

SECTION 5 - ALTERNATIVES

5.1 ALTERNATIVES

5.1.1 An important element of the Environmental Impact Assessment process is the examination of the main alternatives to the proposed development and the main reasons for its choice taking into account the environmental effects. It is considered that the following alternatives are potentially available to the Applicant:

1. Do nothing;
2. Alternative site;
3. Alternative Uses;
4. Alternative Layout.

5.1.2 These are considered in turn below. In relation to each of the topic areas considered in this ES any more detailed alternatives and options considered are set out where they raise potentially significant issues.

Policy Context

5.1.3 It is relevant that the 2007 Core Strategy for Hampshire's Minerals and Waste Plan identified the need to be self sufficient in sustainable waste management facilities that provide for the recycling of the County's waste by 2016. Policy S3 is particularly relevant:

"S3 - Net Self-Sufficiency

By 2016, Hampshire will achieve 'net self sufficiency' in waste management capacity and waste will be disposed of at the nearest appropriate site. No provision will be made for London's waste in the period to 2016, provision post-2016 will be considered by a review of the Strategy."

5.1.4 The Core Strategy also identifies a clear need for additional recycling capacity:

S5 - Capacity Requirements for Recycling, Composting and Recovery and Treatment

Waste management capacity (including specialist facilities as detailed in Policy S7) will be provided in the period to 2020, as follows: Recycling and Composting – facilities for the reception, storage, segregation and processing of 1.86 million tonnes a year of municipal, commercial and industrial waste (and associated bulking-up, transfer and contingency storage facilities); Recovery and Treatment - facilities for the reception, storage and treatment of 0.93 million tonnes a year of municipal, commercial and industrial waste (and associated bulking-up and transfer facilities).

5.1.5 The Core Strategy also identifies the general approach to location of new facilities, in advance of the preparation of the Development Management or Site Specific

Allocations DPD. It focuses new provision for strategic facilities in North East Hampshire and South Hampshire, reflecting the main centres of population and waste arising, supplemented by a network of smaller scale facilities.

“S16 - Location of Waste Management

.....Strategic facilities shall be located within the North East Hampshire or South Hampshire areas shown on the Key Diagram.”

“.....Whilst it is expected that most waste management capacity will be located on brownfield and employment sites, as detailed in PPS10, Planning Authorities should, when preparing Local Development Documents, consider the extent that areas of major development can accommodate waste management facilities. It is expected that land will be made available, within planned areas of major new development, to site suitable recycling and recovery and treatment uses. Where transport connections are suitable, the waste development should serve a greater than local need.....

.....In order to meet the capacity requirements outlined in this Strategy a number of large strategic facilities, supported by a network of smaller more dispersed sites for the reception and onward transfer of waste, will be needed.

5.1.6 The Key Diagram identifies the area including the application site as an Area of Search for Strategic Facilities under policy S16.

5.1.7 The Strategy identifies the key locations where waste development will be supported, including existing and previously developed industrial sites, in policy DC13:

DC13 - Waste Management and Recycling (including Aggregate Recycling Facilities)

Waste management developments (excluding landfill) will be permitted provided that the site:

- a. Is identified as a site, or within an area suitable for waste management uses, in the Hampshire Waste Management Plan or Minerals Plans, or*
- b. Re-uses/redevelops previously developed land and/or redundant agricultural and forestry buildings (including their curtilages), or*
- c. Is within a planned area of large-scale development, or*
- d. Is on employment land, preferably co-located with complementary activities, and*
- e. Has good access to, the minerals and waste lorry route as shown on the Key Diagram, and where possible, the site enables the use of water-borne and rail freight, and*
- f. In the case of recovery and treatment sites, incoming waste shall be subject to pre-treatment, either on or off site to maximise the potential for recycling, and where technically possible, energy will be generated and used and the by-products, including heat, will be reused or recycled, and*
- g. In the case of sites providing public access, the site shall be accessible for use by disabled people.”*

5.1.8 The Core Strategy advises that Previously developed land includes land, which is derelict and has had a previous military, industrial or commercial use.

5.1.9 The following section considers the alternative development options.

Do Nothing

5.1.10 The “do nothing” scenario assumes that the development proposed in the application is not carried out. It is an option that would continue the site in its present use and condition in the absence of the proposed development.

5.1.11 The potential benefits of this are that there would be no environmental or other impacts associated with the use of the main building. All existing features of this part of the site would remain in their present position in the short term.

5.1.12 The disadvantage of this option is that the condition of the building will decline if not put into use.

5.1.13 It also represents a wasted asset and underused resource, that would not accord with policies at local and national level that seek to make optimum use of existing or previously developed land and buildings.

5.1.14 In addition, there would be no additional recycling contribution arising from the site to meet local and national recycling requirements.

5.1.15 Whilst the remainder of the site could continue to be used for the existing level of recycling operations, the chance to move the majority of these operations undercover, into the main building, reducing environmental impacts would be lost.

5.1.16 Similarly, the potential for new conditions to be applied controlling the environmental and amenity impacts associated with the existing or future recycling activities would also be lost.

5.1.17 In considering the options, significant weight is attributed to the benefits associated with the potential site contribution to recycling requirements. These benefits are considered to outweigh the limited impact on the environment identified elsewhere in each of the chapters of this ES and summarised in the Conclusions. For these reasons, the do nothing option was not considered appropriate in this instance.

Alternative Use

5.1.18 The existing consented use of the building is for industrial purposes, though limited by condition to commercial composting. Hence the building could revert to commercial scale composting if not put to other beneficial use.

5.1.19 The use of the building for this consented use may be similar in terms of the environmental effects to the proposed use as a recycling facility, though the use of

organic matter in the composting process is likely to lead to increased issues of odour and airborne particulates in the absence of a clear mitigation strategy.

- 5.1.20 The application site is identified in policy Alt Dev 16 of the Hart District local Plan for redevelopment for redevelopment for Class B1 employment use up to 2,500sqm or other employment development with similar levels of employment.
- 5.1.21 Previous proposals have been put forward through application and appeal, for residential and larger scale office development, each of which has been refused.
- 5.1.22 The existing uses on the wider site amount to a total existing building floorspace of over 5,000sqm and large areas of commercial yard/hardstanding, which is capable of being used for a variety of industrial and associated uses. Given the existing and lawful use of the site and the lack of a viable redevelopment proposal having come forward to date, it is considered unlikely therefore, that redevelopment under the terms of the policy for any alternative to the waste recycling use now proposed or its former use is a likely option in the short to medium term.

Alternative Sites

- 5.1.23 For any new development the consideration of alternative sites is possible. This is particularly so for foot loose development that has a potential choice of locations. The consideration of alternative sites in this case however, is largely constrained in the light of the fact that the application concerns an existing large industrial building within a site that is already used for a variety of waste related and industrial operations. It is these existing site based operations that would be housed within the building in order to improve efficiency and the operational and environmental control. In the absence of the use of the building, these operations are likely to continue in their current form.
- 5.1.24 An assessment has however, been undertaken of alternative sites that are suitable for waste recycling operations of the type proposed and carried out on the site. These include construction and demolition waste recycling, wood recycling, tyres, industrial and commercial waste, involving a range of largely inert or inactive waste types such as brick, concrete, soil, stone, metal, wood, plastic, paper, card and glass.
- 5.1.25 The applicant has been operating from a site in Camberley for the head office (Doman Road) though this is of insufficient size to accommodate any recycling operations. A further site used by the applicant in North Camp has recently been developed for household waste recovery and transfer serving Surrey County Council and hence is no longer available. The nearest alternative facility available to the

applicant is their own site in Reading, which is a significant distance and outside the County. Use of that facility on an ongoing basis would not be sustainable or meet local self sufficiency aspirations of the Core Strategy.

5.1.26 There are no sites currently identified in the Hampshire Minerals and Waste Local Plan (saved policies) for waste recycling operations (other than large-scale EfW). Similarly there are currently no alternative sites identified in the Development Management or Site Specific Allocations DPD of the Hampshire Minerals And Waste LDF.

5.1.27 The only area specifically identified in the Core Strategy is the Area of Search for Strategic Waste Facilities in North East Hampshire. This area includes the application site.

5.1.28 The most recent assessment of sites within this and other areas suitable for waste use was carried out for Hampshire County Council as part of the consideration of sites for the Development Management and Specific Site Allocation DPD as part of the LDF. A call for sites is underway in 2010, though the results are not likely to be available until at least early 2011. As part of this an assessment was carried out by independent consultants in a Review of Employment Land and Industrial Estates (2007).

5.1.29 This assessment included the application site (Site 99). It identified very few other locations suitable for waste recycling in Hart District. None of the other locations in Yateley that can serve the main North East Hampshire towns (Har (a) Sandhurst Road, or Har (b) Blackbushe) are available or were identified as having suitable land available. The other sites in the area identified in the study were considered as being unsuitable for waste recycling uses. Other sites identified as part of the consultation process on the LDF have been ruled out by HCC or Hart District Council as being unsuitable for waste related use.

5.1.30 Hence there are no alternative sites currently available that are of a sufficient size capable of accommodating the use proposed and none are identified as part of the LDF process that are capable of being delivered in the short term in order to help contribute to recycling rates in the period up to 2016.

Alternative Layout

5.1.31 The development of proposals for the application also considered alternative development layouts. The layout proposed moves all waste processing to within the main building which is the subject of the application. The reception and access to

the building is proposed to be located to the west. Only certain product stockpiles would be located to the east, where these would be loaded and despatched from product storage bays

5.1.32 The main alternative considered was a continuation of past operations whereby access to the building was obtained on each side and areas of processing occurred on the main concrete hardstanding to the east of the building. This area is however, closest to the housing on Sydney Loader Place and hence as part of the assessment process, it was concluded that a greater degree of environmental control and protection could be afforded to these properties if the main processing activities were relocated into the building or to the west of the building where they benefit from sound attenuation and environmental control..

5.1.33 All other buildings remain in the locations and uses previously consented and are outside the terms of this application.

5.1.34 An acoustic and environmental screen fence is proposed within the site as part of the mitigation recommended in the EIA. The precise location of the fence the landscape screening on the boundary of the site is shown on the overall site layout plan and accords with the noise and landscape assessment and is proposed to be subject to condition.

Conclusion

5.1.35 Overall, the consideration of alternatives concludes that there are no other suitable sites that would readily meet the requirements to deliver enhanced levels of recycling within the short term. The utilisation of the main industrial building is likely to achieve a greater degree of environmental control than reversion to or reliance on the status quo. Although alternative layouts are possible, the layout proposed is in general terms, the optimum in achieving the environmental enhancement and control of the operations on site.