

CONTENTS

Introduction 5-1
No Development Alternative..... 5-2
Site Suitability And Alternative Sites..... 5-2
Alternative Technologies..... 5-3
Alternative Designs 5-5

INTRODUCTION

- 5.1 Schedule 4, Parts 1 (2) and 2 (4) of the EIA Regulations states that an Environmental Statement (ES) should include:

“An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for the choice made, taking into account the environmental effect”

- 5.2 The EIA Regulations do not expressly require the Applicant to study alternatives; however the nature of certain developments and their location may make the consideration of alternative sites a material consideration. Moreover, recent case law indicates that the EIA regulations do not require an assessment of alternatives. From the Arsenal Football Case it was noted:

“What needs to be covered in the Environmental Statement are the alternatives which the developer has considered. The Regulations do not require alternatives which have not been considered by the developer to be covered, even though the local planning authority might consider that they ought to have been considered”

- 5.3 Further to this, the Inspector presiding over the “Ince Marshes” appeal comments at paragraph 11.9 of his report:

“I also do not accept that there is a requirement under the Environmental Impact Assessment regulations that the proponents of these schemes should have presented a fuller assessment of alternative sites within the Environmental Statement. The question of whether that is required by planning policy is a matter that will be looked at later within this report but there is no express requirement in the Directive and the Regulations that a developer study alternative sites. Paragraph 2 of Part 1 of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 requires the developer to include in the Environmental Statement an outline of the main alternatives studied and an indication of the main reasons for his choice”

- 5.4 The following sections describe the main alternatives to the propose Development. In accordance with best practice guidance, consideration has also been given to, and commentary is provided, to provide an outline of any alternatives or options considered by the Applicant:

- The ‘No Development’ alternative;
- Alternative Sites;
- Alternative Technologies; and
- Alternative Designs

NO DEVELOPMENT ALTERNATIVE

- 5.5 Guidance on the preparation of ESs, suggests that it is good practice to consider the evolution of a Site in the absence of specific proposals, i.e. the 'do-nothing' or 'No Development' alternative.
- 5.6 The 'No Development' option refers to leaving the application site in its current state, and continuing with the current methods for the disposal of waste. The implications of the 'No Development' option are summarised below:
- waste would continue to be sent to landfill, which the government acknowledges is "*clearly wrong*", and would result in significant carbon emissions;
 - the national and local aspirations on strategic waste management such as the 'waste hierarchy' and diverting waste from landfill would not be met;
 - the opportunity would be lost to provide a wide ranging sustainable long-term supply of secondary aggregates;
 - there would be direct and indirect unemployment if the facility were to cease operating;
 - the applicant would need to seek a new secondary aggregate recycling facility located further away which is against the "proximity principle"; and
 - the carbon footprint of the company would increase;
- 5.7 The co-location opportunity with the permanent WTS located within the Eversley Haulage Park facility (see Fig 2.1 Chapter 2) would be lost, meaning around approximately 70,000 tonnes of inert construction and demolition waste would need to travel to the next nearest inert recycling facility. Assuming this was economically viable, if not then it could put the viability of the transfer station at risk.

SITE SUITABILITY AND ALTERNATIVE SITES

- 5.8 In searching for sites suitable, the applicant has referred to paragraph 21 of Planning Policy Statement 10 (PPS10) which states:
- "In deciding which sites and areas to identify for waste management facilities, waste planning authorities should:
- assess their suitability for development against each of the following criteria:
 - the extent to which they support the policies in this PPS;
 - the physical and environmental constraints on development, including existing and proposed neighbouring land uses (see Annex E);
 - the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential; and
 - the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource

recovery, seeking when practicable and beneficial to use modes other than road transport

- give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages.”

- 5.9 The Site is presently used as a secondary aggregate recycling facility which has planning permission until December 31st 2013 so arguably the precedence for this type of activity at the Site has already been set albeit on a short-term basis.
- 5.10 The residential property of Hawkers Lodge is located to the south east of the site. The northern boundary and a significant length of the western boundary of this property are enclosed by a 1.8m high brick wall which limits views of the site from the garden and ground floor rooms.
- 5.11 The first floor of the property includes windows on the northern and western elevations, from where views into the site may be possible. However, these windows are not perpendicular to the site, therefore the site would only be potentially visible from these windows from relatively acute angles. In addition, any such views would be filtered through existing intervening vegetation between the property and the site, further limiting potential visibility.
- 5.12 The pre-application advice from Hampshire County Council states that a residential property named Harewood House is located adjacent to the northern boundary of the Site. However, field work has established that this property no longer exists
- 5.13 As set out in Chapter 6, the Site has a suitable existing access and the Site benefits from being in close proximity to the strategic road network.
- 5.14 The applicant identified the continued need (see Planning Supporting Statement Volume 1) for the facility in this area and selected the Site as a potential suitable Site for such a facility. It is considered that the development of the facility accords with the criteria contained within PPS10 (as outlined above).
- 5.15 It is considered that due to the inter-dependency of the Site and the WTS located at the Haulage Park that there is no logical alternative Site to consider. In fact the Site is literally unique in offering sustainable advantages that no other site could because of its proximity.

ALTERNATIVE TECHNOLOGIES

- 5.16 The applicant has considered a variety of different wash plants based on their specific knowledge of the industry. Without a wash plant it is considered that the aspirations of the local market and demand for product would not be met.
- 5.17 The applicant has considered other wash plants, however the technology is very similar, with no particular plant being more beneficial than the other..

5.18 Essentially there are three ways of processing aggregates that have been considered:

1. Crushing;
2. Crushing & Dry Screening; and
3. Crushing, Dry Screening and Washing,

Crushing

5.19 Simple size reduction process, used to produce all in bulk fill materials, feedstocks are limited to pre sorted concrete, brick, tiles or ceramics, there is no way of sorting aggregates from finer excavation waste using this process.

Issues

5.20 Very selective as to the feedstocks that can be used, can only produce lower quality bulk fill products, the most basic form of aggregate recycling.

Crushing & Dry Screening

5.21 Size reduction by crushing, followed by a dry screening process to separate out the single size fractions, again feedstocks are limited to pre sorted concrete, brick, tiles or ceramics.

5.22 Can produce higher quality products than just crushing alone, but will only work with dry feedstock in dry weather.

Issues

5.23 Even more selective with feedstock than just crushing, as only dry friable material can be dry screened, this process is very weather dependant, and simply does not work during the winter, or periods of heavy rainfall. Quality achievable is good, but nowhere near the quality that can be achieved by a washing process.

Crushing, Dry Screening and Washing

5.24 Processing of selected excavation wastes that uses water to separate out the different size fractions of aggregate contained within the waste, able to process wastes that would block up dry screeners, can cope with high silt contents in the in feed of up to 30-35%, outstanding product quality due to the fact that the aggregate has been scrubbed in a water bath as part of the process.

5.25 Oversize material separated from the in feed is suitable as a feedstock for crushing, so the co-location of the two processes would be ideal, as would be the case with this development proposal at the WHRF.

Issues

- 5.26 High initial set up costs, and higher operating costs than crushing or dry screening, but this is offset by the increased quality, and thus value, of the recycled products produced, otherwise there are no issues with this technology, it can process a much wider range of high quality feedstocks throughout the year, whatever the weather, indeed wet weather would only serve to increase the amount of water available for washing.
- 5.27 It is concluded that on balance that introducing a wash plant at WHRF would be the most effective technology.

ALTERNATIVE DESIGNS

- 5.28 The design of the proposed development has been an iterative process, taking account of a number of constraints and technical considerations. In summary:
- Assessment work confirmed that the south-western part of the Site was less sensitive from a visual, point of view so the site layout was varied to place the wash plant at this location;
 - Two screening bunds have been introduced to provide suitable screening for the proposed development and conceal stockpiles; and
 - In addition, the proposed configuration of the various items of plant/stockpiles has been optimised to provide the most efficient layout in terms of installation of site infrastructure.