

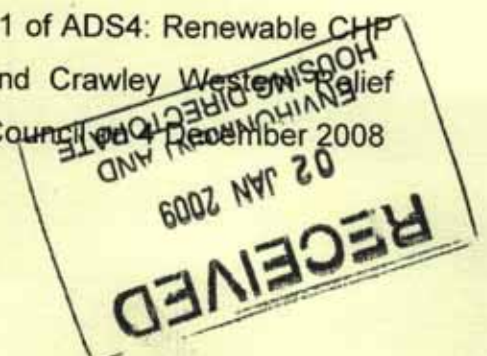


WEST OF BEWBUSH JOINT AREA ACTION PLAN

STATEMENT FROM KTI ENERGY LIMITED RESPONDENT No 59423

CUMULATIVE TRAFFIC IMPACT UPON ISSUE 1 AND ISSUE 2: WEST OF BEWBUSH

- i) Junction 11 of the M23 motorway is self-evidently inadequate in scope and scale causing to confusion to drivers entering and exiting either from the north-bound or south-bound lane. Confusion heightens risk of accident. Highways Agency as Respondent No 173033 objects to any development West of Bewbush until respective developers satisfy it that the traffic impact of that development upon Junction 11 is not excessive.
- ii) Commencing with the West of Bewbush Joint Area Action Plan, we do not believe Crest Nicholson Plc has conducted sufficient work. The community of 2,500 new homes should own around 3,750 cars. We believe half (1,875 cars) will be used regularly to commute to work. Of this amount we suggest approximately 30% (560 cars) will head for Junction 11 between the hours of 0730 and 0900 and return between the hours of 1700 and 1830. That suggests around 375 cars per hour using the Junction at peak hours in the morning and the same in the evening. The impact of this number of cars upon Junction 11 appears not to have been produced in evidence by either Horsham District Council, Crawley Borough Council or Crest Nicholson Plc.
- iii) Next we consider the traffic impact upon Junction 11 of ADS4: Renewable CHP Scheme, non-household waste treatment plant and Crawley Western Relief Road. Our meeting with West Sussex County Council on 4 December 2008

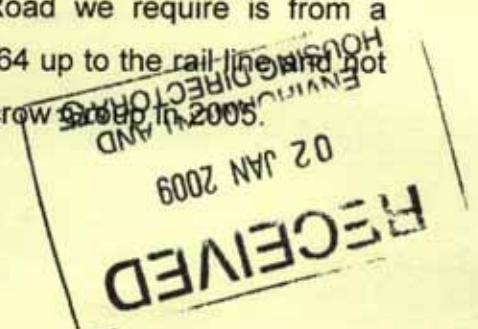




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confirmed the proposed 320,000 t/a MBT plant treating household waste residue is to be built at Warnham. An unknown number of waste collection vehicles serving Mid-Sussex District Council will likely access the west bound carriageway of the A264 via Junction 11 (for West Sussex County Council to disclose). We, for our part, conclude around 25% of the 100 trucks per day delivering biomass fuel to ADS4: renewable CHP station will originate from the M23 and the balance of 75% from the west of the county. We calculate 25 trucks per week day using Junction 11 will deliver biomass fuel between the hours of 0600 and 2000 to create an average traffic impact of 1.8 trucks per hour including peak hours morning and evening. We believe that compared with 375 cars per peak hour arising from the West of Bewbush Joint Area Action Plan, our impact will be negligible and we should not be compelled by Highways Agency to contribute to the upgrading of Junction 11.

- iv) Our discussion with Mr David Trench on ADS3: Major Acute Hospital reveals as many as 4,000 cars could be parked each day by patients and staff. That number is not much different to the traffic impact of West of Bewbush Joint Area Action Plan. Cumulative impact upon the A264 would be high. But the impact of ADS3 upon Junction 11 is likely to be significantly less because of the spread of appointments day and night.
- v) Our discussion with West Sussex County Council on the Crawley Western Relief Road centres upon the future electricity and heat demand of new commercial and residential properties west and north-west Crawley coupled with the consequence of twin runways proposed for Gatwick Airport. Whether the CHP station and non-household treatment plant are built on ADS4 or the alleged unauthorised landfill, the only section of Relief Road we require is from a trafficked intersection of the Relief Road with the A264 up to the rail line and not for its full 7km length to the A23 as proposed by Halcrow Group in 2005.





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- vi) Horsham District Council and Crawley Borough Council maintain the Relief Road is not required to serve the community of 2,500 new homes under West of Bewbush Joint Area Action Plan. Should the Inspector accept our recommendation to find the Plan unsound, justification for building the Relief Road becomes dramatically improved from the passenger and freights needs of the new owner of Gatwick Airport, the need of ADS3: Major Acute Hospital (with most patients and staff originating from Crawley, Redhill and Horsham), and those Alternative Development Sites where a community of 2,500 new homes could be safely built with fewer of the technical and legal obstacles described at length in our Statement on Issue 1: Principle of Development & Identification of the West of Bewbush Site.

- vii) We encourage Highways Agency to study the traffic impact implication of the West of Bewbush Joint Area Action Plan being found unsound and the consequence of Issue 2: Alternative Development Options being approved.

