

**Representor ID:** RP-142

**UI Representor ID:** 315

**UI Representation ID:** 857

**Representor Name:** Judith Priest

**Representor Organisation:** West Bletchley Council

<b>Policy:</b> Policy HQH3		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>The Local Plan continues to prioritise care homes and flatted development over bungalows, despite West Bletchley Council's evidence of demand for independent living options. As evidenced by the Census data, West Bletchley has an ageing population with differing needs to Milton Keynes Centre and newer developments/urban extensions. The MK Plan 2050 fails to adequately address these needs which are also evidenced within the HEDNA, which identifies the need for a range of supported housing types, however the proposed plan over-relies on institutional models.</p>		
<b>Modification Comment</b>		
<p>Proposed wording - Modification sought WBC are seeking Policy HQH3 is amended to explicitly support the delivery of supported units including bungalows and independent living units to accommodate a diverse range of groups. Proposals for, or which include, new supported, adaptable, accessible and specialist homes will be strongly supported where:</p> <ol style="list-style-type: none"><li>1. The form of supported and specialist homes meets one or more element of the Council's latest evidence of need;</li><li>2. It is in a location that is, or can be made, easily accessible to community facilities in line with GS4 and Table 5 and</li><li>3. It will create or maintain a mixed and sustainable community within the wider neighbourhood and not result in an over-concentration of that type of home in that location.</li><li>4. It supports the needs of the existing and evolving community and supports independent living.</li></ol>		
<b>Appear at examination?</b>		
<b>Appear at examination reason?</b>		

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<b>Policy:</b> Policy INF1		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>West Bletchley Council (WBC) strongly supports the infrastructure-first principle. However, the Plan lacks sufficient detail on how this will be delivered in mature areas like West Bletchley. The Plan focuses on new growth areas, with limited reference to infrastructure upgrades in existing communities.</p> <p>The infrastructure-first approach should make stronger reference to the Local Plan evidence base, specifically the Infrastructure Delivery Plan (IDP) and the IDP should be consistent with the Local Plan. Whilst WBC recognises INF1 does link to the IDP, the Plan is not consistent with the IDP, both should make referenced to local shops, and facilities including pubs, post offices and other community facilities. Existing facilities and the local offer are as important as new growth and housing, particularly in established, mature areas such as West Bletchley. Census data showing an ageing population and limited transport links in parts of West Bletchley demonstrate that maintaining and upgrading existing infrastructure is as essential as delivering new infrastructure.</p>		
<b>Modification Comment</b>		
<p>Recommendation:</p> <p>To ensure a consistent and joined-up approach across all Local Plan documents policy INF should include specific commitments to infrastructure investment in West Bletchley, including transport, public realm, and community facilities including pubs, shops etc. In addition the IDP should be amended to include specific references to community facilities such as post offices and pubs which are essential for self-sustaining communities.</p>		
<b>Appear at examination?</b>		
<b>Appear at examination reason?</b>		



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<b>Policy:</b> Policy CB1		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>West Bletchley Council (WBC) supports high-density development in Central Bletchley but emphasises the need for more diversity and where possible resist further flatted development and require high-quality design, type and tenure mix, and accessibility. Particularly for areas such as West Bletchley where high rise/ tall buildings are less accessible due to the ageing population and local needs of residents.</p> <p>Maintenance of Bletchley Park WBC understands Point 8 of CB1 : ‘Development proposals that maintain or improve the learning and visitor facilities at Bletchley Park intended to enable the renovation and enhancement of this internationally important historic and educational site will be strongly supported’ – may have been removed due to the fact that some improvements have already been delivered and completed. Development and proposals should support the continued ongoing maintenance and improvement of the learning and visitor facilities at Bletchley Park, as the increased development within Central Bletchley and wider MK will most likely result in cumulative impact and CB1 should seek to address any adverse impacts as a result of intensification and growth within Bletchley and MK on the historic park.</p> <p>Regeneration The Plan fails to adequately address regeneration in mature areas. Whilst we understand new growth and development is crucial, the Plan focuses heavily on the city core and new development, particularly the urban extensions, there are concerns this will result in mature areas such as West Bletchley being neglected. West Bletchley already suffers from poor-quality public realm and historic under-investment. Therefore, there is a need to provide weight through policy to ensure the new development within Central Bletchley and key areas also positively impacts and generates investment and regeneration in these maturer areas and ensure certain demographics and residents further from key locations do not become disadvantaged or forgotten.</p> <p>Reference to West Bletchley CB1 applies spatially to West Bletchley Parish Council, Bletchley and Fenny Stratford Town Council yet the Plan fails to reference West Bletchley specifically. West</p>		

Bletchley parish has a MADE Neighbourhood Plan which fosters and aligns with MKCC's aims and ambitions for the city. We consider a reference to West Bletchley MADE plan and West Bletchley Town Council that aligns with the paragraph 30 of the NPPF.

**Modification Comment**

Recommendation: Flatted Development

Strengthen CB1 to require high-quality, housing type and tenure-diverse schemes with accessible units and strong public realm integration.

Maintenance of Bletchley Park

In light of the above comment regarding CB1 the removal of bullet point 8, WBC would welcome the inclusion of the following bullet point:

Proposed wording:

- MKCC will strongly support proposals which continue to maintain or improve the learning and visitor facilities at Bletchley Park to enable the renovation and enhancement of this internationally important historic and educational site

Regeneration

Recommendation: Strengthen Policy CB1 and relevant spatial policies to include reference to a regeneration strategy for West Bletchley, with funding mechanisms and design guidance.

Reference to West Bletchley

Recommendation/proposed wording: Include reference to Bletchley and Fenny Stratford and West Bletchley and include/reinstate reference to Bletchley Park in CB1

**Appear at examination?**

Yes

**Appear at examination reason?**

As the Central Bletchley CB1 allocation extends into our parish council administrative boundary (as well as Bletchley and Fenny Stratford Town Council's) we consider it is essential for West Bletchley Council to participate in the examination hearing sess

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<b>Policy:</b> Policy HQH2		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>West Bletchley Council (WBC) strongly opposes the proposed 20% affordable housing requirement for West Bletchley (Viability Area 2) and considers in relation to affordable housing the Local Plan is unsound. This represents a reduction from the 25% proposed at Regulation 18 and falls significantly short of local need. The plan is not positively prepared or justified in this regard. The broad approach with the adoption of viability areas in regard to affordable housing fails to take into consideration the individual challenges of specific areas and towns including West Bletchley. As seen in our 'made' Neighbourhood Plan, we have an aging population in comparison to MK and have a need for truly affordable homes, in addition our Neighbourhood Plan complies with MKCC previous plan 'MK:Plan' which requires developments of 10 or more to deliver 31% affordable homes.</p> <p>WBC recognises the challenge of delivering a high percentage of affordable homes due to viability concerns and supported evidence within the HEDNA. However, the policy should set a higher target with built-in flexibility, such as a viability review mechanism, rather than simply lowering the baseline. This approach ensures that the demonstrated need is met - starting low only leads to further reductions. Viability exceptions should be time-limited, transparent, evidence-based, and include a clawback mechanism.</p> <p>Whilst we recognise that affordable housing provision is a national issue, we think there are opportunities within West Bletchley to help meet needs and therefore suggest the need for flexibility in the policy approach.</p>		
<b>Modification Comment</b>		
<p>Modification sought</p> <p>In view of the above information, West Bletchley Council (WBC) are seeking a higher affordable housing target, with 100% social housing to meet the needs of the city.</p> <p>Proposed wording - Modification sought:</p> <p>Proposals resulting in the creation of 10 or more new homes must provide affordable homes in accordance with the requirements set out below:</p> <ol style="list-style-type: none"><li>1. The proportion of proposed homes that are to be affordable must be as follows:<ol style="list-style-type: none"><li>a. 40%</li></ol></li></ol>		

1. Where a developer demonstrates that the 40% baseline cannot be met due to site specific viability constraints, a reduced provision may be accepted only where all of the following are satisfied:
  - o an independent viability appraisal is submitted by the applicant;
  - o the applicant has demonstrated that all reasonable mitigation measures have been pursued
  - o any reduction is time limited and conditional, with a legally binding clawback mechanism requiring the delivery of additional affordable housing if scheme viability improves before or within five years of completion.
2. Except where site-specific considerations or the form of development dictates otherwise, the tenure mix of affordable homes must be as follows:
  - a. 13% Affordable Home Ownership;
  - b. 67% Social Rent; and
  - c. 20% Affordable Rent

On council-owned land, all of the 40% affordable homes should be designated as (100%) social housing.

<b>Appear at examination?</b>	Yes
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**Appear at examination reason?**

Affordable housing is essential, particularly for areas such as West Bletchley which are more constrained with fewer employed people (as evidenced by the 2021 Census Data). This is in comparison to MK City core and West Bletchley faces different challenge

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<b>Policy:</b> Policy CEA12		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>The Local Plan underplays the historical significance of Bletchley, particularly Bletchley Park, and its role in securing city status. There is a considerable quantum of growth planned for within and adjoining Bletchley which may result in harm on the historic setting. Whilst we are supportive of growth, development and regeneration we feel preservation is equally important There is cumulative pressure from development within the wider MK City administrative boundary alongside adjoining authority growth.</p> <p>Bletchley Park is internationally significant, yet references have been removed from Policy CB1 and are absent from CEA12.</p> <p>To ensure 'soundness' of the Plan West Bletchley Council suggest the inclusion of reference to Bletchley's heritage in CEA12 and recognition of Bletchley's contribution to the city's identity and future.</p>		
<b>Modification Comment</b>		
<p>Proposed wording: The key natural and man-made features that contribute towards the landscape character and its quality;</p> <ol style="list-style-type: none"><li>2. The historic layout and setting of towns, villages and hamlets;</li><li>3. Important views, including local landmarks such as Bletchley Park; and</li><li>4. The tranquillity of the area and the need to protect against intrusion from light pollution, noise and motion.</li></ol>		
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<b>Policy:</b> Policy GS3		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>WBC finds the plan is not consistent with the evidence base, specifically the Infrastructure Delivery Plan (IDP). We are concerned that it fails to adequately cover opportunities in Central Bletchley. The Towns Fund projects sought to benefit from the opportunities provided by East-West Rail, the code breaking legacy of Bletchley Park and the new South Central Institute of Technology (SCIoT) to encourage the digital, cyber and technology sectors to look to Bletchley as an alternative to London, Oxford or Cambridge. The IDP states Central Bletchley is “earmarked as a potential significant location for technology companies”, additionally, the HEDNA, (Locations for Development) notes that Bletchley is being regenerated and “will be a key location of technology companies.”. Therefore, it should be reflected in the strategic policy GS3 to place weight and emphasis on the opportunities related to Central Bletchley.</p>		
<b>Modification Comment</b>		
<p>Recommendation: Table 4 identifies locations for employment growth WBC consider that here should also be reference to new employment provision for the technology/ digital sectors in Central Bletchley, associated with East-West Rail and links to Bletchley Park.</p>		
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<b>Appear at examination reason?</b>		

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<b>Policy:</b> Policy GS10		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>The Plan's emphasis on the grid system and new development corridors overlooks the distinct needs of mature areas like West Bletchley. West Bletchley benefits from a more established transport and movement network, yet its connectivity diminishes further from Bletchley station, leaving parts of the area less well served by the city's broader transport strategy. To ensure equitable access and integration, future planning should recognise and respond to these local variations, prioritising improvements that reflect the mature infrastructure and unique connectivity challenges faced by West Bletchley.</p> <p>The northern part of the parish area suffers with air pollution issues due to the heavily trafficked A421. This will only worsen once the development of c 1735 homes at Salden Chase, immediately to the west, is underway. We have already highlighted the congestion experienced along the B4034 Buckingham Road and this is also expected to worsen as drivers will seek out alternative east-west and southerly routes to avoid the A421. WBC would welcome further discussions on the delivery of the Bletchley southern by-pass to alleviate the levels of traffic congestion in the future.</p> <p>Congestion on Buckingham Road (B4034) remains unaddressed and is evidenced by air pollution issues. There is no reference within the plan to a southern bypass or localised transport improvements for Bletchley.</p> <p>The Plan prioritises new growth areas for transport investment, risking a 'two-speed city'. To ensure equity in transport investment, mature and established areas need to be considered along side the new growth and intensification, especially as parts of West Bletchley are served by fewer transport links resulting in higher car dependency and externalities including increased congestion and poorer air quality.</p> <p>Therefore, it is key that new development fully mitigates its impact on the operation and safety of the local and strategic road network. This will, however, be challenging to achieve in West Bletchley where our traditional street layout opposed to the grid layout which serves MK City core.</p> <p>We are keen to encourage creative solutions to improve access to and efficiency of public transport in West Bletchley, including, for example, running smaller, shuttle-type buses through the area, linking passengers to the MRT stops and transport hubs for onward travel. As raised at Regulation 18 the majority of West Bletchley residents</p>		

are significantly further than the 600m from a Mass Rapid Transit stop/hub. Policy GS10 seems entirely focused on new development, and extensions to existing networks, however creative solutions are also required to improve and enhance existing local road and Redway networks.

**Modification Comment**

Recommendation: Amend GS10 to include a programme of transport upgrades in existing areas, with specific reference to West Bletchley and the safeguarding of a route for a southern bypass.

West Bletchley Council (WBC) would welcome the inclusion of a commitment to assess and address congestion in West Bletchley, including feasibility of a southern bypass, safeguarding of a route and improved east-west connectivity.

**Appear at examination?**

Yes

**Appear at examination reason?**

West Bletchley Council (WBC) would like to participate in the hearing sessions surrounding transport and movement and to be involved in any modifications regarding policy GS10 and would welcome the opportunity to contribute/ be present whilst the text is

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<b>Policy:</b> Policy PFHP2		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>West Bletchley Council (WBC) strongly opposes reducing the marketing/notice period for loss of employment from 12 to 6 months. A shorter period would undermine opportunities to relocate or re market premises, accelerate permanent job losses, erode daytime activity and independent shops, and increase the risk that West Bletchley becomes a commuter area rather than a place that supports local jobs. Traditional employment should be supported, maintained and encouraged and this change poses a risk to local and traditional employment. WBC believe local employment should be safeguarded. Concerns this will not only impact to local employment but also to the local character of West Bletchley. This amendment will ensure a consistent approach with West Bletchley's Neighbourhood Plan which has been 'made' and includes a '12 month' period as opposed to the proposed 6 months.</p>		
<b>Modification Comment</b>		
<p>In light of the above concern, West Bletchley Council are seeking for the reference to six months to be amended to 12 months to reflect the Neighbourhood Plan. Maintain the current 12-month requirement for proposals affecting existing employment uses in West Bletchley and apply stronger safeguards.</p> <p>Proposed wording: Policy PFHP2 Provision and protection of community facilities Policy type: Non-strategic Objectives: 3, 5, 11 Site/sub-area: n/a Location of community facilities A. Proposals for community facilities will be supported where they: 1. Are in a location that is accessible by walking, wheeling, scooting, cycling and public transport; 2. Meet the needs of the local population; and 3. Are well-related to the existing pattern of development and there is no detriment to the character or appearance of the surrounding area.</p> <p>Loss of community facilities</p>		

B. Development proposals that involve the loss of an existing community facility will only be supported where:

1. It can be demonstrated that there is no longer a need for the existing use or any type of community use;
2. Satisfactory alternative provision has been, or has been agreed to be, made elsewhere that is equally or more suitable in terms of its overall quality, function, and accessibility by walking, wheeling, scooting, cycling and public transport;
3. The proposal is for an alternative community facility for which it has been demonstrated that there is a greater local need; or
4. The existing use is no longer commercially viable and has been appropriately marketed for at least twelve months.

<b>Appear at examination?</b>	
<b>Appear at examination reason?</b>	

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<b>Policy:</b> Policy GS11		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>West Bletchley Council (WBC) is concerned about the cumulative impact of growth within MK and neighbouring authorities on West Bletchley's infrastructure and services. Whilst we recognise the intention of policy GS11, it should ensure proposals are planned and delivered in a way that protects and enhances existing communities (including mature areas such as West Bletchley), secures infrastructure and environmental mitigation, and embeds effective joint working with neighbouring authorities, local communities and infrastructure providers.</p> <p>The Plan does not quantify or mitigate cross-boundary impacts on mature communities and doesn't reference known development such as Salden Chase. Therefore, WBC consider the plan is unsound in relation to cumulative impact of growth on areas such as West Bletchley which is impacted not only by MKCC's growth but Buckinghamshire.</p>		
<b>Modification Comment</b>		
<p>Strengthen GS11 to require joint infrastructure planning, setting out an expectation for cooperation with neighbouring authorities and a duty to produce joint infrastructure schedules where growth crosses boundaries (with input from the local parish etc). A need to reference timely delivery of infrastructure and an infrastructure first approach in-line with the overall plan objectives. Specific reference to mature neighbourhoods and the need for mitigation and investment for existing communities affected by adjoining growth.</p> <p>Proposed wording:</p> <ol style="list-style-type: none"><li>1. The local authorities (state the local authorities in policy or explanatory text) will work jointly, and with infrastructure and service providers within Milton Keynes City and neighbouring authorities as relevant, to achieve a coordinated and well-designed development, with engagement beginning as early as possible adopting an infrastructure first approach in line with the councils ambitions;</li></ol>		
<b>Appear at examination?</b>		
<b>Appear at examination reason?</b>		

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<b>Policy:</b>		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
We will prepare new Design Codes alongside developers and landowners to help us implement our policies. These codes will relate to specific areas of expansion or key sites, with particular emphasis on creating people friendly and healthy places. They will		
<b>Compliance Comment</b>		
West Bletchley Council (WBC) considers that the plan fails to address existing, more mature areas and their need for design guidance. Places such as West Bletchley suffer from a poor public realm and historic piecemeal development, design codes should not be limited to new urban extensions but must also be prepared for Central Bletchley and other established neighbourhoods to guide high-quality, context-sensitive improvements; applying codes to existing areas will protect local character, raise design standards, improve accessibility and public spaces, provide clarity and certainty for developers and communities, and unlock wider benefits including increased investment, stronger place-making, and better long-term stewardship of the borough's built environment.		
<b>Modification Comment</b>		
Recommendation - Modification sought: Add a requirement for the preparation and adoption of design codes for existing and mature areas alongside codes for new settlements. The Council should commit to and prepare area-specific design codes for Central Bletchley, West Bletchley and other established neighbourhoods to guide high-quality public realm improvements. Coding should cover street hierarchy, public realm, shopfronts and active frontages, building scale and massing, materials and detailing, accessibility, parking and servicing, green infrastructure, and shopfront signage, and will be informed by heritage appraisal and local engagement. The codes could then be adopted to inform development management decisions and public realm works to ensure consistent design outcomes, protect local character, raise design standards, support local economic activity and secure long-term stewardship of mature parts of the city.		
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<b>Policy:</b>		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
Development proposals that result in the loss of community facilities that are commercially run will not be permitted unless we are satisfied that every effort has been made to retain them. Where the lack of commercial viability is a reason to justify the		
<b>Compliance Comment</b>		
West Bletchley Council (WBC) strongly opposes reducing the marketing/notice period for loss of employment from 12 to 6 months. A shorter period would undermine opportunities to relocate or re market premises, accelerate permanent job losses, erode daytime activity and independent shops, and increase the risk that West Bletchley becomes a commuter area rather than a place that supports local jobs. Traditional employment should be supported, maintained and encouraged and this change poses a risk to local and traditional employment. WBC believe local employment should be safeguarded. Concerns this will not only impact to local employment but also to the local character of West Bletchley. This amendment will ensure a consistent approach with West Bletchley's Neighbourhood Plan which has been 'made' and includes a '12 month' period as opposed to the proposed 6 months.		
<b>Modification Comment</b>		
In light of the above concern, West Bletchley Council are seeking for the reference to six months to be amended to 12 months to reflect the Neighbourhood Plan. Maintain the current 12-month requirement for proposals affecting existing employment uses in West Bletchley and apply stronger safeguards. Proposed wording: Policy PFHP2 Provision and protection of community facilities Policy type: Non-strategic Objectives: 3, 5, 11 Site/sub-area: n/a Location of community facilities A. Proposals for community facilities will be supported where they: 1. Are in a location that is accessible by walking, wheeling, scooting, cycling and public transport; 2. Meet the needs of the local population; and		

3. Are well-related to the existing pattern of development and there is no detriment to the character or appearance of the surrounding area.

Loss of community facilities

B. Development proposals that involve the loss of an existing community facility will only be supported where:

1. It can be demonstrated that there is no longer a need for the existing use or any type of community use;
2. Satisfactory alternative provision has been, or has been agreed to be, made elsewhere that is equally or more suitable in terms of its overall quality, function, and accessibility by walking, wheeling, scooting, cycling and public transport;
3. The proposal is for an alternative community facility for which it has been demonstrated that there is a greater local need; or
4. The existing use is no longer commercially viable and has been appropriately marketed for at least twelve months.

<b>Appear at examination?</b>	
<b>Appear at examination reason?</b>	