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INTRODUCTION

Legislative Requirement

5.1 Alternatives are considered in the context of Regulation 18(3)(d) and paragraph 2 of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Firstly, Regulation 5(2)(d) sates that an EIA Report should include:

> *"a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment."*

5.2 Paragraph 2 of Schedule 4 expands upon this by adding that the information to be provided (where appropriate[1]) should include "*A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.*".

5.3 Guidance contained in the Planning Practice Guidance portal comments[2] that "*the 2017 Regulations do not require an applicant to consider alternatives. However, where alternatives have been considered, paragraph 2 of Schedule 4 requires the applicant to include in their Environmental Statement a description of the reasonable alternatives studied (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects*".

5.4 The main purpose of considering alternatives within an EIA is to consider whether any alternative designs have been considered as part of the process. This could relate to operational practices or phasing of the development for example. Whether a site/land is suitable for limestone extraction is a fundamental consideration of the Development Plan; as such the consideration of alternative sources of limestone is set out in the Planning Statement.

ALTERNATIVES CONSIDERED

5.5 Few alternatives were considered as part of the original 2016 EIA. The design evolution involved the following changes:

- changing the location of the recharge lagoons to the eastern boundary (from the southern boundary);
- opting for a traditional static mineral processing plant, with screens and crusher housed within clad enclosures;

[1] Regulation 18(3)(f) indicates that information contained in Schedule 4 is to be provided where relevant to the specific characteristics of the development.
[2] Paragraph: 041 Reference ID: 4-041-20170728

- leaving two ponds on the periphery known to contain great crested newts *in situ*; and
- altering the restoration strategy from a heavily biodiversity lead scheme to one involving more public access.

5.6 In December 2014 Brett presented to the Environment Agency (EA) a phased site layout placing infiltration lagoons for the UMH and LMH aquifers near the southeast boundary of the site parallel to the A1000. In the EA's email response to Brett's initial proposal (Ally Thomas, 12 March 2015) a request was made for a critical appraisal of options (including adjacent land) for the LMH Lagoon on the basis of practicality and that it should not potentially expand the bromate plume any further than its currently defined location. The EA comments did not specifically relate to the originally proposed UMH lagoon since no bromate is anticipated in the water discharge but SLR has nevertheless reviewed the UMH lagoon as well as well as the LMH lagoon. The review identified that locating the lagoons on the eastern boundary offered several advantages.

5.7 Whist mobile processing plant would have a lower profile (typically being between 4m and 5m in height) it was considered that cladding the screens and crusher would offer more attenuation for dust and noise emissions. Given that the site is well screened, together with the peripheral bunding proposed, it was considered that the change to the processing plant would not have a significant effect. This has been borne out through the Landscape and Visual Impact Assessment (refer to Chapter 8).

5.8 In relation to the two ponds, originally it was proposed to construct a screen bund over them; however, discussions with the projects ecologist indicated that it would be better if they could be left in-situ. Given the location in relation to Home Covert, the removal of bunding in this area would not have any significant effect on the scheme.

5.9 Finally, the restoration strategy was amended following the comments made at a public exhibition (refer to the Statement of community Engagement) where great value is placed by the local community on public access.

5.10 As part of the 2021 EIA work, given that the proposals are a re-submission of the 2016 scheme then no additional alternatives have been considered. Notwithstanding this, it should be noted that the applicant has amended the scheme as follows:

- the erection and operation of a concrete batching plant has been removed from the proposals;
- the standoff for mineral extraction operations in the Lower Mineral Horizon (LMH) to the bromate plume (also in the LMH) will be increased from 50m to 100m;
- there will be no dewatering (pumping) of the LMH; and
- The access road from the quarry entrance has been moved by 5m to the east to allow additional acoustic screening.

5.11 Whilst the option exists to delete one or more of the above changes, this has not been considered as part of the EIA as it would result in an overall reduction in the quality of the scheme; the effect

of such an option would bring the scheme in closer alignment with the previous scheme which has previously been considered through the 2016 ES.

5.12 Finally, the option exists for the 'do-nothing' option whereby proposals to extract sand and gravel are dropped. This would mean that the application site remains in its current state and that 8Mt of sand and gravel are not worked, having an impact on supplies of aggregates within the county and wider region. The implications of this are considered in Chapter 5 of the Planning Statement.

5.13 The MPA has asked whether it would be possible to use field conveyors for transferring extracted sand and gravel to the processing plant. Such an option is best employed where the extraction area is some distance from the processing plant, as is the case with the adjacent Hatfield Quarry, where the extraction area is around 3.5km from the processing plant. Conveyors also work best when extraction is constant throughout the year, with the extracted mineral transferred to a 'surge pile' which in turn is fed (by gravity) into the processing plant. This would not be as effective where extraction takes place over part of the year; it would not be possible to employ a surge pile and so the mineral would need to be handled by loading shovels in the plant site to create the stockpile of as-dug material.