

Application Number: 16/01734/FUL
Minor

Change of use from residential dwelling (use class C3) to house in multiple occupancy (use class C4) with 5 lettable rooms (part-retrospective)

AT 4 Herdman Close, Greenleys, Milton Keynes

FOR Mr Reza Kazemi

Target: 17th November 2016

Ward: Wolverton

Parish: Wolverton & Greenleys Town
Council

Report Author/Case Officer: Danika Hird

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1.0 INTRODUCTION

(A brief explanation of what the application is about)

- 1.1 The main body of the report set out below draws together the core issues in relation to the application including policy and other key material considerations. This is supplemented by an appendix which brings together planning history, additional matters and summaries of consultees' responses and public representations. Full details of the application, including plans, supplementary documents, consultee responses and public representations are available on the Council's Public access system www.milton-keynes.gov.uk/publicaccess. All matters have been taken into account in writing this report and recommendation.
- 1.2 This application is referred to the Development Control Panel for determination due to an objection received from Ward Councillor Middleton and the number of third party objections received.

1.3 The Site

The application site comprises of a two-storey, brick-built, semi-detached dwelling, Situated in front of the property is parking for two vehicles with the rear garden serving the dwelling being located to the north-west. Directly adjoining the property from the south-west is neighbouring property No.3 Herdman Close with No.5 Herdman Close being connected via the attached double garage to the north-east of the site. Located to the north-west of the application site, to the rear of the dwelling is neighbouring property No.23 Buckman Close, Greenleys.

1.4 The Proposal

This application seeks (part-retrospective) planning permission for the change of use from a single dwellinghouse (Use Class C3) to a five bedroom House in Multiple Occupation (HiMO) (Use Class C4). The proposed ground floor will comprise of an entrance hall, w/c, two bedrooms with en-suites, a kitchen and a portioned conservatory. Located on the first floor there will be a further three bedrooms and a bathroom. As part of the proposal, four independently accessible parking spaces and a refuse storage area are to be located to the front of the property. The property's existing rear garden is to be utilised to provide a drying area (containing 2x Rotary Dryers) and a shed for cycle storage.

- 1.5 The existing garage has already been converted to create a bedroom with the existing front garden being block paved to increase the size of the driveway for additional on-plot parking. The application description has been amended to reflect the fact that the conversion of the garage and the increase in the size of the driveway has already been carried out.

2.0 RELEVANT POLICIES

(The most important policy considerations relating to this application)

2.1 Local Policy

Core Strategy 2013

Policy CS 10: Housing

Policy CS 13: Ensuring High Quality, Well Designed Places.

2.2 Milton Keynes Local Plan 2001- 2011

D1: Impact of Proposals on Locality

T15: Parking Provision

H10: Subdivision of dwellings and houses in multiple occupation

2.3 Supplementary Planning Documents

Houses in Multiple Occupation Adopted (2012)

New Residential Development Design Guide (2012)

Parking standards (2016)

2.2 National Policy

National Planning Policy Framework 2012

Section 7: Requiring Good Design

3.0 MAIN ISSUES

(The issues which have the greatest bearing on the decision)

- 3.1 - Principle of Development
- Impact of development on character and appearance of area
- impact on neighbouring properties
- Impact on Parking Provision

4.0 RECOMMENDATION

(The decision that officers recommend to the Committee)

- 4.1 It is recommended that planning permission be granted subject to the conditions set out in Section 6.0 of this report.

5.0 CONSIDERATIONS

(An explanation of the main issues that have led to the officer Recommendation)

5.1 Principle of Development

The proposed development would fall under Saved Policy H10 of the Milton Keynes Local Plan 2001-2011 which allows for the creation of Houses in Multiple Occupation subject to an assessment against a set of 4 criteria. The principle of residential development on the site is acceptable.

5.2 Bedrooms vs Occupants

As part of this application, no information has been provided by the applicant in regard to the number of occupants within the proposed House in Multiple Occupation, only the number of lettable rooms. The submitted plans show two bedrooms on the ground floor with an en-suite each and both bedrooms have access onto their own section of the conservatory. In addition to, a kitchen, w/c and a communal area within the conservatory on the ground floor there would be a further three bedrooms and a bathroom on the first floor.

- 5.3 It is considered appropriate to impose a condition on any permission, restricting the number of lettable rooms to ensure that the intensity of the proposed use does not impact upon the amenities of adjoining occupiers.

5.4 Impact of development on character and appearance of area, impact on neighbouring properties and impact on parking provision

Saved Policy H10 of the Milton Keynes Local Plan 2001-2011 allows for the creation of Houses in Multiple Occupation providing the following criteria are satisfied:

“(i) Effective measures are proposed to minimise the effects of noise and disturbance

5.5

(ii) Off street parking provision and manoeuvring space is provided to

meet the Councils standards, or if on-street parking is necessary, it would not result in unacceptable congestion in the surrounding area

(iii) Adequate outdoor space is available for bin storage and a drying area

(iv) The proposal would not adversely affect the character of the surrounding area or lead to unacceptable concentration of flats or houses in multiple occupation within the area”

5.6 i) Noise Mitigation Measures

No noise mitigation measures have been submitted as part of this application to demonstrate what measures are proposed to minimise the effects of noise and disturbance due to the transference of noise to adjoining properties or the transference of noise between internal walls to other tenants. An Environmental Health Officer has been consulted on this application and no objections have been received to the proposed change of use.

In accordance with the Houses in Multiple Occupation, 2012, Supplementary Planning Document and to ensure the proposed development satisfies saved policy H10(i) of the Milton Keynes Local Plan 2001-2011 it is recommended a condition is imposed if planning permission were to be granted requiring the applicant to submit details in regard to noise mitigation measures, along party walls with neighbouring properties and all internal bedroom walls and (where there is a habitable room above or below) bedroom ceilings and floors.

5.7 (ii) Parking Provision

In addition to saved policy H10 (ii) of Milton Keynes Local Plan 2001-2011, Saved Policy T15 of the Milton Keynes Local Plan 2001-2011 is also applicable and seeks to ensure development proposals meet vehicle parking requirements as laid out in the Parking Standards Supplementary Planning Document 2016 (SPD). The policy states:

“Development proposals should meet the following vehicle parking requirements:

ii) On-site parking should not be reduced below the maximum standard if it would be likely to result in off-site parking causing problems that cannot be resolved by on-street parking controls.”

5.8 The application site is located within Parking Zone B of the Parking Standards, 2016 Supplementary Planning Document (SPD). For a five bedroom house in multiple occupation there is a requirement for four, independently accessible, on-plot parking spaces to be provided. This requirement is also reflected in the Houses in Multiple Occupation, 2012 (SPD). The submitted plans show four independently accessible, on-plot parking spaces to the front of the dwelling (to the south-east of the application site). The proposed change of use is considered be supported by adequate

parking provision.

For Houses in Multiple Occupation (Use Class C4), there is no requirement within the Parking Standards, Supplementary Planning Document, 2016 for visitor parking spaces to be provided.

The proposed development would be compliant with saved policies T15 and H10 (ii) of the Milton Keynes Local Plan 2001 – 2011 and the Parking Standards SPD, 2016 and Houses in Multiple Occupation SPD, 2012.

5.9 (iii) Outdoor Space and Adequate Bin Storage

Saved policy H10 of the Milton Keynes Local Plan 2001-2011 requires adequate outdoor space and bin storage to be provided for all Houses in Multiple Occupation. The Houses in Multiple Occupation, Supplementary Planning Document, 2012, states *“15 square metres of storage space should be provided, as part of the change of use to a HiMO, for drying area and storage of the following waste receptacles:*

- *1 black sack per bedroom*
- *1 pink recycling sack per bedroom*
- *1 blue recycling box per 3 bedrooms*
- *1 x 240 litre green bin for food and garden waster per 6 bedrooms”*

5.10 The 15 square metres is required in total for the outdoor space and bin storage and does not provide individual requirements for each element. The submitted plans show the bin storage to be located to the front of the property with the required refuse facilities which is acceptable. However, the bin storage area is shown to be enclosed by a timber fence. Given the bin storage is to the front of the dwelling and to prevent the enclosure from being visually intrusive it is recommended a condition is imposed if planning permission were to be granted, requiring screening around the fencing to ensure the fence is not visually intrusive within the local streetscene.

5.11 Within the existing rear garden of the property the submitted plans show there to be more than sufficient space for drying, with the proposed layout showing two rotary dryers are to be provided. With this in mind, the applicant has demonstrated that there is sufficient space within the site to meet the drying and bin storage requirements. To ensure these facilities are provided it is recommended that if planning permission were to be granted, conditions are imposed requiring the shown facilities to be provided and retained thereafter.

The proposed scheme would therefore accord with Saved Policy H10 (iii) of the Milton Keynes Local Plan 2001-2011.

5.12 (iv) concentration of flats or houses in multiple occupation within the area

This application seeks retrospective planning permission for the change of use from a single dwellinghouse (Use Class C3) to a five bedroom house in

multiple occupation (Use Class C4). It is noted that this property is the only House in Multiple Occupation within a 50 metres radius of the application site. When calculating the concentration of Houses in Multiple Occupancy within a 50 metre radius the calculation carried out is on the basis of the proposed five lettable bedrooms. In addition to this, there are twenty dwellinghouses and no flats.

- 5.13 The Houses in Multiple Occupation Supplementary Planning Document requires the concentration of Houses in Multiple Occupation and one bedroom flats in an area do not exceed 35%. The proposal for a five bedroom House in Multiple Occupation would lead to a concentration of approximately 20%. As this is below the 35% threshold provided in the Supplementary Planning Document, it is considered that the proposed House in Multiple Occupation would not lead to an over-concentration of Houses in Multiple Occupation to the detriment of the character and appearance of the area.

The proposed scheme would accord with Saved Policy H10 (iv) of the Milton Keynes Local Plan 2001-2011.

5.14 Sandwiching

As outlined in section 4.35 of the Houses in Multiple Occupation Supplementary Planning Document, 2012 states *“a non-sandwiching approach will be applied to prevent any one property (HiMO or non- Himo) being ‘sandwiches’ between two houses in multiple occupation. This will reduce the local impacts on neighbouring properties and will also prevent an over concentration at the localised level”*. As there are no other houses in multiple occupation in the 50 metre radius of the application site there is not considered to be any concerns regarding sandwiching.

5.16 Cycle Parking

Within the Parking Standards, 2016, Supplementary Planning Document there is a requirement of one cycle space per two bedrooms. With this in mind, 2.5 cycle parking spaces would be required. It is considered reasonable to round up this requirement to three cycle parking spaces. The submitted plans show the proposed site layout to have cycle provisions within the rear garden in excess of the cycle parking requirements. The shown cycle parking provisions are acceptable, as such it is recommended that if planning permission were to be granted a condition is imposed requiring this provision to be provided and retained.

5.17 Other Matters:

Appearance of the property: The removal of soft landscaping to the front of the property in order to provide additional on-plot parking through the use of block paving is not considered to be out of keeping within the local area as there are a number of properties located on Herdman Close with a similar arrangement. As outlined above in section 5.10 of this report, it is recommended that a condition should be imposed if planning permission

were to be granted requiring screening to the front of the bin store enclosure to ensure this impact is mitigated. The conversion of the existing garage is considered to be small scale with only a minor impact on the local area and existing dwelling.

5.18 Capacity of drainage with the extra volume of sewerage water and disposal:

Given the scale of the proposed development, the proposed change of use is not considered to have an adverse impact on the capacity of the drainage systems due to the extra volume of sewerage water and disposal.

5.19 Increase in traffic resulting in highway safety concerns: The proposed development will not result in such a significant increase in traffic to the local area that a refusal on highway safety grounds could be substantiated.

5.20 A number of additional issues have been raised by objectors which include:

- Means of escape in case of fire
- Compliance with Building regulations
- Future management of the property
- That elements of the proposal are retrospective
- Covenants
- Noise and disturbance during construction
- Conflict with shared driveway
- Overcrowding
- Setting a precedent
- Tenants already in property
- No details have been provided in terms of who to contact regarding health and safety issues.
- Applicant taking short-cuts
- Anti-social behaviour
- Nature of Development

None of these are material planning considerations that can be taken into account in making a decision on this planning application.

5.21 Paving to the front garden could contribute to flooding:

The proposed development will inevitably lead to an increase in surface water run-off. However The Environment Agency's flood risk from surface water map shows the application site to be situated in an area of very low risk. In addition to this, the application site does not fall within Flood Zones 2 and 3 for Fluvial Flooding. As such, flood risks on the site as a result of the proposed development are considered to be minimal.

5.22 Publicity: As part of this application all neighbouring properties which directly adjoin the application site have been independently notified of application via letters. In addition to this, a site notice was placed near to the application site informing people in the local area of the proposed development.

- 5.23 Three bedroom property being changed into a five bedroom house: In order to accommodate the proposed change of use no extensions are proposed and as a result the footprint of the property is to remain the same. Typically, occupants of a shared property share basic facilities rather than having a number of rooms accessible to them like a single family dwellinghouse. Providing the number of bedrooms proposed does not have a harmful impact in regard to parking or concentration the increase in bedrooms is deemed to be acceptable.
- 5.24 Conversion of garage into a habitable room: There is not a requirement for properties to retain their garage, especially as garages no longer count towards a site's on-plot parking provisions, in accordance with the Parking Standards, Supplementary Planning Document, 2016. The conversion of the existing garage would be permitted development, as such it is considered to be acceptable.
- 5.25 Impact on Shared Driveway: The on-plot parking spaces are shown to be entirely within land owned by the applicant and therefore will not affect the shared driveway. The existing on-plot parking spaces for this property are the spaces which could potentially affect the shared driveway; however this would be an existing issue. The submitted plans show the extent of "dropped kerb" lowering which would be required to serve proposed additional (new) on-plot parking spaces in order for these to be independently accessible. With this in mind, the proposed arrangement is not considered to have a detrimental impact on the existing shared driveway arrangements.
- 5.27 Conclusion

The proposed development is considered to adhere to the provision of the local and national planning policies. It is recommended that planning permission be granted subject to the conditions set out in Section 6.0 of this report.

6.0 CONDITIONS

(The conditions that need to be imposed on any planning permission for this development to ensure that the development is satisfactory. To meet legal requirements all conditions must be Necessary, Relevant, Enforceable, Precise and Reasonable)

1. The house shall not be operated with more than 5 lettable rooms at any time.

Reason: To control future intensification of the application property.

2. Within 4 weeks of the date of this decision the cycle storage for the storage of cycles shown on the approved drawings shall be provided and be retained thereafter.

Reason: To ensure satisfactory facilities and to prevent harm to the amenities of the area to comply with the Parking Standards, 2016, Supplementary

Planning Document.

3. Within 4 weeks of the date of this decision, the on-site bin storage for the storage of household refuse and recyclables shown on the approved drawings shall be provided and be retained thereafter.

Reason: To safeguard the appearance of the area and the amenities of local residents to comply with saved policy H10 (iii) of the Milton Keynes Local Plan 2001-2011.

4. Within 4 weeks of the date of this decision the drying area for the household shown in the approved drawings shall be provided and be retained thereafter.

Reason: To ensure satisfactory facilities and to prevent harm to the amenities of the area to comply with saved policy H10 (iii) of the Milton Keynes Local Plan 2001-2011.

5. Within 3 months of the date of the decision, the following shall be undertaken:

A) All internal bedroom walls and (where there is a habitable room above or below) bedroom ceilings and floors shall meet the sound insulation standard of a minimum value of 40dB.

B) Proof that the above standards have been achieved shall be provided by the submission of a noise assessment to the Local Planning Authority. The noise assessment shall be carried out in accordance with British Standard 8233:1999 (Sound Insulation and Noise Reduction in Buildings) and shall demonstrate that the sound insulation achieves the minimum values as stated above. The submitted details shall include the test methodology and results with all supporting data.

Reason: To avoid nuisance from noise and vibration between the proposed dwelling units, and to comply with saved policy H10 (i) of the Milton Keynes Local Plan 2001-2011.

EXISTING PLANS & ELEVATIONS

1 Existing 1st Floor
 2 Existing 2nd Floor
 3 Existing North Elevation
 4 Existing South Elevation
 5 Existing East Elevation
 6 Existing West Elevation

SITE LOCATION PLAN

7 Project Site
 8 Surrounding Area

PROPOSED PLANS & ELEVATIONS

9 Proposed 1st Floor
 10 Proposed 2nd Floor
 11 Proposed North Elevation
 12 Proposed South Elevation
 13 Proposed East Elevation
 14 Proposed West Elevation

PROPOSED BLOCK PLAN

15 Project Site
 16 Surrounding Area

PROJECT NO.	123456789
DATE	10/20/2023
SCALE	AS SHOWN
DRAWN BY	J. SMITH
CHECKED BY	A. JONES

Appendix to 16/01734/FUL

A1.0 RELEVANT PLANNING HISTORY

(A brief outline of previous planning decisions affecting the site – this may not include every planning application relating to this site, only those that have a bearing on this particular case)

A1.1 None

A2.0 ADDITIONAL MATTERS

(Matters which were also considered in producing the Recommendation)

A2.1 None

A3.0 CONSULTATIONS AND REPRESENTATIONS

(Who has been consulted on the application and the responses received. The following are a brief description of the comments made. The full comments can be read via the Council's web site)

Comments

Officer Response

A3.1 Environmental Health Manager

I think the best way would be to tie in Approved Document E requirements (where I think the first paragraph came from - the issue with the "40dB" bit is that there's no reference to whether its impact noise or airborne noise)

I'd maybe suggest this:

"All internal bedroom walls and (where there is a habitable room above or below) bedroom ceilings and floors shall meet the sound insulation standards of Approved Document E and comply with the sound insulation requirements of Table 0.1b"

I think that would be deemed acceptable to demonstrate compliance with Policy H10(i)

In respect of testing to demonstrate compliance, Approved Document B Annex B details procedures for sound insulation testing, so the applicant can demonstrate compliance with table 0.1b with field measurements undertaken by an acoustic consultant.

Noted, a condition has been applied required noise mitigation details to be submitted to the Local Planning Authority. Given the suggestion by the Environmental Health Officer refers to legislation outside of planning. The advice provided within the comments received will be attached as an informative if planning permission were to be granted, providing the applicant with further guidance as to the expectations of this condition.

A3.2 HIMO - Private Sector Housing

Noted

Raised no objections

A3.3 Parish - Wolverton & Greenleys

Noted and discussed in paragraph 5.7 & 5.8.

Please see below the comments from WGTC ref this application, we previously submitted comments with concerns regards parking etc. as below

"8/08/16 Clerk and Chairman have expressed their concerns that there could be insufficient parking particularly if the rooms are shared by two people, which could have an impact on the neighbours parking, within the vicinity. We trust that this will be taken into account along with all Health and safety precautions when the decision is made".

We are unable to see how the proposed plans have changed in this respect. Therefore the comments submitted before still stand.

A3.4 Ward - Wolverton - Cllr Miles

Noted

No comments received.

A3.5 Ward - Wolverton - Cllr Middleton

Noted.

I write to object to this retrospective planning application.

In opening, I wish to place on record that it was very disappointed and arguably disrespectful to residents in the local area that the applicant has carried out substantial works to the property in question prior to even submitted

this application. This is not in line with formal processes which are there for good reason. Nor for that matter, is it in accordance with what the local community and local residents would expect from a newcomer to the area.

More broadly, with reference to the HiMO Supplementary Planning Document relevant to this application, I wish to object to this application on the following grounds:

- There seems to have been little thought given to how the increased noise and disturbance arising from a substantial increase in occupants would be kept within acceptable limits. This is especially concerning for the adjacent property owners who live in very close proximity to this property. It is likely that their enjoyment and amenity will be unfairly compromised by the introduction of a HiMO. Noted and discussed in paragraph 5.6
- The proposed HiMO will very likely generate unsustainable extra pressure on car parking in the local area, which is already very difficult at the best of times. It appears little thought has been given to this by the applicant, and it is likely that the necessary extra car parking would not be acceptably accommodated in the local streets. Noted and discussed in paragraph 5.7 & 5.8
- Increasing the number of occupants of the property from one family to five individuals will compromise the character of the local area and local community. Local residents are proud of the cohesive and neighbourly community they have over the years nurtured in the local area. This application would unacceptably Noted and discussed in paragraph 5.12 & 5.13

undermine the local community as it would potentially introduce a more itinerant population who for one reason or another are either unwilling or unable to invest in the existing local community.

- There seems to have been little thought given to how the applicant will make sure the increased number of occupants in the property have access to acceptable outdoor space, so they can amongst other things, store the increased levels of waste which will inevitably be generated, and additional, so they can hang their clothes for drying. If these basic day to day activities aren't catered for, then problems will inevitably arise which would potentially compromise the standards of living presently enjoyed by local residents. This would not be fair and would be unacceptable in planning terms.
- Noted and discussed in paragraph 5.9 to 5.11

A3.6 **Ward - Wolverton - Cllr Marland** Noted

No comments received.

A3.7 **Local Residents** Noted

The occupiers of the following properties were notified of the application:

22, 23 & 24 Buckman Close Greenleys Milton Keynes

3 & 5 Herdman Close Greenleys Milton Keynes

Eight **Third Party** objections were received from Nos 1, 2, 3, 5, 19, 20 & 24 Herdman Close including one further representation where no address was provided raising the

following objections:

A3.8	<ul style="list-style-type: none">• Appearance of the property not in keeping with the local area.	Noted and discussed in paragraph 5.17
A3.9	<ul style="list-style-type: none">• Concerns owner will not take action if anti-social behaviour were to occur.	Noted and discussed in paragraph 5.20
A3.10	<ul style="list-style-type: none">• Location of House in Multiple Occupation in a friendly residential close (nature of the development)	Noted and discussed in paragraph 5.20
A3.11	<ul style="list-style-type: none">• Impact on shared driveway	Noted and discussed in paragraph 5.25
A3.12	<ul style="list-style-type: none">• Conversion of garage into an additional bedroom	Noted and discussed in paragraph 5.24
A3.13	<ul style="list-style-type: none">• Parking Provisions	Noted and discussed in paragraph 5.7 & 5.8
A3.14	<ul style="list-style-type: none">• Number of occupants.	Noted and discussed in paragraph 5.2 & 5.3
A3.15	<ul style="list-style-type: none">• Three bedroom property being changed into a five bedroom house.	Noted and discussed in paragraph 5.23
A3.16	<ul style="list-style-type: none">• Concern regarding on-street parking	Noted and discussed in paragraph 5.8
A3.17	<ul style="list-style-type: none">• Capacity of drainage with the extra volume of sewerage water and disposal.	Noted and discussed in paragraph 5.19
A3.18	<ul style="list-style-type: none">• Lack of fire escape from the property in the event of a fire.	Noted and discussed in paragraph 5.20
A3.19	<ul style="list-style-type: none">• Increase in traffic resulting in highway safety	Noted and discussed in paragraph 5.19

concerns

A3.20	<ul style="list-style-type: none">• Anti-social behaviour	Noted and discussed in paragraph 5.20
A3.21	<ul style="list-style-type: none">• No provisions regarding additional noise or waste.	Noted and discussed in paragraph 5.6 & 5.9 to 5.11
A3.22	<ul style="list-style-type: none">• Part-retrospective nature of the development	Noted and discussed in paragraph 5.20
A3.23	<ul style="list-style-type: none">• No details have been provided in terms of who to contact regarding health and safety issues.	Noted and discussed in paragraph 5.20
A3.24	<ul style="list-style-type: none">• Impact whilst works are being carried out.	Noted and discussed in paragraph 5.20
A3.25	<ul style="list-style-type: none">• No notification to the other residents of the close.	Noted and discussed in paragraph 5.22
A3.26	<ul style="list-style-type: none">• Concerns applicant is not following the correct processes and could be taking “short-cuts” regarding other requirement (e.g. fire regulations, health and safety legislation, gas regs)/ Behaviour of the applicant.	Noted and discussed in paragraph 5.20
A3.27	<ul style="list-style-type: none">• Even though planning permission has not been granted there are already tenants living in the property.	Noted and discussed in paragraph 5.20
A3.28	<ul style="list-style-type: none">• Covenants	Noted and discussed in paragraph 5.20
A3.29	<ul style="list-style-type: none">• Paving the front garden could contribute to flooding.	Noted and discussed in paragraph 5.21
A3.30	<ul style="list-style-type: none">• Ground works have taken place to the front of the property to access drains and electrics.	Noted and discussed in paragraph 5.20

A3.31	<ul style="list-style-type: none">• Concerns the building does not meet building regulations – safety of occupiers	Noted and discussed in paragraph 5.20
A3.32	<ul style="list-style-type: none">• Setting a precedent	Noted and discussed in paragraph 5.20
A3.33	<ul style="list-style-type: none">• Concerns regarding overcrowding	Noted and discussed in paragraph 5.20
A3.34	<ul style="list-style-type: none">• Visitor Parking	Noted and discussed in paragraph 5.8