of your challenges listed is to provide for the high percentage increase of people in the 70 to 74 age band in the Cambridge area. Havenfield age-wise is even **above** this category. We suggest that it is time you really do mean what you write because your scheme, with regard to the area is not inclusion but exclusion. Therefore, our challenge is to make you change your attitude with regard to the needs of the aged and disabled residents of Havenfield and ensure that we are included in the scheme.

## PROCEDURAL IRREGULARITIES

### 1) No report on the ‘informal engagement’ has been published or otherwise made public.

Although regrettable, this omission is of less practical importance than the lack of a report on the ‘formal consultation’ (see Point 3 below).

### 2) Failure to consult.

The council has failed to adhere to stated protocols of consultation as outlined in its official documents: Para. 4.5 of the Cambridge City Resident Parking Scheme Delivery Plan 2022 states clearly that: *‘Residents and others with a vested interest in scheme will be consulted at both the formal and the statutory stages’*. The CCC’s Resident Parking Policy states much the same thing in slightly different words: *‘Steps from initiation of a scheme include: [inter alia] A formal consultation with residents and other groups that may be impacted by the proposed change.’* Havenfield residents very obviously have a vested interest in the Scheme, will certainly be impacted severely by it, and were not informed of the public consultation.

In respect of being consulted on this parking Scheme, Havenfield residents have been treated shabbily and the relationship between residents, and councillors and the GCP, has been dysfunctional.

The GCP has stated that Havenfield residents were consulted: letter to Cllr Delowar Hossain 28.02.24 (Quote) ***‘We are aware of the concerns of Havenfield residents which were logged during the consultation, and have discussed and corresponded with them on a few occasions including a site visit’*** and ***‘We consulted upon a proposed scheme last year and received a range of responses, including from residents from Havenfield.’***

Prior to the GCP decision to exclude Havenfield from the parking scheme, residents were NEVER informed by the GCP or County Council that their on-road parking was being considered for termination - there was no information, no leaflet drop and no survey of our needs; were NEVER consulted; and NEVER had the GCP or Council ascertain the needs of Havenfield residents, who have protected characteristics under the 2010 Equality Act, carry out an impact assessment, or make reasonable adjustments to the scheme as required by law. In not publishing the report on the consultation the GCP is not transparent on data relating to Havenfield. The number in favour of being excluded from the parking scheme must have been very small as this objection is from 53 residents out of 58 occupied flats!

No ‘discussions’ with Havenfield were had before 7th December 2023, one year and one month after the end of the formal consultation and 6 weeks before the GCP wrote to residents’ associations involved (but, as usual, not to Havenfield) to say the permanent TRO was to be advertised imminently.

Havenfield residents were, inadvertently or deliberately, excluded from discussions and consultation:

13.03.22 ex Cllr Scutt informed Havenfield of ‘informal discussion’ and said that, ‘No decisions have been made or would be made without proper consultation’, and that she, ‘Did want Havenfield as a concerned group to come in on the discussion’.

After that, no further information of any sort was received, and no consultation with Havenfield took place.

10.03.23 the Communications and Engagement Officer GCP informed Havenfield Manager that a public consultation had taken place and Havenfield residents were excluded from the scheme.

Nothing from the council or GCP had been heard, or said, in the interim.

Over the last year, the vast majority of communications from Havenfield to the GCP, Highways and Transport Committee, and County and City Councillors, have been unacknowledged and not replied to.

Full details of the deficient correspondence trail are available to see. They include, for example:

- No response from GCP, and our County and City Councillors, who might be expected to reply when emailed and asked for a meeting, assistance, or political support.



- No response to three phone calls asking for an urgent meeting.
- A two-page letter sent by Royal Mail to the GCP and councillors, by one Havenfield resident trying to elicit a response, but to no avail.

The 'site visit' referred to by the GCP in the above quotation appears to be a 'superficial gesture'. Designated an 'informal meeting', it was devoid of substantive dialogue or resolution of issues. It came 10 months after Havenfield had been informed by the GCP they were excluded from the parking scheme and 6 weeks before they were informed by a telephone call that their exclusion from the scheme was confirmed and it was going to a permanent TRO. This timeframe suggests a lack of genuine effort on the part of the GCP to consult or to address Havenfield's deep concerns. It did not appear that much was done by the GCP in these 6 weeks! With no published report of the consultation at the time of the TRO, we are deprived of knowing whether any other residences on the northern side of Arbury Road were consulted but, as far as we can ascertain, they were not. The council consulted with only those who would benefit from the scheme and not with Havenfield, and those others on the northern side of Arbury Road, who would suffer the consequences. (Please see Procedural Irregularities, Point 6.)

The crux of the objection lies in the discrepancy between stated consultation procedures and the actual implementation. Failing to engage with Havenfield residents, and depriving us of the possibility of making submissions to the formal consultation before the closing date, represents a denial of our rights to participate in the decision-making process regarding a scheme that directly impacts our lives. It seems that the thinking may have been that as we were now to be excluded from the area of the Scheme, we had no right to be consulted. The words '*and others with a vested interest in the scheme*' and '*other groups that may be impacted by the proposed changes*' show in the Council's own words that this was incorrect.

### **3) No report on the 'formal consultation' (03.10.22 - 14.11.22) has been published or otherwise made public.**

The formal consultation on the amalgamation of the three earlier schemes proceeded with no residents in Arbury Road, and possibly the entire proposed zone knowing that the boundary had been changed to exclude Havenfield and the northern side of Arbury Road (see Point 6).

On 24th April 2023 a Freedom of Information Act request by a resident of the Hurst Park area for the data relevant to the formal consultation was formally refused on the basis that '***the report remains a living document still being compiled, and is not available for public release. The raw data of responses will be published on the GCP's website, once the report is issued***'.

**As at the date of advertisement of the Permanent TRO on 18th March 2024, some 16 months after the consultation, the report has still not been published and we can find no raw data on the GCP's website.**

The council may be in breach of the Freedom of Information Act and may have acted illegally in respect of this scheme.

### **4) Infringement of own stated policy of prioritising parking for those residents with little.**

The proposed exclusion of Havenfield from the scheme demonstrates a failure of the council to uphold its stated commitment to prioritise parking for those with limited off-road options.

In 'Permanent TRO, Section - Statement of Reasons', it states, 'The scheme is intended to prioritise on-street parking for residents and in particular those with little or no off-road parking'.

Havenfield are equally 'residents' with those on the other side of the road, but are not given parity with them by the council. Havenfield residents have little off-road parking too - 21 places for 68 flats. The council intends, in its proposed scheme, to make them, and their visitors, have no on-street parking!

**5) Misrepresentation of the Proposed Milton Road Resident Parking Scheme at the time of the formal consultation as a simple amalgamation of three earlier defined areas. In fact, the original Hurst Park Scheme area boundary was altered so as to decrease it in size, at the same time as the amalgamation made the total area of the new scheme much larger. This boundary change excluded Havenfield, and all properties on the north side of Arbury Road, even though they had been included in the originally proposed Hurst Park Resident Parking Scheme.**

At the time of the 'informal engagement', the map showed Havenfield and the northerly side of Arbury Road, as included in the, as yet, un-amalgamated Hurst Park Scheme.

The originally proposed Hurst Park Area was then greatly expanded in size by means of the proposed amalgamation with the Ascham and Elizabeth Schemes. That expansion introduced many more, probably hundreds, of extra vehicles into the Scheme. At the same time, the northerly border of the Hurst Park Scheme was reduced slightly in area, excluding only a small number of vehicles including Havenfield's. The decision lacks logical coherence. The expansion introduced many more additional vehicles into the scheme, directly contradicting the original proposal and exacerbating parking issues. It is, therefore, the GCP's amalgamation that **'introduces many additional vehicles'** in the scheme. Havenfield, and the northern side of Arbury Road, is being made to pay the price for the council's unclear thinking.

#### **6) Failure to notify affected persons of a Scheme boundary change excluding them from the proposed scheme, although they had initially been included.**

The properties on the north eastern side of Arbury Road were in the proposed Hurst Park Scheme until the amalgamation into the Milton Road area resident parking mega-scheme was proposed. The maps were changed **after** the informal 'engagement' and just **before** the formal consultation, to show a new boundary which excluded the northern side of Arbury Road. The county council failed completely in its duty to inform residents of the proposed changes. As a result the boundary change was not noticed by anyone including Havenfield. This lack of communication deprived us of the opportunity to provide input.

Not informing residents and *'others with a vested interest in the scheme'* (*Cambridge City Resident Parking Scheme Delivery Plan, 2022*) and *'other groups that may be impacted by the proposed changes'* (*CCC resident Parking Policy - undated but on line as at March 2024*), that the boundary line had changed to exclude the northern side of the road is enough to discredit the whole amalgamated scheme and the councillors and staff who proceeded, in effect, to 'railroad' the Scheme through, regardless of the council's own policies and the general principles of transparency and democratic procedure in local government.

Arbury Road East Residents' Association, heavily involved in contributing to the scheme, did not know that the northern side of Arbury Road was excluded from the scheme until Havenfield informed them on 13.02.24, 13 months after the formal consultation had ended, and just 1 month before the TRO was advertised. We, therefore, posit that, not only did, those due to suffer the consequences of the scheme not know, but, in all likelihood, no one who completed the public consultation knew that the boundary had been changed to exclude the northern side of Arbury Road including Havenfield.

This major change, so detrimental to Havenfield and others on the northern side of the road, was not formally notified to anyone by the council until the day of the publication of the permanent TRO, 18.03.24, one year and four months after the close of the formal consultation, and three weeks before the closing date for comments and objections.

#### **7) The reason given by the GCP for the exclusion of Havenfield and the other properties on the northerly side of Arbury Road does not withstand scrutiny.**

The GCP's rationale for excluding Havenfield (and the northerly side of Arbury Road) does not stand up to scrutiny:

***'most of the north side properties have access to off-street parking. This includes Havenfield....'*** (This is true, Havenfield has parking, albeit inadequate, and so do the other Flats, and many households have private parking in their gardens.) Therefore, the inclusion of Havenfield (and the other households on the northern side of the road) would not ***'introduce many additional vehicles eligible to apply for parking permits'***, but only a few, and those permits would only be used to park in the Scheme when the private parking areas were full.

In any case, as the GCP points out, Blue Badge holders would be able to park in the scheme anyway. The retention of the original northerly border, that included Havenfield, would not introduce any vehicles into the scheme at all, because they were already in the original proposal.

This is another example of muddled thinking by the GCP and council (see Point 5).

**8) Failure to comply with requirement of the Cambridgeshire County Council Resident Parking Policy, namely that ‘Before a scheme is implemented, an assessment is made to ensure that a scheme is [inter alia] cognisant of new or displaced parking problems’.**

The failure to comply with the CCC Resident Parking Policy regarding the assessment of new or displaced parking problems is evident in the case of the Milton Road Resident Parking Scheme. No such assessment was conducted, and it became apparent that the parking issues arising from excluding Havenfield were not considered until after the formal consultation closed.

Despite our efforts to engage with the Greater Cambridge Partnership (GCP) regarding this matter, no resolution has been reached. The suggestion of amending the scheme boundary, which would have rectified the oversight, was met with the requirement for a further public consultation.

Major changes to the scheme, including boundary adjustments, were made after both the ‘informal’ and the ‘formal’ consultation periods without notifying residents until the day of the advertising of the permanent TRO (see 6 above). This shows that a boundary change now, which after all would only be a change back to the originally proposed Hurst Park Scheme would seem to be entirely possible without a formal consultation. However, the council has demonstrated that it is able to make major changes to this Scheme when it wants to, without a further consultation, but stated that it can’t when the changes are requested by residents adversely affected by the scheme.

**9) Out-of-date and misleading information is presented by the GCP on one web-site and the quite different up-to-date information on a completely different Cambridgeshire County Council website.**

Erroneous information was presented. It raises suspicions of either incompetence or deliberate obstruction. It did not treat Havenfield residents, or the public, with respect or equity:

**i. The original, and outdated information published at the time of the formal consultation, remained on-line as official information from October 2022 to 17th March 2024, and, beyond that date!**

This was the only information that Havenfield residents had access to.

The GCP website still displayed outdated maps as of March 31, 2024, misleading visitors about the current scheme details.

**ii. Information published at the time of the TRO is in inferior form (compared with the earlier information), and largely illegible format to anyone not in possession of above-average computer-skills.**

The updated map, intended to reflect changes, was too small-scale and printed in grayscale, making it difficult to decipher. Despite claims of availability at the Cambridge Central Library, only inadequate black-and-white copies were provided. Despite the technical capabilities available to the council, the provided map failed to meet basic standards of clarity and accuracy. This lack of accessible information shows deficiency about the transparency and fairness of the process.

**10) Significant changes to the proposed Scheme were notified only on the day of the publishing of the TRO (18<sup>th</sup> March 2024).**

The Proposed Parking Scheme’s ten maps from September 2022, along with other documents used in the Formal Consultation, still available on the GCP’s website as of March 26, 2024, differ significantly from a single map published on March 18, 2024, alongside the Traffic Regulation Order (TRO) Public Notice.

The new map contradicted earlier proposals, notably regarding parking bays on Arbury Road. While previous maps showed no parking bays due to a cycle lane, the new map suddenly introduced 53 parking bays and no cycle lane. This major and significant change, introduced questions of safety for pedestrians and cyclists at the east end of Arbury Road; it was only made public on the day of the TRO.

The late release of major changes to the scheme (one year and four months after the close of the formal consultation) with the public left with only three weeks to submit objections, further complicated an already convoluted and unsatisfactory situation and undermines trust in and the legitimacy of the council’s consultation process and Scheme implementation.

Overall, these procedural irregularities are more than sufficient to demonstrate the Cambridgeshire County Council and the GCP’s disregard for proper procedure. They cast doubt on the legitimacy of the Proposed Milton Road Resident Parking Scheme’s implementation.

In addition to the objections raised, the following points, as indicated by the GCP, are **NOT SOLUTIONS** to the problem:

**i. Granting Carers an exemption outside the proposed boundary.**

Although it would benefit carers, it would not help residents and visitors. On extreme time limitations, carers would still park as close to their clients as they can get, and in the car park if there is a space. Residents and visitors, excluded from parking on the road outside the car park, would, therefore, still be left with nowhere to park .

**ii. Consult again with those within the scheme.**

The northern side of Arbury Road is small in number compared to those currently privileged and inside the scheme. Those now entitled will not want to add more residences into it; they would be voting against their own self interest. It should not be in their hands as to whether Havenfield is included, or excluded, but rather a rational and just decision taken by the Authority.

**iii. Put Havenfield (in Chesterton electoral district) into a newly proposed parking scheme (in Arbury electoral district) at a later date.**

Pointless - too far away. Parking would be over half a mile away.

**iv. Ignoring the fluctuating need for car ownership by elderly residents in Havenfield.**

There are currently 23 Havenfield residents with cars and 10 properties unoccupied. Information supplied 20.03.24 by Manager - [REDACTED]

For policy making, this figure needs to be used with understanding and caution. Car ownership in Havenfield is very fluid. The steps for elderly residents are that they give up cycling and walking long distances because of age-related difficulties and keep their cars (in order to maintain independence). They then give up their cars and get cared for in Havenfield or go into a care home. Havenfield has a high turn-over of residents because, unfortunately, they move on into care homes or die. The unoccupied properties could conceivably be sold to owners who each have a car. It is not possible to predict what car ownership will be in Havenfield, even in a couple of months' time.

If the parking scheme goes ahead, another unintended consequence of the council's proposal will be that it will deter elderly people from buying, or renting, properties in Havenfield.

## **SUMMARY AND CONCLUSION**

It has been disheartening to witness the council's apparent lack of conformity with its own current published policies and its determination to proceed with this scheme without addressing procedural flaws and the adverse impact on Havenfield residents. It has been deeply disappointing to not have our communications acknowledged or responded to, before it was too late, and not be consulted. The decision making process has not been thorough and fair, when with such a significant impact on the rights and freedoms of elderly people, it should have been subject to greater scrutiny by the council. The reasons given for the scheme are inadequate and if the council insists on proceeding with it, it will be nothing short of indefensible.

It is the county council's duty to serve and protect all members of the community in Arbury Road, Cambridge, yet Havenfield residents find themselves facing an unjust plight imposed on them by the council. The decision is brutal, callously disregarding the fundamental needs and challenges faced by our elderly residents and will have a lasting impact that will affect their health, safety, emotional well being, and ability to live a relatively normal life. This is about exclusivity versus social justice and the council proposing to come down on the side of exclusivity. The impact of this decision will be far-reaching - just one example is that a resident, whose family is experiencing difficulties, does a school-run with a grandchild, sometimes twice a; he is thinking of having to move; he is 80 years old.

Essentially, we find ourselves as residents that Transport Minister Mark Harper spoke about (BBC News 17.03.24). He said, ***"I want local people to have their voices heard, and any traffic schemes to have the consent of those they impact"***. Concerns of his were, Quote, that councils, ***"didn't consult"***, and ***"I think there are places where councils haven't taken people with them"***, where, ***"schemes are not properly balanced"***, and the council ***"pitted one side against another"***. He stated that he is issuing statutory guidance on this in June 2024 and that, ***"Failing to be confident of local support could affect future transport funding under the new guidance"***. Neglecting to prioritise the well-being of all community members in Arbury Road would undermine the credibility of the council and the GCP.

Our experience has been that proponents of the scheme have either been unaware of unintended consequences or have been driven by ideology. The latter have only ever talked benefits, while editing out

the consequences, and they have used every excuse to keep it running irrespective of the obvious damage to the community.

There is inadequate private parking for residences on the southern side of Arbury Road because of the age of the housing. Similarly, Havenfield residents reside in a building with inadequate private parking because it too was built in an era when fewer parking spaces were required - many of the elderly female residents in the 80's, when the flats were built, had not ever learnt to drive! It is important that the council designs this parking scheme with not only us in mind but for the residents who come after us. The Scheme currently discriminates in favour of those residents on the southerly side of the road with limited private parking, leaving the northern side with egregiously deficient options. If the Council is saying that the scheme, as devised, cannot cope with vehicles from Havenfield parking within it and that Havenfield residents have to sacrifice their on-road parking for the good of those to be privileged on the southern side of the road then the scheme should not proceed and the status-quo, which has worked well at the Arbury Road end of the proposed Scheme should remain.

There is ample room for Havenfield residents to park within the Scheme and demands of fairness are higher when it relates to a decision which is likely to deprive someone of an existing benefit.

Havenfield residents tried to get the TRO for this scheme paused and the scheme evaluated and reviewed before proceeding. This was declined by the GCP. We are left with only one option now - to object to the scheme as a whole.

The essence of this objection lies in the unfairness, unreasonableness, and disregard for the law and the council's own policy intentions in the implementation of the scheme. These reasons invalidate the proposed Scheme and we are totally against it.

We are not against a resident parking scheme per se but against this one for the reasons outlined. If the majority of our neighbours on the southern side of Arbury Road and in the Hurst Park Estate wish for a Resident Parking Scheme, and we do not know because the consultation has not been published, we have no wish to deprive them of one. If they do, all we ask is that we be included in it and we have made the case for this.

If the council or GCP rejects Havenfield residents' objections and do not rectify their mistake by reinstating the original Hurst Park Scheme boundary line, which included Havenfield, then they will be obliged, by law, to take positive action measures and make reasonable adjustments to the scheme to protect the rights of Havenfield residents, with protected characteristics. Havenfield residents have substantial disadvantages compared with other adults on the boundary line and complying with the duty, and where doing so is allowed by the Act, might mean having to treat Havenfield more favourably than others.

We expect the Cambridgeshire County Council to assure us in writing that the residents of Havenfield will be included in the Proposed Milton Road Resident Parking Scheme. Without this assurance this remains as objection to the Scheme as a whole.

**This is a formal objection on behalf of every Havenfield resident represented below (53 people in total), and we each request a formal written response, which we would each like to receive, personally addressed.**

This objection is a testament to our unwavering resolve to oppose this unjust scheme and a firm belief that councillors, in recognising the critical gaps, will join with us in wanting to include us in the scheme.

We are not criticising all local government councillors or officers. We are at one with those who make great efforts to promote a 'listening culture' within the county council, provide democratic and transparent policies and procedures, and improve the lives of citizens – thank you.

Decision making is a public good in itself and something that we appeal, please, to the County Council to make great efforts to achieve in this case.

Thank you.

Representing the Team from Havenfield who collaborated on this objection and have each sent letters of objection under separate cover:

(5 named residents of Havenfield)

And representing a further 47 residents of Havenfield (evidence available), 34 of whom have also sent letters of objection:

(47 named residents of Havenfield)

**PS** If you are thinking this is a long read then please be aware that it is nothing compared to the length of time it would take us to walk every time we were forced to park outside the scheme!! If you lived in Arbury Road where we do, would you think this scheme fair and practicable? Even more so, we appeal again, that if you wouldn't do this to your granny then please don't do it to us.

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I write as a resident of Havenfield, the retirement development on Arbury Road, to request that those of us who are car owners might be included in the residents' parking permit scheme for this area.

Parking at Havenfield itself is limited and car ownership has outgrown original provision, making it occasionally necessary to find a parking space on the surrounding streets. While only a minority here are Blue Badge holders, many of us are limited by age and general infirmity from walking long distances and are thus dependent on driving for everyday needs and on parking in relatively close proximity to where we live.

If it is not possible to park at Havenfield, as on occasion it is not, due to trade, nursing vehicles and other visitors occupying spaces, it would be impossible to park outside the limits of the residents' parking area and make our way on foot to the development. If, on the other hand, we were able to purchase permits so that, on the rare occasions when parking here is impossible, we were able to park on the streets, it would be a source of extra revenue to the Council, without putting undue pressure on street parking spaces or inconveniencing residents who presently park on the streets as a matter of course.

I sincerely hope that it will be possible for Havenfield residents to be included in the scheme.

---

I am writing to object, in the strongest possible terms, to the proposed Milton Road Resident Parking Scheme (Reference PR0998).

To divide the the community down the middle of Arbury Road will have divisive consequences, and I am particularly concerned about the impact on Havenfield residents. Please take the time to look into and understand how poorly served these elderly residents already are for parking. And given the needs of (lowly paid, overly scheduled) carers, frequent immobility of residents, emergency vehicles needs and to encourage visitors to prevent loneliness and poor mental health amongst the elderly, I would urge you to consider it for parking rights more immediately (eg within the Milton Road Parking scheme) than is currently proposed.

Thank you. I look forward to your consideration and response.

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I am a resident of Havenfield on Arbury Road Cambridge and I am aware that a proposal exists for a "Milton Road Parking Scheme", which my information tells me excludes the Havenfield Development.

You may not be aware but our car parking facilities are so restricted in number that we are often unable to park on site and are forced to look for side street parking on regular occasions.

If we are excluded from this new scheme I know that we will be forced to having to look for parking much further afield, and may even be forced to break parking regulations in the process.

My Havenfield colleagues are required to be over 60 years of age in order to have a home there and would appreciate a little forethought and common sense on our behalf in developing the Milton Road scheme.

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1st. March 2024

Dear members of the County Council,

I write to protest about the fact that you have omitted the residents of Havenfield in your decision on the Milton Road Parking Scheme. It is an example of discrimination of older people, many of whom rely on visits from family, friends and carers.

It is another burden to bear on top of the existing chaos in Milton Road. I hope you will reconsider this matter.

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I am writing to express my concern re above. Havenfield is an over 60s scheme which includes a number of vulnerable adults. We have a limited number of parking spaces (21) for 68 flats. If the car park is full then residents park down Leys road. If the current chime goes ahead as planned it will cause severe problems for a vulnerable group which is likely to reach the Disability Act (2010). There has been a worrying lack of transparency and a veil of secrecy about the the implementation of this scheme which may require a judicial review. I would emphasise that Havenfield want to be included in this scheme.

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In regards to the above Parking Scheme I wish to express my support to include 'Havenfield' in this Scheme.

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I am writing to express my concern regarding the above scheme.

[redacted] at Havenfield over 60's Scheme.

There is a small amount of parking spaces compared to the amount of flats so often carers/family need to park down Leys Road/Arbury Road.

If the current plan goes ahead it will cause severe problems for me & those who visit - especially the carers who come [redacted] a day.

Again I would like to point out that I am [redacted]. We need to be included in this scheme.

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Please note my strong objection to the above proposal.

I am a resident at Havenfield also a car owner. I park my car in the residents car park which accommodates a total 21 cars. Apart from residents cars, the car park also accommodates the cars of Carers, the cars of visitors and the vehicles of various workmen and delivery vehicles from time to time. On the occasions that the car park is full I park legally in the nearest available space on the public road, usually nearby in Arbury Road or Leys Road.

I understand that the proposal is to make these areas unavailable for parking to us Havenfield residents and that we and our visitors will be forced to seek parking in or beyond Campkin Road or Union Lane. This could be late at night and in any weather!

All our residents are over sixty and I will be [REDACTED] and there are already days I am unable or just do not want to walk those distances.

Apart from the above I feel strongly as somebody who pays council tax and road dues that my freedoms are being unfairly removed in favour of other people!

---

I would like to object to the exclusion of Havenfield in the parking scheme. I am a resident in this development. It is for 60's and over, many of whom have difficulty in walking, [REDACTED]. We are incapable of walking from Union Lane or Campkin Road, expecting us to do so is absolutely ludicrous. Leys Road on the other hand is doable. I urge you to include Havenfield in the Residents Parking Scheme.

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I am a resident of the Havenfield Retirement Home. By writing this letter of objection, I express my strong opposition to the proposed Milton Road Resident Parking Scheme for the following reasons.

Currently, though our retirement complex at Havenfield contains 67 apartments, the available parking on the site can accommodate only 21 vehicles. The majority of us do not have parking spaces within the site though we all wish to have a vehicle parked on the site. Furthermore, most of the time, available spaces are also occupied, which has already created problems for visitors. If the retired residents of Havenfield are excluded from the proposed parking scheme, our visitors and contractors would not have any space nearby to park because both Union Lane and Campkin Road area parking are hard to reach if visitors are elderly. Of course, you already know the sidewalks on Arbury Road for pedestrians are not well levelled and maintained evenly to enable the elderly to navigate the path safely and comfortably.

In the twenty-first century, any form of "exclusion" is bad. In the proposed parking scheme, it appears the elderly residents of Havenfield have been excluded deliberately without giving any reasonable explanation. This situation does not look good when it is done by the County Council. We can assert here also that the visitors of the retired elders are also deprived of having parking permits under this new scheme.

Therefore, I request your attention to this issue and include the residents of Havenfield Retirement Home in the proposed Milton Road Parking Scheme.

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I am writing to you on behalf of [REDACTED] [REDACTED] lives at xx Havenfield, she is [REDACTED] and has difficulty walking. Whilst she doesn't drive herself, I need to visit regularly to take her out for appointments, shopping etc and also to visit her. Many times I have found it difficult to park at Havenfield, which has only 21 parking spaces, to date I have been able to find parking in the streets nearby and this has been important as [REDACTED] can't walk far. We are concerned that the proposed residents parking scheme for Arbury Road has not taken into consideration the needs of residents of Havenfield Court, many of whom are elderly and/or infirm. We are very worried that the introduction of a permit scheme on only one side of Arbury Road would put additional pressure on parking at Havenfield, leading to even fewer parking spaces. This is particularly worrying for those residents who have regular carers visiting who certainly don't have the time to try to find parking and then walk, particularly if parking is going to be pushed further away. I have no doubt that [REDACTED] may well need more care in future and will be among those residents worrying that their carers are unable to visit for their allotted time.



Finally, we have no objection to parking permit schemes in principle and would welcome it if both sides of Arbury Road were to be included in the scheme, including for Havenfield.

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I am extremely concerned about parking restrictions being imposed in our area, the latest move against elderly and vulnerable people in the Havensfield retirement complex and in nearby streets and I may add in the City of Cambridge in general.

Not only have residents been forced off the streets as pedestrians as we have had to cope with several years of roads works and dangerous road crossing to cater for the pro-cycling fanatics and speeding e-scooter users who pose and increasing danger to the life and limb of those going about their everyday business on foot.

Now residents who have been forced in many cases to seek refuge from this road works chaos in the safe space of their own cars are being targeted with an anti-motorist onslaught with intolerable parking restrictions.

I'm am sure a council tax strike by the elderly of Cambridge is not far off and then you and your colleagues would have to build prisons for the elderly, which I am sure you would willingly do given the uncaring attitude displayed by Cambridge Council towards those who were born into a world of rationing after World War II and then helped rebuild this nation from the 1960s into the 2000s.

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I reside in Havenfield and use our parking bays for my car. I am usually able to find a space but on occasion, if bays are full, have had to use Leys Road or Arbury Road. Being quite mature, the distance I would have to walk to reach home, perhaps in the dark, foul weather or with shopping etc., should the proposed Milton Road resident parking scheme/Havenfield happen, leaves me very worried. Therefore I ask that reconsideration be made on the proposal especially for residents such as myself.

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As a resident of Havenfield I am writing to express my concerns about the above proposed parking scheme. Havenfield is an over 60s scheme where a number of vulnerable adults reside. There is a limited number of parking spaces (21) available here for a total of 68 apartments. When the car park is full then residents use the nearby Leys Road car park. If the current scheme goes ahead as proposed it will cause severe problems for a vulnerable group which is likely to breach the Disability Act (2010). There has been a complete lack of transparency about how the scheme will be implemented which may require a judicial review. I would like to state clearly that Havenfield want to be included in this scheme.

---

I AM WRITING BECAUSE I AM  
VERY WORRIED RE. THE ABOVE  
PARKING SCHEME WHICH  
EXCLUDES HAVENFIELD,  
FAMILY AND CARERS WILL  
BE UNABLE TO PARK NEARBY  
WHEN OUR RELATIVELY SMALL  
CAR PARK IS FULL. I AM  
LIMITED IN MY ABILITY TO  
WALK FAR AND THIS ALSO  
APPLIES TO SEVERAL OF  
THE RESIDENTS OF HAVENFIELD

---

I am writing to you as I am concerned about the above. The people who live in Havenfield are over 60, and includes a number of vulnerable people. Car parking here is limited as there are only 21 spaces for 68 flats. If the car park is full residents park down Leys Road.

If the scheme goes ahead as planned it will cause severe problems for the vulnerable who need carers, cleaners etc: to come to them.

So please if this scheme has to go through could you include us at Havenfield.

---

I am writing to say that I strongly object to Havenfield being currently excluded from the

"Proposed Milton Road Resident Parking Scheme".

Havenfield has 21 parking places for 68 flats.

Should your scheme go ahead, and residents find that our carpark is full, the nearest public car park to Havenfield is in Campkin Road, almost half a mile away.

I personally cannot easily walk there and back to Havenfield if I am unable to park in Havenfield or Leys Road.

I know I am not the only resident who would say this.

I gather there is a Disability Act (2010) which could work in our favour.

It is extremely important for it to be noted that the Havenfield car park caters not only for residents, but also residents' carers (some residents may need carers more than once a day), and residents' families who visit not only socially but to give help and support, or to bring them their shopping.

If private carers cannot park at Havenfield, the time it takes them to walk from Campkin Road might mean they cannot spend the right amount of/any time caring for their resident.

Havenfield does wish to be included in this scheme, please.

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I am writing to express my concerns re the above. Havenfield is a complex of retirement flats. Because of their age some of our residents need outside assistance with their daily lives. They rely on Carers. Our car park has 21 spaces for the 68 flats. Overspill means we, or our visitors, need to park in either Leys Road or for limited time on Arbury Road. Once the above scheme becomes operational such on street parking will no longer be an option. If a Carer cannot find a parking space, some though not all, will be tempted to stop seeing their clients. Family and friends could also reduce the number of times they visit elderly relatives. We are also concerned some residents of Arbury Road will see Havenfield as a convenient car park for them or their visitors.

---

I wish to express my serious concerns regarding this proposed scheme. I am a resident at Havenfield, which is a housing development specifically for people aged over 60 years. I am [redacted] years old and consider myself to be a vulnerable person, as are many other residents of Havenfield. We have 21 parking spaces on site for 68 flats. Clearly, this is rather limited to accommodate all of the daily to-ing and fro-ing of family, friends, visitors, maintenance staff, contractors and carers. Consequently, some of these people have to park on Arbury Road and its side-roads. If the current scheme goes ahead as planned, however, this will not be possible because Havenfield is excluded from the scheme. That would cause serious difficulties for the residents of Havenfield. We are a group of vulnerable people and such action would breach the Disability Act (2010).

It is therefore critically important that Havenfield is included in the scheme, should it go ahead, and that no actions are taken to curtail access to the residents for their essential services, social needs and personal caring.

I also wish to highlight my concern over the lack of transparency surrounding this scheme: its design, consultation and implementation. This may well lead to judicial review.

To conclude. Havenfield needs to be included in the Arbury Rd./ Milton Rd. Resident Parking Scheme and I trust that you will ensure that indeed happens.

---

I am writing to express my concern re above. Havenfield is an over 60s scheme which includes a number of vulnerable adults. We have a limited number of parking spaces ( 21 ) for 68 flats. If the car park is full, then residents park down Leys road. If the current scheme goes ahead as planned it will cause severe problems for a vulnerable group which is likely to reach the Disability Act (2010). There has been a worrying lack of transparency and a veil of secrecy about the implementation of this scheme, which may require a judicial review. I would emphasise that Havenfield want to be included in this scheme, please.

---

I am writing to express my concerns  
re above. Havenfield has 21 spaces  
for 68 flats, if the carpark is full  
then Leys Road or Arbury Road has  
spaces to accommodate the overflow  
if these spaces are not available  
it will affect the vulnerable,  
and will isolate a lot of the  
residents. I would urge you to  
reconsider and allow Havenfield  
to be part of the parking scheme.

I am writing to express my concern about the proposed resident parking scheme referenced above.

Firstly, I would like to emphasize that the residents of Havenfield, including myself, were sadly omitted from the consultation phase. Now that we have become aware of the implications, should the scheme be given the go-ahead, we are somewhat distressed by the thought of being deprived of nearby parking which is a necessity when the Havenfield car park is full; which it quite often is. I would point out that our car park has only 21 spaces and there are 68 flats in the development.

Would you kindly take into consideration that many vulnerable residents require regular visits by health carers who need a parking space whilst they carry out their duties.

Others, such as myself [REDACTED] require regular visits by [REDACTED] etc., all of whom need to park their cars whilst in attendance. I would also bring to your attention that we have two guest rooms in the development. These guest rooms are regularly booked for one or more nights by the relatives or friends of Havenfield residents. Many of the guests arrive by car and need to park in our car park; but when the car park is full they resort to parking in Leys Road.

I do hope you will understand the serious difficulties that would be faced by many Havenfield residents in the event of the proposed scheme being approved.

I AM WRITING TO VOICE MY CONCERNS  
ABOUT YOUR PARKING SCHEME IT  
WOULD HAVE BEEN NICE TO BE  
CONSULTED. WE ONLY HAVE 21 SPACES BUT  
68 FLATS AND WE WANT IS TO BE  
INCLUDED IN YOUR SCHEME NOT  
A LOT TO ASK FOR THE ELDERLY  
TENANTS IN HAVENFIELD

██████████ is a resident of Havenfield, Arbury Road. As you are probably aware this is a development of two buildings providing accommodation for people over 60 years of age.

Parking at Havenfield and nearby is critical for access for the residents, some of whom are frail or for whom driving a vehicle is their only option, for mobility to essential services.

Family carers and relatives also need to be able to park a reasonable distance from this accommodation. Some, like myself, do not live in Cambridge and need to drive to visit and help my mother. I also note that there are many carers and nursing service providers that visit Havenfield regularly and need parking nearby to provide their essential services.

As an outsider to Cambridge there seems to be a focus on cycling; sadly not everyone can safely cycle, as in ██████████ case, and alternative means of mobility and access to essential services needs to be considered for the elderly, frail and those with disabilities.

There is no bus stop on Arbury Road adjacent to Havenfield and it is currently a dangerous (road works) and considerable distance for someone who needs assistance with walking to get to the bus stop, if they can.

Please do incorporate the needs of the residents and families of Havenfield's occupants, many have lived here since the 80s, and the changes in the immediate vicinity need to include their input and needs.

Thank you for your time, consideration and action with our thoughts on this situation.

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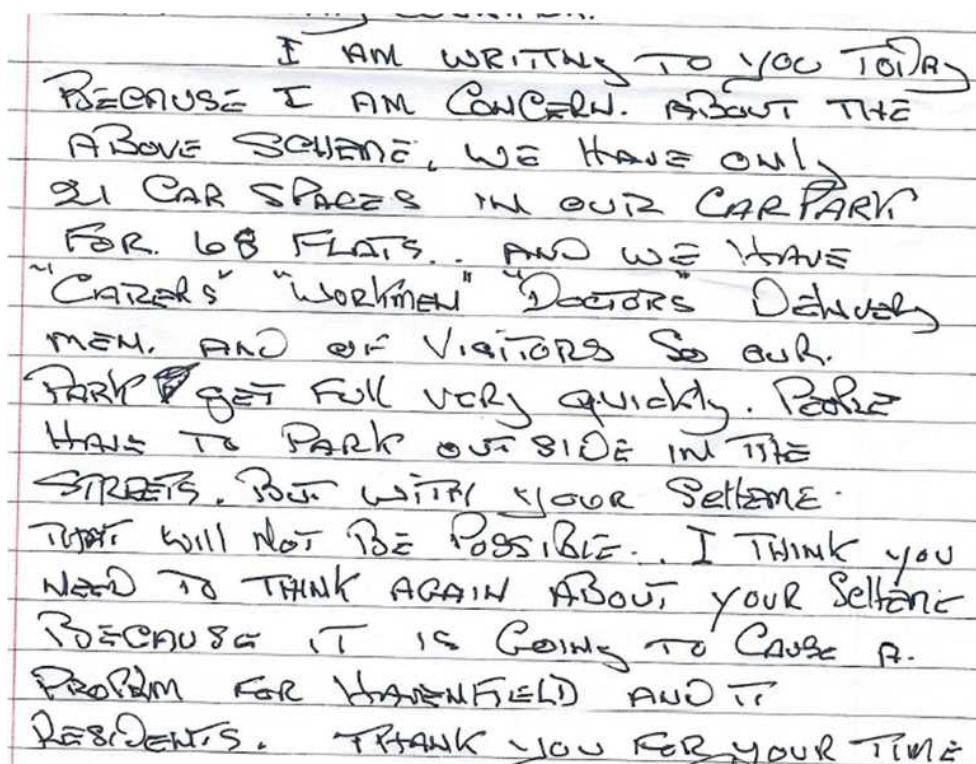
I am writing to express my concern regarding the above. Havenfield is an over 60s development which includes a number of vulnerable adults. We have a limited number of parking spaces (21) for (68) flats.

If our car park is full some of our residents are forced to park down Leys Rd opposite our development. If the new scheme goes ahead it will cause severe problems for a vulnerable group of our residents, and this information will be in breach of the Disability Act 2010.

There has been a worrying lack of transparency and a veil of secrecy surrounding the implementation of this scheme which may require a judicial review.

I want to emphasise that Havenfield want to be included in this scheme.

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I AM WRITING TO YOU TODAY BECAUSE I AM CONCERN ABOUT THE ABOVE SCHEME, WE HAVE ONLY 21 CAR SPACES IN OUR CAR PARK FOR 68 FLATS. AND WE HAVE "CARERS" "WORKMEN" "DOCTORS" "DELIVERY MEN" AND OF VISITORS SO OUR PARK GET FULL VERY QUICKLY. PEOPLE HAS TO PARK OUTSIDE IN THE STREETS. BUT WITH YOUR SCHEME THAT WILL NOT BE POSSIBLE. I THINK YOU NEED TO THINK AGAIN ABOUT YOUR SCHEME BECAUSE IT IS GOING TO CAUSE A PROBLEM FOR HAVENFIELD AND IT RESIDENTS. THANK YOU FOR YOUR TIME

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[redacted] both in our [redacted], are most alarmed by the implications of this scheme. We are residents of Havenfield but have lived in Arbury Road [redacted]. We have seen many changes but none as threatening as this.

[redacted] and receive regular visits from nurses; [redacted] also relies heavily on a [redacted]. All come by car and park, if they can, in Havenfield car park.

But when it is full they have to park in nearby roads.

We are not car owners but members of our family are and they face similar problems when visiting. We rely heavily on [redacted] for support. Many other people in Havenfield face similar problems.

Please consider with compassion the needs of our vulnerable group.

---

With reference to the parking scheme. Havenfield is a development for retirement for the over 60. Some of them are very vulnerable. There is not enough parking spaces so if this project is carried on excluding Havenfield, the residents, carers and visitors would have nowhere to park.

I therefore pray that Havenfield will be included in the parking scheme.

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[redacted] and cannot walk unaided. Her only pleasure in life is being able to visit [redacted] some 30 miles from Cambridge. If the current scheme goes ahead, it will cause a major problem for [redacted] if it is passed.

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Here we go again the invisible ones no consideration for myself and all residents here at Havenfield. This is ageism at its best. The older we get the more invisible we become. We desperately need to be able to park near our homes. As time passes the less able we become to walk distances I have found this to be in my case. I cannot use a bus stop in Milton Road because there isn't one nearby and to walk to Campkin Road is out of the question. The car park there will be overcrowded if this scheme is implemented. To keep my body fit [redacted] but I am in constant pain due to [redacted]. So from my point of view yes please keep me on the road while I am able and add my name to your signatures.

---

I cannot believe the unfairness of this decision. The Havenfield Residents are over 60: most are over 70, with some 90+! Our limited car park is used by: residents; their family and friends visiting; plus care helpers and medical staff for such an elderly group of residents! Most residents rely on family and friends for lifts! How are they meant to manage to go where they need to without transport and spaces in our car park: also used by numerous workmen, used to improve our living areas etc.,? Compare the age/ structure, etc., of the residents here to those living in Arbury Road up to say Maio Road: how unfair that is as a comparison of their parking facilities and alternative options.

As I write this consider those, like me, who on health grounds ( I have a [redacted] ) require access in our community: a vital facility. Closing parking options to us will prevent the most basic options! How can such inequality and unfairness be acceptable?!

PLEASE do the fair thing and make Havenfield Residents have the same equality and fairness afforded our neighbours.

Please list, finally, your reasons for seeing Havenfield Residents as an exception to all listed!

---

I am writing to you as a elderly pensioner, as we have 68 Flats in Havenfield and only 21 parking spaces this becomes impossible at night.

Luckily most people who can not walk far have been out in the day time, they can mostly park in Havenfield but some can not, as carers plus work men parking in Havenfield this again causes residents to park over keys road, having some to use their frames this still becomes difficult.

A few residents who still work do not come home until the evening, some have to park over in keys road,

Some residents who can not walk far, if they go out to a Club or visiting relatives, or go out socially then they have to park in keys road, some have to use their frames, to walk across to their flats, in the winter months when its dark this becomes unacceptable in this day and age.

So please as most of us have been local residents supporting our Cambridge County Council for many years,

PLEASE could we be included in the new Parking Scheme.



management partnership

I am writing to ask you to include Havenfield in the proposed residents parking scheme for this area.

This scheme will make life difficult for myself and others living out Havenfield, and I periodically suffer with pain and discomfort from [redacted] which affects my walking long distances. I therefore hope that you will include Havenfield in this scheme.

Please delay advertising the Traffic Regulation Order, and include Havenfield in this scheme. Please forward this letter to everyone in your group.

I strongly object to the proposed Postcodes Permit. If the residents of Havenfield are excluded from the scheme, we will be forced to leave our cars. As many are aged over 70 - 90 years of age, this would make getting very difficult and deprive them of seeing relatives, thus causing isolation.

I am familiar with the proposed parking scheme situation and have kept myself informed for the past year since this scheme first became known by Havenfield.

My particular concern is that the so-called "consultation" was in name only. Who exactly was consulted? Certainly not me and I know of no one else in Havenfield.

Is the council trying to push this through with minimal input from those who are most affected?

Do you really have any idea of the real consequences of the proposed parking scheme that will prevent elderly Havenfield residents from having any on-road parking for up to half a mile away from their homes? Do you really want to worsen the lives of the majority of Havenfield for a bit of extra space for the lucky folks on the southern side of the road.

Further investigations are necessary before proceeding. There is much to unpick in the drawing of the boundary line that excludes the northern side of Arbury Road, including Havenfield, and benefits only certain groups.

Councillors have said that their decisions are evidence-based. What evidence have you that supports the exclusion of Havenfield from the parking scheme? Is it balanced enough to stand up to any reasonable scrutiny sufficient for a measured decision by your committees?

The proposed parking scheme should simply not go ahead. There is overwhelming feedback already why it shouldn't go ahead, much is plain common sense.

I urge you to please reconsider with investigations and take into account Havenfield's valid reasons. It should not be done in the first place, for reasons of plain common sense and it will cause predictable human damage.

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Under the Milton Road Residents Parking Scheme, Havenfield Apartments (off Arbury Road ) will be adversely affected as they are not included in the proposals as they are on the North side (even numbers) of the Road. We were not informed of this proposal, although we will be greatly affected.

There are 68 apartments for residents over the age of 60 and although there are 21 parking spaces, there is a need for extra provision for carers and visitors. The roads opposite are currently available for the overspill but the new proposal will remove that option. It is a long walk to Campkin Road or Union Lane as an alternative which will be impossible for some residents.

We have protected characteristics under the Equality Act 2010 due to lack of mobility and frailty.

I am objecting to this Scheme as it is now and asking for Havenfield to be included if it goes ahead.

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Here are my feedback, my comments and my formal objections to Permanent Traffic Order PR0998, in response to the Public Notice published by the Cambridgeshire County Council on 18<sup>th</sup> March 2024.

My overall comment on the proposed Milton Road area Resident Parking Scheme is that the residents of Havenfield flats, including myself, are excluded unfairly from inclusion in the Scheme. Some of the procedures followed are in conflict with Council policies, and there have been numerous departures from sound principles and practice. Details and references are supplied in the following eight pages. Therefore I object to the Scheme.

This letter is sent by mail and also by e-mail to [policvandregulation@cambridgeshire.gov.uk](mailto:policvandregulation@cambridgeshire.gov.uk). The two letters are identical, except for the medium, and should be regarded as one response, not two. The reason the letter is sent twice is so that I can be reasonably certain it does not go astray, or be otherwise mislaid.

I have not sent it via <https://consultation.appyway.com/cambridge> for reasons which I will inform the Council of on another occasion.

#### PERMANENT TRAFFIC ORDER PR0998

My position is that there have been so many departures from proper democratic and transparent processes by the Cambridgeshire County Council and the Greater Cambridge Partnership with regard to this matter, that the whole Scheme should be scrapped.

My objections are laid out below, with references to documents given in the notes to each numbered objection provided on the following pages. Many of the points raised are to do with the Council failing to follow its own published procedures and policies. In the case of the removal of the 50% majority requirement described in Objection 6), it is the change of policy itself that I object to.

#### PART ONE: BRIEF STATEMENT OF OBJECTIONS

**Objection 1):** Failure to notify affected persons of formal consultation meetings.

**Objection 2):** Lack of transparency at the time of the formal consultation regarding information provided to the public on the matter of a slightly altered Scheme boundary (which unfairly excludes my home).

**Objection 3):** Failure to notify affected persons (including myself) of a Scheme boundary change excluding us from the proposed Scheme, although we had initially been included.

**Objection 4):** The reason given by the GCP for the exclusion of Havenfield and the other properties on the northerly side of Arbury Road does not withstand scrutiny.

**Objection 5):** No report on the 'informal engagement' on the amalgamation of the three originally-proposed schemes has been published or otherwise made public.

**Objection 6):** No report on the **formal consultation** has been published or otherwise made public, and there has been little publicity given to the question of the 'over 50% majority' required in the Council's Resident Parking Scheme Policy document,

but discarded by a resolution of the Highways and Transport Committee on 12<sup>th</sup> July 2022, just two months *before* the formal consultation in October-November 2022.

**Objection 7):** No adequate Equality Assessment of the proposed Scheme has been published.

**Objection 8):** There was a failure to comply with yet another requirement of the CCC Resident Parking Policy, namely that 'Before a scheme is implemented, an assessment is made to ensure that a scheme is *[inter alia]* cognisant of new or displaced parking problems'.

**Objection 9):** Significant changes to the proposed Scheme were notified only on the day of the publishing of the TRO (18<sup>th</sup> March 2024), whereas the original information published at the time of the formal consultation is still on-line at the time of writing, 6<sup>th</sup> April 2024) and as misleading as ever. The March 2024 information on the TRO web-site is in inferior form (compared with the earlier information), and largely illegible to anyone not in possession of above-average computer-skills. Resources available to the Council and the GCP (their cartographers, advisers and suppliers of technical services WSP) were not used in a manner that served the public with respect or equity. Out-of-date and misleading information is presented by the GCP on one web-site and quite different up-to-date official information on a completely different Cambridgeshire County Council web-site. A better set of Cambridgeshire County Council maps, this time drawn by the Ordnance Survey, is available on the appyway.com website. These maps appear to be accurate and up-to-date, but are not where one might expect to find them, namely on the GCP Milton Road area Resident Parking Scheme web-pages, or perhaps attached to the TRO notice. This looks more like an attempt to confuse the public than to inform them. I would not go so far as to say it is intentional, but it is misleading to the public, who are the sole funders of the Council's activities.

## **PART TWO: NOTES RELEVANT TO EACH OBJECTION**

The objections are repeated above each note for convenience of reference.

**Objection 1):** Failure to notify affected persons of formal consultation meetings.

**Note on Objection 1):** Para. 4.5 of the Cambridge City Resident Parking Scheme Delivery Plan 2022 states clearly that: '*Residents and others with a vested interest in scheme will be consulted at both the formal and the statutory stages*'. The CCC's Resident Parking Policy states much the same thing in slightly different words: '*Steps from initiation of a scheme include: [inter alia] A formal consultation with residents and other groups that may be impacted by the proposed change.*' Havenfield residents very obviously have a vested interest in the Scheme, and will certainly be impacted severely by it. This was known to the local County councillor (now former councillor) at the time of the 'informal engagement'. My complaint is that while our County councillor at the time consulted us at the time of the 'informal engagement', the County Council and/or the Greater Cambridge Partnership, failed to inform us of the formal consultation, depriving us of the possibility of making submissions to the formal consultation before the closing date. It seems that the thinking may have been that as we were to be excluded from the area of the Scheme, we had no right to be consulted. The words 'and others with a vested interest in the scheme' and 'other groups that may be impacted by the proposed changes' show in the Council's own words that this was incorrect (sources referenced above).

**Objection 2):** The proposed Milton Road area Resident Parking Scheme seems to have been misrepresented at the time of the formal consultation as a simple amalgamation of three earlier defined areas, whereas in fact the original Hurst Park Scheme area boundary was altered so as to decrease it in size, at the same time as the amalgamation made the total area of the new Scheme much larger. This boundary change excluded all properties on the north-eastern side of Arbury Road, even though they had been included in the originally-proposed Hurst Park RPS.

The proposed Milton Road area Resident Parking Scheme seems to have been misrepresented at the time of the formal consultation as a simple amalgamation of three earlier defined areas, whereas in fact the original Hurst Park Scheme area boundary was altered so as to decrease it in size, at the same time as the amalgamation made the total area of the new Scheme much larger. This boundary change excluded all properties on the north-eastern side of Arbury Road, even though they had been included in the originally-proposed Hurst Park RPS.

**Note on Objection 2):** Aspects of this are treated under Objections 1); 3); 4); 7); and 8).

**Objection 3):** Failure to notify affected persons of a Scheme boundary change excluding them from the proposed Scheme, although they had initially been included.

**Note to Objection 3):** See note to Objection 2).

**Objection 4):** The reason given by the GCP for the exclusion of Havenfield and the other properties on the northerly side of Arbury Road does not withstand scrutiny.

**Note on Objection 4:** We at Havenfield enquired via a sympathetic councillor from a neighbouring ward,\* of a senior staff-member of the GCP as to the reason for our exclusion, and the GCP's reply to the councillor included the following:

*'The rationale for not including properties on the north side of the street in the scheme (as consulted upon) is that would introduce many additional vehicles eligible to apply for parking permits within the zone, which would be likely to lead to the scheme being over-subscribed and potentially ineffective.'*

It is true that the scheme as consulted upon (in the formal consultation) did not include the properties on the north-eastern side of Arbury Road, including Havenfield. Havenfield was not made aware of the formal consultation (see Objection 1) above, and at the time of the earlier 'informal engagement' (which we were aware of) the map did show us as included, in the as yet un-amalgamated Hurst Park Scheme. The residents of the 68 Havenfield properties were therefore deprived of the ability to respond to the proposal 'as consulted upon'.

The 'informal engagement' was not a formal consultation. The phrase 'as consulted upon' refers to the formal consultation, about which no-one on the north-eastern side of Arbury Road was notified. I have shown above (Objection 1) how this was a breach of the Council's Resident Parking Policy.

Returning to the GCP's statement: *'It would introduce many additional vehicles ...'* What actually happened was that the originally-proposed Hurst Park area RPS, which did include the north-eastern side of Arbury Road, was greatly expanded in size by means of the proposed amalgamation with the Ascham and Elizabeth Schemes to the south and east of the Hurst Park Scheme. That expansion introduced (or would introduce) many more, probably hundreds, of extra vehicles into the Scheme. At the same time, the northerly border of the Hurst Park Scheme was reduced slightly in area, excluding only a small number of vehicles, those connected with the residents of the north-eastern side of Arbury Road. The GCP acknowledges that this involves only a small number of vehicles, when it says in the same reply to the councillor: *'At the same time, most of the north side properties have access to off-street parking. This includes Havenfield ...'* This is true; the properties excluded are relatively well-served by their own parking on private land. So the GCP's 'rationale' quoted above does not stand up to scrutiny.

The inclusion of the properties on the north-eastern side of Arbury Road (including Havenfield), would not 'introduce many additional vehicles eligible to apply for parking permits', because those residences were included in the originally-proposed Hurst Park RPS. Neither the Council nor the GCP has produced any evidence that the boundary change consulted upon in the Formal Consultation was supported by any member of the public at all. If such evidence exists in the responses to the Formal Consultation of October-November 2022, it has not been published (see note to Objection 6) below.

The difference in numbers of vehicles either way would not be great, and those permits would only be used to park in the RPS when the private parking areas were full. The retention of the original northerly border would not 'introduce' any vehicles into the scheme at all, because they were already in the original proposal from the start. It is the proposed amalgamation that would introduce far more vehicles. Therefore, it must be the proposed amalgamation that, in the GCP's own words: *'would introduce many additional vehicles eligible to apply for permits within the zone'*. What the responders to the formal consultation thought of this remains unknown. The logic seems inescapable: the amalgamation of the three smaller schemes into the mega-scheme, *'would be likely to lead to the scheme being over-subscribed and therefore potentially ineffective.'* The words in parentheses are the GCP's words, not mine.

As for the comment that *'Most of the north side properties have access to off-street parking ...'*, I would remind the GCP and the Council that the possession of private land on which one has the right to park does not deprive one of the general right to park (where it is permitted) on the public highway. I would remind the GCP (and the Council), that however many cars I might own, and however I might care to park them on private land, is (with certain exceptions relating to safety or nuisance) none of the Council's business, and it should form no part of Council policy-making, let alone of independent attempts to make policy by Council or GCP officers, were that ever to be contemplated. 'Off-street' does not mean the same as 'on private land'. The parking in question is all on private land.

If the Scheme is to go ahead, the reason Havenfield needs to be included in it is that carers and other visitors sometimes find the Havenfield car-park full, and need short-term 'overflow' parking. It is a peculiarity of this part of Arbury Road that there are no streets running north between Milton Road and Campkin Road, a distance of about half a mile. (The cul-de-sac Maio Road, which looks like a public road, is an unadopted road, and is private property, so ARERA was informed by the County Council).

On-street parking in the northerly part of the Hurst Park area has always been plentifully available, at no cost, to Havenfield residents and anyone else. No mandate has been demonstrated by the Council for any change to this situation. If we are never to be given access to the data from the Formal Consultations, that will remain the situation. (See Objection 6) below). I am aware that the Statutory Consultation on the Permanent TRO at present underway is not the same as the Formal Consultation which took

place in October-November 2022. An organ of government that refuses to publish public information in its possession (national security matters and the like excepted) can no longer be regarded as either transparent or democratic.

\*Havenfield's County Councillor and member of the HTC did not reply to, or even acknowledge, our several letters, nor did our City councillor. Is it any wonder I fear for our democratic rights in Cambridge?

**Objection 5):** No report on the 'informal engagement' has been published or otherwise made public.

**Note on objection 5):** Although regrettable, this omission is of less practical importance than the lack of a report on the formal consultation (see **Objection 6)** below).

**Objection 6):** No report on the formal consultation has been published or otherwise made public, and there has been little publicity given to the question of the 'over 50% majority' required in the Council's Resident Parking Scheme Policy document, but discarded by a resolution of the Highways and Transport Committee on 12<sup>th</sup> July 2022, just two months before the formal consultation in October-November 2022.

**Note on Objection 6):** So far as I am aware, this change of policy, which discarded the 'over 50% majority' requirement, was not communicated to the public in the public meetings held on the Formal Consultation. It effectively rendered the consultation meaningless, and a waste of the local residents' time. This is borne out by the fact that one year and four months later no report on the consultation has been published, yet the Council has gone ahead and published the Permanent TRO, apparently with no mandate from any member of the public. It remains completely unknown to the public what data were collected at the time of the formal consultation. Let us look at the history of this sorry state of affairs: the matter of the over 50% requirement was discussed at the GCP Joint Assembly meeting on Thursday 9<sup>th</sup> June 2022, a month prior to the HTC meeting of 12<sup>th</sup> July 2022 referred to above. In Appendix 10 to the minutes of the GCP Joint Assembly meeting, which recorded questions from the public, a questioner described as a CAMCYCLE Infrastructure Campaigner, refers to *'The consultants' report, section 3.2.7'*, and praises it because it *'at long last states in black and white the clear problem with previous residents' parking policy: "The current County Council policy is that a new scheme cannot be introduced unless supported by 50% of residents in the relevant area responding to a consultation. This gives small numbers of residents an unusual veto power which can affect policy for the whole city, restricting the County Council's ability to make changes to the highway network at a holistic, city-wide level"'*. The questioner then commends this view as follows: *'The report is quite right to describe this as an 'unusual veto power'. It is utterly ludicrous to be spending tens of millions of pounds on very welcome bus lane schemes, when freebie parking still remains available within 10 minutes' walk of the city centre. This is not joined up thinking. 1. Does the committee agree that residents' parking must at last now be recognised not merely as a street by streets issue, but as a strategic traffic management tool as well? And that the introduction of parking and traffic management schemes which will benefit the city as a whole, cannot be held up due to a 'small number of residents with unusual veto powers'? 2) and that it needs to be introduced as soon as possible even where there is not yet overall support in an area?'*

That last bit is worth repeating: 'even where there is not yet overall support in an area'. 'Yet'? Only a seer, one who can see into the future, could equate 'where there is not yet overall support in an area' with the actual state of affairs, which is: 'where there is not overall support in an area'. Another way of expressing this is 'wishful thinking'.

The report referred to is the Integrated Parking Strategy Initial Report (WSP project 70056482), dated June 2022. The CAMCYCLE campaigner quotes the paragraph exactly as it appears in the report, but it might be worth repeating it here: *'The current County Council policy is that a new scheme cannot be introduced unless supported by 50% of residents in the relevant area responding to a consultation. This gives small numbers of residents an unusual veto power which can affect policy for the whole city, restricting the County Council's ability to make changes to the highway network at a holistic, city-wide level'*.

The first sentence in this quote is correct (give or take the minor ellipsis by which the words 'a majority of over 50%' are abbreviated to '50%'). The second sentence is not a statement of fact at all, but a rather bizarre opinion. It is an extraordinarily undemocratic statement. How is a requirement of a majority of over 50% of respondents to a consultation 'an unusual veto power'? It is standard practice in the United Kingdom not only for elections, but for decisions at meetings, and votes in the House of Commons. How can something that is standard practice in this country be 'unusual'?

The consultants, WSP, are a multi-billion dollar 'global' company offering consultancy and technical services to a number of joint authorities in the U.K. As far as I know, they are a perfectly respectable company, and I am not suggesting they have done anything wrong in offering their opinion on the 50% majority requirement, ludicrous as I find their notion.

In the House of Commons, of 650 Members, if only 400 vote on a particular issue, say 350 for and 50 against, the 'ayes' will have it. The 250 members who fail to vote are not considered relevant to the vote, any more than the 930 members of the public who

failed to respond to the consultation in my imaginary example would be considered relevant to the consultation. That is our well-tried and tested British system.

It is also, as it happens, the system laid out in the Constitution of the Cambridgeshire County Council, para. 15.1, namely:

*'Majority. Unless the Constitution provides otherwise, any matter will be decided by a simple majority of those members voting and present in the room at the time the question was put'.*

Note that those members *not* voting and present in the room at the time are ignored, for the purpose of the result of the vote. If that is an 'unusual power of veto', the Council should amend its Constitution. Clearly it is not, so the Council should restore the '50% majority' provision for formal consultations, or suffer its democratic pretensions to be exposed as hypocrisy. It is the CCC that runs Cambridge, not CAMCYCLE, worthy and influential as that 'two wheels good' brigade might be. The provision is still in the Resident Parking Scheme Policy (paragraph 6.2, bullet point 6) as accessed on-line on 2<sup>nd</sup> April 2024.

The consulting company seems to be confused over the fact that, to quote a theoretical example again, out of 1,000 possible responders, if only 70 actually bothered to respond, and 30 of those were against the scheme, and forty were for it, the result would be decided by only ten votes, or just 1% of the total number of possible (but not actual) responders. WSP describes this as 'an unusual veto power'. What is unusual about it? If a vote in the House of Commons were lost by just one vote, would that be an unusual power of veto? Maybe in Canada, but not in the United Kingdom. Does the County Council think it is getting value for tax-payers' money in employing a foreign company to give it anti-democratic notions? (Pace WSP, it is the Council I am questioning here, not you).

Perhaps what worries CAMCYCLE and the HTC is that there might be more non-responders than responders, as in fact there usually are. Does the campaigner believe that rather than respect the veto of a small number of responders, his own opinions should prevail? I suppose this is why Sir Winston Churchill observed: 'It has been said that democracy is the worst form of government except for all the others that have been tried'.

WSP merely made an observation, an ill-considered one in my opinion, but they did not explicitly recommend that any course of action should follow from their opinion. It was the CAMCYCLE campaigner who picked that ball up and ran with it. Astonishingly, the Highways and Transport Committee of the CCC agreed with him and voted to accept the Cambridge City Resident Parking Plan, which includes the abolition of the over 50% majority requirement. What would have happened at that meeting if the meeting rules had not included an 'over 50% majority' requirement, is anyone's guess.

The abolition of this provision was not widely publicised, but neither was it covered up. A news item was published on the CCC web-site on the 5<sup>th</sup> July 2022 which read, in part: *'The plan proposes to streamline the policy surrounding the introduction of new resident parking schemes by removing the need for a councillor-led informal consultation and the need for 50% of those that respond to the formal consultation to support a scheme.'* There you have it, people of Cambridge; your freedoms are being snatched away from under you by your own elected representatives. For the double-speak 'streamlines', read 'remove the democratic provisions of'. The shade of George Orwell must be chuckling 'I told you so'.

The GCP Joint Assembly meeting referenced above seems not to have commented on the over 50% policy, simply noting that 'The policy for delivering new residents' parking schemes is set by the County Council, and the next Highways and Transport Committee will consider this.' The HTC did consider it and leapt into bed (so to speak) with the anti-democratic notions of WSP and CAMCYCLE. I do not mean to be harsh on CAMCYCLE. I recognise their tireless work in promoting better cycling conditions in Cambridge. I have some democratic regard for their large membership numbers. I have some sympathy for their opinion on 'joined-up thinking', if they mean taking all aspects of a question into consideration. However, the 'holistic' approach, if taken too far, can mean excessively monistic thinking, the political version of which is called totalitarianism. That is the route to global dictatorship, and the extinction of diversity and of anything resembling democracy and freedom.

An agenda item for the 12<sup>th</sup> July 2022 Highways and Transport Committee Meeting of the CCC (Forward Plan ref: 2022/060), notes that *'the Cambridge City Resident Parking Scheme Delivery Plan (para. 2.6) 'removes the need for 50% of those who respond to the formal consultation to support a scheme'*. I am aware that the Delivery Plan is not the Policy document. For the removal of the 50% requirement to go ahead, it was necessary for the Delivery Plan to be approved by the HTC, and it was so approved, according to the minutes of the HTC meeting of 12 July 2022. The exact wording is: *'It was resolved to: a) Note the content of the Greater Cambridge Partnership (GCP) Resident Parking Scheme update; b) Approve the Cambridge Resident Parking Scheme Delivery Plan;'* [and other items].

As at 16<sup>th</sup> March 2024 the 50% requirement has *not* in fact been removed from the CCC's published Resident Parking Scheme Policy on the Council's web-site.

However the Highways and Transport Committee is a sub-committee and not the Council itself. In the minutes of the GCP Joint Assembly meeting of 9<sup>th</sup> June 2022 I find a record of discussion at the meeting during which the Assistant Director for Sustainable and Inclusive Growth noted that such a decision [on the removal of the over 50% majority threshold] 'would need to be made by the county council'. As of the time of writing I have not located such a decision by the County Council, so am in the dark as to whether the Delivery Plan or the RPS Policy is the current policy of the Council.

The CCC Resident Parking Policy document available on-line on the CCC's web-site on 18<sup>th</sup> March 2024 states, inter alia, that 'A scheme will be considered only where all the below criteria are met:' and I find under para. 6.2 the sine qua non provision that: 'A majority (over 50%) of households responding in the survey support the introduction of a Resident Parking Scheme'. If this current published information is correct, why has the report on the formal consultation not been published, as at the date of the publishing of the Permanent TRO (18<sup>th</sup> March 2024)? How are the people of Cambridge to know whether the 50% threshold was met during the consultation, or not? The Policy change was approved by the HTC, so I can only assume that someone at the Council thought that gave them carte blanche not to publish (in other words to suppress) a report on the formal consultation.

The same minutes referenced above note that during the course of discussion it was mentioned that: 'The removal of the 50% threshold was designed to remove unintended consequences when areas were divided into smaller zones'. This initially puzzling remark makes sense if compared with another provision in the CCC Resident Parking Policy, para 6.2: 'Avoiding the need for consensus within an area by reducing the area is not considered an effective or efficient way of managing parking, as experience shows that the problem transfers to streets excluded from the area'. It seems to me that the reduction of the originally planned Hurst Park scheme to exclude the properties on the northerly side of Arbury Road, was such a reduction. However, at the same time, the originally-proposed Hurst Park area was greatly increased by the proposed amalgamation with the Ascham and Elizabeth schemes. Finding a way through the logic of all this is not easy. The remark, and the policy provision, seem to be aimed at avoiding the skewing of consultation results by reducing scheme areas so as to exclude negative responders. What actually happened, was that the scheme areas were greatly expanded, by a massive amalgamation. By the logic of the remarks and the Policy, if the reduction of areas would reduce consensus, presumably the expansion of the areas would increase consensus. Either way, any change of boundaries, whether increasing or decreasing the area, would appear to influence consensus. This not my idea, but clear enough from the wording of the Council's own Policy and the reported remarks of the discussion at the HTC on 12 July 2012. In this case, I don't think the Council was consciously trying to skew the consensus. How much easier just to ignore the responses from the public. I think that these notes to my Objection 5) are more than sufficient to demonstrate a lack of transparency and democratic procedure on the part of the Cambridgeshire County Council and its collaborators at the GCP. Facts are facts, and flannel is flannel.

**Objection 7):** No adequate Equality Assessment of the proposed Scheme has been published.

**Note on Objection 7):** In the same HTC meeting papers mentioned in 5) above (12<sup>th</sup> July 2022 HTC meeting), I find (inter alia) under para. 4.4: 'Equality and Diversity Implications' that 'The equality impacts relating to the change in Resident Parking Policy is being assessed along with the Integrated Parking Strategy, and an equality impact assessment will be brought to this Committee in due course'. I have been unable to locate an Equality Assessment corresponding to that statement.

However, a limited Equality Impact Assessment does form 'Appendix 5' of the papers for the HTC meeting of 12<sup>th</sup> July 2022, but the scope of that Assessment is limited to a 'Review of Residents permit limits and fee structure'. Under 'Section 2: Scope of Equality Impact Assessment', out of eleven headings, arranged as boxes to be marked with a cross, only two are in fact so marked. They are: 'Disability' and 'Poverty'. The other headings, left blank, are: Age, Gender reassignment, Pregnancy and maternity, Religion or belief, Sexual orientation, Rural isolation, Marriage and civil partnership, Race, and Sex. Most of these are probably not relevant in the context of the RPS, but as far as we are concerned at Havenfield, 'Age' is a glaring omission. Havenfield is a development of 68 retirement flats, restricted to residents over 60, but most of the residents are between 70 and 100 years of age. 'Age' is a protected characteristic under the Equality Act 2010. In failing to properly assess the Scheme in relation to our protected characteristics, the Council would seem to be in breach of the Equality Act 2010, (Section 149 in particular), and in breach of its own 'Equality, Diversity and Inclusion Strategy 2023-2027 (p.10), as published. I do realise that a better Equality Assessment may have been produced recently. If so, I would be grateful to be told where it might be accessed.

'Disability' is mentioned in the limited Assessment presented to the July 12<sup>th</sup> 2022 HTC meeting, but the fact that many Havenfield residents are disabled to either a lesser or a greater degree, and the problems the RPS, or our exclusion from it are certain to cause us, is treated summarily. It is mentioned that one negative impact that might be anticipated is that 'Reduced visitor permit number could impact those who use this type of permit for carer visits and could increase social isolation'. Havenfield was excluded (unfairly, because Havenfield residents were not informed of the Formal consultation and were therefore deprived of the right to respond to it.) from the amalgamated Scheme consulted on by the formal consultation, so the significant number of residents who rely on carers will not have the right to apply for carer's resident parking permits at all. This situation is so significant, that it would appear to be a potential breach of the Equality Act 2010, and therefore illegal under the law of

the United Kingdom. At the very least, it contravenes the Cambridgeshire County Council's own *Equality, diversity and inclusion strategy 2023-2027* (p.10 in particular). *This in itself is enough to show that the Scheme should be scrapped.*

Objection 8): There was a failure to comply with yet another requirement of the CCC Resident Parking Policy, namely that 'Before a scheme is implemented, an assessment is made to ensure that a scheme is *[inter alia]* cognisant of new or displaced parking problems'.

Note on Objection 8: No such assessment was made in this case, and this is demonstrable because the parking problems which would be caused by excluding Havenfield were not considered until well after the closing date of the formal consultation. Once we at Havenfield became aware that we had not been notified in time to respond to the formal consultation, we contacted the GCP and a meeting was arranged with the senior member of staff responsible for the implementation of the Scheme. Some correspondence has since ensued. One point that was made by the GCP manager in the correspondence was that *'amending the scheme boundary as you suggest could not be done without a further public consultation'*. Perhaps what is needed is a new consultation, given that it was the Council's (or the GCP's) dereliction that no-one on the northern side of Arbury Road was informed of the consultation at the time. Major changes were made to the Scheme after the formal consultation (see Objection 10) below). The changes were not notified until the day of the publication of the TRO, 18<sup>th</sup> March 2024, one year and four months after the close of the formal consultation, and about three weeks before the closing date for comments and/objections to the Permanent TRO. Those changes show that a change such as the boundary change, which after all would only be a change back to the originally-proposed Hurst Park scheme northern boundary, would seem to be entirely possible, without a further formal consultation. The residents on the northerly side of Arbury Road, including the 68 residences in Havenfield, were not informed of the consultation, therefore did not respond, and discovered that the boundary had been changed to exclude them about four months too late to respond. In the light of this shockingly shambolic situation, it seems reasonable, as it was the Council or the GCP, who made the mistake of not informing us of the formal consultation, for me to say to the Council and the GCP:

*'Now, dear Council and GCP, if you still want to proceed with the Milton Road area Resident Parking Scheme, you are going to have to return to the situation as it was before the formal consultation of October-November 2022, that is to say with the north-eastern side of Arbury Road included in the proposed Hurst Park RPS, and have another formal consultation pointing out the boundary change, and this time inform the public, including all those affected by the scheme, of the result.'*

I can almost hear the Council and staff laughing at this. There is a very prevalent opinion in Cambridge that no matter how much people like myself protest, and how many breaches of Council's own policies and principles occur, 'they will go ahead anyway'. This should make our councillors hang their heads in shame. I do not blame the staff, no matter how inept (if they are), because it is the councillors who employ them, on behalf of the public, and who have the ability to keep them under control. The councillors in turn, are kept under control by the electorate, but only from time to time. The electorate are taxpayers. All the money spent on and by the Council is tax-payers' money. The Council owns nothing, and Councillors have no personal power. Limited administrative powers are delegated to Councils for limited periods, so that they may perform certain functions. Councillors and their staffs are functionaries. They no more 'own' power than they own the money they are entrusted to spend on the public's behalf. At times it seems some of them need to be reminded of these truths. They cannot avoid responsibility by delegating their responsibilities to their staff. If they do delegate, as they seem increasingly willing to do, they remain responsible for the actions taken.

Starting with the 'informal engagement', the RPS was presented as a Community-led initiative. I did not know at the time that the whole plan for the delivery of Resident Parking Schemes in Cambridge had been mapped out in advance before the formal consultation. Had I been more alert at the time I might have noticed such items as the discussion at the GCP Joint Assembly meeting of 9<sup>th</sup> June 2022, where it was *'Considered whether the size of some or all of the residents' parking schemes should be increased to improve parking options for those that used them and minimize border issues . . . with one member further suggesting that the whole of Cambridge could become one parking zone'*. It was at this same meeting that it was *'Queried whether it would be possible to remove the current requirement for new residents' parking schemes to obtain the support of at least 50% of residents in the area.'*

When I did finally become aware of this information, I wondered what possible agenda could be behind the idea of introducing a resident parking scheme that did *not* have the support of a majority of residents in the area (and others affected by it). For the answer, see the reports prepared for the GCP by WSP: *Greater Cambridge Partnership Integrated Parking Strategy Initial Report*, dated June 2022, and *Greater Cambridge Partnership Residents' Parking Delivery Plan*, dated May 2022.

The Formal Consultation should have indicated the level of support for the Milton Road area RPS, but it didn't. This could only be a result of laxity or intentional obfuscation by the Council and/or the GCP. At the time of writing, nineteen days after the publication of the Permanent TRO, the data from the Formal Consultation are still as unknown to the public as the depths of the Mariana Trench, or the inside of a black hole.



**Objection 9):** Significant changes to the proposed Scheme were notified only on the day of the publishing of the TRO (18<sup>th</sup> March 2024), whereas the original information published at the time of the formal consultation remained on-line as official information from October 2022, is still there at the time of writing (6<sup>th</sup> April 2024), and is as misleading as ever. The 18<sup>th</sup> March 2024 information on the TRO web-site is in inferior form. Resources available to the Council and the GCP (namely their cartographers, consultants and suppliers of technical services WSP) were not used in a manner that served the public with respect or equity.

**Note on Objection 9):** The changes mentioned above were published only on the day of the publishing of the TRO (18<sup>th</sup> March 2024). The changes were notified to the public for the first time in the documents published on that day. An essential part of this information was an updated version of the map of the whole Scheme area on which the formal consultation was based in 2022. This one map was very small-scale and the details (of significant changes) are effectively illegible. The map was advertised in the Public Notice of the TRO as available for inspection at the Cambridge Central Library, so two Havenfield residents hastened to the Library on 18<sup>th</sup> March, expecting to see a full-sized map in the correct colours. All the librarian was able to provide them with was an A3 black and white copy, which they could have printed themselves at home. This was not of course the librarian's fault, she was only able to provide what the Council had provided her with, which was, in the case of the map, next to nothing. We later discovered a good set of maps on the <https://consultation.appyway.co/cambridge> website. It is unlikely that anyone would find this set of maps until they were about to submit their response to the Statutory Consultation, via the appyway web-site. The maps on the GCP Milton Road area Resident Parking Scheme web-site are out-of-date and entirely misleading, and the single map provided on the CCC's TRO web-site is illegible to everyone except those of us with above-average computer skills, who were able to enlarge and clarify it section by section in order to reveal the details of the recently revised proposal. The appyway maps were apparently produced by the Ordinance Survey, and the 2022 GCP maps by WSP. The woefully inadequate February 2024 map presented as official information with the Public Notice of the Permanent TRO, published on 18<sup>th</sup> March 2024, was also drawn by WSP. It was drawn using AutoCAD software in A1 size, so the original must be of good quality. Why then was it published on-line in illegible form, when it could have been provided as a good set of ten maps, like the 2022 maps, or the Ordinance Survey ones? And why was public money spent on two different sets of maps when one would have been adequate, had they been specified properly. I say 'specified', because we cannot blame the cartographers for this fiasco; they can only be expected to do what the Council or the GCP commissions them to do. If I were of a suspicious frame of mind, I would suspect that the illegible map was provided to cover up the extent of the last-minute changes to the Scheme since the formal consultation. As I am not so uncharitable, I am inclined to put it down to mere incompetence.

I leave it to the Council to ponder the propriety of stating in an official Public Notice that *'Documents are also available for inspection during normal office hours at Cambridge Central Library'*, when one of the key documents, the map, was not in fact available in decipherable form. It seems to me that what the Council should have done, was to order a full-sized and properly coloured printout from the company that drafted the map, and had that ready for inspection at the Library on the publication day of the TRO. The map was drafted in A1 size (23.4 inches by 33.1 inches, or 594 by 841 millimetres), using AutoCAD software. Very good results are possible using such methods. I would be very surprised if the multi-billion dollar global consulting and technical services company employed by the GCP lacked the technical facilities to do this. Clearly they were not directed to produce a full-sized, properly coloured, legible map by the Council or the GCP, although the Ordinance Survey seems to have been commissioned to draw a better version. That is not my only complaint about the map. At the time of the formal consultation (as I now know), ten maps were made, to show the whole area of the Scheme, at a reasonable scale and resolution, and in fairly good colour. There was also a document listing the number of parking bays proposed in each street. I am primarily interested in the situation in Arbury Road. The relevant maps (numbers 3 and 5), show no parking bays on the south-western side of Arbury Road. Instead, there is a cycle-lane, from the Milton Road corner to the westerly boundary of the Scheme, where, very logically, it joins the existing cycle lane which continues to the west. The accompanying document clearly states: *'Arbury Road, number of parking bays '0'*, that is to say 'zero'. Needless to say, where there is a cycle-lane, there can be no parking bays, in a narrow road such as this. (Arbury Road does widen by almost a metre further to the west). So, imagine my surprise when the single new map was published on the day of the TRO notice, and I find, after a bit of manipulation to render it legible, that the cycle-lane has disappeared, and fifty-three parking bays are now proposed, in place of the earlier maps' 'zero' bays.

To recoup: vital official information on the scheme was available in fairly clear form at the time of the Formal Consultation in October-November 2022, including a set of ten maps. The same maps were put on-line on 23<sup>rd</sup> August 2023. On 18<sup>th</sup> March 2024, this information became obsolete, in the light of major changes to the scheme. Unfortunately (if that is the right word) the obsolete information is still displayed on the GCP's official Milton Road area Resident Parking Scheme. Quite different (but correct) information was published on March 18<sup>th</sup> 2024 in the documents accompanying the official Public Notice of the Permanent TRO. The associated documents included the new, difficult to decipher map. At the time of writing, 6<sup>th</sup> April 2024, 19 days after the publication of the TRO, the ten earlier maps and the document enumerating the number of parking bays on each street are still on the GCP web-site, and the new map is not. On 18<sup>th</sup> March 2024 the ten older maps were officially superseded by the single new, largely indecipherable, map. I have not researched the date of publication of the Ordinance Survey versions, which, whenever they were published, were hidden away on the appyway site. As far as formal objections are concerned, the new map on the TRO web-site was published at the very last possible moment, but the older maps were left on the GCP web-site exactly as if they were accurate current information. This means that anyone consulting the GCP website on or after the 18<sup>th</sup> March would be completely misled as to the details of the Scheme. This might well lead them to respond erroneously, or not to respond when they might have done so had they seen the correct information.

The main difference between the maps, apart from their legibility, is that the old maps show a cycle lane all along the south-western side of Arbury Road, and no parking bays, whereas the new map shows no cycle-lane and 53 parking bays. This is not minor detail!!

References: The 'old' maps referred to are: *GCP Resident Parking Scheme General arrangement sheets 1-10*, dated September 22 (i.e. September 2022), and the 'new' map is the one titled *GCP Resident Parking Scheme Milton General Arrangement Overview*, dated February 24 [i.e. February 2024]. The maps drawn by the Ordnance Survey were published on the <https://consultation.appyway.com/cambridge> website. I do not know the date of publication, but it is likely to be 18<sup>th</sup> March 2024, the date of publication of the TRO.

At first I could not understand why the quality of the map provided as part of the legal notification of the Permanent reference number PR0998 should be so poor, when clearly the GCP has the technical ability, by way of their cartographers at WSP, to provide good quality maps. Indeed, the map I am complaining of, was drawn as an A1 size document, and could easily have been made available at the Library as a printout on paper at that size (23.4 x 33.1 inches, or 594 x 841 millimetres). Such a printout should be true-to-colour, and that would mean that the indications on the map would be interpretable by reference to the map key. In the case of the 'old' maps, I was able to print them in reasonably satisfactory colour on a cheap home printer in A4 size, and then colour-photocopy them satisfactorily in A3 size. WSP must certainly have an A1 colour printer. Eventually the explanation dawned on me: the earlier maps were published by the GCP. The later, very different one, was published by the CCC. (The CCC is the body responsible for the statutory publication of TROs). It seems to me that the CCC and the GCP simply were not talking to each other. This has resulted in the Council publishing information which conflicts with and contradicts the information published by the GCP. This could be dismissed as just a bureaucratic error, but the public deserve and have right to accurate information, especially when it will affect many lives. What use is a statutory consultation such as the one I am responding to at this very minute, if the information consulted on is incorrect? Anyone relying on the maps and other information on the GCP's Milton Road area Resident Parking Scheme web-pages for information on which to base their response to the consultation would be seriously misled. A statutory Public Notice out-ranks a GCP web-page in legal status, so the map provided by the CCC must be the correct one. What a pity it is almost illegible. If the CCC map were legible, there would be no need for anyone to turn to the GCP web-pages, but as it is not, it would not be surprising if someone turned to more accessible, larger-scale, better-coloured, and more attractive (but inaccurate) GCP maps for information.

It seems to me this alone is sufficient to invalidate the present statutory consultation.

It might sound too obvious to bother stating, but, dear Council officers and GCP staff, if you are required to conduct a Statutory Consultation (as by law you are for TROs), you really must try to do it properly, which means not misleading the public with outdated, erroneous, conflicting, hard-to-find or illegible information. Talk to each other, find out what your colleagues are doing, and get it right.

## CONCLUSION

I am sure that most councillors are aware that decisions in one area can lead to unintended consequences in another. Perhaps the Milton Road RPS could be looked at again in that light, and in the light of the procedures which have not followed the County Council's own current published policies.

I do appreciate that the recent pandemic made life and work difficult for everyone. We have all seen the deleterious effects on central government when sound principles were over-ridden, at times by what seemed to be opportunistic elements. I hope such dark days can now be left behind us, and we can get stricken Britain back on its feet and on the right path. That is your noble task, at local level, dear councillors.

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I am writing to object most strongly to the Resident Parking Scheme which is proposed for Milton Rd.

I am speaking as the [REDACTED] of one of the elderly residents who live in Havenfield.

Firstly I would like to say that the Havenfield residents, who it could be argued are amongst those who would be the most affected should this proposed scheme go forward, were not consulted.

The needs of the Havenfield residents have not been adequately assessed, nor their disabilities taken into account. When I visit [REDACTED] who lives in Havenfield there is rarely a free parking place. This is because in order to remain independent, many residents need to have their own cars yet there are only 21 spaces for 68 flats. In addition to this there is a constant stream of visitors, nurses, doctors, carers and tradespeople. If the scheme is adopted, the very nearest overflow parking places are over 480 meters away. In order to qualify for a disabled parking permit one must not be able to walk more than 50m. Some of the residents can walk more than 50m, so wouldn't qualify, but it is not reasonable to expect people in

their 80s who are able to remain independent by virtue of having their own transport, to walk that distance (and indeed many actually can't walk that far), especially in the winter when it is dark by 4pm, and cold.

Your proposed scheme will take away highly-valued independence from many of the residents. Their elderly frail friends will not be able to visit them. This will adversely affect their mental health. Being, in effect, confined to the Havenfield grounds, will also affect their physical health. I know this from personal experience. [REDACTED]. She is normally independent, but needed help both with personal hygiene and housework when she was first discharged from hospital. [REDACTED] visited her daily until she could manage. If we had had to park >1/3 mile away, this would have been difficult. Pay and display parking spaces are very expensive for people living on a state pension, and often the number of hours that the car can be parked is restricted.

Please take these factors into account when you are deciding on a course of action which will have far-reaching effects which so far have perhaps not been taken into consideration.

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With reference to the above Traffic Order, I must **object** to your scheme to create a parking zone which excludes the north side of Arbury Road, as this will not achieve your expected results of easier parking for residents. Quite to the contrary it will make life more difficult for those "outside" and "inside" too, plus increased costs of those within the borders of the scheme. Your act of excluding the north side of Arbury Road from your parking scheme is completely incomprehensible view the fact that it would seem all other roads in this proposed scheme, and those in place in other parts of the city, include both sides of the roads involved.

I find your scheme unnecessary as this does nothing to alleviate the Hurst Park Estate from car and van drivers cutting through from Arbury Road to Milton Road to avoid the traffic lights at the Arbury/Milton Road junction (rat-running as you call it in your answers to the questions raised by ARERA). The cause of this is, of course, the remodelling of Milton Road (and before that the remodelling of Histon Road). Until these road-works are finished the "rat-run" will continue and drivers will consider it better to brave the sleeping soldiers which are most probably planned to be put in place, rather than wait in line at the lights.

The Cambridgeshire County Council is imposing a residents' parking zone on the community which is centred in and around Arbury Road, Leys Road and adjoining streets, through the services of the Greater Cambridgeshire Partnership, using as a reason "Parking for Residents is the main focus". I regret immensely, along with many other persons living in this area that, elected county councillors who have the majority vote concerning transport in the City of Cambridge have, in their complete arrogance (or is it the arrogance of the GCP?) arbitrarily decided that the north side of Arbury Road should not be included in this parking scheme. As such, the north side of Arbury Road was excluded from the preliminary consultations way back towards the end of 2022. It should be noted that no results have been published as yet. Where are these results please?

This implementation of this scheme has been completely against the Cambridgeshire County and Cambridge City Councils' procedures for setting up residential parking zones which state that they are obliged to consult **ALL** persons who could be affected/have a vested interest in your schemes. It is quite obvious that none of you understand, or, if you do, you prefer to ignore the fact that during the day there is no problem to park in Leys Road in particular or on Arbury Road. Your Traffic Order will have quite the opposite effect to that stated in your reasoning that it "is intended to prioritise on-street parking for residents and, in particular, those with little or no off-road parking available".

(1) In your reply to ARERA questions, I quote, N° 11 "There are two properties on the north side of Arbury Road that do not have driveways". Your reply: "They need to find alternative spaces in other roads" is contrary to your reasoning.

(2) Your scheme will force Arbury Road residents on the south side who have no room to put their cars on their own property, to move their cars mainly, of course, into Leys Road, and these will permanently fill up the spaces in this road so that residents there will be unable to park when they return home in the evenings.... It will also detrimentally affect Maio Road, Marfield Court, Twickenham Court..... who will also see an influx of cars, and especially the community of senior citizens of Havenfield, the latter which already has difficulties to accommodate the doctors/nurses/carers who continually come and go during the day to carry out duties specified by doctors. How can you blatantly say that your scheme is "focussing on residents parking"?

I also **object** on the grounds that this scheme will kill the shops in Arbury Road. Your "Statement of Reasons" that this order is for "Preserving or Improving the Amenities of the area through which the road runs" is a non-starter. Due to your insistence that there will be no parking for the shops/businesses on Arbury Road – double yellow lines - your scheme will eventually kill them and probably also those on Milton Road as those

persons who need their car for shopping (residents of Havenfield in particular) will be unable to stop as no parking will be allowed. I fail to see that your scheme will "Preserve our Amenities".

I have already voiced my opinion, in my request that you pause the issue of the TRO, regarding your negligence in your duties towards "specifically protected categories" in other words elderly and disabled although for some who are happily not disabled enough to warrant having a blue badge, this scheme will dramatically affect their lives.

I therefore also **object** to the way in which you proceeded to get this scheme passed at all costs by ignoring the residents on the north side of Arbury road who will be the "parking losers" in a big way (see above para.). Your scheme is divisive. Clearly you only have concerns for your pay-scheme zone and don't care about those of us on the north side who will lose on-street parking – a case of "I'm alright jack" and to hell with the rest of us!!

Last but not least, I read that you are considering putting in a pedestrian crossing at the level of N° 15 Arbury Road. Should this not be at the level of Leys Road to facilitate the safe passage of elderly people crossing the road to get to the shops? Yet another failure of the Cambridge County Council to put into effect their Equality, Diversity and Inclusion Statement with regard to the residents of Havenfield.

Basically, your scheme will not have the desired effect of facilitating on-street parking for residents, **quite the reverse** but it will certainly increase the revenue of the City/County Councils which will most likely not be used to fill the deep potholes in the roads in this scheme !

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I object whole heartedly. [REDACTED] lives in the retirement complex in Havenfield where there are not enough spaces for the residents let alone anyone visiting. These residents are elderly and restricted in mobility - in these plans they will not be allowed to have residents parking or visitor permits. It's discriminatory- they are unable to walk long distances to where they will have to park if they can't get in their car park (built over 30 years ago - with only 21 spaces for 68 flats)

Similarly, we won't be able to support her with shopping etc if we are unable to get there.

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