

CMK Town Council's further submission re: SAP4 in MK Council's Site Allocations Plan Draft for Examination

1. SAP4 – CMKAP Policy G1

1.1. In responding to the Inspector's initial questions, MK Council wrote on 23 May 2017:

"SAP4 is an available site within a sustainable city centre location which is suitable for residential-led, mixed-use development. The landowner has put the site forward and has expressed its desire to proceed with the development of the site as soon as possible. It is therefore felt that the site is deliverable. It is the Council's view that if the site is allocated through the SAP process, this would supersede the CMK Alliance Plan Policy CMKAP G1 as the more up-to-date policy document and therefore carry more weight in decision making."

1.2. MK Council had not hitherto been so specific that it wished to remove site SAP4 from Policy G1 of the CMK Alliance Business Neighbourhood Plan (CMKAP) which is part of the suite of documents that make up the current statutory development plan. By extension, site SAP4 might by the same logic be considered by MK Council to be removed from all Policy coverage in the CMKAP.

1.3. CMK Town Council was extremely disturbed to see the Site Allocations Plan (SAP) being used, through SAP4, to remove a highly conspicuous and sensitive section of "classic CMK infrastructure" – a non-designated heritage asset – from Fig 15 and defined in Policy G1 of the CMKAP. No justification or evidence base had been provided to substantiate such a proposition, and public consultation had not previously declared such an intent.

1.4. This was an unnecessary conflict. CMK Town Council has corresponded with MK Council and is pleased to report that the Head of Planning Brett Leahy has confirmed that a proposed amendment will now be brought forward to "formally refer to G1 and G11 under the 'key principles' section of SAP4 to ensure that the policy expectations are clear for any potential proposal coming forward for this site". **CMK Town Council would be content with such an amendment.**

2. SAP4 - Development Brief for SAP4

2.1. Site SAP4 is owned by Milton Keynes Development Partnership (MKDP), a company wholly owned by MK Council with Councillors on the Board. In response to the Inspector's initial questions, MK Council stated on 15 May 2017:

"It is a requirement of the MKDP that an adopted Development Brief, which has been prepared with full community and stakeholder engagement, must be in place before they commence marketing or developing any of their larger sites."

- 2.2. However, the proposed words under key principle item v) SAP4 are "...should a development brief be published...." This is misleading as it suggests publication of a development brief is discretionary.
 - 2.3. CMK Town Council have therefore requested of MK Council that they bring forward a further amendment to SAP4 key principles stating that an adopted Development Brief, which has been prepared with full community and stakeholder engagement, must be in place before marketing or developing site SAP4. **CMK Town Council would be content with such an amendment.**
 - 2.4. We are hopeful that MK Council will agree to propose such a helpful amendment, though it is appreciated that this may be difficult before the 5pm deadline today.
3. Participation in public sessions of Examination
 - 3.1. CMK Town Council formally requests that it is an invited Participant for discussion of SAP4 in any public examination of that proposed allocation.