



Modified Branston Neighbourhood Plan 2012-2031

A report to East Staffordshire Borough Council

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Independent Examiner**

10 December 2019

Executive Summary

I was appointed by East Staffordshire Borough Council on 9 October 2019, with the agreement of the Branston Parish Council, to carry out the independent examination of a proposal to modify the Branston Neighbourhood Plan 2012-2031.

The existing BNP was “made” (ie formally adopted) by East Staffordshire Borough Council on 17 August 2015. Modifications of neighbourhood plans are provided for in the legislation, and the Parish Council now wish to revise a single policy of the Plan; this is Policy B11, which deals with car-parking standards. I am in agreement with both the Local Planning Authority and the Parish Council that this proposal, while a “material” one in terms of the legislation, would not be so significant or substantial as to change the nature of the Plan. This means that independent examination is required but that, whatever the outcome, no referendum would be necessary.

My examination was completed solely on the basis of the written representations received, no public hearing appearing to me to have been necessary. Given the nature and scope of the examination, I did not consider it necessary to visit the Neighbourhood Plan area.

Subject to recommended changes to the wording of revised Policy B11, I have concluded that the Branston Neighbourhood Plan, modified as proposed, meets all the necessary legal requirements and that it can be made without a referendum.

Introduction and procedural matters

1. The Branston Neighbourhood Plan (BNP) was “made” (ie formally adopted) by East Staffordshire Borough Council on 17 August 2015, since which time it has been a part of the statutory development plan for the area. It was one of the first Neighbourhood Plans produced for an urban area following the passing of the Localism Act 2011. The Parish Council have now resolved to update Policy B11 of the Plan, for reasons which I will summarise shortly, and I was appointed by the Borough Council on 9 October 2019 to conduct a formal examination of this proposal.
2. I am independent of the Parish Council and do not have any interest in any land that may be affected by the Plan. I have the necessary qualifications and experience to carry out the examination, having had 30 years’ experience as a local authority planner (including as Acting Director of Planning and Environmental Health for the City of Manchester), followed by over 20 years’ experience providing training in planning to both elected representatives and officers, for most of that time also working as a Planning Inspector. My appointment has been facilitated by the Independent Examination Service provided by Trevor Roberts Associates.
3. Modifications to neighbourhood plans are provided for in the legislation and are subject to the following principal stages, as set out in Schedule A2 to the Planning and Compulsory Purchase Act 2004:
 - in preparing a draft of the Plan as it is proposed to be modified, the “qualifying body” (in this case the Branston Parish Council) must set out the reasons behind the proposed change(s);
 - the Local Planning Authority (in this case, East Staffordshire Borough Council - ESBC) must consider whether or not the proposed modifications “are so significant or substantial as to change the nature of the neighbourhood plan” which the new Plan would replace;
 - the LPA must then send the draft modified Plan for independent examination.

4. Planning Practice Guidance published by the Secretary of State (paragraph 085¹) explains that there are three types of modification which can be made to a neighbourhood plan:
 - minor modifications which would not materially affect the policies in the plan and which would not require independent examination;
 - material modifications which do not change the nature of the plan and would require examination, but not (unlike the original plan) a referendum; and
 - material modifications which change the nature of the plan which would require both examination and a referendum.
5. In the present case, I am satisfied that the proposed modification to the BNP would fall within the second of these categories. This conclusion is one shared by both the Parish Council and the Local Planning Authority.
6. There is no general requirement to review or update a neighbourhood plan². It is therefore important to note that, while I have familiarised myself with the content of, and background to, the existing version of the BNP, I have restricted my examination of its draft replacement to the terms of Policy B11 and any direct consequences that might have for other elements of the Plan.
7. In carrying out my assessment, I have had regard to the following principal documents:
 - the existing (“made”) BNP
 - the Basic Conditions Statement relating to the proposed change to Policy B11
 - the Evidence Base and Consultation Statement relating to the proposed change to Policy B11
 - the Local Planning Authority’s Screening Opinion
 - the representations made to the proposed modification to the BNP under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)
 - any relevant policies of the adopted East Staffordshire Local Plan
 - relevant paragraphs of the NPPF (February 2019)
 - relevant paragraphs of the PPG (March 2014 and updates).
8. The general rule is that neighbourhood plan examinations, including those relating to modifications, should be carried out on the basis of written representations only. Having considered all the information before me, I have been satisfied that the proposed modification to the BNP could be examined without the need for a public hearing (and it should be noted that there were no representations to the contrary). Given the nature and scope of the examination, I did not consider it necessary to visit the Neighbourhood Plan area.

The Parish of Branston and the existing Plan

9. From an examination of material readily available online, I have been able to understand that the Parish of Branston lies immediately south of the important urban centre of Burton-upon-Trent, and that it consists of a mainly residential area separated from the River Trent by green spaces (including a golf course), with a more commercial zone adjoining the A38 trunk road. Beyond the A38 the Parish is largely rural in character. The BNP notes the fact that significant changes have recently taken place within the area (with more anticipated): in 2011 the

¹ Reference ID: 41-085-20180222

² PPG Reference ID: 41-084-20190509

population was recorded as 6749, and this is expected to double by the end of the BNP period (2031). The principal intention of the Plan is therefore to guide the projected new development to ensure that it meets the needs and expectations of both existing and future residents.

10. Paragraph 4.1 of the Plan sets out the following vision:

“Branston will be an attractive and safe residential neighbourhood, with good access to a range of shops, services and employment opportunities. Local green spaces will be enhanced for the benefit of residents and wildlife, and linked to the canal, River Trent and town centre through a series of safe, green footpaths and cycleways. Local people will feel proud to live in Branston and to be part of this welcoming and supportive community”.

11. Eight objectives and 14 specific policies are designed to support this broad overview. Given the limited scope of the present examination, there is no need for me to describe or comment on any of these elements of the Plan (other than those relating to Policy B11). The Plan runs from 2012 to 2031, and I note that the end-date is the same as that applying to the adopted East Staffordshire Local Plan.

The basic conditions

12. As indicated above, the Parish Council and ESBC are in agreement that the nature of the proposed modification is such that, while it would materially affect a policy in the BNP, it would not be so significant or substantial as to change the nature of the Plan. This is a conclusion which I share. The procedural consequence of this is that no referendum would be required after my examination has been concluded and considered by the relevant bodies.

13. I am not required to come to a view about the ‘soundness’ of the plan as it would be modified; instead I must principally address whether or not it is appropriate to make it, having regard to certain “basic conditions”, as listed at paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004; I must also be satisfied that it is generally legally compliant. Recommendations may be made concerning changes both to policies and any supporting text. To this extent, the provisions are the same as those governing the examination of the original Plan. The modified BNP must:

- have regard to national policy and guidance (Condition a);
- contribute to the achievement of sustainable development (Condition b);
- be in general conformity with the strategic policies in the development plan for the local area (Condition c);
- not breach, and otherwise be compatible with, EU obligations, including human rights requirements (Condition d);
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017; and
- comply with any other prescribed matters.

Other statutory requirements

14. A number of other statutory requirements apply to the preparation of neighbourhood plans, all of which I consider have been met in this case. These are:

- that the Parish Council is the appropriate qualifying body (Localism Act 2011) able to lead preparation and modification of a neighbourhood plan;
- that what has been prepared is a modification to a Neighbourhood Development Plan, as formally defined by the Localism Act (it remains the case that the plan area does not relate to more than one Neighbourhood Area and that there are no other neighbourhood plans in place within the area covered by the plan);
- that the plan period must be stated (which in the case of the BNP remains 2012-2031); and
- that no “excluded development” is involved (this primarily relates to development involving minerals and waste and nationally-significant infrastructure projects).

National policy

15. National policy is set out primarily in the National Planning Policy Framework (NPPF), a key theme being the need to achieve sustainable development. The NPPF is supported by Planning Practice Guidance (PPG), an online resource which is continually updated by Government. I have borne particularly in mind the advice in the PPG³ that a policy in a neighbourhood plan should be clear and unambiguous, concise, precise and supported by appropriate evidence.

The Development Plan for the area

16. The East Staffordshire Local Plan (ESLP) was adopted in October 2015, a short time after the BNP was formally “made”. The Basic Conditions Statement draws attention to the ESLP’s Strategic Policy 1, which emphasises the need for development proposals to demonstrate the principles of sustainability, including the protection of residential amenity.

17. While not a part of the statutory development plan, a relevant publication for my examination is a supplementary planning document (SPD) on parking standards, formally adopted by ESBC in October 2017, replacing an earlier version adopted in 2004. This document is designed to support a number of ESLP policies (details at paragraph 1.4), although from my reading of these, none has any direct relevance for the specific standards which are the subject of BNP Policy B11.

18. I would note here that the SPD would remain a material consideration in respect of relevant planning applications within the Parish even after the modified BNP is “made”. The only difference would be the changes in parking requirements which are the subject of the modified Policy B11.

³ Reference ID: 41-041-20140306

Existing BNP Policy B11

19. Policy B11 is supported by three of the Plan's broad objectives: to improve the management of existing traffic and to ensure that any additional impacts linked to the development locations are addressed (Objective 3); to improve cycle and walking networks within the parish and to support initiatives which encourage healthy lifestyles (Objective 4); and to improve parking facilities (Objective 5).

20. As it stands, Policy B11 reads as follows:

"All new development will be expected to comply with the following minimum parking standards:

- *1 bed house/flat: 1 off-road car-parking space*
- *2 bed house/flat: 2 off-road car-parking spaces*
- *3 bed house/flat: 2 off-road car-parking spaces*
- *4 bed house/flat: 2 off-road car-parking spaces*
- *5 bed house/flat: 3 off-road car-parking spaces*

Visitor parking will also be required or where the developer can demonstrate that this would not be viable, road widths should be wide enough to accommodate additional on-street parking".

21. Little detailed explanation is given about the specific rationale for these standards, beyond the supporting paragraph 5.44, which simply states that "it is important that new development does not lead to an increase in problems such as those related to car parking and highway safety. Adequate off-street parking is essential if this is to be achieved". The examiner of the draft of the original Plan (the relevant policy at that time being referenced B13) also noted that "no particular evidence or justification has been put forward for the specific car parking standards proposed" (paragraph 6.139 of his report). However, he pointed out that the standards were very similar to those adopted by ESBC in 2004, except that the BNP now expressed them as minimum requirements instead of maximum, something which accorded with a Ministerial Statement of 2015, and which is now reflected in paragraph 106 of the NPPF. The examiner concluded that, in the absence of any objection to the then Policy B13 (which became Policy B11 in the final version of the Plan) from either ESBC or the County Council, the policy met the basic conditions.

Evidence base and consultation exercise

22. The need for a new policy is explained in the Evidence Base and Consultation Statement (EBCS) dated July 2019. This explains that considerable growth has occurred in the Parish since the Plan was first made, and that this has provided the opportunity to assess the cumulative impact of new development on the area as a whole. Some caution is expressed as to whether or not parking provision in recent major schemes (as well as further development which is anticipated) will be sufficient to avoid any overflow impacting in neighbouring residential streets.

23. The Parish Council have identified some specific trends locally:

- growth in the demand for parking from existing households, with some of this being difficult to satisfy where existing streets are narrow;
- the growth in home delivery services;
- the particular problem where the streets under pressure are also bus routes;
- the generation of additional demand for parking where houses are converted into flats etc; and
- the difficulties of meeting national aspirations for a growth in plug-in infrastructure.

24. The EBCS then explains how the Parish Council went about gathering evidence to determine what changes might be needed to Policy B11, the detail of the process being contained in three appendices to the document. I make an observation about the nature of the evidence shortly; before this, however, it is necessary to refer to the requirements of Regulation 15⁴ in relation to the content of neighbourhood plan consultation statements. They must:

- (a) contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explain how they were consulted;
- (c) summarise the main issues and concerns raised by the persons consulted; and
- (d) *describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan* [my emphasis].

25. While I consider that the first three of these elements are present in the document, the fourth is not. ***I recommend that the Evidence Base and Consultation Statement be revised in order briefly to record how the Parish Council chose to respond to the representations made on the draft Plan, in accordance with the requirements of Regulation 15.*** This should include reference to representations made on behalf of St Modwen Properties, something to which I return shortly.

26. The Parish Council's approach to gathering relevant evidence is summarised in paragraph 11 of the EBCS: *"Providing evidence for the nature and location of existing problems inevitably relies upon photographic evidence, and the reports of residents and councillors over time on badly affected locations. Local residents and Parish (and Borough) Councillors have provided evidence of where currently parking causes problems and the type of problem experienced....."*. It is perhaps inevitable that much of the evidence in an exercise of this kind will be "soft" or anecdotal in nature; however, I am satisfied that the approach taken provides ample evidence that certain parts of the Parish are under the kind of pressure which the revised policy is designed to address.

27. I have noted that the new requirements would exceed those set out in the current guidance on parking standards published by ESBC. In this respect the Parish Council make appropriate reference to PPG paragraph 041, which provides for neighbourhood plans to "respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared": this clearly allows for an approach which, in detail, differs from that covering the ESBC area as a whole. It is something which, in any event, is provided for in the Council's guidance (paragraph 2.2)

28. The new policy (modified in the light of the consultation exercise) would read:

All new development will be expected to comply with the following minimum parking standards:

- 1 bed house/flat 1 off road car parking space*
- 2 bed house/flat 2 off road car parking spaces*
- 3 bed house/flat 3 off road car parking spaces*
- 4 bed house/flat 4 off road car parking spaces*
- 5 bed house/flat 5 off road car parking spaces*

Visitor/delivery vehicle parking will also be required:

- a) For apartment schemes, visitor parking should be 1 space per 3 dwellings, irrespective of the*

⁴ The Neighbourhood Planning (General) Regulations 2012, SI 2012 no 637

number of bedspaces in each apartment. A space suitable for a short stay by a delivery vehicle should also be included. For schemes with more than 10 apartments this should be 2 spaces.

- b) Where a residential scheme is proposed with a new access road, parking spaces should be provided off the access road at appropriate intervals for visitor and delivery vehicles. These should be carefully integrated into the layout design to avoid a vehicle-dominated street scene.*
- c) For single residential units, or extensions, visitor parking should be provided off-street unless there is normally spare on-street parking capacity in the immediate vicinity which would enable the safe passing of vehicles.*

Where a proposal for an extension to an existing dwelling creates additional bedspace(s), 1 additional parking space is required for each bedspace created.

Where a dwelling is subdivided into two or more separate flats, each new unit will require parking provision according to the above standards.

Where the conversion of a shop to flats(s) is proposed the above standards will apply.

The above requirements will only be varied:

- 1) where there is normally spare on-street parking capacity in the surrounding area (this should be demonstrated by the applicant, with evidence from weekday daytimes - including school starting/finishing times if applicable - evenings and weekends); and*
- 2) the additional parking likely to be generated by the development can be safely accommodated on-street, without causing obstruction to driveways or hindering the passage of emergency, refuse collection and delivery vehicles (and buses if applicable).*

The width of roads in the surrounding area will be a factor in determining this parking capacity, as well as existing levels of parking.

The following design standards will be applied to encourage the use of off-street parking in new development, unless there are overriding design reasons why they should be varied, and on-street highway parking problems would not be created or exacerbated:

- (A) Driveways should be a minimum of 3 metres wide to allow vehicle doors to be opened and closed, so that access to the vehicle is convenient.*
- (B) Specific parking bays in communal parking areas should be a minimum of 2.4m wide to allow vehicle doors to be opened easily.*
- (C) For detached, semi-detached and end of terrace properties, driveways down the sides of properties are preferred, with at least some of the land to the front of the dwelling being landscaped garden, in order to introduce variety in the street scene by allowing breaks in the frontage. If forecourt parking is included, it should be on a minority of dwellings, and spaces should be at least 2.4m wide.*
- (D) Dwellings with tandem parking - where one vehicle cannot be moved without another being moved onto the road first - should only be part of the design if on-street parking can be accommodated safely on surrounding streets.*
- (E) Parking spaces along the gable end of a property should be a minimum of 3.2m from property wall to curtilage to allow access to side and rear doors of the house, as well as*

car door opening.

(F) Garage spaces should be at least 6 metres by 3 metres internally to be considered a parking space. This allows for some storage of householder items, such as bikes, as well as door-opening space”.

29. It will be seen that the revised policy differs from the existing one in two respects: firstly, the minimum parking requirements for three houses or flats have been increased by one space and for four and five houses or flats by two spaces and, secondly, the new policy goes into a great deal more detail than its predecessor version.

Representations received (Regulation 16)

30. Representations were received from The Environment Agency, Historic England, Natural England, National Grid, The Coal Authority and Staffordshire County Council’s Historic Environment Record, none of which raise any material issues for this examination. I will comment shortly on a number of highways-related issues raised by Staffordshire County Council.

31. In December 2018, CT Planning, acting on behalf of St Modwen Properties plc, made representations to the pre-submission version of the Plan. Following a request for clarification I made to ESBC about the Regulation 16 process, it became clear that the company (along with two other individuals who had made representations to the pre-submission version) were not directly contacted at the Regulation 16 stage, as is ESBC’s standard practice. This has been rectified, and I am satisfied from reading the subsequent correspondence that St Modwen wish to reiterate their original concerns. I deal with them below.

Assessment

32. The Basic Conditions Statement prepared in connection with the proposal is dated July 2019. It sets out the statutory and related context to the proposed modification⁵ and demonstrates the new policy’s compliance with the principal relevant matters, namely conditions (a) and (c).

33. I am satisfied that NPPF paragraphs 102, 105 and 106 are reflected in the replacement Policy B11, especially in relation to the criteria to be taken into account when local parking standards are being set. The broad design objectives advocated in PPG paragraphs 008 and 012 are also noted. The over-arching approach to sustainable development set out in paragraph 8 of the NPPF is satisfied by the proposed modification and is similar to the ground covered by East Staffordshire Local Plan Strategic Policy 1.

34. Basic conditions (a) and (c) are therefore met. In a Screening Opinion carried out by ESBC in November 2018, the Council concluded that neither a Strategic Environmental Assessment nor a Habitats Regulation Assessment was necessary. No other EU obligation is considered to be engaged by the proposed modification.

35. Staffordshire County Council make no formal objection to the proposed modification of Policy B11. They do, however, make a number of detailed observations about the effect of its implementation covering potential loss of green space; the impact on biodiversity; drainage requirements; and approaches to parking design and layout. None of these comments have any significance for the basic conditions, and so I have no need to consider any recommendations in

⁵ The BCS uses the term “revision”, but the PPG reference in paragraph 106 is to a “modification”, and I have adopted that formulation for this report

respect of them.

36. St Modwen's concerns focus on the relationship between the revised approach to parking standards and a significant development which they are in the process of carrying out in phases, known as Branston Leas. The company explain that this scheme was planned and gained planning permission on the basis of ESBC's then standards, and that it contains other features designed to provide an accessible addition to the urban area of Burton. They consider that it is too early to attempt to assess the effectiveness of these various measures and, for that reason, say it is premature for the Parish Council to attempt to review parking standards in the way being proposed, and that the exercise should be delayed until at least 2020. The company also point to the largely anecdotal nature of the evidence informing the Plan (something which I have already commented on).
37. While I can accept that a fuller picture of the impact that recent (and ongoing) development in the area would be gained were a review of parking standards to be delayed in the way St Modwen suggest, I am satisfied that the evidence already available to the Parish Council provides a sufficient and rational basis for the action they propose. There is certainly nothing here which points to any failure to meet the basic conditions (and it should be noted that St Modwen do not themselves suggest otherwise).
38. Notwithstanding my overall conclusion as to the basic conditions, and returning to the advice in the PPG that a policy in a neighbourhood plan should be both clear and concise, I consider that significant changes are needed to the way the policy is expressed if it is to satisfy the reasonable information requirements of applicants for planning permission in these respects. As it stands, the policy is somewhat convoluted, and should be significantly simplified. In addition, there is a need to differentiate between what is meant to be seen as a firm standard (subject to specified exceptions) and what should more properly be viewed as guidelines. At present, the policy does not make that distinction (or at least not with any clarity), and as a consequence can be criticised for being over-prescriptive and its intentions not as clear as they might be.
39. Below I set out my recommendations for the way in which the policy should be re-cast in order to deal with these issues. It is my intention, in so doing, to retain the purposes of the original draft, with the following reservations:
- sub-paragraph c) reads: "for single residential units, or extensions, visitor parking should be provided off-street unless there is normally spare on-street parking capacity in the immediate vicinity which would enable the safe passing of vehicles". On the face of it, this part of the policy would require visitor parking (in addition to what would be required under the first part) for very small developments – a single dwelling-house or an extension to an existing one. This is unduly onerous and likely to prove impracticable in many cases. ***I therefore recommend that this requirement be deleted.***
 - sub-paragraph b) contains design advice in a situation where a residential scheme proposes a new access road. I consider this to be better located along with similar material in an appendix (see below);
 - It is unclear how "the width of roads in the surrounding area" would be taken into account by the Local Planning Authority in determining a planning application, and I have therefore not included this as a requirement;
 - NPPF paragraph 105(a) advises that local parking standards should take into account the accessibility of development sites: given that the majority of retail premises will be located

within local centres, I question the appropriateness of automatically requiring schemes involving the conversion of shops to residential use to include specific provision for parking. I have therefore added a caveat to this requirement to provide the necessary flexibility.

40. ***I therefore recommend that the policy be re-worded thus:***

“(a) Parking for occupiers of new residential accommodation

- Unless a lower provision can be justified in the terms set out below, new residential development requiring planning permission must provide one off-street parking space for each bed space created.
- Where a dwelling is subdivided into two or more separate flats, or an extension to an existing dwelling creates additional bed-space(s), each new unit will require parking provision according to the above standard.
- Where the conversion of a shop to flats(s) is proposed, the same standard will apply, unless it can be demonstrated that adequate car-parking is available in the immediate area.

(b) Parking for visitors/delivery vehicles

- Visitor/delivery vehicle parking will normally be required for apartment schemes. 1 space per 3 dwellings should be provided on-site, irrespective of the number of bed spaces in each apartment. For schemes with more than 10 apartments 2 spaces per 3 dwellings are required.

The above requirements will only be varied where:

- there is normally spare on-street parking capacity in the surrounding area (this should be demonstrated by the applicant, with evidence from weekday daytimes - including school starting/finishing times if applicable - evenings and weekends); and
- in the opinion of the Local Planning Authority, the additional parking likely to be generated by the development can be safely accommodated on-street, without causing obstruction to driveways or hindering the passage of emergency, refuse collection and delivery vehicles (and buses if applicable)”.

41. ***I also recommend that the material presently lettered (A) to (E) should be removed from the policy itself and placed in an appendix.*** This is because I consider it too prescriptive for development management purposes, and because it is not clear whether or not failure to comply with any given aspect of it would be likely to risk a refusal of planning permission. The policy should instead conclude by saying: ***“In addition, reference should be made to the design guidelines for parking layouts as set out in Appendix...to this Plan”***. I would draw particular attention here to the use of the word “guidelines”, as opposed to “standards”: I have noted a readiness (referred to in the preamble to this part of the policy) to consider exceptional circumstances, but in my view there is a broader need to make it clear that these detailed requirements do not have the same force as the numerically-based aspects of the policy.

Conclusions on the basic conditions

42. I am satisfied that the Branston Neighbourhood Plan, as it is proposed to be modified by the alteration to Policy B11 and its associated explanatory text, continues to make appropriate provision for sustainable development. I conclude that in this and in all other material respects, subject to my recommended change of wording, it has appropriate regard to national policy and guidance. Similarly, and again subject to my recommendations, I conclude that the Plan is in general conformity with the strategic policies in the development plan for the local area. There is no evidence before me to suggest that the Plan is not compatible with EU obligations, including human rights requirements.

Formal recommendation

43. I have concluded that, provided that the recommendations set out above are followed, the Branston Neighbourhood Plan would continue to meet the basic conditions if Policy B11 were modified as suggested, and that the Local Planning Authority should make the draft Plan with the modifications proposed.

David Kaiserman

David Kaiserman BA DipTP MRTPI
Independent Examiner

10 December 2019

APPENDIX 1 – SUMMARY TABLE OF RECOMMENDATIONS

Examiner's report paragraph	NP reference	Recommendation
25	Evidence Base and Consultation Statement	<ul style="list-style-type: none">• Revise to briefly record how the PC chose to respond to representations on the pre-submission version of the Plan
39 - 41	Proposed Policy B11	<ul style="list-style-type: none">• Delete the requirement in relation to visitor parking in sub-paragraph c)• Remove the material lettered (A) to (E) and place in an appendix• Make reference to that appendix at the end of the policy• Reword the remainder of the policy as specified in paragraph 40.