



LEWIS & CO

MID SUSSEX DISTRICT PLAN
2021 - 2039

MATTER 5: THE SPATIAL STRATEGY

ON BEHALF OF VISTRY GROUP

SITE: LAND AT MALTHOUSE LANE, BURGESS HILL

SITE REF: 1105/710

RESPONDENT REF: 1191618/1191628



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1.0 INTRODUCTION AND SUMMARY

- 1.1 This Matter Statement has been prepared on behalf of Vistry Group who are promoting Land at Malthouse Lane, Burgess Hill (SHELAA ID: 1105) for a major residential-led development comprised of a new neighbourhood of 750 homes. The eastern parcel of the site (Maltings Grange) is also being promoted in isolation for a development of 360 new homes (SHELAA ID: 710) and is located within the Brighton and East Sussex Housing Market Area (HMA), Northern West Sussex HMA and the Coastal Urban Area Functional Economic Market Area (FEMA).
- 1.2 The site was identified as a sustainable option for allocation but has not been included as an allocation within the Plan, despite a request from Brighton and Hove City Council (at Regulation 18 stage) for the site to be allocated to assist with their unmet housing needs - see paragraph 6.15 of our Regulation 19 representation.
- 1.3 These Hearing Matter Statements submitted on behalf of Vistry Group individually address select questions under each Matter to be considered at Hearings beginning on 24th February 2026. However, these matters and others considered pertinent to the soundness of the Plan are addressed in greater detail within our Regulation 19 responses (references 1191618 and 1191628).
- 1.4 It is Vistry Group's position that:
- The Plan has not been *justified* as the spatial strategy is overly reliant on an unprecedented level of windfall delivery and does not proactively seek to address the main strategic planning issues affecting the district including the unmet needs across the sub-region and the evidence base therefore fails to reflect national planning policy requirements;
 - The Plan has not been *positively prepared* and is not *effective*, as the Council have made no meaningful efforts to reach agreement with neighbouring areas to assist with their unmet needs (even where these neighbouring authorities have made specific requests of this nature) nor have they proposed allocating additional sites to respond to declared unmet housing need or deliver additional housing provision as directed by the Inspector in IDJB-01;



- The Plan is not *consistent with national policy* as the plan period is insufficient and the Plan fails to deliver a sufficient supply of homes as required under paragraphs 11, 22, 35 and 61 of the Framework.

1.5 We consider these to be significant shortcomings that render the Plan unsound in its current form.

1.6 It is Vistry Group's view that the Plan can be made sound through the reconsideration of the overall spatial strategy and housing requirement, and re-assessment of all Stage 3 sites that could assist in meeting the unmet needs of neighbouring authorities against the criteria at Paragraph 11 (b) of the NPPF. Main modifications to allocate additional housing sites at the district's most sustainable settlements could remedy these identified issues.



MATTER 5: THE SPATIAL STRATEGY

- 2.1. The Inspector's Matters and Issues document (IDJB-05) raises the following questions in relation to Matter 5:

"The effectiveness and soundness of the proposed distribution of new development in meeting social, economic and environmental objectives, whether it will achieve more than the sum of its parts and whether it will amount to positive planning.

- a) *Whether the plan's apportionment of development to larger and smaller settlements and freestanding allocations, and to different sizes of site,/ is effective in ensuring delivery and in meeting community needs*
- b) *The relationship between the spatial strategy and transport objectives, transport infrastructure and transport constraints*
- c) *Whether the spatial strategy takes an appropriate approach, at the strategic level, towards climate change mitigation, countryside protection, environmental protection, flood risk and heritage"*

- 2.2. These matters are addressed below. Where relevant, references to the National Planning Policy Framework (NPPF) relate to those within the December 2023 version unless otherwise stated.

ISSUE 1: WHETHER THE PLAN'S APPORTIONMENT OF DEVELOPMENT TO LARGER AND SMALLER SETTLEMENTS AND FREESTANDING ALLOCATIONS, AND TO DIFFERENT SIZES OF SITE/ IS EFFECTIVE IN ENSURING DELIVERY AND IN MEETING COMMUNITY NEEDS

- 2.3. Paragraph 22 of the NPPF states that:

"Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area,



policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”

- 2.4. The proposed development at Crabbet Park (DPSC2) is described by the promoter as Crabbet Park village and is essentially a new settlement – albeit originally envisaged as an extension to accommodate the growth of Crawley in the At Crawley Study (2009).
- 2.5. Alongside other developments at Sayers Common, the development proposed at land south of Reeds Lane (DPSC3) will add an additional 2,543 dwellings to a village of approximately 900 residents. Sayers Common is categorised by the Council as a Category 3 settlement, defined as a medium sized village providing essential services only.
- 2.6. These large-scale developments are dependent on the delivery of widescale infrastructure improvements, and both lack existing infrastructure, including sustainable forms of transport.
- 2.7. The Council have published an updated Infrastructure Delivery Plan (IDP) in December 2025 (document reference IV6) which identifies a series of ‘critical’ infrastructure improvements. However, these critical improvements lack any identified timescales or estimated costs and are severely lacking in detail. For example, under the Transport section of the document these measures generically refer to “active travel improvements” and “public transport improvements linking to key destinations” for each of the three wards where strategic-level developments are proposed within the submission District Plan (Burgess Hill, Copthorne and Sayers Common). No further details are provided, and the costs and timescale sections are left entirely blank. All entries are listed as critical and DPSC1, DPSC2 and DPSC3 are all listed as ‘dependant’ on these improvements.
- 2.8. This calls into question whether the Council’s approach of focusing its housing delivery on large-scale standalone sites and urban extensions is well considered. Some specific interventions are identified and costed within the document for junction capacity upgrades at the A23/A2300 (Hickstead) junction in Burgess Hill (required in all scenarios and not attributed to District Plan traffic) and the provision of improved cycle storage and access facilities at Burgess Hill station.



However, infrastructure upgrades for DPSC3 remain uncosted – including a 7km ‘active travel’ route to Burgess Hill station within Annex 1 of document O15 that has not been costed and does not appear deliverable. Junction capacity improvements at Sayers Common are identified within document T11 and directly attributed to the traffic from developments proposed in this location.

- 2.9. The upgrades required to the strategic road network as a result of the additional traffic generation (directly attributed to allocations at Sayers Common) are still not fully costed within the Council’s latest Infrastructure Delivery Plan (December 2025 – document reference IV6). No confirmed or indicative timescale has been identified for these significant works within the same document. The works must be scheduled, funded and delivered to support the delivery of DPSC3 and surrounding sites.
- 2.10. No timetable has been provided by the Council on the funding and delivery of these works to demonstrate that this critical infrastructure will not significantly delay the delivery of DPSC3 (see our Matter 2 Statement for further details).
- 2.11. This approach has been necessitated by the Council’s failure to seriously and iteratively consider the spatial strategy through the plan-making process. It is not clear from the evidence why the submission District Plan proposes Copthorne and Sayers Common as locations with ‘High Growth Potential’ or the district’s towns have been given a lower priority for growth. The allocation at DPSC2 is envisaged as a standalone settlement (Crabbet Park Village – see the promoters Vision Document) and there are at least nine settlements within the district that are Category 1 and Category 2 settlements under the Council’s own sustainability hierarchy, and therefore more sustainable locations for large-scale development than Sayers Common.
- 2.12. The Council’s adopted District Plan (2018) strategy focused on the delivery of new homes in the most sustainable settlements – with a focus on delivery in Burgess Hill given the town’s existing infrastructure and two railway stations. This strategy is still being implemented with large scale allocations still being delivered. There is therefore any opportunity through the District Plan Review process for the Council to build on this strategy and ensure that it’s aims and objectives are met. Any change from this strategy should be clearly justified and



evidenced. The 2018 District Plan strategy therefore remains relevant to the District Plan 2021 – 2039.

- 2.13. In contrast, the Land at Malthouse Lane site would be delivered alongside DPSC1 as a natural urban extension to Burgess Hill and offer greater sustainability benefits to future residents as a result. Residents would benefit from direct access onto the town's Green Circle network of public open spaces, would be in close proximity to the town's existing Tesco superstore, walking distance from the local schools, the town centre and railway station (with walking routes already proposed and funded for enhancement through the Burgess Hill Place and Connectivity Programme in 2027) as well as easy access to the District's Centre for Outdoor Sport and Triangle Leisure Centre to the north. This existing infrastructure provision at Burgess Hill is far superior to that proposed alongside development at Sayers Common (and to a lesser extent Crabbet Park) even excluding the onsite infrastructure proposed at Land at Malthouse Lane within Vistry Group's masterplan.
- 2.14. The District Plan has not evolved in response to the submission of additional sites or evidence that demonstrates that omission sites can be developed without adverse impacts. As a result, the Plan continues to promote growth in locations that are not considered to be more sustainable by reference to the Council's own Settlement Hierarchy.
- 2.15. The omission of sites at Category 1 settlements that are considered to be a "sustainable option for allocation" through the Council's own site selection process could deliver an estimated 1,550 new homes at these settlements, allowing the District Plan to either contribute a greater quantum of development towards the unmet needs of neighbours, or reduce reliance on large-scale developments in unsustainable locations that cannot provide reliable delivery within the Plan period. These sites, adjoining the settlement boundaries of Burgess Hill and Haywards Heath, would better align with the findings of the Council's own Sustainability Appraisal.
- 2.16. Appendix A of the Sustainability Appraisal shows that options 4 (focusing development in the three Category One settlements) and 5 (prioritising development on brownfield land) were rejected due to the lack of available sites to deliver the district's housing needs in full. However, these Options 4 and 5



scored significantly higher against the identified sustainability objectives than Option 2 (the option taken forward as the spatial strategy for the Plan). The two options were shown to achieve better sustainability outcomes against nearly all objectives including health and wellbeing, education, community and crime, flood and surface water, natural resources, biodiversity and geodiversity, landscape, climate change and transport, energy and waste, economic regeneration and economic growth.

- 2.17. Despite these findings, the District Council have not changed course from their Regulation 18 spatial strategy (which only considered Options 1 and 2 within the accompanying Sustainability Appraisal). This is not *justified*, and the Council's own evidence shows that further housing delivery could be focused at sustainable Category 1 settlements, in accordance with the current District Plan's strategy and the findings of the Sustainability Appraisal.
- 2.18. Additionally, no options have been directly appraised in consideration of meeting the unmet development needs of neighbouring authorities. As a result, no consideration has been given to the likely impacts of failing to address the unmet needs of neighbouring authorities on the social and economic wellbeing of residents. The consequences of failing to address the housing supply issues within the functional housing and economic areas are likely to be severe, impacting on the affordability of housing for all residents. Worsening affordability will likely also have secondary impacts on the cost of living, local economy and quality of life for residents across the functional housing market area, including within Mid Sussex.
- 2.19. The adopted District Plan directly appraised options for higher housing delivery numbers and was supported by an evidence base document entitled "Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan", which assessed the potential for assisting six neighbouring authorities in meeting their unmet needs for housing and employment land.
- 2.20. The Sustainability Appraisal does consider an alternative option to the approach within Policy DPH1 (Housing), which shows that the delivery of higher levels of growth will deliver positive improvements against the identified sustainability



objectives¹. However, despite this, this option has not been brought forward through the Plan and the reasons for this are not detailed within the Sustainability Appraisal itself.

- 2.21. It is our view that the overarching strategy should have been based on a transparent appraisal of the adopted District Plan strategy and explanation of why this strategy should not be maintained or not, as well as an updated and detailed consideration of the ability of the Council to contribute towards a sub-regional response to meeting the unmet needs of neighbouring authority areas.
- 2.22. In particular, the District Plan spatial strategy should have evolved through the Plan-making process as evidenced emerged that additional/alternative sites at Category 1 settlements would be sustainable options for allocation. Instead, the Council have continued to allocate sites in lower category settlements whilst also failing to identify and cost the critical infrastructure needed to support these developments.
- 2.23. This not only reduces confidence in the overall deliverability of these allocations, but also the delivery timescales if those infrastructure upgrades can be identified and funded. As set out in our Statement on Matter 1, the submission District Plan only looks ahead over a period to 2039 (thirteen years from now) with a proposed modification to extend this by a single year and our concerns around delivery timescales for the largest allocations in the Plan (DPSC2 and DPSC3) are also set out in detail within our Matter 2 Statement. In summary, we consider it likely that approximately 1,000 homes identified within the Council's housing land supply to the end of the Plan period could be delayed by slower build-out rates from these two sites alone. The single-year contingency identified within the Council's identified 'headroom' in MS-TP2 is not sufficient to address these risks.
- 2.24. The Council's spatial strategy therefore fails to align with its own evidence and has been pursued despite better performing sites being found to form sustainable alternative options for allocating.

¹ Appendix B.12 Housing, Mid Sussex District Plan (Regulation 19) Sustainability Appraisal (November 2023) JBA Consulting (Document Reference DP7)



ISSUE 2: THE RELATIONSHIP BETWEEN THE SPATIAL STRATEGY AND TRANSPORT OBJECTIVES, TRANSPORT INFRASTRUCTURE AND TRANSPORT CONSTRAINTS

Our response to this issue has been prepared by Katie Stock, Senior Director – Transport at Pegasus Group

- 2.25. The National Planning Policy Framework (2024) sets out the following:
- i. Paragraph 105 encourages significant growth to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport.
 - ii. Paragraph 109 states that transport issues should be considered from the earliest stages of development proposals using a vision led approach to identify transport solutions that deliver well designed, sustainable and popular places, and that this should involve realising opportunities from existing and proposed transport infrastructure and changing transport technology and usage.
 - iii. Paragraph 115 suggests that sustainable transport modes are to be prioritised and that any significant impacts on the transport network can be effectively mitigated to an acceptable degree through a vision led approach. Paragraph 115 also states that development should only be refused on transport grounds where the residual cumulative impacts, following mitigation, would be severe, taking into account all reasonable future scenarios.
 - iv. Paragraph 118 it states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and that the application should be supported by a vision led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.
- 2.26. It is Pegasus Group's view that the NPPF policy requirement for a vision led approach is in place to ensure that proposals consider ambitious masterplanning and sustainable travel measures together, in combination and from the outset, in order to both minimise vehicular travel and encourage sustainable travel associated with new development. It is also Pegasus Group's



view that an associated vision led approach should be fairly reflected within trip assessment methodologies, as the approach is expected to be used when impacts are to be mitigated, assessed and monitored.

- 2.27. A draft NPPF was issued in December 2025 and is the subject of public consultation at the time of writing. The emphasis remains on reducing car dependency, promoting walking, cycling and public transport, and integrating transport considerations into plan-making and development decisions. The draft NPPF says at TR.6 item 4 that *“In assessing potential impacts, all reasonable future scenarios should be considered, taking into account impacts at different times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself”*.
- 2.28. At a regional level, West Sussex County Council’s Transport Plan (WSTP) 2022-2036 has a focus on *“planning positively to minimise traffic growth through a ‘vision-led’ approach to design rather than designing to cater for forecast traffic growth or overproviding capacity which would have negative impacts on carbon emissions. It also means planning positively to reduce the impacts of vehicle use and using demand management measures; e.g. parking controls, in constrained areas.”* This follows the principles of the NPPF.
- 2.29. The District Plan has a strategic aim of increasing walking and cycling, with a long-term goal that these should be the first choice for shorter journeys such as those to and from school, college, work or leisure trips.
- 2.30. The Plan sets out 15 strategic objectives; many of which include aspirations for sustainable communities including sustainable transport.
- 2.31. The Plan places a strong emphasis on 20 minute neighbourhoods as the means to improving accessibility by non-car modes and as a threshold for a development site being suitable in accessibility terms. This means a 10 minute walk (800 metres) in each direction for daily needs. It is noted that the wording which precedes Policy DP3 states that *“the concept of a 20 minute journey time will be used as a guide and not rigidly applied”*. It is not realistic to take this prescriptively in a predominantly rural district.



- 2.32. The Plan includes a number of policies which support the strategy and objectives that will be used in determining planning applications within the district. DPS1 refers to the 20-minute neighbourhood and DPS6 seeks to prioritise active travel such as walking and cycling and sustainable transport.
- 2.33. Policy DPT1 relates to placemaking and connectivity and states that *“Development that is likely to generate significant amounts of movement and/or have a significant impact on the transport network shall provide a Transport Assessment/ Statement, Sustainable Transport Strategy and Travel Plan to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it and to accord with the requirements of the NPPF”* (our underlining) and that *“All major developments must demonstrate how all relevant sustainable travel interventions (for the relevant local network) will be maximised and taken into account in terms of their level of mitigation before considering physical highway infrastructure mitigation”*.
- 2.34. Page 110 of the Plan states that *“All new developments will be required to demonstrate as a first priority, that all sustainable travel interventions have been fully explored and sustainable mitigation maximised. Any residual impacts shall then be assessed and the need for physical highway mitigation explored.”*
- 2.35. The policies will guide development. However, the evidence which sits under the policies is considered to be lacking.
- 2.36. The Plan identifies a package of transport measures that MSDC claim to be adequate to support the quantum and dispersed location of development. This is primarily based around sustainable transport measures. Policies DPI1, 2 and 3 do not identify infrastructure requirements for the development sites, nor are they identified in the individual DPSC policies.
- 2.37. One of the twelve core planning principles detailed in the NPPF is that plan making should *“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”*.



- 2.38. Paragraph 31 of Circular 01/2022 reiterates the principles of the Framework and states that *“The NPPF expects local plans and spatial development strategies to be underpinned by a clear and transparent evidence base which informs the authority’s preferred approach to land use and strategic transport options”*. Paragraph 31 also states that National Highways *“will expect this process to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel”*.
- 2.39. Whilst it is understood that sustainability is not just accessibility, Pegasus Group’s view is that the sites identified do not appropriately reflect accessibility objectives enough. For example, there are a number of sites which are remote (see Figure 3 of the transport evidence) and therefore will rely on car travel. Whilst they are located next to the A23, this does not provide good accessibility for non-car modes. There needs to be realism about this. Other sites, such as Land at Malthouse Lane, are not remote and provide for good accessibility for all modes. However, these have not been accounted for. This is not right in our view.
- 2.40. The Plan takes a tunnel vision approach whereby sites have been selected at the start and continued through the Plan making process without considering the effects for further optioneering. Whilst there has been some logic for removing sites (see paragraph 3.8 to 3.34 of the Site Selections Conclusions Paper, July 2024), there is no logic for why sites have been left in.
- 2.41. It is not clear how the Council’s evidence base has informed the preferred approach to land use and strategic transport options within the Plan. There appears to be little change in sites that are selected, and most of the sites have been carried through to the Draft District Plan which is the subject of EiP. The subsequent modelling scenarios include an assessment of modal shift for those sites, to remove any ‘severe’ impacts. It appears that at no point in the assessment process has the existing operation of the highway network been considered in determining the most appropriate location for development sites, nor the potential traffic impact of different sites or a different combination of sites.



- 2.42. Whilst recent policy changes promote a vision led approach, there still has to be confidence in the end mitigation scenario. There needs to be some realism in our view that physical work will be required, even with a vision led approach. The transport evidence relies on a scenario whereby all modal shift assumptions are taken up, including travel planning and possible increased internalisation of trips within the larger sites.
- 2.43. The principles of a monitor and manage approach within the Plan to support the vision led approach are reasonable, but the evidence is weak in our view. It is necessary to plan properly, as well as to monitor and manage. There is no assessment which considers at what point in the Plan period infrastructure improvements may be required to deliver the proposed strategy. This would help to identify mitigation measures that may be required on the highway network and appropriate trigger points for their delivery. Whilst sustainable transport options are considered within the Plan, these are broad brush, and there is significant doubt about both the funding and deliverability of any transport infrastructure required to support the identified growth strategy.
- 2.44. The NPPG, under “Delivery of Strategic Matters” confirms that the Plan making process should identify “*infrastructure deficits and requirements, and opportunities for addressing them*” through an assessment of “*quality and capacity, and its ability to meet forecast demand.*” It goes on to say that a funding statement should be provided which sets out how the delivery of infrastructure will be provided throughout the plan period.
- 2.45. Whilst it is noted that transport evidence including junction capacity work has been provided, detail is lacking regarding the infrastructure requirements and their proposed delivery.
- 2.46. Some of the sites selected for allocation are isolated and rural in nature (SHLAA id 601, 799 830, 1003 and 1026 at Sayers Common), and rely heavily on large scale on-site infrastructure to support their delivery. It has not been demonstrated that there will be no unacceptable impact on highway safety, or that the residual cumulative impacts would not be severe (paragraph 115 of the Framework).



- 2.47. Appendix 3 of the Plan presents a “potential active travel route” between Sayers Common (where there are 2,500 houses proposed by the Council for allocation) and Burgess Hill. The IDP does not set out an estimated cost for this scheme. The measures set out to support the delivery of the sites require their own feasibility studies before they can be committed to. This includes active travel schemes and highway capacity improvements. It is not considered that the Council can be confident these can be delivered at this stage.
- 2.48. The IDP (2024 update) states that its three main purposes are to:
- *“To provide evidence for the District Plan by identifying infrastructure required to support the delivery of development during the plan period.*
 - *To provide evidence of how identified infrastructure needs will be met and the costs of doing do.*
 - *To provide evidence for the funding mechanism.”*
- 2.49. In our view, the IDP does not fulfil these purposes.
- 2.50. It is therefore not yet clear what the improvements would be, where on the network they will be provided, and how they mitigate the residual impacts of the identified sites. Phasing of development and specific infrastructure requirements has not been set out. The IDP needs to set this out in our view. There is therefore no evidence to demonstrate that there would be no residual severe impacts as a result of the proposed allocation sites.
- 2.51. Land at Malthouse Lane can help to fund interventions and would not be as reliant upon the private car as other sites.
- 2.52. A Statement of Common Ground (SoCG) between MSDC and National Highways (dated July 2024) sets out the locations where mitigation is needed and is potentially needed. This includes four junctions on the Strategic Road Network, two of which are in close proximity to the identified allocation at Sayers Common. There does not appear to be any further agreed position between MSDC and National Highways. We note that a Transport and Infrastructure Management Group (TIMG) has been established but this sets out terms of reference only and no firm review of potential mitigation requirements.



It is noted that the junctions listed in the SoCG are not listed in the IDP either as planned for future provision.

Summary

- 2.53. There is no certainty or reassuring evidence that shows that the sustainable transport measures proposed, including the delivery of Travel Plans, would be capable of sufficiently mitigating the traffic impact of the Plan. The transport evidence is directed towards “soft” mitigation measures, and it does not present any “hard”, physical highway infrastructure schemes as mitigation. Therefore, it is not possible to confirm whether this can be achieved as the costs for any works has not been considered.
- 2.54. The monitor and manage approach is considered reasonable, but there has been no identification of a ‘traditional’ mitigation strategy within the Plan that can be used to define the necessary contribution required by each development to mitigate its impact. There is therefore no tangible alternative option if the sustainable transport mitigation strategy fails. A suitable level of confidence is required. As such, it is not possible to confirm at this stage whether any Site is viable.
- 2.55. Whilst monitor and manage is considered a reasonable approach, it is not a ‘cure-all-ails’, particularly because it relies on very optimistic assumptions. There should still be some identified physical mitigation schemes in our view associated with each of the development sites. Other schemes would therefore be considered and reviewed through a monitoring regime at specifically identified locations. A monitor and manage approach cannot be delivered without knowing what needs to be monitored and how it will be managed.
- 2.56. The Plan and mitigation strategy has not considered the locational benefits of different sites which may assist with minimising vehicular movements on the SRN and local highway network and/or encouraging trips by sustainable modes and assisting with the funding of appropriate transport interventions. This includes Land at Malthouse Lane which would provide additional dwellings on the edge of an existing settlement and could provide local transport corridor improvements for pedestrians and cyclists, as well as contribute towards funding for improvements to the SRN.



ISSUE 3: WHETHER THE SPATIAL STRATEGY TAKES AN APPROPRIATE APPROACH, AT THE STRATEGIC LEVEL, TOWARDS CLIMATE CHANGE MITIGATION, COUNTRYSIDE PROTECTION, ENVIRONMENTAL PROTECTION, FLOOD RISK AND HERITAGE

2.57. No comment.

End