

## Commons Act 2006: Section 15

**Application for the registration of land as a Town or Village Green**

Official stamp of registration authority  
indicating valid date of receipt:

<b>COMMONS ACT 2006</b>
<b>10 JUN 2019</b>
<b>CAMBRIDGESHIRE COUNTY COUNCIL COMMONS REGISTRATION AUTHORITY</b>

Application number:

CR193

Register unit No(s):

N/A

VG number allocated at registration:

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(CRA to complete only if application is successful)

Applicants are advised to read the 'Guidance Notes for the completion of an Application for the Registration of land as a Town or Village Green' and to note the following:

- All applicants should complete questions 1–6 and 10–11.
- Applicants applying for registration under section 15(1) of the 2006 Act should, in addition, complete questions 7–8. Section 15(1) enables any person to apply to register land as a green where the criteria for registration in section 15(2), (3) or (4) apply.
- Applicants applying for voluntary registration under section 15(8) should, in addition, complete question 9.

**Note 1**

Insert name of  
registration  
authority.

**1. Registration Authority**

To the

Cambridgeshire County Council of Shire Hall Castle Hill Cambridge CB3 0AP
--

**Note 2**

*If there is more than one applicant, list all names. Please use a separate sheet if necessary. State the full title of the organisation if a body corporate or unincorporate.*

*If question 3 is not completed all correspondence and notices will be sent to the first named applicant.*

**2. Name and address of the applicant**

Name:

Full postal address:

Postcode

Telephone number:

(incl. national dialling code)

Fax number:

(incl. national dialling code)

E-mail address:

**3. Name and address of solicitor, if any**

Name:

Firm:

Full postal address:

Post code

Telephone number:

(incl. national dialling code)

Fax number:

(incl. national dialling code)

E-mail address:

**Note 3**

*This question should be completed if a solicitor is instructed for the purposes of the application. If so all correspondence and notices will be sent to the person or firm named here.*

**Note 4**

*For further advice on the criteria and qualifying dates for registration please see section 4 of the Guidance Notes.*

*\* Section 15(6) enables any period of statutory closure where access to the land is denied to be disregarded in determining the 20 year period.*

**4. Basis of application for registration and qualifying criteria**

If you are the landowner and are seeking voluntarily to register your land please tick this box and move to question 5.

Application made under **section 15(8)**: ☐

If the application is made under **section 15(1)** of the Act, please tick one of the following boxes to indicate which particular subsection and qualifying criterion applies to the case.

**Section 15(2)** applies: ☐

**Section 15(3)** applies: ☒

**Section 15(4)** applies: ☐

If **section 15(3) or (4)** applies please indicate the date on which you consider that use as of right ended.

10 January 2019 (see attached statement)

If **section 15(6)\*** applies please indicate the period of statutory closure (if any) which needs to be disregarded.

**Note 5**

*The accompanying map must be at a scale of at least 1:2,500 and show the land by distinctive colouring to enable it to be clearly identified.*

*\* Only complete if the land is already registered as common land.*

**Note 6**

*It may be possible to indicate the locality of the green by reference to an administrative area, such as a parish or electoral ward, or other area sufficiently defined by name (such as a village or street). If this is not possible a map should be provided on which a locality or neighbourhood is marked clearly.*

**5. Description and particulars of the area of land in respect of which application for registration is made**

Name by which usually known:

Land at Shire Hall including Castle Mound as shown edged red on the plan attached hereto.

Location:

Shire Hall  
Castle Hill  
Cambridge  
CB3 0AP

Shown in colour on the map which is marked and attached to the statutory declaration.

Common land register unit number (if relevant) \*

**6. Locality or neighbourhood within a locality in respect of which the application is made**

Please show the locality or neighbourhood within the locality to which the claimed green relates, either by writing the administrative area or geographical area by name below, or by attaching a map on which the area is clearly marked:

City of Cambridge  
including: Castle Ward,  
Arbury Ward,  
West Chesterton Ward &  
Market Ward  
Abbey Ward

Tick here if map attached: ☐



**7. Justification for application to register the land as a town or village green**

**Note 7**

*Applicants should provide a summary of the case for registration here and enclose a separate full statement and all other evidence including any witness statements in support of the application.*

*This information is not needed if a landowner is applying to register the land as a green under section 15(8).*

Please see attached statement and appendices

The application site has been used 'as of right' for informal recreational purposes for a period of at least 20 (twenty) years preceeding the date of the landowner's deposit, as explained in greater detail in the attached statement and appendices thereto.

**Note 8**

Please use a separate sheet if necessary.

Where relevant include reference to title numbers in the register of title held by the Land Registry.

If no one has been identified in this section you should write "none"

This information is not needed if a landowner is applying to register the land as a green under section 15(8).

**Note 9**

List all such declarations that accompany the application. If none is required, write "none".

This information is not needed if an application is being made to register the land as a green under section 15(1).

**Note 10**

List all supporting documents and maps accompanying the application. If none, write "none"

Please use a separate sheet if necessary.

8. Name and address of every person whom the applicant believes to be an owner, lessee, tenant or occupier of any part of the land claimed to be a town or village green

Cambridge<sup>shire</sup> County Council, Shire Hall, Castle Hill, Cambridge  
CB3 0AP

9. Voluntary registration – declarations of consent from 'relevant leaseholder', and of the proprietor of any 'relevant charge' over the land

**10. Supporting documentation**

- |                                |                         |
|--------------------------------|-------------------------|
| 1 Supporting Statement         | 3 Application Site Plan |
| 2 Witness Statements by:       | 4 Photographs           |
| - Elizabeth Claire Richard     |                         |
| - Marie Thompson               |                         |
| - Rosalind and Jonathan Higham |                         |
| - Yvonne Barr                  |                         |
| - Elaine Hope                  |                         |
| - Claire Peirce                |                         |
| - James Little                 |                         |
| - Robert Evans                 |                         |
| - Jane Fenton                  |                         |
| - Sophie Grove                 |                         |
| - Alison Taylor                |                         |
| - Anne Marie Garvey            |                         |
| - Dr Lesley Dee                |                         |
| - Dr Jocelynn Scutt            |                         |
| - Andrew Sharpe                |                         |

**Note 11**

*If there are any other matters which should be brought to the attention of the registration authority (in particular if a person interested in the land is expected to challenge the application for registration). Full details should be given here or on a separate sheet if necessary.*

**Note 12**

*The application must be signed by each individual applicant, or by the authorised officer of an applicant which is a body corporate or unincorporate.*

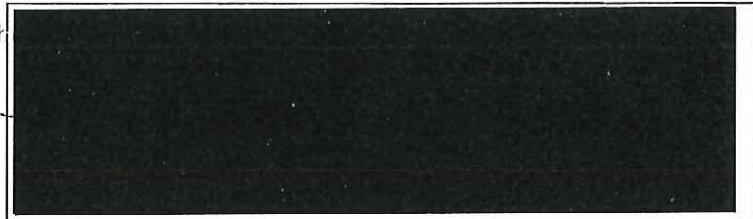
**11. Any other information relating to the application**

See attached statement

Date:

7 June 2019

Signatures:

**REMINDER TO APPLICANT**

You are advised to keep a copy of the application and all associated documentation. Applicants should be aware that signature of the statutory declaration is a sworn statement of truth in presenting the application and accompanying evidence. The making of a false statement for the purposes of this application may render the maker liable to prosecution.

**Data Protection Act 1998**

*The application and any representations made cannot be treated as confidential. To determine the application it will be necessary for the registration authority to disclose information received from you to others, which may include other local authorities, Government Departments, public bodies, other organisations and members of the public.*

## Statutory Declaration In Support

*To be made by the applicant, or by one of the applicants, or by his or their solicitor, or, if the applicant is a body corporate or unincorporate, by its solicitor, or by the person who signed the application.*

<sup>1</sup> *Insert full name  
(and address if not  
given in the  
application form).*

I Simon Kelly solemnly and sincerely declare as follows:—

<sup>2</sup> *Delete and adapt  
as necessary.*

1. I am the solicitor to the applicant.

<sup>3</sup> *Insert name if  
Applicable*

2. The facts set out in the application form are to the best of my knowledge and belief fully and truly stated and I am not aware of any other fact which should be brought to the attention of the registration authority as likely to affect its decision on this application, nor of any document relating to the matter other than those (if any) mentioned in parts 10 and 11 of the application.

3. The map now produced as part of this declaration is the map referred to in part 5 of the application. The aforesaid map is attached at appendix 1 to the attached supporting statement.

<sup>4</sup> *Complete only in  
the case of  
voluntary  
registration (strike  
through if this is not  
relevant)*

~~4. <sup>4</sup> I hereby apply under section 15(8) of the Commons Act 2006 to register as a green the land indicated on the map and that is in my ownership. I have provided the following necessary declarations of consent:~~

- ~~(i) a declaration of ownership of the land;~~
- ~~(ii) a declaration that all necessary consents from the relevant leaseholder or proprietor of any relevant charge over the land have~~

*Cont/*



Continued

been received and are exhibited with this declaration; or  
(iii) where no such consents are required, a declaration to that effect.

And I make this solemn declaration, conscientiously believing the same to be true, and by virtue of the Statutory Declarations Act 1835.

Declared by the said

SIMON KELLY

at

Barr Ellison Solicitors

39 Parkside, Cambridge CB1 1PN

this

7 day of June 2019.

Signature of Declarant

Before me \* LUCY HARRISON

Signature:

Address:

39 Parkside  
Cambridge CB1 1PN

Qualification: SOLICITOR

\* The statutory declaration must be made before a justice of the peace, practising solicitor, commissioner for oaths or notary public.

Signature of the statutory declaration is a sworn statement of truth in presenting the application and accompanying evidence.

REMINDER TO OFFICER TAKING DECLARATION:

Please initial all alterations and mark any map as an exhibit



# **Land at Shire Hall, Castle Hill, Cambridge CB3 0AP**

## **Supporting Statement to**

**Application by the Hon. Dr Jocelyne Annette Scutt, Elizabeth Claire Richards and Katie Thornburrow (the Applicants)**

**to register a**

**Town and Village Green**

**Pursuant to**

**Sections 15 (1) and (3) of the Commons Act 2006**

**The Commons Registration (England) Regulations 2014**

**and**

**The Commons (Registration of Town or Village Greens) (Interim Arrangements) (England) Regulations 2007**

### *Introduction*

1. This is an application to register the land described below as a town or village green for the purposes of the Commons Act 2006.
2. Appended to this Statement is a plan showing the application site within the wider context of Cambridge City, a redline plan identifying the extent of the application site, and witness evidence of the recreational use. That witness evidence has been assembled at short notice, but the applicants consider that it is sufficient for the purposes of this application.
3. As a landowner deposit has been registered, this application is made under s. 15(3) of the Commons Act 2006. The locality relied on for the purposes of section 15(3)(a) are the electoral wards of Arbury, Castle, West Chesterton, Market and Arbury albeit, it is also well known that the application site is also regularly frequented by residents of other parts of the City of Cambridge, either for their own recreational purposes, or as a place where Cambridge residents bring out-of-town guests to view the roofscape of the town.
4. For the reasons set out below, the Applicants consider that the application site has been used 'as of right' for informal recreational purposes for a period of at least 20 years preceding the landowner deposit, and therefore request that the application site is registered as a town and village green.

### *Background*

5. The site which is the subject of this application is shown edged red on the plan attached to this statement at Appendix 1 (the Site). It comprises a grassed area in front of the southern elevation of Shire Hall and beyond that, the old Castle Mound. Shire Hall was built in around 1932 and

since that date has been the main offices of Cambridgeshire County Council (the County Council).

6. The freehold of the Site is owned by Cambridge County Council and registered at the Land Registry under title number CB418.
7. The County Council has given a notice dated 13 November 2018 under section 31(6) of the Highways Act 1980 and section 15A(1) of the Commons Act 2006 (the Act) (the Notice). According to the County Council's online register, this notice was first deposited on 10 January 2019 (Record Number 480). It is unclear whether a map was attached to that notice as required by section 15A(3) of the Act, however, the County Council's online interactive map suggests that the area to which the Notice was intended to apply includes all the green space at Shire Hall. This statement assumes that the application for the Landowner's deposit was properly made.
8. As the supporting witness evidence to this application demonstrates (attached at Appendix 2 and summarised below) the Site has been used 'as of right' by a significant number of the inhabitants of the Castle and Arbury electoral wards, and of Cambridge City more generally for lawful sports and past times for more than 20 years preceding either the date of the landowner's deposit, or the date of the Notice. Notably, there are no notices either within the Site or at any entrance to the Site either prohibiting the use of the Site by the public or authorizing that use. Nor is the Site fenced or closed-off at any point so that access cannot be freely obtained.
9. The statements attached to this Statement at Appendix 2 evidence use of the Site for informal recreation as summarised below:

Author of Statement	Address	Period Covered	Nature of Evidence
Elizabeth Claire Richard	Glisson Road, Cambridge	1987 – 1989	Personal and family use of the Site since 1987 for recreational purposes. Witness to use by local residents for dog walking, picnicking and walking, wedding ceremonies
	30 York Street, Cambridge	1989 - 1997	
	Beche Road, Cambridge	1997 - date	
Marie Thompson	156 Gilbert Road, Cambridge CB4 3PB	1960 – date	Easter Sunday celebrations by congregations of 'Church at Castle' on Castle Mound since before 2000
Rosalind and Jonathan Higham	20 Carlton Way CB4 2BZ	1996 - date	Taking visitors to and personal use of Castle Mound for many years. Children play area
Yvonne Barr	55 Oxford Road, CB4 3PH	1996 - date	Person use, and showing to visitors.



			Frequent recreational use by girl guides
Elaine Hope	Riverside, Cambridge	n/a	Taking school children on local history outings to Site. Witness to children playing on Site
Claire Peirce	13 Christchurch Street, Cambridge CB1 1HT	1950s to date	Personal recollections of visiting site as child in 1950s and early 60s, showing site to own children in 1980s, incidental visits en-route elsewhere. Likens use to recreational use of Midsummer Common and river walks.
James Little (son-in-law to Claire Peirce)	Sheffield (but grew up in Cambridge)	Childhood (see above) and specific memories of 2000, 2013 and 2014	General recreational use for sight seeing (showing visitors to Cambridge ) in childhood, visits to Site in 2000, 213 and 2014
Robert Evans	1 Wentworth Road, Cambridge, CB4 3PN	1968 – date	Memories of taking visitors up Castle Mound and showing them remains of castle walls, general recreational use
Jane Fenton	44 Hertford Street, CB4 3AG	1980 – date	Dog walking, picnicking, tobogganing with children in winter, witness of use by other walkers and wedding receptions.
Sophie Grove	18 Hertford Street, Cambridge CB4 3AG	1983 - date	Memories of playing in Site as child in 1990s, Maypole dancing as Park Street School child on May day in 80s and 90s, taking visitors to Site, taking family (children) to Site
Alison Taylor	40 Hertford Street, Cambridge CB4 3AG	1983 - date	Led tours starting in Site, witness of use by young people for various recreational

			uses, wedding receptions, children's play area, dog walking, use by elderly
Anne Marie Garvey	18 Hertford Street, Cambridge CB4 3AG	1984 – date	Regular walker through Site. Use of Site by disponsee's children and grandchildren, use on Bonfire Nights and other festival events.
Dr Lesley Dee	9 Clare Street, Cambridge CB4 3BY	Unspecific	Report on Questionnaire Survey (84 responses) distributed to houses in Magrath Avenue, Searle Street, Clare Street, Hale Street, Arthur Street, St Luke's Road, Hertford Street, Alpha Road and Carlyle Road. Text on page 4 records use of Castle Mound for dog walking and children's play. Site described as 'green space' on page 6. Page 12 – confirmation of use of Castel Mound by children to play and meet friends
Jocelynne Annette Scutt	18 Hale Street, Cambridge, CB4 3BZ	1974-1976 Part of 1975 2011- date	Personal recreational use of Site (grassed area at base of Mound and Mound itself), witness to recreational use by others, Supervising Beaver Scouts and Scouts playing on grassed forecourt, filming on Mound, wedding parties
Andrew Sharpe	16 Bedford Close, Ely	1979 - date	Visits to site evidenced by photographs

10. The photographs contained at Appendix 3 to this Statement show actual recreational use of the Site.

#### *Legal Background*

11. Subject to criteria set out at section 15 (2) – (4) of the Act, section 15(1) of the Act authorises any person to apply to the relevant commons registration authority (in this case Cambridge County Council) to register land to which Part 1 of the Act applies as a town or village green. Section 5 of the Act applies Part 1 to all land in England and Wales with certain exceptions, none of which apply in this case. Part 1 of the Act therefore applies to the Site.
12. Given the fact that a landowner's deposit has been registered, the criteria for a successful registration are those set out at s. 15 (3) (a), (b) & (c):
- a. "a significant number of the inhabitants of any locality, or of any neighbourhood within a locality, have indulged as of right in lawful sports and pastimes on the land for a period of at least 20 years;
  - b. they ceased to do so before the time of the application ... ; and
  - c. the application is made within [the period of one year beginning with the cessation mentioned in subsection (3)(b)]<sup>1</sup>.
13. Case law has established the following relevant principles:
- i. 'Significant' does not of itself require a considerable or substantial number. It only requires the use to be "sufficient to indicate that [the] use of the land signifies that it is in general use by the local community for informal recreation rather than occasional use by individuals as trespassers" (*R. (o.a.o. Alfred McAlpine Homes Ltd) v Staffordshire County Council* [2002] Admin at para 71)
  - ii. 'Locality' must be a distinct and identifiable community recognised by law (*R. (o.a.o. Laing Homes Ltd) v Buckinghamshire County Council* [2004] 1 P.& C.R. at paras 132 – 134). Moreover, it is sufficient if the land is 'predominantly' used by such inhabitants (*R. v Oxfordshire County Council e.p. Sunningwell Parish Council* [2000] 1 A.C. 355, at p. 358)
  - iii. "Sports and pastimes" include all kinds of modern informal recreation (e.p. *Sunningwell* at p. 357D).
  - iv. "As of Right" means openly, without force and without permission and does not require any subjective belief by the users that they have a legal right to use the land (*R. (o.a.o. Lewis) v Redcar and Cleveland LBC* [2010] UKSC 11).

#### *Discussion*

14. The Site is a well-known vantage point within an otherwise very flat Cambridge which provides easily accessed views across Cambridge and the surrounding countryside. As the County Council

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<sup>1</sup> See s. 15(3)(c) and the definition of 'relevant period' in subsection (3A)



will itself be aware, the Site is regularly visited by the residents from across Cambridge who will commonly bring visitors to the City to the Site to benefit from the panoramic views.

15. More particularly, and as the appended witness statements summarised above show, the Site has been in regular use by residents of the Castle, Arbury, West Chesterton and Market electoral wards of Cambridge City for a range of informal recreation since at least the 1950s. That use has continued up to the date of the Landowner's Deposit and indeed, continues to date. That use has been carried out both by the deponents themselves and members of their families, and the deponents are witnesses to that same use by third parties.
16. The degree of use evidenced in the attached witness statements is sufficient to demonstrate a general use by the local community (rather than occasional use by individuals as trespassers), and that the use is predominantly by residents of the locality and of Cambridge City more generally.
17. For the following reasons, it is clear that that use has been 'as of right', i.e. it has been (and is) open, without permission and enjoyed without force:
  - a. It has taken place in full view of and with the full knowledge of the County Council, whose officers will be daily reminded of that use, as their offices overlook the Site.
  - b. The Applicants are not aware of any express licence by the County Council for such use; no signs have been posted explaining that the Council has authorised the use of the Site for such purposes;
  - c. The Site is neither fenced nor can it be closed (indeed, the witness evidence records use of the Site on festival days by religious groups, and the Site is a well-known destination amongst Cambridge families for Christmas day walks, as a way of walking-off the excesses of Christmas dinners). The use is therefore not by force.
18. In these circumstances, the necessary criteria to justify the registration of the Site as a Town or Village Green as set out at Section 15(3) of the Act are satisfied, and the Applicants request that the Site is registered as a Town and Village Green.

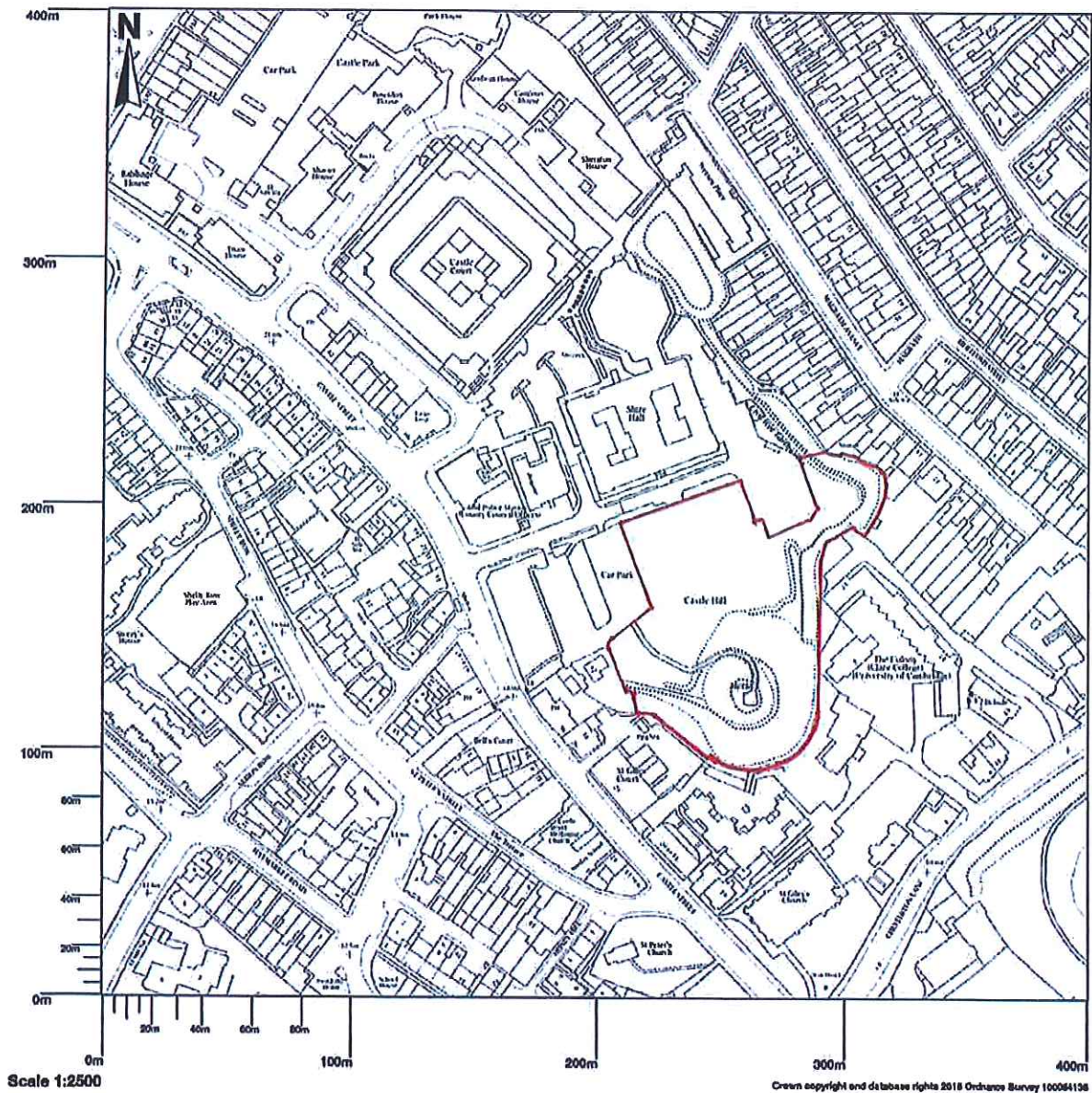
**Richard Buxton Solicitors**  
7 June 2019



## Appendix 1: Site Plan



## Castle Hill Cambridge



Map area bounded by: 544320,259071 544720,259471. Produced on 04 June 2019 from the OS National Geographic Database. Reproduction in whole or part is prohibited without the prior permission of Ordnance Survey. © Crown copyright 2019. Supplied by UKPlanningMaps.com a licensed OS partner (100054135). Unique plan reference: p16buk/354870/482103

This is the map referred to in paragraph 3 of the statutory declaration sworn by Simon Kelly on 7 June 2019 before:

Lucy Harrison, Solicitor.

## Appendix 2 – Witness Evidence



**Statements- Shire Hall Heritage Site**

Town Green Applications

Received via emails

I, Elizabeth Claire Richards, do solemnly and sincerely declare that:

The plan attached hereto and marked as Exhibit 1 is a true copy of the OS-based plan of the area showing the site to which this statement relates edged red.

I have lived in Cambridge since 1987. I lived on Glisson Road Cambridge from 1987-1989, 30 York Street Cambridge from 1989 to 1997 and 25 Beche Road, Cambridge from 1997 to date.

When I first moved to Cambridge in 1987, I missed the Welsh hills and took my daughter in her push chair onto the Shire Hall site and up the mound to see the view and remind myself of home. Since those days, Cambridge has become my home and since 2017 I have the honour of representing the residents of Castle. When I work at the County Council, from time to time, I go onto the mound or the grassed forecourt and have a flask of coffee and eat my lunch and enjoy one of Castle's green spaces. I see local residents walk their dogs there, picnic there and cut through the site to go to the shops or to work. I see communities taking part in weddings and citizenship ceremonies there.

I have received emails from friends and residents who have let me know of the importance of the mound and the Shire Hall heritage site to them. It is important to them as a space for individuals, families and communities to come together. They have let me know that community and faith groups meet there, that educational trips take place on the mound, that they celebrate there, come together there, value its history and feel strongly that they should have free and open access to it for generations to come.

As the local councillor for Shire Hall, I wish to represent my residents and protect free and public access to the mound and Shire Hall heritage site in perpetuity. People all over the nation have the right to access our public monuments and our collective history and I determined to fight for their right to do so in Castle.

Declared by Elizabeth Claire Richards

On 7 June 2019

Signed: Elizabeth Claire Richards

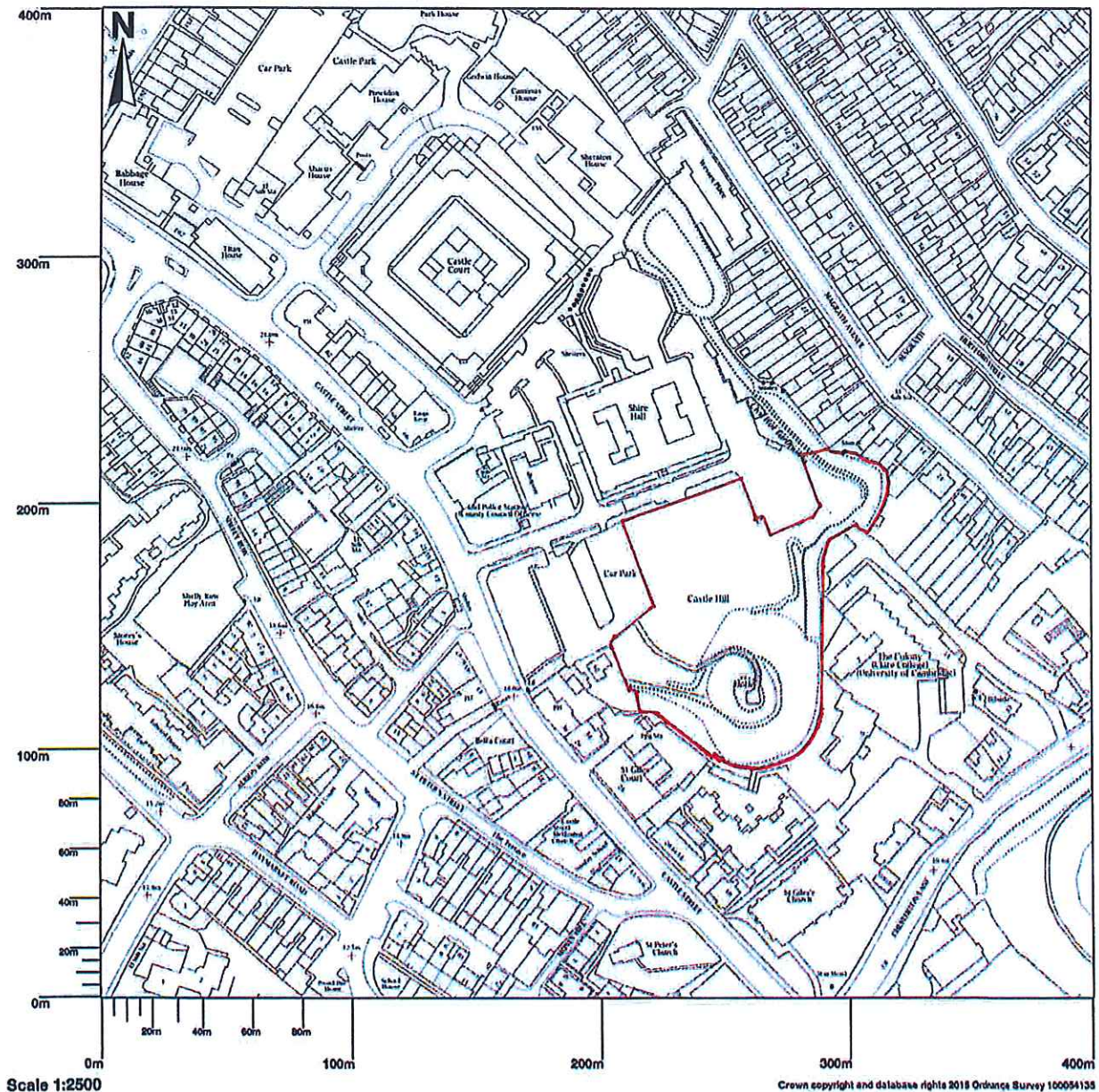
before Simon Kel

Solicitor  
Richard Buxton Solicitors  
19B Victoria Street  
CB1 1JP





## Castle Hill Cambridge



Map area bounded by: 544320,259071 544720,259471. Produced on 04 June 2019 from the OS National Geographic Database. Reproduction in whole or part is prohibited without the prior permission of Ordnance Survey. © Crown copyright 2019. Supplied by UKPlanningMaps.com a licensed OS partner (100054135). Unique plan reference: p16buk/354870/482103



# STATUTORY DECLARATION

I, JOCELYNNE ANNETTE SCUTT of 18 Hale Street CAMBRIDGE CB4 3BZ,

do solemnly and sincerely declare that:

1. The Plan attached hereto and marked as Exhibit 1 is a true copy of the OS-based plan of the area being the 'Site' to which this statement and the application it supports refer.
2. I went up to Girton in 1974 and was a student from 1974-1976. I lived at Wolfson Court, Clarkson Road, Cambridge CB3 0HD when it was accommodation for Girton students. When going into town I cycled across the backs, however, I also cycled to and from Girton College along Huntingdon Road and Castle Street, passing Shire Hall. At this time I was aware of the importance of the Castle site, comprising most particularly but not only The Mound. I can recall that on these occasions I sighted people walking in the grounds of Shire Hall and, to the best of my recollection, standing atop The Mound, walking and sitting on the lower reaches, and walking or standing on the grassed forecourt.
3. Whilst up at Girton I spent some months of 1975 in Friburg-im-Breisgau, Germany at the Max-Planck-Institut. During this time, I returned to Cambridge to consult with my supervisor Dr Peter Glazebrook of Jesus College and again traversed Huntingdon Road so in my recollection observing people in Shire Hall grounds in similar circumstances to those aforestated.
4. I returned to Australia in 1976, and thence to the United States over the period 1977-1978, however from that time onward and particularly in the 1980s and 1990s I visited Cambridge on a number of occasions when again I had the opportunity to observe The Mound and Shire Hall grounds and its attraction to people who may have been residents and/or tourists or both. One of my colleagues in the 1990s was a graduate student at Lucy Cavendish College and following her residency she and I discussed the historical importance of Cromwell's connection with the Shire Hall site. She and I visited Cambridge and now that I live in Cambridge she has stayed with me and together we have walked the grassed area and at the base of The Mound. I am aware of the not inconsiderable research, writing and archaeological interest in the site and have read many of the writings relating to it, these founding the basis of a number of our discussions and my discussions with others including residents and visitors. There is no doubt in my mind of the historical, heritage and general importance of The Mound, the grassed forecourt (particularly but not only because of the prison connection, the Civil War Earthworks to Cambridge residents, tourists and to Cambridgeshire and England.
5. In August/September 2011 I returned to Cambridge as a Visiting Fellow at Lucy Cavendish College. I lived at 88 Chesterton Road, Cambridge CB4 1ER (a property of Lucy Cavendish College) and walked regularly from that address to Lucy Cavendish where I researched and wrote and attended College Council meetings and events. This meant I walked along Chesterton Road, often going up Alpha Road or Hertford Street to walk through the grounds of Shire Hall and down to Margaret Road and Lucy Cavendish College through Shelly Gardens. I observed people (adults and children, often together with dogs) climbing or standing on The Mound and walking about Shire Hall grounds, including the grassed forecourt.



## STATUTORY DECLARATION

6. After moving to 2 Queensway, Trumpington, CB2 8AX in September/October 2012, I was selected as Labour candidate for West Chesterton Division for the 2013 County election. This meant that I regularly walked and cycled from Queensway to West Chesterton for branch meetings and for canvassing sessions, which I did regularly, often canvassing most days of the week and regularly at weekends and in the spring/summer evenings. I often took the route through Shire Hall, over the grounds from Castle Street to McGrath Street to reach the canvassing meeting point. Thus in addition to crossing the grounds myself and on occasion sitting on the forecourt, as in the past I observed others doing so and climbing The Mound or standing on top of it.
7. From the time I was elected to the County Council in May 2013 and then re-elected in May 2017 I have been a frequenter of Shire Hall and the grounds. In late 2013 to early 2014 I was Visiting Professor at Pennsylvania State University, living in Carlisle PA so was away from Shire Hall for some periods however during this time I returned to Cambridge for County Council Full Council and other meetings and thus continued to observe the public use of the grounds including the forecourt and The Mound. During this time when in Cambridge I lived at 126 Chesterton Road CB4 1DA. Throughout this period I have sited people accessing Shire Hall site, from the McGrath Street cut through, and from each of the entrances on Castle Street (opposite The Architect public house) and Huntingdon Road (the main entrance to Shire Hall and both entrances leading to what is now Castle Student accommodation.
8. From May 2015 I have lived at 18 Hale Street CB4 3BZ and from that time I have solidly used the McGrath Street/Huntingdon Road/Castle Street cut through. I have rarely used it without observing others doing so, the numbers consistently high and in my experience increasing over time and particularly with the change of use of Castle Court to student accommodation. Even early in the mornings (around 6.10-6.15am) others walk this route when I do, and similarly upon my return in the evenings and at night. In the mornings sometimes, and in the evenings frequently particularly in the spring and summer months I pass residents walking their dogs on the grassed forecourt and during those days I am at Shire Hall for meetings or passing through going into town particularly on weekends I observe people climbing The Mound and standing atop it, looking down over Cambridge City.
9. At one time, over a period of weeks during the summer months in or about 2017, a group of youths cycled early in the morning, passing me on the parking area and cut through when I was on my way to the 6.25am X5 from Northampton Street. Generally, this group cycled on the ramp behind the Octagon Building however on occasion cycled around the side of Shire Hall toward the front.
10. Frequently I have observed and continue to observe wedding parties at the Register Office (both entrances – side and front) mostly at weekends however in my recollection also during the week. These wedding parties I have seen on the grassed forecourt with photographs being taken, the purpose I surmised to be the creation of a record of the wedding. This I have seen from at least the period May 2015 to the present and it is rare that any great length of time goes by without my observing these users of the site.