

Minutes of the meeting of the **DEVELOPMENT CONTROL COMMITTEE** held on **THURSDAY 2 JULY 2020** at 7.00 pm.

Present: Councillor Brown (Chair)
Councillors Alexander, Baines, Bint, Exon, Lancaster, Legg, McLean, Petchey, Trendall and Wallis

Officers: T Darke (Director, Growth, Economy and Culture), J Palmer (Head of Planning), E Verdegem (Team Leader – West Team), R Edgington (Senior Planning Officer), C Walton (Senior Planning Officer), E Gineikiene (Senior Solicitor – Planning & Highways) and P Brown (Head of Democratic Services).

Also Present: Councillors A. Geary and Williams. Mr Andrew Golland (Viability Consultant)

DCC12 INTRODUCTIONS AND WELCOME

The Chair welcomed members of the public and councillors to the meeting and explained that the meeting was being held remotely and would be broadcast live on YouTube. He further explained the procedures to be adopted.

DCC13 DECLARATION OF INTERESTS

Councillor Petchey asked that it be noted that in respect of application 20/00938/FUL, for transparency, he would like to clarify that he had been nominated as a board member of The Buckingham Internal Drainage Board, which had commented on the application. However, his appointment was after any discussion had taken place in respect of the matter and had made no comment.

DCC14 PUBLIC PARTICIPATION

The Committee received the following Questions to which responses were given:

1. From Mr D Tooley;

‘Has the Council received the Dorfman Review into Blakelands?’

Chairs response;

‘The Council has not received the report but has received a further update from Mr Dorfman indicating that the report will be submitted by the end of July.

We expect to be able to schedule a meeting of the Audit Committee to receive the report in August.’

Mr Tooley asked, as a supplementary question, 'I have been in touch with local residents who tell me that they are concerned that Mr Dorfman won't be considering all the relevant information. Is the Council confident that the review will be completed at the end of July and it will be as comprehensive as it needs to be?'

The Head of Planning responded and told the Committee that the report that had been commissioned was independent and therefore until it was received it was not possible to comment beyond saying it was hoped that it would be a thorough and comprehensive review.

2. From Mrs Sung (Council Manager at Walton Community Council).

'The minutes of the Development Control Committee meeting of 4 June 2020 contains inaccuracies and important omissions. Our main objection to the application was about the reasons and justification for the increase in density at the Hindhead Knoll development site, which had been included in Plan:MK final version but had not been subject to appropriate public consultation.

The Chair made a commitment to investigate the procedural errors and delve into the reasons around how the increase in density and numbers of dwelling at the site, had come about.

Minutes should be a true record of proceedings, so why was this not published in the original minutes and I would ask that the minutes be amended to reflect the commitment made by the Chair?'

Chairs response;

'Committee minutes are not intended to be an ad verbatim record of what was discussed at a meeting. Rather, a brief note of proceedings that in particular, records the decisions made.

The issues raised in relation to the modifications to Plan:MK and the density increase as far as making a decision were not material planning considerations in the case referred to.

It is not our usual custom and practice to minute non-material matters in any detail, but members of the Committee may agree that the circumstances in this case are exceptional and warrant some non-material details being recorded in the minutes. It is likely that an amended minute will be moved to this effect by a member of the Committee.'

As a supplementary question Mrs Sung asked, 'I would like an assurance that the outcome of your investigation will not be just a description of how modifications are dealt with generally in Plan:MK. This has been the usual response to any question that we have asked the Planning Officers, this was also the response that was given by the Officers at the DCC meeting on the 4th of June when Councillor Lancaster gave them an opportunity to respond on this matter on five occasions, the Planning Officers are just not answering the question. What we want to know is how these particular changes were made in Plan:MK, we want to know the reason for the increase in numbers and the justification, not just a general response about how modifications are usually made. So I would like to request that the results of your investigation be made public and can I be assured that the outcome of this investigation will provide an open and honest account of the reason for the increase in numbers on the site, which will hopefully restore some faith and trust in MKC's planning processes?'

The Chair responded that he was happy to correspond with Mrs Sung to confirm which points the Council needed to investigate and that he was happy that a clear set of questions to which answers were sought, be drawn up. The Chair further stated that he was aware of an ongoing case with the ombudsman which he did not want to compromise and that would dictate the timeline.

3. Councillor A Chapman-Ballard (WCC), referring to comments from Councillor Petchey at the meeting of the Committee on 2 June, asked;

'Is it MKC/DCC practice to support all social or affordable housing development applications, or those containing those units, regardless of their suitability for the local area they will be situated in - or what is the policy and approach to those type of units, or is there a policy that says 'affordable equals good'?'

Chairs response;

'The weight that is attached to affordable housing within any given proposal, whether that be weight in favour or against, is guided by Policy HN2 (and potentially HN1 in terms of the mix of units) within Plan:MK.'

As a supplementary question Councillor Chapman-Ballard asked, 'if there is no blanket, 'affordable equals good' policy, why would someone like Councillor Petchey make the comment about the 'Hindhead Knoll' development, why would he, when by his own

admission, he had never visited the Walnut Tree, Hindhead Knoll site and has no detailed knowledge of that area or its needs, he seems keen just to apply a blanket policy of affordable equals good?’

The Chair told the Committee that he could not speak for Councillor Petchey but Members were entitled to have their views and express them during the debate and that he did not think Councillor Petchey was suggesting that was the policy, rather that the policies followed are HN2 and HN1.

4. Question from Mr S Copeland;

‘In Plan:MK, a change to the density of the two sites at Hindhead Knoll was made without public consultation. The change was made in the Schedule of Additional Modifications - what other changes were made in that document that were not typographical or minor corrections?’

Chairs response;

‘159 additional modifications were made to Plan:MK via the Examination in Public process. The Schedule of Proposed Additional Modifications (October 2018) included a reason why each of these changes were proposed.’

Mr Copeland asked, as a supplementary question, ‘18.1 lists in total 159 changes relate to the changes to the density of various sites I cannot see an explanation to each one of those changes and certainly in respect of the Hindhead Knoll site there were no changes in the main modification document either, so this references back to changes in 2018 where there wasn’t a change to that particular density, where is the explanation that sits behind all of the items in the table?’

The Chair commented that this was not a question he could immediately answer, would require some research and he would respond in writing.

5. From Councillor T Chapman-Ballard (WCC);

‘If you're refusing these flats (20/00185/FUL – Bowback House) due to their impact on the local and nearby infrastructure, why does that kind of mentality not apply city wide including at walnut tree?’

Chairs response;

‘The recommended reason for refusal for Bowback House (20/00185/FUL) relates to the fact that the section 106 contributions do not offset the impacts of the development in this instance. Each application is considered on its own merits and therefore the recommendation for the application at Bowback House is site specific and does not set a precedent.’

Councillor Chapman-Bollard asked, as a supplementary question, ‘At the 4th of June DCC meeting, while discussing Hindhead Knoll, Councillor Legg stated, ‘we urgently need more properties’, and voted for the tripling of Hindhead Knoll development density, then at the same meeting Councillor Petchey said, ‘having looked carefully at the video’s we have been presented with, it would seem that in urban terms what we would have read as an intensification of a development, therefore I don’t think it will seem to be too big, he then voted for the illegal intensification of the Walnut Tree development, but both Councillors Petchey and Legg in voting to allow the same density, 306 flats development in Central Milton Keynes regardless on the impact of local services as a result are you not committed to the fair and even development of Milton Keynes as a whole?’

The Chair responded by advising that Members are trained on process and make decisions based on each individual case and its own merits.

DCC15

MINUTES OF PREVIOUS MEETINGS

Councillor Bint, seconded by Councillor Brown proposed the following amendments to the minutes of the meeting of the Development Control Committee on 4 June 2020;

‘Min DCC06 of 4 JUNE relating to application 19/02856/FUL

Paragraph 5 bullet point one, add ‘(evidenced in the Council’s Housing Needs Survey)’ so that the sentence reads;

- ‘• The proposal to provide only 2-bedroom apartments when the need (evidenced in the Council’s Housing Needs Survey) was for larger family homes’

Replace paragraph 6

‘A number of non-material planning matters were raised by both the objectors and the applicant, these were identified for the benefit of the Committee.’

With;

'A number of other non-material planning matters were raised by both the objectors and the applicant. In particular, the process by which Plan:MK had been subject to modifications in 2017/18, the associated density increase for this site and a lack of consultation, were raised by those objecting. Officers advised that concerns about how Plan:MK came to have its final wording were discrete to the determination process and concerns should be raised in some other way.'

Add an additional paragraph 12 to read;

'Councillor Lancaster asked further questions about the process by which Plan:MK had been modified and subsequently, Councillor Bint indicated that he felt the answers provided in relation to the modification of the density for the site in Plan:MK were unsatisfactory, calling on the Chair to investigate the matter. In response, the Chair undertook to investigate the matter further and invited Councillor Bint to assist him to do so. The Chair also confirmed that it was his understanding that the modification process was not material to the Committee's decision.'

RESOLVED;

That the minutes of the meeting of the Development Control Panel held on 4 June 2020 be agreed as an accurate record subject to the amendments as detailed above and signed by the Chair as such.

DCC16

REPRESENTATIONS ON APPLICATIONS

Councillor Williams (Ward Councillor) spoke in objection to application 20/00185/FUL, Demolition of Bowback House (existing B1(a) Office building) and erection of 14 storey residential scheme, to include 306 residential units (C3), 2 commercial units (flexible use classes A1/2/3 and D2), associated amenity space, hard and soft landscaping, and car parking at Bowback House, 299 Silbury Boulevard, Central Milton Keynes, Milton Keynes.

Town Councillor Thomas (Central Milton Keynes Town Council) spoke in support of the application.

The Applicant Mr M Hawkins exercised the right of reply.

Mr S Williams (Applicant's Agent) spoke in support of application 20/00787/FUL, Change of use of land to residential garden land associated with numbers 44, 46, 48 and 50 Randall Way; 6, 7, 9, 11, 13 and 15 Gomez Close; and 25, 27 and 29 Keel Way at Land adjacent to 6 Gomez Close, Oxley Park, Milton Keynes, the application having been recommended for refusal.

Town Councillor Winsor (Newport Pagnell Town Council) spoke in objection to application 20/00938/FUL, Erection of a two-storey detached dwelling with undercroft voids and car port with the extension to the existing access track and associated works at The Paddocks, Lakes Lane, Newport Pagnell, Milton Keynes.

Councillor A Geary (Ward Councillor) spoke in support of the application.

The Applicant, Mr C Terelinck, exercised the right of reply.

DCC17

PLANNING APPLICATIONS

20/00185/FUL DEMOLITION OF BOWBACK HOUSE (EXISTING B1(A) OFFICE BUILDING) AND ERECTION OF 14 STOREY RESIDENTIAL SCHEME, TO INCLUDE 306 RESIDENTIAL UNITS (C3), 2 COMMERCIAL UNITS (FLEXIBLE USE CLASSES A1/2/3 AND D2), ASSOCIATED AMENITY SPACE, HARD AND SOFT LANDSCAPING, AND CAR PARKING AT BOWBACK HOUSE, 299 SILBURY BOULEVARD, CENTRAL MILTON KEYNES, MILTON KEYNES FOR CANNON CAPITAL DEVELOPMENTS LTD.

The Team Leader – West Team introduced the application with a presentation.

The Team Leader told the Committee that an update paper had been published detailing the applicants undertaking to provide a s106 agreement to include 14% affordable housing, she further confirmed that the recommendation remained to refuse the application for the reasons stated in the Committee report, she commented that the decision was finely balanced and Members would need to consider whether the benefits of the scheme outweighed the harm when coming to a conclusion. It was noted that the affordable housing provision had been subject to an independent viability assessment.

The Committee heard from the Ward Councillor who raised concerns in respect of the low percentage provision of affordable housing, he stated that he believed it to be in contravention of policy HN2 of Plan:MK, and policy G11 of the Neighbourhood Plan. He reminded the Committee

that the Council policy had been formed based on the Strategic Housing Needs Assessment and should be applied in this case.

He further commented that the Council's independent assessment of viability did not concur with that of the applicant and it was his view that the full requirement could and should be provided.

The representative of the Town Council told the Committee that the Town Council supported the application as the scheme would provide a high-quality building that would enhance the area and would integrate well with the CMK infrastructure.

The Committee also heard that the Town Council was concerned that should the application be refused an existing permission for conversion to 104 units with nil affordable housing provision could be built. He further stated that it was the view of the Town Council that there was no conflict with policy G11 of the Neighbourhood Plan.

The applicant's agent told the Committee that the building was a high-quality development. He further told the Committee that although there was a difference of opinion between the applicant's and Council's viability assessments, the applicant has now offered to increase the provision to 14% as a minimum with the undertaking to conduct an 'upwards only' review of the affordable housing provision as the scheme progressed to assess whether this could be increased.

The Committee heard that in respect of s106 money the applicant had agreed to pay all that which had been sought. However, in terms of the provision of Affordable Housing the Committee heard from the Council's Independent Viability Consultant who gave the Committee a comprehensive explanation of the assessment.

The Team Leader advised the Committee that whilst the offered affordable housing provision did not match the local requirement of 31% it did exceed that of the NPPF, which was 10% for major schemes.

Councillor Brown proposed that the officer recommendation to refuse the application for the reasons stated in the Committee report be agreed, this was seconded by Councillor Exon.

Members of the Committee made the following comments;

- The scheme would now offer 43 units (14%) affordable housing, which is greater than many other schemes within Milton Keynes.
- The loss of employment facilities was not a major concern with the shift towards working from home.
- The shortfall of parking provision (183 spaces) was a concern within Central Milton Keynes.
- That the non-immediate 'Article 4 Direction' made on 2 July 2020, in the Central Business District area of Central Milton Keynes would have no bearing on the existing 'permitted development' conversion of 104 units at the site.
- The viability of the scheme being disputed could result in an appeal being lost and the associated loss of the offer of the 14% affordable housing.
- The Council's policy requiring 31% affordable housing was well publicised and should be adhered to.

On being put to the vote the motion to refuse the application for the reasons stated was lost with Councillors Brown, Legg, Petchey, Trendall and Wallis voting for the motion and Councillors Alexander, Baines, Bint, Exon, Lancaster and McLean voting against.

Councillor Bint proposed that the authority to grant the application be delegated to the Director, Planning, Strategic Transport and Place Making subject to conditions, the details of which to be agreed in consultation with the Chair and Vice

Chairs of the Committee. The conditions were to include a Parking Management Plan together with other conditions deemed suitable for the site. Also, the requirement to complete a s106 agreement.

This was seconded by Councillor Exon.

The Team Leader advised the Committee that there was a list of standard conditions but would also recommend the inclusion of conditions in respect of the appearance and materials of the facades of the car park, waste storage and management and confirming use classes on the commercial units within the site, also, a wind assessment for the balcony's.

It was commented by Councillor Baines that the detail of paragraph 2.1 of the published update paper should be taken account of in drawing up the conditions.

On being put to the vote the proposal to delegate authority to grant the application to the Director, Planning, Strategic Transport and Place Making, subject to conditions the details of which to be agreed in consultation with the Chair and Vice Chairs of the Committee. The conditions to include a Parking Management Plan together with other conditions deemed suitable for the site, alongside the requirement to complete a s106 agreement was carried with Councillors Alexander, Baines, Bint, Exon, Lancaster & McLean, voting in favour, Councillors Brown, Legg, Petchey, Trendall and Wallis.

RESOLVED –

That authority to grant the application be delegated to the Director of Planning, Strategic Transport and Place Making, subject to conditions agreed, in consultation with the Chair and Vice-Chairs of the Committee and the completion of a s106 agreement.

20/00787/FUL

CHANGE OF USE OF LAND TO RESIDENTIAL GARDEN LAND ASSOCIATED WITH NUMBERS 44, 46, 48 AND 50 RANDALL WAY; 6, 7, 9, 11, 13 AND 15 GOMEZ CLOSE; AND 25, 27 AND 29 KEEL WAY AT LAND ADJACENT TO 6 GOMEZ CLOSE, OXLEY PARK, MILTON KEYNES FOR THE OCCUPIERS OF NOS. 44, 46, 48 AND 50 RANDALL DRIVE, OXLEY PARK, MILTON KEYNES, MK4 4SZ; NOS 6, 7, 9, 11, 13 AND 15 GOMEZ CLOSE OXLEY PARK, MILTON KEYNES, MK4 4SX AND NOS. 25, 27 AND 29 KEEL WAY OXLEY PARK, MILTON KEYNES, MK4 4TZ.

Councillor Brown, having declared a personal interest in the application, stepped down from the Chair and Committee during consideration of this application.

It was agreed by Acclamation that Councillor Bint take the Chair during consideration of the application.

The Senior Planning Officer introduced the application with a presentation.

The Committee was told that it was now advised that reason for refusal number 1, in respect of contravening Policy L3 of Plan:MK (2019) and Paragraph 97 of the National Planning Policy Framework (2019) be withdrawn further to the submission of an open space assessment, which demonstrated that the outline site provided sufficient amenity space in accordance with the standards set within Plan:MK. As such the proposal met one of the criteria of Policy L3 and was therefore acceptable in principle on this basis.

The Committee heard that the recommendation remained to refuse the application as the development would result in a non-provision of designated green infrastructure defined within Plan:MK, which also results in an erosion of the openness of the nationally recognised bridleway, also causing detriment to the allocated wildlife corridor. The application therefore contravenes Policies D1, NE2 and NE4 of Plan:MK (2019).

The Committee heard from the applicants' agent

that the land being claimed had been laid out in the original plans as part of gardens and as such had been maintained by the residents, however it has recently become known to the residents that the land remained in the ownership of the developer and was intended as amenity public open space.

The application sought to regularise the use of the space as gardens.

The Committee was told that the application was supported by an Open Space Assessment which identified that the land represented less than 1% of the total available in Oxley Park.

It was further commented that should the application be granted the residents had no intention to enclose the land or change its appearance, therefore there would be no harm to the openness of the site as a whole, furthermore there is a buffer ranging from 8m to 15m from the bridleway which is entirely surrounded by open fields.

Should the application be granted there would be no change to the Green Infrastructure as defined in the NPPF.

The Senior Planning Officer clarified that in respect of the harm to the openness of the green space, officers were of the view that the change of use would cause unacceptable harm.

It was confirmed that should the Committee be minded to grant the application, then permitted development rights could be removed to ensure that no boundary changes in terms of the landscaping were introduced at a later stage and furthermore, conditions restricting boundary treatments could be applied.

It was noted that the ownership of the land was not a material consideration, the land however was subject to a s106 agreement to transfer ownership to the Council which would remain in place, this was also not a material planning consideration.

Councillor Bint proposed that the officer

recommendation be moved for the purpose of debate, this was seconded by Councillor Exon.

Members of the Committee stated that whilst they were sympathetic to the situation the residents found themselves in, the land was public land and it should remain as such for the benefit of all.

On being put to the vote the proposal to refuse the application for the reason stated was carried with Councillors Alexander, Baines, Exon, Lancaster, Legg, Petchey, Trendall and Wallis voting in favour and Councillors Bint against McLean against.

RESOLVED –

That the application be refused as the development would result in a non-provision of designated green infrastructure defined within Plan:MK, which also results in an erosion of the openness of the nationally recognised bridleway, also causing detriment to the allocated wildlife corridor. The application therefore contravenes Policies D1, NE2 and NE4 of Plan:MK (2019).

20/00938/FUL ERECTION OF A TWO-STOREY DETACHED DWELLING WITH UNDER CROFT VOIDS AND CAR PORT WITH THE EXTENSION TO THE EXISTING ACCESS TRACK AND ASSOCIATED WORKS AT THE PADDOCKS, LAKES LANE, NEWPORT PAGNELL, MILTON KEYNES FOR MR TAJ RAJA, THE PADDOCKS, LAKES LANE, NEWPORT PAGNELL, MILTON KEYNES.

Councillor Brown rejoined the Committee and resumed in the Chair.

The Senior Planning Officer introduced the application with a presentation and explained the planning history of the site.

It was confirmed that the officer recommendation remained to refuse the application for the reasons stated in the Committee report.

The Committee heard from the representative of Newport Pagnell Town Council who raised the following;

The site was identified in the Neighbourhood Plan as unsuitable for residential development due to the high risk of flooding and associated drainage issues.

- The site is in the Great Ouse flood plain.
- The proposed development was out of keeping with the other developments in Lakes Lane.
- The drainage ditch adjacent to the property takes flood water from the adjacent Poets Estate and there are 2 x 2 feet diameter concrete pipes discharging into it, it is itself liable to flooding.
- The visual splay at the entrance to the site would need extending, requiring the removal of a section of historic hedgerow.
- Lakes Lane is a single-track road with no capacity for further traffic movement.

The applicant's agent told the Committee that the previous approval of an outline application on the site established the principle of development. The new proposed development is 37m from the original approved outline application.

It was further commented that the new proposed development was to be set back from the road and did not impact on the amenity of the neighbouring properties. The design and layout was appropriate for the rural setting of the site.

The Committee was also told that the design had been amended in line with comments from the Town Council including a reduction in footprint and height.

The Ward Councillor told the Committee that there was a live reserved matters application in respect of

the granted outline permission and that the remaining time to resolve this was not a relevant consideration.

He told the Committee that the existing permission required that the original proposed building had to be raised by 1.7m and therefore the new proposal was to develop a similar property further back on the site to avoid overshadowing the neighbouring bungalow.

It was also noted that the proposed development was lower than the other neighbouring property, despite being of a significant height.

The Ward Councillor stated that he believed the reasons given for refusing this application were dealt with when the existing outline permission for the development on the site was granted and that he would welcome the new proposal which is more set back and a less prominent feature as opposed to that presently permitted.

The Senior Planning Officer told the Committee that no design had been approved for the existing outline permission at this time. The only approved issue was the access arrangement.

The Senior Planning Officer further told the Committee that the existing Outline Planning Permission did not in his view, establish the principle of development given that the application before the Committee was a full planning application. If, however, a reserved matters application had been submitted, pursuant to the existing outline planning permission, then the principle of the development could not have been challenged, as it would have been secured via the outline approval. It was however a material planning consideration and had been taken account of in reaching the conclusion and recommendation being considered in respect of the application. This had also been reassessed in light of the reserved

matter application that had recently been submitted, but the conclusions remained the same.

The Committee was also reminded that since the Outline Permission had been approved, the Council had adopted a new Local Plan and the application had been assessed against that. The site was within a critical drainage catchment and that remained a significant consideration.

In response to a question the Senior Planning Officer confirmed that the separation of 9m between the drainage swale and the proposed development had been achieved, and the proposal to raise the development was as required.

Councillor Brown proposed that the application be refused for the reasons stated in the Committee report, this was seconded by Councillor Exon.

Some Members of the Committee stated that they believed that the principle of development had been established despite the comments of the officer due to the existence of the Outline Permission. It was further commented that the alternative was a development that was less desirable.

It was also commented that the proposed buildings height was less than that of one of the neighbouring properties and therefore, it could be argued that it was not out of keeping with the area, and the proposal was compliant with the requirements of the Environment Agency in respect of mitigating flood risk.

Other Members of the Committee took an alternative view in so far as the new proposed development is not on land that was part of the application relating to the outline permission and therefore no principle had been established, furthermore it was commented that the Neighbourhood Plan had been drawn up following

significant consultation and consideration and as the site was in open countryside and not designated for development the principles within the Plan should be supported.

It was noted that Buckinghamshire Fire and Rescue Service had objected to the application.

The Head of Planning told the Committee, as a point of clarification, that the Environment Agency did not comment on the Sequential Test and left this matter for the Local Planning Authority to determine, which was the basis for the second reason for refusal.

On being put to the vote, the proposal to refuse the application for the reasons stated in the Committee report was carried with Councillors Alexander, Brown, Exon, Legg, McLean, Petchey, Trendall and Wallis voting in favour and Councillors Baines, Bint and Lancaster voting against.

RESOLVED –

That Planning Permission be refused for the following reasons;

1. The proposed development is located outside of a defined settlement boundary in an area designated as Open Countryside. The proposal represents an unacceptable form of development within the Open Countryside and fails to accord with the strategic policies for the delivery of new residential development within the Borough. The application fails to accord with Policies DS1, DS2 and DS5 of Plan:MK and Policies NP1 and NP4 of the Newport Pagnell Neighbourhood Plan.
2. The application site is located within Flood Zone 3a (with Flood Defences), as indicated by the Environment Agency's Flood Map for Planning (Rivers and Sea) and Milton Keynes

Strategic Flood Risk Assessment. The application fails to adequately demonstrate that this proposal cannot be located in an area at lower risk of flooding and therefore does not pass the criteria of the Sequential Test. Accordingly, the proposed development is contrary to Policy FR1 of the Plan:MK.

3. The applicant has failed to demonstrate that the proposed development would not increase the flood risk to the Critical Drainage Catchment within which the application site is situated. Accordingly, it is deemed that the proposal fails to accord with Section E of Policy FR1 of Plan:MK.

THE CHAIR CLOSED THE MEETING AT 9:57 PM