Hearing Statement on behalf of the Malthouse Lane Action Group (MLAG)

2021-2039 Mid Sussex District Plan Examination Main Modifications

Objection to modification MM60

Land East and West of Malthouse Lane, Hurstpierpoint
SHELAA Reference 1105

Introduction

Rural Planning Group Ltd has been instructed by the Malthouse Lane Action Group (MLAG), representing more than 120 local households, to prepare this Hearing Statement in connection with the Main Modifications to the Mid Sussex District Plan 2021–2039.

MLAG strongly objects to Main Modification MM60, which proposes the allocation of approximately 750 dwellings on land east and west of Malthouse Lane (Site 1105), and seeks its deletion in its entirety. This statement builds upon MLAG's group September 2026 representation and many objections submitted by individual residents. It addresses the matters identified by the Inspector for the continued Matter 7 hearing.

MLAG's position is unequivocal: MM60 is an unsound allocation and should not form part of the District Plan. The evidence reveals fundamental and interrelated constraints concerning highway safety, access, landownership, infrastructure delivery, flood risk, landscape harm and the erosion of the countryside separating Burgess Hill from Hurstpierpoint. These are not minor issues of detailed design that can reasonably be deferred to a future planning application. They go to the heart of whether the site is suitable for development of this scale and whether the allocation can realistically be delivered.

MLAG submits that the Council has failed to demonstrate that MM60 satisfies the four tests of soundness. The allocation has not been shown to form part of a sustainable, positively prepared strategy; its selection has not been adequately justified against reasonable alternatives; its delivery depends upon unresolved access, land and infrastructure constraints; and its environmental and transport implications have not been satisfactorily addressed in accordance with national planning policy.

This statement follows the Inspector's agenda in IDJB-15 and draws upon the Council's own site-selection evidence, Sustainability Appraisal, the promoter's technical reports and the representations submitted by affected residents. Taken together, this evidence exposes substantial weaknesses in the case for MM60 and demonstrates that its inclusion would undermine the soundness of the District Plan.

MLAG therefore calls upon the Inspector to recommend the deletion of MM60 in its entirety. This objection applies to both the eastern and western parcels. Removing the western parcel would not overcome the independent constraints affecting the eastern land, nor would it justify retaining a materially different allocation without proper reassessment.

Movement

Form of access from Jane Murray Way

MLAG strongly objects to the proposed principal access to MM60 from Jane Murray Way (A273). The introduction of another major roundabout onto this important route raises serious concerns about highway capacity, safety and the impact on the Green Circle.

MLAG considers that the Council has failed to demonstrate that the proposed access arrangements are safe, suitable or deliverable. The key objections are:

1. *An unacceptable concentration of junctions along Jane Murray Way*

   The proposed MM60 access would introduce another roundabout onto Jane Murray Way, alongside the proposed access arrangements associated with DPSC1 and the existing junctions serving this part of Burgess Hill.

   This would result in a concentration of junctions along a relatively short section of road, including the proposed DPSC1 roundabout near York Road and the existing Jane Murray Way/West End Farm Avenue junction.

   The Council has not demonstrated how these junctions would operate together, particularly during peak periods, or the cumulative consequences of introducing multiple new access points whilst prioritising pedestrians and protecting the Green Circle.

2. The Council's own transport modelling identifies serious junction capacity concerns

The August 2026 SYSTRA Scenario 7 assessment includes the full 750-dwelling MM60 allocation within its cumulative transport modelling.

Significantly, the assessment identifies the Jane Murray Way/West End Farm Avenue junction as newly severe when applying the original assessment thresholds. Although this classification changes when relaxed thresholds are applied, the underlying forecast traffic pressures remain relevant.

Stonepound remains severe even under the relaxed thresholds. These findings cannot reasonably be dismissed when considering the introduction of another major residential allocation relying upon Jane Murray Way.

3. Existing traffic arrangements could increase pressure on adjoining junctions

The existing left-turn-only arrangement at the Malthouse Lane/Jane Murray Way junction already restricts how vehicles can enter and leave the local road network.

The introduction of a further 750 dwellings, together with a new roundabout, has the potential to add to these movements and create additional pressure on adjoining junctions. The Council has not provided a sufficiently detailed, site-specific assessment demonstrating how these movements would be accommodated safely and efficiently.

4. The impact on the Green Circle and vulnerable road users has not been adequately resolved

Jane Murray Way forms part of the setting of Burgess Hill's Green Circle, which provides an important recreational connection for pedestrians and cyclists.

The introduction of additional junctions, traffic movements and associated highway infrastructure risks undermining the safety, continuity and enjoyment of this route.

It is unclear how pedestrians and cyclists would safely negotiate the proposed junction arrangements and how the Green Circle would remain connected and accessible without significant new infrastructure such as a bridge or underpass, which in itself would adversely affect its character and recreational value.

These matters are fundamental to the acceptability of the proposed access strategy and cannot be adequately addressed through general commitments to sustainable transport or future landscaping.

5. The transport evidence does not demonstrate that MM60's impacts can be satisfactorily mitigated

Although the Scenario 7 modelling includes MM60 among the additional development sites assessed, it does not separately identify the allocation's contribution to the forecast problems at individual junctions.

The modelling also incorporates assumptions about reduced commuter travel through homeworking and increased use of sustainable transport. Those assumptions do not remove the need to demonstrate that the specific access arrangements proposed for MM60 are safe and deliverable.

Nor does the identification of possible monitoring or future junction improvements establish that the necessary mitigation can be secured, funded and delivered when required.

The Council has therefore not demonstrated that the additional traffic generated by MM60 can be accommodated without unacceptable consequences for the surrounding highway network.

The proposed Jane Murray Way access represents a fundamental weakness in MM60. The Council's own evidence identifies serious highway pressures, yet the safety, operation and deliverability of the proposed access remain insufficiently demonstrated.

These unresolved issues undermine the justification and deliverability of the entire allocation. They would also remain relevant to any eastern-only scheme, which would require a separate assessment rather than relying on the modelling of the combined 750-dwelling development.

Buses, cycling, wheeling and walking; connections between parcels, town centre and station

MLAG strongly objects to the proposed sustainable transport strategy for MM60. The allocation relies upon safe and convenient walking, cycling and public transport connections to reduce dependence on private cars. However, the Council has failed to demonstrate that these essential connections can be legally secured or practically delivered.

The key objections are:

1. The east–west connection is fundamentally constrained

The proposed connection between the two parcels relies upon an existing private access road, which also carries a public footpath. The surfaced carriageway is 312 metres long and approximately 3.3 metres wide, within a restricted corridor of approximately 4.5–5.5 metres. This is clearly inadequate for the proposed movement strategy without substantial alterations, particularly where vehicles, pedestrians and cyclists would need to share the route.

2. Third-party ownership and legal rights prevent a straightforward solution

The September 2026 Michelmores correspondence (as appended to the correspondence from DJA Planning) identifies third-party ownership and landowners who are unwilling to release land for widening or the substantial alterations required. These are insurmountable obstacles. The Council has not demonstrated how a safe and legally deliverable connection can be achieved without the cooperation of affected landowners.

3. The proposed bus network is uncertain and dependent on adjoining development

The promoter's March 2026 Vision Document acknowledges difficulties in providing bus connections without access through adjoining land, including DPSC1. No sufficiently evidenced, deliverable bus route and implementation programme has been demonstrated. The claimed public transport benefits therefore remain critically uncertain.

4. Safe walking, cycling and wheelchair access has not been demonstrated

Malthouse Lane, Danworth Lane and sections of College Lane and Chalkers Lane are narrow rural roads with very limited or absent footways and numerous visibility constraints. The Council has not demonstrated how safe, continuous and accessible routes to Burgess Hill town centre, the railway station, schools and other services would be provided.

5. The claimed sustainability benefits cannot be relied upon

The proposed 15-minute neighbourhood depends upon connections that remain unproven. The Council cannot reasonably rely upon reduced car use and improved sustainable transport to justify MM60 without demonstrating that

the necessary routes, land rights and infrastructure can actually be secured and delivered.

The inability to demonstrate a safe and lawful east–west connection represents a critical obstacle to the delivery of MM60. The evidence of third-party ownership and their opposition to widening raises serious doubts that a workable solution is achievable.

The sustainable transport strategy is not demonstrably deliverable and cannot provide a sound basis for allocating 750 dwellings. The allocation is therefore not justified, because its claimed sustainable transport benefits depend upon connections that have not been demonstrated to be achievable. It is not effective, because essential access arrangements and infrastructure have not been shown to be deliverable. It is also not consistent with national policy, which requires development to provide safe and suitable access and genuine opportunities for sustainable transport.

Availability of and distance to social and community facilities

MLAG strongly disputes the promoter's description of MM60 as a sustainable '15-minute neighbourhood'. The Council's own evidence identifies poor accessibility to essential services, while the infrastructure needed to overcome these deficiencies remains uncertain.

The key objections are:

1. Poor accessibility confirmed by the Council's evidence

The SSP8 site assessment records negative scores for access to the main service centre, primary schools and healthcare, alongside poor rail accessibility. These are serious weaknesses in the site's location that cannot be overcome simply by describing the development as a 15-minute neighbourhood.

2. Loss of the proposed on-site primary school

The March 2026 Vision Document anticipates approximately 188 primary-school-age children but proposes expanding an existing off-site school rather than delivering a new school within MM60. This removes a significant potential benefit of the allocation and increases reliance on unsustainable journeys beyond the development.

3. Unsafe and inadequate routes to existing facilities

Children and other residents would depend upon surrounding rural roads, including Malthouse Lane and Danworth Lane, which lack continuous footways and have restricted widths and visibility. Safe, direct and accessible routes to schools, healthcare, shops and public transport have not been demonstrated.

4. The 15-minute neighbourhood claim is unsupported

The Council has not demonstrated realistic walking and cycling distances from both parcels to essential facilities using safe and legally available routes. Proposed connections dependent upon third-party land or future infrastructure cannot be treated as established accessibility benefits.

These shortcomings directly undermine the soundness of MM60. The allocation is not justified, because its claimed accessibility and community benefits are not adequately supported by the evidence. It is not effective, because the necessary connections and supporting infrastructure have not been demonstrated to be deliverable. It is also not consistent with national policy objectives for accessible services and sustainable transport.

Surrounding road network and safety of all users, including schoolchildren and horse riders

MLAG strongly objects to the impact of MM60 on the surrounding rural highway network. The existing roads are unsuitable for significant additional traffic without substantial improvements, and the Council has not demonstrated that those improvements are achievable. The safety of schoolchildren, pedestrians, cyclists and horse riders is a particular concern.

The key objections are:

1. Narrow and unsuitable rural roads

Malthouse Lane, Danworth Lane and adjoining roads have narrow carriageways, blind bends, restricted visibility and limited or absent footways. These roads are already shared by pedestrians, schoolchildren, cyclists, horse riders and agricultural vehicles. Additional traffic would increase the potential for dangerous conflicts between road users.

2. Increased through-traffic towards Hurstpierpoint

The proposed Jane Murray Way access and east–west connection could create an attractive alternative route between Burgess Hill, Hurstpierpoint and Hurstpierpoint College. This risks introducing large swathes of additional through-traffic onto rural lanes that were not designed to accommodate it. It has not been demonstrated how such movements would be prevented or safely managed.

3. Unacceptable risks to vulnerable road users

Additional traffic would increase safety concerns for children walking or cycling to school, pedestrians and horse riders, particularly along southern Malthouse Lane and Danworth Lane, where opportunities to move clear of approaching vehicles are highly limited. These risks have not been adequately addressed.

4. Inadequate assessment of cumulative traffic and safety

It has not been sufficiently demonstrated how MM60, alongside DPSC1 and other development, would affect traffic movements through the surrounding rural roads.

The Council cannot reasonably allocate 750 dwellings without demonstrating that the surrounding roads can safely accommodate the resulting traffic. These fundamental highway safety concerns reinforce MLAG's request for MM60 to be deleted in its entirety.

Landscape, countryside and heritage

Separate identity of settlements and planting buffers

MLAG strongly objects to the substantial and permanent loss of countryside resulting from MM60. The allocation would extend development southwards from Burgess Hill into the rural landscape separating it from Hurstpierpoint, undermining the distinct identity and setting of both settlements.

The key objections are:

1. Misleading association with Burgess Hill

Although MM60 has been promoted as an extension of Burgess Hill, the site lies within Hurstpierpoint and Sayers Common Parish, in the countryside between the two settlements. It is not an extension of the existing urban area. Its location and landscape character must be assessed in the context of Hurstpierpoint and the important countryside separating the settlements, rather than as Burgess Hill's expansion.

2. Loss of countryside and settlement separation

MM60 would introduce approximately 750 dwellings and associated infrastructure across a 54-hectare countryside site. This would significantly reduce the open countryside separating Burgess Hill from Hurstpierpoint, permanently eroding the rural character and distinct identity of both settlements.

3. The Council's own evidence identifies limited landscape capacity

The Council's 2007 Landscape Capacity Study identified low development capacity within the Burgess Hill Southern Fringe landscape area. SSP8 Appendix 1 subsequently records a Negative landscape score for Site 1105, with low to low/medium potential for change. The Council's own evidence therefore identifies clear constraints on development of this scale.

4. Development would alter the rural setting of Hurstpierpoint

The site slopes southwards towards Herrings Stream and forms part of the countryside experienced from surrounding footpaths and viewpoints. The promoter itself acknowledges views towards Hurstpierpoint College chapel. The introduction of housing, roads and lighting would permanently change this rural landscape.

5. Planting buffers cannot replace lost countryside

Landscaped corridors and retained vegetation may soften views of buildings, but they cannot restore the countryside lost to development or preserve the existing physical separation between settlements. Screening an urban extension is not the same as preventing the erosion of the countryside gap.

6. The eastern parcel is not an acceptable alternative

Jane Murray Way and the Green Circle forms a clear boundary to Burgess Hill. Development of the eastern parcel would extend the urban area beyond this boundary into open countryside within Hurstpierpoint Parish. Removing the western parcel would not overcome the fundamental landscape and settlement-separation objections.

The Council has failed to demonstrate why development of this sensitive countryside location represents an appropriate strategy when considered against reasonable alternatives.

The allocation also raises serious concerns regarding consistency with national planning policy, particularly the recognition of countryside character and the intrinsic value of landscapes.

The fact that MM60 lies within Hurstpierpoint and Sayers Common Parish, rather than Burgess Hill, reinforces the importance of assessing its impact on the identity, setting and separation of both settlements. Planting buffers cannot remedy the permanent loss of this countryside.

Significance of heritage assets

MLAG strongly objects to the impact of MM60 on the historic environment. The Council has failed to demonstrate that the significance and setting of nearby heritage assets would be adequately protected.

The key objections are:

1. Impact on nearby heritage assets

Of particular relevance are Grade II listed Kent's Farmhouse, Ruckford Mill and Hurstpierpoint College chapel. The introduction of 750 dwellings, roads and lighting would substantially alter the surrounding rural landscape, potentially harming the setting and significance of these assets, including their historic relationship with the countryside and surrounding views.

2. Contradictions in the Council's own evidence

The proposed MM60 policy expressly requires protection of Kent's Farmhouse's setting, retention of views towards Hurstpierpoint College chapel and sensitive treatment of nearby historic buildings. Yet SSP8 Appendix 1 awards the site a *Very Positive* score for listed buildings, stating that no listed buildings are on or near the site and no impact is anticipated. This apparent inconsistency seriously undermines confidence in the Council's site-selection assessment.

It is therefore not justified or consistent with national planning policy, as the Council has failed to demonstrate that the heritage implications have been properly assessed and weighed against the proposed development's benefits.

Countryside and access to it; trees, woodland and wildlife

MLAG strongly objects to the permanent loss of accessible countryside resulting from MM60. The allocation would significantly diminish the rural environment enjoyed by existing Burgess Hill and Hurstpierpoint residents, not simply those living within the proposed development.

The key objections are:

1. Loss of countryside for existing residents

The land immediately south of Burgess Hill provides valuable access to open countryside for walking, cycling, running and recreation. Developing 54 hectares of rural land would permanently diminish this amenity and fundamentally change the experience of residents who currently enjoy these routes.

2. Significant harm to the Green Circle

The Green Circle provides an important recreational route around Burgess Hill. MM60 would introduce housing, roads, traffic and lighting immediately beyond this established countryside boundary without. It is not clear how this will be retained given the infrastructure requirements and even if it were it is unlikely to preserve its current rural setting, tranquillity or recreational value.

3. Public rights of way would lose their rural character

Existing footpaths through open fields would become routes through or alongside residential development. Although their legal alignments may be retained, their character and enjoyment would be completely altered.

4. Loss of established habitats and landscape features

Development would place additional pressure on existing hedgerows, trees, woodland and the Herrings Stream corridor. Proposed planting and green infrastructure cannot compensate for the loss of established habitats or their contribution to the wider countryside and landscape character.

5. Proposed improvements remain unproven

The promoter's illustrative masterplan identifies new green corridors and recreational connections, but does not establish that all necessary land, crossings and access rights can be secured. These proposed benefits cannot be treated as guaranteed.

MM60 fails to give sufficient weight to the permanent loss of countryside, established recreational routes and the amenity enjoyed by existing residents.

The provision of new landscaped spaces cannot replace the open countryside that would be lost. These impacts further undermine the soundness of MM60 and reinforce the case for deleting the entire allocation.

Infrastructure, delivery and capacity

Site capacity and delivery rates

MLAG strongly objects to the proposed allocation of 750 dwellings at MM60. The Council has failed to demonstrate that the site can accommodate this level of development or that the necessary infrastructure can realistically be delivered within the Plan period.

The key objections are:

1. Previous non-selection has not been adequately justified

Sites 1105 and 710 were previously considered through the Council's site-selection process and not selected for development, with concerns over cumulative development and infrastructure delivery. The Council has not adequately demonstrated what has changed to justify allocating 750 dwellings in this location.

2. The Council's own evidence identifies significant constraints

SSP8 identifies landscape sensitivity, flood-risk concerns and poor accessibility to essential services. Furthermore, the promoter's Vision Document no longer proposes an on-site primary school, removing a significant potential infrastructure benefit previously associated with development of this scale.

3. Essential infrastructure is not demonstrably deliverable

The proposed east–west connection is constrained by third-party landownership. Wider transport connections and bus services also depend upon adjoining development. It has not been demonstrated that the land, legal rights or infrastructure necessary to implement the masterplan can be secured.

4. The proposed 750-dwelling capacity is unsubstantiated

The Council has not demonstrated that 750 dwellings can be accommodated alongside the necessary roads, drainage, landscape buffers, open space and other mitigation. These requirements could substantially reduce the land available for housing and undermine the assumed capacity.

5. Housing delivery assumptions are unreliable

The Council has not adequately demonstrated how unresolved access, landownership and infrastructure requirements have been reflected in the proposed commencement dates, construction phases and annual housing delivery rates. Although the Council's SSP8 assessment recommended that Site 1105 should be considered further, including alongside DPSC1, this was not confirmation that 750 dwellings could be delivered.

The Council has still not demonstrated that the full housing capacity is achievable, that the necessary land and infrastructure can be secured, or that development can proceed at the rates assumed in the housing trajectory.

In this capacity MM60 is not justified or effective**.** The Council has failed to establish that the proposed capacity is achievable or that the essential infrastructure and housing can realistically be delivered within the plan period.

These uncertainties also affect any eastern-only alternative, which would require a separate assessment of capacity and delivery.

Utilities and potential impediments to delivery

MLAG strongly objects to MM60 on the grounds that fundamental legal and landownership constraints threaten its deliverability.

The key objections are:

1. Restrictive covenant affecting Kents Farm

The September 2026 Michelmores correspondence (as appended to the correspondence from DJA Planning) identifies a restrictive covenant limiting the use of Kents Farm to agriculture and forestry. The Council has not demonstrated how this restriction would be overcome to enable residential development.

2. Third-party ownership

The proposed east–west connection is affected by third-party ownership and landowner opposition to widening. No credible, legally deliverable solution has been demonstrated.

3. An eastern-only allocation is not a sound alternative

Removing the western parcel would not resolve the eastern parcel's independent highway, landscape, Green Circle and settlement-separation constraints. The same issues would also arise with the connecting lane due to the easement rights to it, meaning access into the East Parcel maintains all the challenges on this lane as the full allocation would. Any revised allocation would require fresh consideration of its housing capacity, infrastructure and sustainability.

The Council has not demonstrated a realistic means of overcoming these serious obstacles or delivering the proposed development within the Plan period.

Flooding and Drainage

MLAG strongly objects to MM60 because existing flooding already makes Malthouse Lane unreliable and, during heavy rainfall, impassable to smaller vehicles. The proposed development would increase dependence on a highway network that is already vulnerable to flooding.

The key objections are:

1. Existing flooding already restricts access

Local residents regularly experience flooding on Malthouse Lane during heavy rainfall, with sections becoming impassable to smaller cars. Flooding also affects other nearby roads. This is an existing highway safety and accessibility problem that impacts already on local residents.

2. Additional traffic would compound an existing problem

MM60 would introduce substantial additional traffic onto roads already affected by flooding. When Malthouse Lane becomes impassable, vehicles travelling between Burgess Hill, Hurstpierpoint and Hurstpierpoint College must either negotiate floodwater or seek alternative routes. Additional development traffic would intensify congestion, disruption and safety risks during these events.

3. Drainage measures would not resolve existing highway flooding

Even if the developer demonstrates that MM60 would not increase flood risk, this would not make Malthouse Lane safe or passable during heavy rainfall. The

Council has not demonstrated how reliable access would be maintained for existing residents, school traffic and future occupants.

4. The Council's own evidence identifies significant flood concerns

The developer's October 2022 appraisal identifies flood-prone land, drainage constraints and the need for further investigation. The July 2026 Sustainability Appraisal records a major negative effect for flooding and surface water, despite SSP8 assigning a Neutral flood-risk score.

5. The cumulative consequences remain unassessed

The Council has not adequately demonstrated how MM60, alongside DPSC1 and other development, would affect traffic movements when Malthouse Lane or adjoining roads are flooded. The consequences for alternative routes, emergency access and journeys to Hurstpierpoint and local schools need to be taken into account.

The Council has failed to demonstrate that the surrounding highway network can reliably accommodate the proposed development during flooding events including local events.

Introducing 750 dwellings into an area where key roads already become impassable would compound an established problem for existing residents and future occupants.

Additional evidence – Sustainability Appraisal

MLAG's concerns regarding the soundness of MM60 are reinforced by the Council's own Sustainability Appraisal. As detailed in Appendix 1, the appraisal identifies three major negative effects and further environmental harm, while some of the benefits

relied upon to justify the allocation remain dependent on infrastructure and connections whose delivery has not been demonstrated.

The Council has failed to adequately justify why MM60 represents an appropriate allocation in light of these findings and the reasonable alternatives available.

Conclusion

MLAG strongly objects to MM60. It is an unsound allocation which should be deleted in its entirety.

The evidence demonstrates fundamental shortcomings in the suitability and deliverability of the site for 750 dwellings.

These include:

- Access and highway safety: The Council has failed to demonstrate that safe, suitable and legally deliverable access arrangements can be secured, or that the surrounding highway network can accommodate the additional traffic.
- Infrastructure and deliverability: Essential connections and infrastructure depend upon unresolved landownership constraints. The delivery of 750 homes within the Plan period has not been adequately substantiated.
- Flooding and drainage: Existing flooding already renders Malthouse Lane impassable to smaller vehicles during heavy rainfall. Even if development-related flood risk can be mitigated, the additional traffic would compound existing accessibility and highway safety problems.
- Landscape and countryside: MM60 would permanently erode the countryside separating Burgess Hill and Hurstpierpoint, altering the rural setting of the Green Circle and established public rights of way.
- Additional evidence: The Council's own Sustainability Appraisal identifies significant adverse effects, while important benefits relied upon to justify the allocation remain uncertain or undeliverable on the evidence presented.

Taken together, these failings demonstrate that MM60 does not satisfy the four tests of soundness:

1. Positively prepared: The allocation has not been demonstrated to deliver a sustainable pattern of development supported by suitable transport connections and essential infrastructure.

2. Justified: The Council has failed to demonstrate that MM60 represents an appropriate strategy, having regard to its significant constraints, environmental impacts and reasonable alternatives.

3. Effective: The Council has not established that 750 dwellings and the necessary access, infrastructure and mitigation can realistically be delivered within the Plan period.

4. Consistent with national policy: The allocation has not been demonstrated to comply with national policy requirements concerning sustainable transport, highway safety, flood risk, landscape, heritage and the natural environment.

MLAG's position is unequivocal the Council has not demonstrated that MM60 meets the tests of soundness. The shortcomings are key to the allocation and cannot be overcome simply by imposing policy requirements or deferring their resolution to the planning application stage.

Deleting only the western parcel would not provide an acceptable remedy. The eastern parcel has its own substantial constraints, and its retention would require a fresh and robust assessment of capacity, access, infrastructure, environmental impacts and sustainability.

MLAG therefore requests that the Inspector find MM60 unsound and recommend its deletion in its entirety.