

Public Questions

Question 1.

Noisy motorbikes and cars were speeding up and down streets in Cambridge late at night stopping people from getting to sleep, or waking them or their children from their sleep. A bus shelter on Green End Road was demolished by a late night speeder and another speeding car crashed into a house on Highworth Avenue, just off Milton Road. This was an issue all over Cambridge reported on the platform 'Next Door'. Stated that the vehicles must have been modified to make the loud noises. Asked for long-term and short-term solutions to this issue be investigated.

Asked for the City Council to listen to residents and act as a co-ordinator for authorities like the Police and Highway Authorities who were best able to deal with the issues of noisy and dangerous driving. Asked Councillors to support Councillor Hauk's motion.

Executive Councillor response:

Noted that the issue would be debated as part of Councillor Hauk's motion. Summarised information provided by Councillors Bird and McQueen regarding measures which had been undertaken in East Chesterton. Had been working with residents regarding the reduction of anti-social driving in the ward, particularly in the Fen Road area. A Residents' Forum had been set up and was now being led by residents at their request. Cameras had been put up in various points in the ward including Water Lane Boatyard, Fen Road and Green End Road. Recognised that cameras on their own were not the only solution. Was looking at putting a camera on the High Street near Tesco. Asked that incidents were consistently reported to the Police. A Local Highways Improvement Bid had been submitted for chicanes on Water Lane and Fen Road. Confirmed the Police had anti-social driving and road safety as a priority. Partnership working on this issue was on-going.

Question 2.

Question related to the Local Plan and the huge number of documents which had been published in relation to the new Local Plan. Asked if the archived documents the Council deposited with the Cambridgeshire County Archive Collection could be made public. Particularly proposals which had been submitted in previous years. As an example referred to a document called Cambridge Futures 2 which was written in 2003 but had not been digitised but would help residents to be able to scrutinise the process.

Asked if the Council would make the commitment to digitise the documents themselves or give permission to a member of the public to do it for them.

Executive Councillor response:

The question raised an important point about access to historical information. Increasingly information was expected to be made available online. If information wasn't easily available online then people would stop looking for it and settle for what was available.

Would support a move to digitising historical public records, this would assist officers, councillors and members of the public. To do this, three issues would need to be resolved: money, rights and hosting. Scanning to archive quality was not the same as taking a photograph of a document on a phone. Getting the materials, cataloguing and scanning them and then storing them in a suitable way took time, cost money and at the moment there were no funds available. The rights in the materials may not necessarily be free of copyright limitations. They would have been commissioned and written for a number of different circumstances and contracted with different relationships than with the council. The Council could not assume that documents were rights free and could be published online. Public bodies (including the Council) could digitise material for preservation purposes, but this did not mean they could make them available online. This issue would need to be investigated further. There would also need to be somewhere that the materials could be stored long-term. The Internet Archive was an interesting suggestion. Would like to discuss the issue further with the public speaker.

Supplementary Question:

In relation to the concert hall, one of the documents found in the Cambridgeshire collection was a study by a former Chief Planner of the Council which was published in the mid-1960s. He made a case for a new concert hall to be built with a minimum capacity for 2500 people, which would be significantly greater than the Corn Exchange. Also found a press cutting of an announcement made by a former Vice Chancellor of the University of Cambridge which said the University of Cambridge would contribute funds to cover 50% of the costs back in 1962. Encouraged Councillors to take up the former Chancellors offer.

Supplementary Executive Councillor response:

Cambridge City Council's Culture and Community team has been developing and updating the evidence base in relation to cultural infrastructure ahead of the development of a coherent cultural infrastructure strategy, which will provide a high level picture of future needs, taking into consideration our existing city infrastructure and data on audience patterns, to provide a robust platform for more detailed proposals to come forward.

Question 3.

The over-reliance of the City Council on the results of the delayed Gypsy and Traveller Accommodation Needs Assessment (GTANA) was misplaced, particularly in regard to Transit Sites. The evidence of need was before you in plain sight. Last year, during the pandemic, South Cambridgeshire had 10 unauthorised encampments while Cambridge City had five.(1) Despite that, Cambridge City was the only council in the county to evict travellers during the first lockdown, and this punitive response had continued. There was a chequered history of GTANAs, with the 2006 GTANA being the most successful in reaching out to the Traveller communities across Cambridge and its surroundings (2). This was largely because of the County Council's provision of Traveller Education (CREDS) and the existence of the Traveller Health Team. Both these services had been decimated. Cambridge City had little engagement between Councillors and Travellers in their constituencies or travelling through and camping on Council land. The 2011 GTANA was a desktop exercise, which failed in its duty to consult with the Gypsy & Traveller communities resulting in the ludicrous assessment of the need for only 1 pitch between 2011 and 2031 in Cambridge City. Judging by the number of successful Appeals, this GTANA was worse than useless. The 2016 GTANA produced by ORS (3), took place during the changes to the definition of Travellers for planning purposes (PPTS) (4). This resulted in a methodology by ORS wildly underestimating who should be included and with only a few interviews actually conducted, in large part because many families refused to speak to them. Despite this, their figures went into the Local Plan as the basis for housing policy for Travellers. There was little reason to expect the 2020 GTANA by RRR to have much greater success in reaching communities who had little to no trust in officials approaching them for personal information. This was due to the punitive fashion in which their needs had been dealt with and the systemic racism that characterises their experience of living in and around Cambridge. With the imminent threat of passage of the Police, Crime Sentencing and Courts (PCSC) Bill, which would criminalise trespass and eliminate the

nomadic way of life, the solution was obvious. Transit sites and negotiated stopping places were needed in Cambridge now.

Would the draft findings of RRR's GTANA be available for public view and when and where will the Council conduct a meaningful period of public consultation?

Executive councillor response:

Reiterated the commitments passed at the July 2021 Council meeting. The commitments remained unchanged. The Council were not going to prejudice the GTANA's findings by second guessing what it would say. The findings were expected in January 2022.

Any decision regarding transit site accommodation like any other form of housing need, needed to be based on evidence. If the GTANA stated that there was a major need for transit sites and negotiated stopping points then that would be what the council would work towards. Any decision would need to be based on evidence. The Council had a duty to the whole community to allocate resources on the basis of identified need.

The new GTANA currently underway included survey questions for Gypsy Roma Traveller (GRT) communities across the study area about potential need and preferred location for transit stopping place provision. Engagement with stakeholders would be used to identify any potential need and to inform the Council's approach going forward. This would include informing the Greater Cambridge Local Plan and whether transit pitches or further negotiated stopping places should be explored. The Local Plan was subject to public consultation. The first proposal consultation which starts on the 1 November sought views on a range of issues including those related to planning and GRT sites and all communities were encouraged to take part.

Wanted the GTANA to accurately represent need as much as possible and wanted to encourage the GRT community to take part in this process. Was happy to have constructive discussions about how this could be done.

One of the reasons for selecting RRR Consultancy to carry out the work was because they had a good track record of engaging with GRT communities.

Question 4.

At the Full Council Meeting, on 22 July, the Council resolved to: Express strong concerns, Stand in solidarity, Write to the Home Secretary, Continue to work and Identify opportunities in its resolution on the PCSC Bill (1). No actions were listed to immediately support Gypsy and Traveller communities in the face of Section 4 of the Bill. In answer to Public Questions (2), with regard to 'process', the Executive Councillor stated that "encampment is also considered in respect of the welfare needs of those present. We assess the reason for the visit, the intended length of stay, homelessness status, medical need, and access to services such as education and social care."

With regard to the question of 'eviction', the Executive Councillor said "In the last two years we have dealt with 16 unauthorised encampments, involving 6 family groups. This did not include the most recent encampment at Arbury Town Park. All of these have resulted in evictions after having followed due process and after a Court decision."

At the Environment and Community Scrutiny Committee on 7 October, the Council reaffirmed its commitment to promote equality and tackle discrimination in its 'Single Equality Scheme 2021–24'.(3)

Despite these commitments, there had been at least three evictions since these documents were approved by the Council.

The Arbury Town Park unauthorised encampment was a case in point. The families were served with a S.77 Order by an Environment Protection Officer (nailed to a tree) and addressed to 'the occupant/(s)'. One and a half days later, 'Occupants and Persons unknown' were issued with a Summons to appear at Huntingdon Magistrates Court. (4)

It was difficult to imagine at what point in these proceedings a welfare assessment was carried out. If the Council had done so, it would be odd if they hadn't then referred to the family/(s) by name. Note also, that many Travellers of this generation are functionally illiterate and written documents attached to trees is not an effective form of communication. In this instance, reading the Order and Summons aloud and answering any questions would have shown greater respect and understanding for this communities' oral culture. In any event, it was more than likely that the families would have refused to respond, precisely because of their mistrust of officials attending these encampments asking questions as well as the systemic racism this community had experienced over the years in and around Cambridge.

Punitive responses and universally applied evictions were incompatible with a welfare-based approach. The Council would never improve its relationship with this Community or tackle the discrimination they experience without offering real solutions, in this case the urgent provision of transit sites and authorised stopping places.

Would the Council now move urgently to the provision of Transit sites in the face of the imminent passage of the PCSC Bill?

Executive Councillor response:

The first thing the Council would do with an unauthorised encampment would be to carry out a welfare assessment. The Council's process was led by that.

If families had welfare issues that meant they needed to remain in the area, the council would ask for some form of evidence. For example, if someone said they were there as they needed to be near the hospital then the officer would ask for evidence of need. Based on any evidence provided, officers would negotiate with the group around how long they could stay or whether it might be more appropriate for them to move to another more suitable location. This would consider the results of the welfare assessment together with other issues such as location of the encampment and the potential impact of the encampment on other local residents

It was recognised that there may be some mistrust and a reluctance by some within the Gypsy Roma Traveller (GRT) community to provide personal information to the council, officers would wherever possible, try to avoid carrying out any eviction where evidence was provided that the family needs to remain. Without that evidence then the council may have no choice but to start proceedings.

If eviction was necessary then then papers would be handed directly to a representative of the group, with a verbal explanation of what the papers involved. Not simply nailed to a tree as had been claimed. Displaying a notice at the site was a legal requirement to inform other interested parties, such as other residents in the area.

In the unusual event of not being able to serve notice in person, the papers would be left in a visible place (for example under a vehicle windscreen wiper); but this was very rare.

Every case was dealt with on its merits, and there had been at least one example recently where the welfare assessment had led to allowing a

family being able to stay for a period and where it was agreed that eviction would be inappropriate.

The Council continued to stand in solidarity with the GRT community, every councillor in the chamber was concerned about the implications of the Police Crime Sentencing Courts (PCSC) Bill. Anti-traveller racism was taken seriously and would be challenged when it was seen. Councillor Collis had done this recently in relation to the group currently on Arbury Town Park.

It should also be noted that some families on unauthorised encampments may not need transit or emergency stopping place provision but may be in need of permanent site or bricks and mortar accommodation. The group at Arbury Town Park had told the council very clearly that they were looking for a permanent location. This did not appear to indicate a need for a transit site.

Urged communities to agree to be interviewed by the consultants carrying out the GTANA study (RRR Consultancy). This would help the council to get a better picture of what the needs are for both transit/emergency stopping place and/or permanent site provision.

Question 5.

Under its Public Sector Equality Duty, the last Environment and Communities Scrutiny Committee on 7th October [2021] approved an Equality Impact Assessment (EqIA) regarding enhancements to the boundary of Trumpington Meadows. Under Item 11 Action Plan, it was stated 'We have also contacted a Traveller representative, who had expressed concerns about previous project at this site, which was subsequently withdrawn' (sic). Under item 13 Sign Off, there are no Traveller representatives listed amongst people consulted on the new plan. To my certain knowledge, neither myself nor my colleague, who were the Traveller representatives who raised objections to the scheme, were contacted. Our names were known by Trumpington Councillors including Katie Thornburrow and Peter Lord as we attended the meeting of the September 29th 2020 Planning and Transport Scrutiny Committee on Microsoft Teams (as indicated in email communications with Democratic Services) (1). Councillor Lord put forward the S106 funding application on behalf of a resident, which was clearly aimed at the prevention of unauthorised encampments by building ditches, bunds and fencing around the perimeter thinly disguised behind provision of new

habitats for wildflowers, flowering shrubs, insects and invertebrates. The posting on Facebook and the recording of the meeting no longer exists.

The Action plan (point 11.) states that impacts will be identified ... throughout the planning and implementation stages and 'to stand in solidarity with Traveller and Gypsy communities and continue to build trust and good relations with them' and resolves 'to find solutions where it is found that there is a lack of legal sites' to help mitigate potential impacts of this project. The Council have fallen at the first hurdle by incorrectly inferring that they consulted with any members of the communities impacted or with the Traveller representatives who were easily contactable. This seriously undermines this Equality Impact Assessment. At the risk of sounding like a broken record, the solution to this issue is the urgent and immediate provision of transit sites and negotiated stopping places.

What actions would the Council now take to publicly correct the misrepresentations in the EqIA approved on the 7/10/21 and published 8/10/21 on the Council website, and what plans do they have in place to remedy the failure to consult with the Traveller community and/or its representatives, one of the groups impacted by the current enhancement Project on Trumpington Meadows?

Executive Councillor response:

The works referred to were actually scheduled to take place at Trumpington Recreation Ground on Anstey Way, not on Trumpington Meadows.

The Equality Impact Assessment (EQIA) referred to was compiled in relation to a S106 project that was considered at Environment and Community Scrutiny Committee on 7th October 2021, relating to informal open space biodiversity improvements for the Recreation Ground.

The EQIA explored the likely impact of the proposed improvements.

Believed the Action Plan contained within the EQIA was where the confusion arose. Agreed that this could be corrected to read 'we will also contact'.

Since the project had been allocated funding (following the decision made on 7th October), it would be subject to a full public consultation. This is what would routinely be done with any project like this. During the consultation, there would be a range of opportunities to feedback and

discuss the proposals. Encouraged all interested parties to make their voice heard during the consultation period. This included the traveller community either directly or through any of their representatives. Welcomed a conversation with the public speaker as to how this could be done.

Part of the council's job was to listen to the whole community. Would not presume to know what the results of the consultation would be and looked forward to exploring them in due course.

Noted reference to the planning and implementation stages of the project. The consultation was one of those stages. On the basis that those stages have not yet begun, felt it was premature to suggest that the council had 'fallen at the first hurdle'.

Asked the public speakers to meet with the Executive Councillor, the Open Spaces Team, the Housing Team and the Communities Team. They were ready for a positive and constructive conversation on the issues raised.

The following public questions were tabled but owing to the expiry of the period of time permitted, were not covered during the meeting. Written responses will be published on the meeting webpage and sent to the members of the public.

Question 6.

Why has the council closed its waiting lists for the allotment sites at Auckland Road, New Street and Empty Common?

This is bad practice: the National Allotment Society "opposes the closure of waiting lists, irrespective of their length, because waiting lists are an important measure of the unsatisfied demand for plots, and thus of the need to expand supply if the allotment provider is to fulfill its statutory duty to provide a sufficient number of allotments." [1]

Will you re-open these lists?

You could make it clear that waits are long without denying people the opportunity to register their interest in a particular site, informing demand for allotments in that part of the city.

[1][NAS policy on waiting lists](#)

Executive Councillor response:

Thank you for this question, and also for taking the time to show me around the site at Foster Road.

Thanked the member of the public on behalf of the food hub at Trumpington for the amazing amount of fresh allotment-grown produce he had supplied them with.

To give a bit of context and background, listed some of the current waiting list lengths and expected time of wait. For example;

- Auckland Road – there were 41 on the waiting list, and wait time was expected to be more than 13 years before an offer could be made.
- At New Street there were 16 on waiting list with a wait time of more than 7 years. This list was scheduled to reopen in January 2022.
- Empty Common – 165 on the waiting list, with an estimated wait time of more than 5 years.

Long waiting list had encouraged use of other available allotment sites. Waiting lists at all sites had grown exponentially since the first Covid lockdown was introduced in 2020. Our overall waiting list pre-March 2020 was 144 and it now stood at 638, which was an increase of 343%.

At Empty Common alone, this had increased from 38 to 165, an increase of 334%.

Other sites that had had dramatic increases in waiting list numbers (since March 2020) were;

- Kendal Way – up from 17 to 49 (an 188% increase, estimated wait time in excess of 3 years)
- Fanshawe Road – now stands at 102, up from about 25 (308%, estimated wait time in excess of 3 years)
- Hawthorn Way up from 22 to 65 (195% increase) with an estimated wait time in excess of 6 years.

Even Clay Farm had a waiting list of 40 people, all of whom had joined since the transfer of the site in May 2021. There wasn't any estimated wait time attributed to this site as yet.

The expectation was that from 1 November 2021, when the two-yearly waiting list update was undertaken, these numbers would drop considerably (as people would have moved or circumstances changed), and sites would again re-open to new applicants.

To help address the shortfall in plots, the Council would sub divide all full-size plots as they become vacant. This had been the practice for many years. However a balance had to be drawn between sub dividing plots to offer more spaces and ensuring people had a suitably sized plot to be able to cultivate. A full-size plot may be split into three or four sub plots.

Hoped this detail gave reassurance that the City Council was currently managing an unprecedented demand and making sure that allotment supply was being used appropriately. Also welcomed further conversations with the member of the public on this.

Officers sought Executive Councillor approval before closing these lists because the waiting time for example on Auckland Road was estimated to be 13 years. This approach encouraged applicants to consider other sites. Applicants could only be on one waiting list.

Every two years the Council sent out letters asking people to tell us if they wished to remain on the waiting list and this often reduced the numbers, therefore allowing the waiting lists to be reopened.

Covid 19 had significantly increased demand however, recent examples of offers made at Clay Farm showed that the interest was not sustained with 25- 30% of offers rejected from applicants.

Waiting lists could be opened but as people were only permitted to be on one waiting list the likelihood of ever getting an allotment at some locations was very highly unlikely.

Open waiting lists created a demand expectation we cannot manage in some circumstances for example low plot numbers with no or limited applicant churn.

The City Council made provision for new allotments on growth sites, and had three more new locations to support Darwin Green for example. The provision of allotments was a planning consideration on many of the city's fringe sites.

Question 7.

Over the past few months the world has watched in horror as a crisis has unfolded in Afghanistan, with the Taliban seizing back control of the country and forcing thousands of Afghan citizens to flee their homes. The UN has estimated that, by the end of 2021, this could be as many as half a million people. And this comes on top of 2.2 million Afghan refugees already in neighbouring countries and 3.5 million people forced to flee their homes within the country's borders. Some of those airlifted out of Afghanistan will be here in the UK, where local councils like ours will support them. Can you please update us on what progress the City Council has made in its commitment to resettling any refugees that arrive here?

Question 7 - supplementary question

How is City Council planning to develop the collaborative relationship and connections with the new county joint administration that strengthen the refugee resettlement offer?

Executive Councillor response:

Cambridge City Council pledged to resettle a further 200 refugees over the next five years under the Home Office Resettlement of Vulnerable People schemes. This was in addition to the 125 Syrian and other refugees resettled in the past five years. The Council was working jointly with South Cambridgeshire District Council (SCDC) on ongoing refugee resettlement. The Council would also be working on the relocation of Afghan people already in the UK in holding hotels and those who would come to the UK in the next few years. Joint working was taking place on the two schemes, Afghan Citizens Resettlement Scheme (ACRS) and Afghan Relocations and Assistance Policy (ARAP). The Council was working with SCDC, East Cambridgeshire District Council and several Housing Associations to source housing across the districts and would be providing the support to the families through the Community Safety – Community Cohesion Team. The City Council had currently relocated 3 Afghan families through joint working with SCDC and had offered several other properties across the districts

to the Home Office and are awaiting matched families. The Council had a strong history of partnership working with the County Council on the resettlement schemes and was continuing that working arrangement through links with the county joint administration.

Question 8 – First question.

My questions relate to the motions put by Councillors Moore and Bennett. I am unable to come in person as I am speaking at a concurrent meeting. I raise my question as both Cambridge resident, and as Heritage Chair of the Sustainable Traditional Buildings Alliance (STBA) <https://stbauk.org> , a UK-wide group which brings construction industry, heritage, and sustainability interests. The STBA developed and promoted the “whole-house” approach to retrofit, now promoted by the Government.

Response:

We can confirm that all domestic retrofit projects using central govt. funding and promoted or administered by Cambridge City Council will be compliant with PAS2035 standards as a minimum and this I believe will address an number of the points raised.

Cllr Moore’s motion references 51,124 homes needing to be retrofitted, with 6,405 per year to meet the Council’s Net Zero carbon vision.

All such targets raise serious issues, including:

- lack of industry skills and capacity, particularly in relation to traditional construction;
- the time required to train a competent workforce; and
- the risks of unintended consequences , wasting both money and carbon.

Response:

Taking the first 2 points which relate to skills shortages and market capacity to respond - these are real issues that the Council is both aware of and has experience of how this is currently affecting delivery both for our own housing stock and funded retrofit schemes. Skills and training are not direct areas of responsibility of Cambridge City Council but sits with the CPCA and County Council. It is something we are actively discussing with partners and has been raised by the Cambridgeshire & Peterborough Independent Climate Change Commission.

Cllr Moore's motion highlights the issue in two of its commitments:

- Widen the scope of our working group to include working with housing associations, private landlords and owner occupiers to help access investment and to build the skills and expertise necessary to reach our Climate Change Strategy aspirations.
- Work with local partners, including the Cambridgeshire & Peterborough Combined Authority (who lead on skills strategy), the Greater Cambridge Partnership, local councils, businesses, and education providers to create the skilled workforce that we need.

Re the last bullet point, only clearly thought out, value for money, well regulated, carbon saving, retrofit actions will be promoted, funded or carried out by Cambridge City Council.

What consideration has Cllr Moore given to potential complementary approaches? Including

- the need for a risk-based approach
- the potentially reduced need for retrofit as Grid Decarbonisation progresses ; and
- promoting behaviour change. As Dr Tia Kansara said recently to the Environmental Audit Committee "The fastest way to retrofit a building, if I may say so, is behaviour change. In a number of studies we have found that between 20% and 35% of energy can be reduced inside a building primarily with use."

Response:

Our approach to retrofit is currently still being developed. Currently as set out in the motion, we have commissioned significant studies to look at retrofit pathways, costs, and solutions for both public and private sector homes. This work will look at common housing archetypes and therefore is a first step in targeting significant numbers of properties. This approach acknowledges that there are many examples of heritage and sensitive unique buildings in Cambridge that will require a more bespoke solution.

Following an archetype-based analysis for retrofit solutions and targeting fuel poverty and poorly performing homes as a priority is our preferred approach this is in essence a risk based approach.

Given the need to decarbonise heating and transport to meet net zero carbon is a big challenge to Electricity generation and distribution. To meet that need with no improvement to building fabric would require more than 3 times our current national electricity output. Decarbonisation of the grid alone cannot deliver this and substantial energy efficiency measures for all but the most sensitive buildings will be required to deliver net zero.

Behaviour change alone cannot take us to net zero but is of course part of the solution alongside energy efficiency and changes to the way we heat our buildings and this will require significant retrofit activity.

Has Cllr Moore noted that the PAS 2035 standard (cited in the “proposed Policy Direction’ of the draft Local Plan Great Places topic paper “GP/CC: Adapting Heritage Assets to Climate Change”) costs £190, and that the companion standard BS 7913 (essential for traditional and historic buildings) costs £218?

Has Cllr Moore noted the free guidance prepared by STBA and other bodies, and will the Council join STBA and others in pressing for the key retrofit standards to be made freely available?

Response:

The Council regularly review the available policy and guidance to ensure best practice and involve relevant officers in policy development such as planning conservation officers. This motion has the intent of both raising awareness of the need to retrofit and call on Central Government to resource and clarify a coherent response following best practice.

Question 8 – Second question.

Cllr Bennett’s motion cites the CLC’s “National Retrofit Strategy” which ignores the need for a different approach to traditional buildings, which form at least 20% of the stock (up to 35%, according to a study by the Building Research Establishment for the Government). I ask Councillors to recognise that a “one size fits all” approach such as that being promoted by the CLC may not be appropriate for buildings of traditional construction.

Response:

Our approach to future retrofit is currently still being developed. We have commissioned significant studies to look at retrofit pathways, costs, and solutions for both public and private sector homes. This work will look at common housing archetypes and therefore is a first step in targeting significant numbers of properties. This approach acknowledges that there are many examples of heritage and sensitive unique buildings in Cambridge that will require a more bespoke solution.

I commend to all Councillors the STBA's recently-published "From Retrofit to Regeneration – a blueprint for post-Covid recovery" <https://stbauk.org/wp-content/uploads/2021/10/From-Retrofit-to-Regeneration-STBA-2021.pdf>: this looks beyond reductions in energy use, to potential co-benefits including health and wellbeing, and protection and enhancement of cultural heritage. These are also among the objectives of the PAS 2035 standard (which STBA helped to draft).

Response:

See general response above re PAS 2035.