



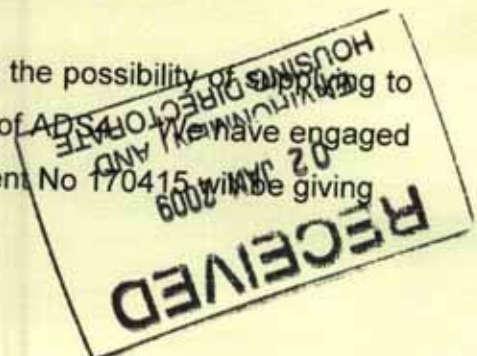
WEST OF BEWBUSH JOINT AREA ACTION PLAN

STATEMENT FROM KTI ENERGY LIMITED

RESPONDENT No 59423

ISSUE 2: ALTERNATIVE DEVELOPMENT OPTIONS

- i) We have concluded on scientific evidence in our Statement on Issue 1: Principle of Development & Identification of the West of Bewbush Site that the West of Bewbush Joint Area Action Plan is unsound. A community of 2,500 new homes should be planned on Alternative Development Sites other than ADS3 and ADS4 on virgin farmland north of Kilnwood Lane. Should the Inspector accept our recommendation, that would leave the landowner, PJ Brown and Horsham District Council with unremediated landfills exposed to continuing risk of heavy legal environmental liability.
- ii) We have prepared a Sustainability Appraisal under ADS4 for the proposed renewable CHP scheme, non-household waste treatment plant and Crawley Western Relief Road and submitted it to the Inspector and statutory planning consultees to the Department of Energy & Climate Change under Section 36 of the Electricity Act 1989. We do not intend in this Statement to repeat their regional significance to generate and supply green electricity and heat to Crawley and Gatwick Airport. However, the Sustainability Appraisal did not include a traffic impact assessment. We are consequently preparing and shall submit to the Inspector and statutory consultees a separate Statement quantifying the wider traffic implication to be shared with Highways Agency.
- iii) Our sole interest in ADS3: Major Acute Hospital is the possibility of generating to it green electricity and heat from the infrastructure of ADS4. We have engaged discussion with Mr David Trench who as Respondent No 170415 will be giving

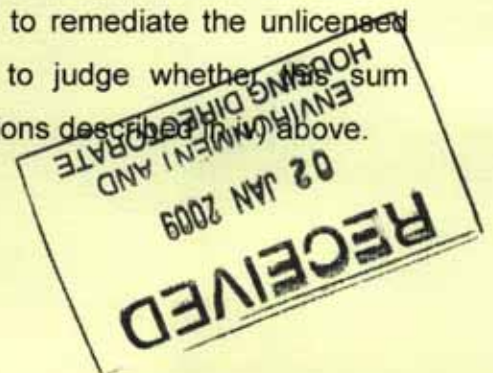




- 2 of 3 -

evidence to the Inspector on ADS 3 concurrently with KTI Energy Limited on Tuesday, 20th January, and Wednesday, 21st January 2009. There is evident conflict between the land use requirement of ADS3 and ADS4. We do not wish to stand in the way of his regional hospital as we are sure he does not wish to stand in the way of our regional renewable energy and climate change scheme.

- iv) We are accordingly evaluating the option of moving the renewable CHP station and non-household waste treatment plant eastward from ADS4 to the alleged unlicensed 10.6 hectare landfill outlined in red on the attached site plan. We conclude that apart from high concentration of acid and alkali we should expect asbestos, hospital waste, radio-active waste and other toxic waste in the fill. We have consulted colleagues in the United Kingdom and United States on the construction of power generation facilities on unstable ground, whether in earthquake zones, river silt or landfill. We conclude firm foundations for the CHP station and non-household waste treatment plant will be significantly more expensive to construct than on ADS4 because we would need to deploy a combination of landfill mining coupled with piled, cellular and raft techniques.
- v) The Inspector is requesting a Business Plan from Crest Nicholson Plc on its financial ability to remediate the landfills and construct a community of 2,500 new homes by 2018 under the West of Bewbush Joint Area Action Plan. The consequence of the Inspector accepting our recommendation in i) above would be that Crest Nicholson Plc, and its owners (Halifax Bank of Scotland & West Coast Capital), would be relieved of a heavy responsibility at a time of financial crisis. We conclude accordingly that it is not unreasonable for the Inspector to reveal to us the sum which the landowner, PJ Brown and Horsham District Council are prepared to pay Crest Nicholson Plc to remediate the unlicensed landfill to enable Environment Agency and us to judge whether the sum compensates for the additional cost of firm foundations described above.





- 3 of 3 -

- vi) Our discussions with Mr David Trench on ADS3 reveal he prefers a 100 hectare site to build his Major Acute Hospital. Moving the renewable CHP station and non-household waste treatment plant from ADS4 to the alleged unlicensed landfill outlined in red on the site plan would release c. 44 hectare virgin farmland west of the Crawley Western Relief Road. The virgin farmland within the West of Bewbush Joint Area Action plan outlined in blue on the site plan (east of the Relief Road) measures c. 10 hectare. The area of PJ Brown landfill entered as Holmbush Farm (Map 8) under West Sussex Strategic Waste Site Allocations Development Plan Document measures c. 5 hectare. Virgin farmland north of the Three Bridges-Horsham rail line, measuring not less than 10 hectare, becomes accessible to the hospital once the road bridge over the rail line forming part of the Relief Road is constructed. We consequently deduce, without evident conflict of interest, that not less than 69 hectare could be made available by the Inspector to Mr Trench for the purpose of constructing ADS3: Major Acute Hospital.
- vii) There are two provisos which are required to be registered under this Statement. The first is that additional testing of the alleged unlicensed landfill outlined in red could reveal a level of contamination (e.g asbestos) which is unsafe to the health of nearby residents of Bewbush to remediate. The second is the remaining cumulative traffic impact of ADS3, ADS4 and other Alternative Development Sites upon Junction 11 of the M23 of concern to Highways Agency. Notwithstanding incomplete evidence submitted by Horsham District Council and Crawley Borough Council to Government, which the URS report confirms, we remain optimistic that neither proviso will be a 'show-stopper'.



LAND
RAISING WITH
INGERT (?)
MATERIAL

DISUSED LANDFILL
(UNAUTHORISED ?)

STREAM

PROBABLE
DISUSED
LANDFILL

Virgin Farmland

ADS 3 ?

RECEIVED
02 JAN 2009
ENVIRONMENTAL AND
HOUSING DIRECTORATE