

West of Bewbush Submission Joint Area Action Plan

Statement of Case by West Sussex County Council (December 2008)

Objection re Waste Management under tests of soundness 4 and 7

1.0 Introduction

- 1.1 West Sussex County Council (WSSCC) has maintained from the start of the Joint Area Action Plan (JAAP) preparation process that it would be appropriate for the provision of a site for new or expanded waste management facilities to be considered as part of the JAAP. This was based on evidence that there is a shortage of potential sites for waste management in the Crawley area.
- 1.2 Consequently, WSSCC has sought to work with Horsham District Council (HDC) and Crawley Borough Council (CBC) in order to identify the most suitable size of, and location for, built waste management facilities. It has made various inputs and formal submissions as follows:
- Formal Response to Issues and Options Consultation (Autumn 2006)
 - Meeting held with HDC/CBC (29 March 2007)
 - Position Statement (May 2007)
 - Formal Response to Preferred Options Consultation (Autumn 2007)
 - Position Statement Update (February 2008)
- 1.3 In addition, as part of the work on the West Sussex Minerals and Waste Development Framework, a meeting was held in February 2007 between WSSCC, Crest Nicholson, Savills and SLR Consulting. The notes are attached as Appendix A.
- 1.4 Although WSSCC objected at the Issues and Options Stage and subsequently provided a Position Statement, the issue of sites for waste management was completely ignored by HDC/CBC in the Preferred Option. Therefore, the same objection was made at the Preferred Option stage but no attempt has been made by HDC/CBC since Autumn 2007 to address the WSSCC's concerns. As a result, the approach to the preparation of the JAAP has been unsound under test 4 (although WSSCC have not formally objected under test 7 it also fails this test), and the treatment of the issue of waste management sites in the Submission Version is not acceptable.

2.0 Paragraphs 4.41–4.43 and Policy WB18 of the JAAP

- 2.1 The Companion Guide to Planning Policy Statement 10: Planning for Sustainable Waste Management (DCLG 2006, paragraphs 7.3–7.4) states that "planning for waste management requires integration with other areas of spatial planning". It also states that, "waste should not be considered in isolation from other

planning concerns, even when addressed through thematic LDD” and that, “AAP, in looking in detail at an area undergoing change or new development, can be a useful tool for integrating waste management needs with wider spatial concerns”.

- 2.2 Section 3.6 of the PPS12 Companion Guide (ODPM 2004) (which applied at the time when the document was being produced) also underlines the potential for AAP to “set out proposals for major new waste management capacity in order to ensure adequate provision”.
- 2.3 In not making provision of a waste management facility as part of the JAAP, the Submission JAAP has not achieved any integration between planning for new local development and the need for the provision of new waste management capacity to meet both local needs and the wider needs of the County.
- 2.4 Paragraph 4.41 of the JAAP states that “It was not considered appropriate for such a [Built Waste Management] facility to be identified in the JAAP at this time”. WSCC have not seen any evidence of the ‘consideration’ that took place in order to make this statement and, as stated above, no approach has been made by HDC/CBC to address the County Council’s objections/concerns. If this statement is based on evidence, there needs to be made clear explanation of why it was not considered appropriate which reflects the evidence gathered. The inclusion of the wording “at this time” in the JAAP, suggests uncertainty about what is required and when, despite clear advice and offers of support from WSCC.
- 2.5 The last sentence in paragraph 4.41 of the JAAP states that “The conceptual masterplan has sufficient flexibility to incorporate such a facility should such a facility be included in the West Sussex Core Strategy”. The County Council does not accept that the masterplan contains the flexibility required to incorporate a built waste facility.
- 2.6 The JAAP contains considerable detail about exactly what the vision, principles and objectives for the other land-uses and reflects these in the policies. Detail is provided on the floorspace required each for different use, and how each use will fit in with the overall scheme. When it comes to the treatment of waste management, however, the JAAP does not contain the same level of detail in the section on waste management and recycling facilities. It is unclear whether or not a waste facility will be required within the timescale of the document and how this would be delivered.
- 2.7 It is understandable that there is uncertainty about the longer-term situation due to the draft South East Plan and North East Gatwick etc. The JAAP, however, provides no certainty that there will be any future opportunities for the provision of waste management facilities in the longer-term. As stated in the County Council’s Position Statement (May 2007), there would be opportunities for the co-location of built waste management facilities with strategic employment provision.

3.0 Formal Response by WSCC to Submission Document (July 2008)

- 3.1 Against the background set out above, an objection under Test 4 has been made. This is because the preparation of the JAAP has not “had regard to any other relevant plans, policies and strategies relating to the area or to adjoining

areas” as it fails to take into account the County Council’s emerging Minerals and Waste Development Plan Documents.

3.2 The formal response of the WSCC is as follows:

“The County Council is currently reviewing and updating its own evidence base as part of the Minerals and Waste Core Strategy DPD and will shortly be re-commencing work on the identification of strategic waste management facilities. The emerging evidence continues to support the need for built waste management facilities across the County for the recycling, composting and treatment of waste. It is essential that opportunities for the provision of built waste facilities are not missed, particularly where there is the allocation of major greenfield development and that the authorities in two-tier areas work together to ensure that adequate provision is made to meet broader County needs.

The Council recommend that the wording of paragraph 4.41 and Policy WB18 be strengthened to ensure that provision is made for a built waste management facility, either as a separate site or possibly co-located with the proposed Combined Heat and Power plant. This provision should be illustrated on the conceptual Masterplan diagram and detail should be included about what will be required and how delivery will be phased.”

4.0 Postscript

4.1 Further to the formal representation by WSCC on the submitted JAAP in July 2008, no response (informal or otherwise) was received from HDC/CBC.

4.2 In the absence of any approach by HDC/CBC to address the County Council’s objection, a meeting was arranged by WSCC officers to be held on 5 November 2008. Unfortunately, the meeting had to be cancelled due to staff sickness but representatives from HDC, CBC, Crest Nicolson and SLR Consulting still met to discuss matters. Following this meeting, an e-mail (attached at Appendix B) was sent to WSCC setting out a joint HDC, CBC, Crest and SLR position.

4.3 It set out why they consider that a waste management facility could not form part of the Submission JAAP. The reasons given include:

1. There was little certainty regarding the direction of the County’s waste strategy at the time of drafting the Submission JAAP (February/ March 2008) and the evidence base was still being formulated
2. There was concern that to proceed with an allocation would be premature of a robust analysis of the need for strategic waste facilities in the north-east of the County and of the opportunities for development of such facilities on suitable sites using location criteria set out in PPS10.
3. There is no evidence to suggest that the land West of Bewbush would be suitable (in the context of the site ‘opportunities’ listed in Background Paper 6: Strategic Waste Sites, Version 1, October 2008, CDSX2) for anything other than a small-scale facility to deal with waste from the West of Bewbush development or to treat waste to provide renewable energy at a scale commensurate with that of the needs of the development

- 4.4 The County Council's informal response to the points is as follows, in line with the original objection:
- 4.5 Evidence was provided at each stage of the preparation of the JAAP highlighting the shortage of potential sites for strategic waste management facilities in the Crawley area. At the time of drafting the Submission JAAP, WSCC was continuing to work on the Core Strategy DPD evidence base as well as developing a series of Background Papers.
- 4.6 As part of the evidence base an annual update of the Waste Forecasts for West Sussex 2007-2021 was undertaken by consultants AEA (October 2007). This study concluded that in order to meet 50% recycling targets for commercial and industrial (C&I) waste streams, additional capacity of 100,000tpa would be required. The study also concluded that treatment capacity of approximately 250,000tpa would be required for commercial and industrial waste.
- 4.7 The Waste Forecasts have recently been updated and rolled forward to 2026 (AEA, April 2008), in line with the draft South East Plan period, and this information has informed Background Paper 2: Waste Arisings and Waste Management Capacity (Version 1, June 2008) and Background Paper 6: Strategic Waste Sites (Version 1, October 2008, CDSX2). Background Paper 6, Table 1 identifies a capacity shortfall of 0.35mtpa for C&I waste recycling and composting and 0.2mtpa for recycling of construction and demolition waste (C&D) (this will increase if current capacity at Holmbush Farm is lost). The capacity shortfall for C&I treatment facilities is at least 0.11mtpa but in order to divert additional waste from landfill, a higher figure of 0.21mtpa is proposed.
- 4.8 The need to identify suitable sites for strategic built waste management facilities has not changed since the publication of the Core Strategy Preferred Option DPD and the Strategic Waste Site Allocations DPD in early 2007, prior to the preparation of the JAAP Preferred Options document in October 2007.
- 4.9 In relation to the location of built waste facilities within the County, the Core Strategy Preferred Option document identified that facilities need to be well-located in terms of the origins of waste, including urban areas in the north-east of the County. The Core Strategy also identified that sites should be reasonably accessible to the Advisory Lorry Route. This approach has been carried forward in developing the Spatial Strategy Options for C&I recycling facilities and treatment facilities, with the north-east of the County being identified as a suitable location under several of the Options proposed.
- 4.10 In relation to the 'opportunities' identified in Background Paper 6, these represent a starting point for the site search process, and not a definitive list of potential sites. If suitable opportunities, such as those listed, cannot be found in the County, then WSCC will be looking for greenfield sites to meet need. This is set out in Background Paper 6, paras. 4.16 and 4.22.
- 4.11 WSCC previously carried out a through assessment of the 'opportunities' available in the Crawley area and the result of this assessment was that the only site taken forward in the Strategic Waste Site Allocations DPD was the Holmbush Farm site (see Position Statement, May 2007). WSCC are currently in the process of revisiting and updating the previous waste site work. This involves mapping the spatial strategy options and starting to identify sites within the search area, as well as carrying out a "call for sites" to gather

information on potential site availability. Sites that were previously identified will be re-assessed as part of this process. There is no guarantee that undertaking this work will yield any more 'opportunities' than the previous assessment.

- 4.12 HDC and CBC were aware that this work would not be completed in time to inform the JAAP and therefore the opportunity presented by the West of Bewbush area should have been considered on its own merits. To suggest otherwise is promoting a view that the only means of allocating built waste facilities is through the Minerals and Waste Core Strategy DPD. This is contrary to the response made by HDC and CBC to the Minerals and Waste Core Strategy and Strategic Waste Site Allocations document which stated that "the Councils consider that the Joint Area Action Plan remains the most appropriate process through which to identify a suitable waste management facility site (at the Preferred Options/ Submission stage). This would provide certainty about where development will occur, allowing such a facility to be masterplanned accordingly" (Respondent ID 216, March 2007). It is considered that CBC/HBC failed to take this opportunity at any stage in the process.
- 4.13 The 'opportunities' listed in Background Paper 6 are not "indicative of the general need to for separation of strategic waste operations and urban neighbourhood land uses" (CBC e-mail, see Appendix B). The list draws attention to potential effects of operations (the list refers to all potential waste management uses) and the fact that some potential sites will be limited by the proximity of other uses.
- 4.14 The potential for a built waste management facility should have been considered at the outset as requested by WSCC in order to meet local (district) needs as well as broader County and sub-County needs for waste management. As a result, the JAAP fails to meet test 4 and also fails test 7 as the resulting masterplan does not "represent the most appropriate in all the circumstances, having considered all the relevant alternatives" (PPS12, test 7).

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Appendices to Statement of Case by West Sussex County Council (December 2008)

Appendices

Appendix A: Notes of Meeting between WSCC, Crest Nicholson, Savills and SLR Consulting (23 February 2007) p.7

Appendix B: E-Mail sent to WSCC by CBC (7 November 2008) p.10

Appendix A: Notes of Meeting between WSCC, Crest Nicholson, Savills and SLR Consulting (23 February 2007)

Those present:

Tony Odams, West Sussex County Council
John Ilett, Crest Nicholson
Jonathan Steele, Savills
John Leeson, SLR Consulting

Purpose of Meeting

To discuss issues arising out of identification of the Bewbush construction and demolition waste recycling facility in the Preferred Option Strategic Waste Site Allocations Development Plan issued for consultation by West Sussex County Council in January 2007.

The site falls within an area of search for a strategic mixed use development as defined in West Sussex County Council's Structure Plan, which is now subject to a Joint Area Action Plan (JAAP).

Crest Nicholson is seeking to develop the southern part of the area of search which includes the former Bewbush inert landfill site as well as the construction and demolition waste recycling facility that used to be associated with the landfill.

Key Points:

Draft Policy CSW2- Safeguarding

John Ilett reported that, at the JAAP Working Party Meeting of 7 February 2007, both Crawley Borough Council and Horsham District Council Officers confirmed they would be objecting to the draft safeguarding policy CSW2 in the draft Minerals and Waste Core Strategy as it is applied to land to the west of Bewbush.

The officers considered that the current approach could result in the allocated area being sterilised from any other form of development as Policy CSW2 is currently drafted and notwithstanding the fact that the current permission for recycling operations is only temporary now that the landfill has closed. Both councils are happy with the principle of a small area for waste management purposes to be safeguarded if necessary, but not the area of almost 5 hectares which relates to the current operations (including a lengthy access road) rather than the needs for any future built waste facility.

Jonathan Steele pointed out that it is by no means clear as to which development site will form the preferred option arising out of the JAAP process as there are two other potential development areas within the JAAP area. Accordingly, the waste management requirement needs to be considered across the whole of the search area rather than the current area used by the construction and demolition waste recycling facility.

Tony Odam indicated that the draft allocation was largely applied as a prompt to the planning system in the context of the future development west of Crawley as the need for waste management facilities had not been explicitly acknowledged in the core strategies of Horsham DC and Crawley BC. He also noted that there are few sites available for waste management infrastructure in the Crawley area. John Leeson pointed out that the wording in Policy CSW2 is considered to be inappropriate; in particular it raises a circular argument suggesting that the facility should be safeguarded unless the site is unsuitable for continued waste use or if it could be included as part of a scheme accepted by WSCC as being of wider benefit than the retention of the site for waste use. The text in paragraph 5.3.6 of the Core Strategy refers to the county council seeking to protect sites from inappropriate neighbouring developments which could prejudice their continuing operation.

Tony Odam confirmed that it was not the County Council's intention to make the waste requirement an impediment to the location of future developments and referred to a meeting with Neil Border of WSCC that John Ilett and John Leeson had attended when the site had been listed in the Revised Deposit Draft of the Waste Local Plan (the preparation of which had since been halted) at which this had also been discussed.

John Leeson suggested that the Policy should be redrafted to make it clear that the allocation at this location was non-site specific and formed part of a mixed-use development. There are helpful statements to this effect in the 3.4.5 and 3.4.6 of the Strategic Waste Sites Allocations document but a more explicit clarification of this point could be made in the Core Strategy and policy, for avoidance of doubt.

John Ilett confirmed that the JAAP Working Party (JWP) is in the process of consulting stakeholders regarding constraints on development and West Sussex County Council should be one of those bodies. Jonathan Steele noted that David Barker of WSCC had attended the JWP meetings but Tony Odam indicated that he had retired. It was suggested that Neil Border (or another WSCC representative) should attend the next JAAP meeting on 6 March 2007 and Tony Odam agreed to look into this.

Form and Size of Facility

Whilst it is not possible at this stage to identify the precise form of waste management facility that would be appropriate in the context of the mixed-use development, it was agreed that it is possible to confirm that this would be a built facility rather than an open-air facility such as the current construction and demolition waste recycling activities or windrow composting.

Tony Odam and John Leeson agreed that built waste management facilities do not need any buffer zone, such as the 250m buffer that is often applied to open-air windrow composting, and that they could be entirely compatible with employment type uses within a mixed-use development as they are no more detrimental to adjoining land users than other light industrial activities. Indeed they form perfectly legitimate employment uses within areas zoned for this use.

John Leeson suggested that whatever waste facility is to be provided for, it is likely to need to serve a wider area than the development site and Tony Odam agreed, noting that Crawley has few built waste management facilities at present.

The scale of the development was discussed. John Leeson suggested that the policies in WSCC's Core strategy should require the masterplan for the mixed use development to make a minimum provision for 1.0 ha of waste management related employment uses noting that the Strategic Sites Allocation document suggests that a 1.0 ha site could accommodate up to 50,000 tonnes of waste treatment capacity. Tony Odam replied that a greater area may be required but John Leeson suggested that increased provision could be made but that to suggest that a larger area should be retained for waste related uses could result in "sterilisation" of land that could be used/ needed for other employment related uses. Tony Odams suggested that the JAAP could consider sources of information regarding built waste facilities including the draft West Sussex High Quality Waste Management facilities Supplementary Planning Document, September 2006¹ and the ODPM report² on Planning for Waste Management Facilities, Enviros, 2004. These documents show that well built waste facilities can be co-located with other forms of development.

Tony Odam passed a hard copy of the WSCC report to Jonathan Steele.

Summary

It was agreed that:

- West Sussex County Council would look favourably on a policy which did not impose a site specific location within the JAAP boundary and which perhaps showed the entire JAAP search area as being an area in which a built waste facility may be needed; and
- Crest (via SLR) will make representations and suggest alternative policy wording to that effect.

These notes do not form Crest's formal representations to the Minerals and Waste Development Framework consultation process.

Appendix B: E-Mail sent to WSCC by CBC (7 November 2008)

The matters that we are seeking your response on are set out below and focus on your Submission JAAP representation and your Alternative Development Site representation, particularly relating WOB ADS 4 (Renewable Combined Heat and Power (CHP) Scheme, non-household waste mechanical treatment (MT) plant and Western Relief Road).

Submission JAAP Representation

The policy approach of the JAAP is that the waste facilities to be provided will meet the needs of the development. Accordingly the Conceptual Masterplan addresses that opportunity by identifying a location for a combined heat and power plant, the intention being to provide the potential to accept fuel sources such as biodegradable digestate from the nearby Biffa anaerobic digestion plant recently consented by yourselves. Further, we had understood that, following a meeting on 23 February 2008 between Crest and Tony Odams of your council, it had been agreed that it would be appropriate for an area of up to 1 hectare of land to be made available in SDL to enable development of a local waste facility for recycling/treatment of elements of the waste generated by the new neighbourhood.

The basis of your representation, as we understand it, is that the JAAP and accompanying Conceptual Masterplan does not make specific provision for a strategic waste management facility to meet both local and the wider needs of the County. As reiteration of the dialogue through the formulation of the JAAP, the Councils considered that such an identification could not form part of the Submission JAAP for the reasons outlined below. As a consequence of the production of the West Sussex Waste Core Strategy being in its infancy, and therefore its evidence base being formulated, it was considered that little certainty regarding the direction of the County's waste strategy existed at the time of drafting (February/March 2008). Closely linked to the extent of the evidence base, concern existed that to proceed with an allocation would be premature of a robust analysis of the need for strategic waste management facilities in the north-east of the County and of the opportunities for development of such facilities on suitable sites using location criteria set out in PPS10. In essence, the identification of West of Bewbush can not be seen as an opportunity for a strategic waste allocation without a robust assessment of other site opportunities. In light of the above the fundamental conclusion of the Councils was that, even if the Councils were minded to pursue an allocation within the JAAP at the time of drafting, there was insufficient progression of the Waste Core Strategy and the evidence base to be able to substantiate a strategic allocation.

In this context, we note that you have just published Background Paper 6: Strategic Waste Sites (Version 1: October 2008) which, using information on capacity requirements from Background Paper 2: Waste Arisings and Waste Management Capacity (Version 1: June 2008) appears to suggest that a total of around 12 medium sized strategic waste treatment, recycling and composting facilities will be needed across the county. Examination of the spatial needs for facilities suggests that there may be a need for three or four such facilities in the north-east of the county, an area including Crawley, Horsham, East Grinstead and probably extending down to Haywards Heath.

Paragraph 5.7 of Background Paper 6 identifies a list of what are described as "opportunities" for the identification of sites including, inter alia, redundant buildings and farms, contaminated land and active mineral workings. Such locations are indicative of the general need for separation of strategic waste operations and urban neighbourhood land uses. In this context, paragraph 5.7 also notes (last but one bullet point) that, in built up areas (which the JAAP in accordance with the Structure Plan, clearly envisages that west of Bewbush will be), *"there will, however, be scope for some types of facility, especially those dealing with waste generated in the locality (for example, recycling points and facilities within new developments)"*.

There is no evidence to suggest that the land West of Bewbush would be suitable (in the context of what are effectively site selection criteria in para 5.7) for anything other than a small scale facility to deal with waste from the West of Bewbush development or to treat waste

to provide renewable energy at a scale commensurate with that of the needs of the development.

In its representations on the JAAP Conceptual masterplan, Savills (letter dated 11 July 2008) on behalf of Crest Nicholson supported draft policy WB18 regarding Household Waste Recycling Facilities and suggested, in para 59, that a built waste facility, sized to accord with the needs of the West of Bewbush development could be made within an Environmental Infrastructure Area. Crest also made representations to the effect that the area shown for the CHP facility shown on the Conceptual Masterplan should be referenced instead as an Environmental Infrastructure Area which could allow it to accommodate suitable waste management uses. This would be consistent with the opportunity identified in para 5.7 of Background Paper 6.

Accordingly, and having discussed this issue with Crest and its advisors, we would suggest that we try and reach common ground where Crest and the three councils produce a statement to the effect that the west of Bewbush development should incorporate provision for an Environmental Infrastructure Area (or areas) extending to c 1 ha which would include provision for waste management facilities that could serve the locality as well as, say, a CHP facility sized to the needs of the development.

Alternative Development Sites Representation

In light of your confirmed support for ADS4 (a major thermal waste treatment facility on land immediately to the west of the West of Bewbush JAAP allocation) the Councils would like to raise the following points. As you are aware, at the Alternative Development Sites stage either support or objection is expressed for a proposal, not for the principle. Although you are not currently listed as an Examination participant for the hearing on ADS4, I suspect that in light of confirmation of your support for the proposal the Inspector may invite you to attend this hearing and comment on your support for the proposal in conjunction with the respondent. As general context, if your support for the proposal is maintained would it be right for the Councils to conclude that the proposal will form part of the emerging Waste Core Strategy?

As you may be aware, Crest and its advisors have been contacted by the respondent for several years in connection with what has previously been described as a biomass power station but which is clearly a proposal for a major residual waste treatment facility. Crest has always maintained that siting such a facility on land to the West of Bewbush would not comply with the locational criteria in PPS 10 nor indeed with the "opportunities" set out in para 5.7 of your Background Paper 6: Strategic Waste Sites. Furthermore, it would appear that such a large facility (the 60 MW that the respondent refers to in its letter of 16 October 2008 would take over 600,000 tonnes of waste per annum to generate) would be of sub-regional importance given the lack of need for a facility of this scale to serve the needs of West Sussex as set out in your Background Paper 2.

The importation of large volumes of waste (presumably from London) into West Sussex would be in contravention of emerging policy in the SE Plan which suggests that the only waste that should be imported into the SE Region should be residual waste from disposal at landfill rather than waste for treatment. Furthermore there is no evidence that the respondent's proposals are in relation to any identified waste streams such that the proposals appear entirely speculative.

At previous meetings with the respondent, it has been indicated that the facility would generate 60 MW of electricity, and would involve a 45m high building with an 80m+ high stack. The respondents' representations indicated that an area in excess of 20 hectares of land, to the immediate west of the West of Bewbush SDL, would be involved, within an area constrained by a Strategic Gap policy and adjacent to the AONB. The scale and height of development at the West of Bewbush neighbourhood has been strongly influenced by the need to carefully mitigate the visual impact of the development, within the constraints of existing vegetation and topography. The waste facility being put forward by the respondent would be of a scale in complete contravention of the constraints of the area. We now note that in yet another change to its position, the respondent is now suggesting that a 9 ha site within the

West of Bewbush allocation should be provided as well as rail sidings outside the site without any cognisance of the potential impact of the waste treatment facility on the adjacent West of Bewbush development or on the potential to develop a new station to serve the development in a sustainable manner. The potential impact of the revised proposal on the ability to deliver the development can not be underestimated. At this stage, it is our belief that the development would be unable to be delivered in conjunction with the revised proposal and therefore the Councils would be unable to meet the requirements of Structure Plan Policy LOC1 (Locational Strategy), which we assume remains one of the County Council's most critical policies and one that there is a desire to see implemented.

For these reasons, the councils and Crest do not support the ADS4 proposals or the respondent's more recent suggestions. Given the pivotal role of West Sussex as the waste planning authority, it would be very useful to agree with you in advance of the Examination, exactly what your council's position is with regard to waste management proposals of this scale being put forward in advance of the completion of your waste planning strategy.

As a matter of clarification, we consider your Submission JAAP representation to be separate and addressing a different issue than your support for ADS4 and clarification on this understanding would be beneficial.

As outlined in the opening paragraph your response to these matters would be beneficial to all parties. In addition, the Councils are happy to work with you to formulate a Statement of Common Ground, or indeed a Statement of Uncommon Ground if you feel that would be a better way of conveying your perspective. Finally, of course, you could choose to rely on your representations as drafted and the matter be solely addressed through Examination Statements and the Examination.

This e-mail should be considered as an e-mail on behalf of the two Councils, Crest and SLR.

If you have any queries regarding the above, please do not hesitate to contact Barbara, or myself.

Regards

Steve

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Crawley Borough Council

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