

Minerals Site Specific DPD Site Selection Criteria

1. A viable reserve proven by geological evidence		
Responses		Action
Allen Newport Ltd	It is essential for any site put forward to be economically viable, otherwise its inclusion in the "plan" could not be justified as the prospect of it coming forward could not be guaranteed. Viability is usually dependent upon the quality and quantity of proven resources. Perceived quality to an operator, i.e. stone:sand ration and silt content may not necessarily be consistent across the industry or country. For an individual operator it may well be end-use based. As far as quality is concerned, no minimum quality should be specified for an extension to an existing site although it may be appropriate for a new site.	This is accepted. Guidelines for quality and quantity of material expected within sites will be added to the Core Strategy.
Stradbroke Parish Council	Yes - agree - important	
Kersey Parish Council	Yes	
Brett Aggregates	<p>The resource should be proven by reasonable geological evidence but the question of viability is a commercial issue and the reference to it should be removed.</p> <p>The use of criteria to assess whether or not the reserve should be included is supported. The previous MLP criteria have worked well except that the minimum stone content should be removed to allow additional flexibility. The economic importance of working mineral with a lower coarse aggregate content is likely to change during the plan period and should not be prevent sites being considered for working in the future. Furthermore, opportunities for blending and recycling both indigenous and recycled material to achieve future sustainable development may be compromised by a ridged criteria for minimum stone content.</p> <p>A new site should also be of sufficient size to allow for possible variations of mineral quantity and quality, i.e. >500,000 tonnes. Encouragement should also be given to satellite sites to feed established quarries</p>	This is accepted. Guidelines for quality and quantity of material expected within sites will be added to the Core Strategy.
Wickham Market Parish Council	Essential	
Bucklesham Parish Council	This is obviously relevant	
Broads Authority	Viability will change over time. Reserves often more variable when worked than when tested. Need to define carefully	This is accepted. Guidelines for quality and quantity of material expected within sites will be added to the Core Strategy.
Withersfield Parish Council	Yes, agree	

Exning Parish Council	Agree	
Forest Heath District Council	Agree	

2. Available for extraction within the timescale of the plan (to assumed date of 2021 at this stage in the process)		
	Responses	Action
Allen Newport Ltd	For identified sites to be identified in the plan it is essential that at least most of the site is available for extraction during the plan period.	Agreed. The sub-regional apportionment figure needs to be allocated in the Plan and an assurance that identified sites can deliver within the period of the plan is important. However, regular reviews of the Plan will mean that changing circumstances can be taken account of e.g. a site not coming forward.
Stradbroke Parish Council	Yes - agree- important	
Kersey Parish Council	Yes	
Brett Aggregates	The mineral resource should be available for extraction within the timescale of the Mineral Development Documents (<i>either 2021 or 2018</i>).	Agreed. The sub-regional apportionment figure needs to be allocated in the Plan. However, the regular reviews of the Plan will mean that changing circumstances can be taken account of e.g. a site not coming forward.
Wickham Market Parish Council	Desirable	
Bucklesham Parish Council	Very relevant	
Broads Authority	How can this be determined? Is this a planning consideration or are you allocating a landbank?	In the context of the Minerals Specific Site Allocation DPD it is a landbank consideration. If necessary, a phasing policy relevant to a steady supply of aggregates will be provided for.
Withersfield Parish Council	Yes	

Exning Parish Council	Agree	
Forest Heath District Council	Agree	

3. Sufficient site area for related operations (processing, stockpiles etc).		
	Responses	Action
Allen Newport Ltd	Only important for sites where on-site processing is considered to be the most sustainable option.	Accepted. This will no longer be a site-selection criterion but it will be part of a generic Development Control policy
Stradbroke Parish Council	Yes, this is agreed to be important	This will no longer be a site-selection criterion but it will be part of a generic Development Control policy. It remains an important consideration
Kersey Parish Council	Yes	This will no longer be a site-selection criterion but it will be part of a generic Development Control policy. It remains an important consideration
Brett Aggregates	The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not. Agreed unless a) The site is an extension area adjacent or nearby related operations b) The site is a satellite unit which will feed mineral to a nearby processing plant (see response to Core Issues consultation Q.17) c) The site is a "windfall" operation such as a farm irrigation reservoir or a borrow pit	Accepted. This will no longer be a site-selection criterion but it will be part of a generic Development Control policy
Wickham Market Parish Council	Essential	This will no longer be a site-selection criterion but it will be part of a generic Development Control policy. It remains an important consideration
Bucklesham Parish Council	Very relevant	This will no longer be a site-selection criterion but it will be part of a generic Development Control policy. It remains an important consideration
Withersfield Parish Council	Yes	This will no longer be a site-selection criterion but it will be part of a generic Development Control policy. It remains an important consideration
Exning Parish	Agree	This will no longer be a site-selection

Council		criterion but it will be part of a generic Development Control policy. It remains an important consideration
Forest Heath District Council	Agree	This will no longer be a site-selection criterion but it will be part of a generic Development Control policy. It remains an important consideration

4. Ability to use existing site infrastructure		
	Responses	Action
Allen Newport Ltd	An advantage but not essential for site identification	Disagree. Where an extension to an existing site is proposed and restoration of a worked out area is not prejudiced unduly, the retention of an existing processing plant that is well screened and easily accessed may be preferable to the erection of a new facility.
Stradbroke Parish Council	Yes – agree - important	
Kersey Parish Council	Including access by third party vehicles using any public facilities such as public weigh bridges	Not a relevant matter
Brett Aggregates	<p>The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not.</p> <p>Equal consideration should be given to new sites with purpose-built infrastructure designed to modern standards. This may be of continuing importance to enable a successful afteruse.</p> <p>Every site should be considered on its own merits and against all the policies and emerging guidance in the mineral development documents including the sustainability appraisal and environmental report.</p>	Disagree. Where an extension to an existing site is proposed and restoration of a worked out area is not prejudiced unduly, the retention of an existing processing plant that is well screened and easily accessed may be preferable to the erection of a new facility.
Wickham Market Parish Council	Essential	
Bucklesham Parish Council	Advantageous if available	
Broads Authority	Concern that this will concentrate uses in one area and prejudice restoration	Where an extension to an existing site is proposed and restoration of a worked out area is not prejudiced unduly, the retention of an existing

		processing plant that is well screened and easily accessed may be preferable to the erection of a new facility.
Withersfield Parish Council	Yes this is vital	
Exning Parish Council	Agree	
Forest Heath District Council	Agree	
RSPB	<p>The RSPB believes that the identification and development of mineral extraction sites should be directed towards sites with existing infrastructure, providing that there are no adverse impacts on the environment.</p> <p>The RSPB would be supportive of an approach of 'extension to existing sites.' Since the infrastructure is already in place, extension of existing sites is likely to cause the least disturbance to the environment and communities. The efficient use of existing infrastructure is most likely to be the most economical option.</p> <p>The RSPB recommend that, before resuming activities on inactive workings, any conservation interest that may have developed be fully assessed.</p>	<p>Agree partially. Where an extension to an existing site is proposed and restoration of a worked out area is not prejudiced unduly, the retention of an existing processing plant that is well screened and easily accessed may be preferable to the erection of a new facility.</p> <p>Inactive workings are addressed by the section of the Environment Act 1995 which refers to the Review of Old Mineral Workings.</p>

5. Extent to which mitigation measures are already in place		
	Responses	Action
Allen Newport Ltd	Development control criterion rather than site selection criterion	Agreed – this will no longer be a criterion but will be considered through the generic Development Control policies.
Stradbroke Parish Council	Yes - agree	This will no longer be a criterion but will be considered through the generic Development Control policies.
Kersey Parish Council	Yes	This will no longer be a criterion but will be considered through the generic Development Control policies.
Brett Aggregates	<p>The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not.</p> <p>Equal consideration should be given to new sites with purpose-built infrastructure</p>	This will no longer be a criterion but will be considered through the generic Development Control policies.

	<p>designed to modern standards. This may be of continuing importance to enable a successful afteruse.</p> <p>Every site should be considered on its own merits and against all the policies and emerging guidance in the mineral development documents including the sustainability appraisal and environmental report.</p>	
Wickham Market Parish Council	Desirable to high level	This will no longer be a criterion but will be considered through the generic Development Control policies.
Bucklesham Parish Council	Advantageous if available	This will no longer be a criterion but will be considered through the generic Development Control policies.
Broads Authority	Will this not concentrate operations in one area and create presumptions against final restoration? Cumulative impacts needs to be taken into account.	It is considered that this issue be considered as a development control issue rather than a site selection criteria
Withersfield Parish Council	Does not understand what this means.	Some potential sites, especially if they are an extension to an existing site, may already have screening in place through tree-belts or earth bunds
Exning Parish Council	Agree	This will no longer be a criterion but will be considered through the generic Development Control policies.
Suffolk Preservation Society	I would suggest that this does not go far enough. It appears to me that you should be analysing whether the mitigation measures are working or not	The effectiveness of mitigation measures are monitored regularly, and altered where necessary
Forest Heath District Council	Agree	This will no longer be a criterion but will be considered through the generic Development Control policies.

6. Proximity to settlements/individual dwellings

Responses		Action
Allen Newport Ltd	A combination of distance and potential mitigation measures should determine permissible working distance from properties.	Agreed in part. It is clearly desirable for mineral workings to be located away from settlements and housing, but distance as a sole factor for this criterion is unlikely to be appropriate in all cases, particularly where effective mitigation measures already

		exist or can be put into place or where topography is relevant.
Stradbroke Parish Council	Should not be close to above	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites
Sudbury Town Council	Sudbury Town Council is of the opinion that this criterion should be worded to show that consideration is given to the impact on residential amenity	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites
Kersey Parish Council	Yes	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites
Brett Aggregates	<p>It is noted in the covering letter dated 3rd May 2006, accompanying this paper, that a sustainability appraisal will be taken into account together with the revised (presumably this is after current consultation) site selection criteria to produce an objective assessment of all the sites submitted, which will be published in the Specific Site Allocation DPD for consultation.</p> <p>It is therefore presumed that all the policies within the MLP together with the responses to the Core Strategy Issues and Options Paper, which included generic Development control policies, are carried forward and will be applied within the site selection criteria.</p>	The Sustainability Appraisal results will, together with the site selection criteria, accompany the Preferred Options version of the Specific Site Allocations DPD.
Wickham Market Parish Council	Absolutely crucial, especially if a new site	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites
Bucklesham Parish Council	As far away as possible yet close to SSLR network	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites
Broads Authority	Setting distances is a difficult process	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites
Withersfield Parish Council	Be neighbourly	Protection of residential amenity is clearly vital and it will be given the

		highest level of importance in assessing submitted sites
Exning Parish Council	Agree	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites
Federation of Suffolk Byways and Bridleways Groups	As far as possible away from homes	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites
Forest Heath District Council	Agree	Protection of residential amenity is clearly vital and it will be given the highest level of importance in assessing submitted sites

7. Potential for buffer strips		
	Responses	Action
Allen Newport Ltd	A combination of distance and potential mitigation measures should determine permissible working distance from properties.	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact
Stradbroke Parish Council	Yes - agree- important	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact
Kersey Parish Council	Minimum size of buffer strips to be stated varying according to proximity to existing settlements/dwellings, taking into account any current site objections on file	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact
Brett Aggregates	By way specific comment support is given to Policy SMLP (d) for consideration to buffer zones, or stand-off distances, to be considered on a site specific basis. To specify a set distance would be contrary to government guidance as made clear in MPS2 paragraph 27 and 28. Clearly a site close to housing should not be allocated but there is a danger in trying to impose standardised buffer strips. The Inspector at the Bucks M&WLP Inquiry came down strongly against them or even the use of guidelines for their use)	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact

Wickham Market Parish Council	Essential	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact
Bucklesham Parish Council	Very important	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact
Broads Authority	These can be managed pro-actively for wildlife	The biodiversity potential of buffer zones is well-recognised
Withersfield Parish Council	Reasonable	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact
Exning Parish Council	Agree	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact
Federation of Suffolk Byways and Bridleways Groups	Essential	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact
Forest Heath District Council	Agree	Proximity to settlements and dwellings is a relevant consideration notwithstanding that topography can influence the size and shape of buffer zones to mitigate impact

8. Not designated for other development

Responses		Action
Allen Newport Ltd	Should not be a reason for not identifying a site	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses
Stradbroke Parish Council	Each case should be considered on its merits	This criterion will not be used, as mineral extraction need not prejudice

		appropriate subsequent land uses
Kersey Parish Council	Yes	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses
Brett Aggregates	Minerals Consultation Areas and criteria should be carried forward and embodied into Minerals Development Documents. It must be made mandatory for the LPA's to consult with the MPA in all instances to agree consultation criteria and the MPA's views must be taken into account. The LPA should not designate any area for development before it has checked with the MPA on mineral related issues for the area concerned. If necessary time should be given to enable minerals to be extracted before development commences- possibly also on land surrounding the development where mineral sterilisation would otherwise occur	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses. However, Minerals Consultation Areas will be carried forward in the Minerals DPDs, and the MPA will try to ensure that extraction takes place before potentially sterilising development
Wickham Market Parish Council	Important	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses
Bucklesham Parish Council	Development on nature of other development	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses
Broads Authority	Mineral extraction need not prejudice other land uses with modern restoration methods	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses
Withersfield Parish Council	Can do it after, perhaps	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses
Exning Parish Council	Agree	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses
Federation of Suffolk Byways and Bridleways Groups	Essential	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses
Forest Heath District Council	Agree	This criterion will not be used, as mineral extraction need not prejudice appropriate subsequent land uses

9. International nature conservation designations

Responses		Action
Allen Newport Ltd	If working methods and restoration achievable have no adverse impact on the nature conservation interest there is no reason not to identify such a site for mineral extraction. Conversely, if an existing working can demonstrate that it can add to the	In view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature

	nature of conservation interest there is a positive reason for identifying the site for mineral extraction	conservation sites, this criterion will be retained. Any sites which, either alone or in combination, could have a material adverse impact on a SAC, SPA or Ramsar site will have to undertake an Appropriate Assessment to demonstrate that they will not have an impact on the designated area. If they would have an impact, then the site should not be allocated
Stradbroke Parish Council	Nature conservation of the highest importance	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature conservation sites, this criterion will be retained.
Kersey Parish Council	Yes	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature conservation sites, this criterion will be retained.
Brett Aggregates	The criteria for the "protection of Heritage and Countryside" are set out in the draft MPS1 together with the associated Good Practice Guidance. Both documents detail specific steps which need to be taken to demonstrate that mineral development in these areas may proceed, specifically in MPS1 paragraph 8 and Good Practice Guide paragraph 46. The Suffolk MWDF should not depart from government policy which must be overriding in these matters. This particularly applies for international sites which as detailed in PPS9 paragraph 6, whereby "specific policies in respect of these sites should not be included in local development documents (see also part 1 of the ODPM/Defra Circular ODPM 06/2005 Defra 01/2005)."	It is not proposed to repeat national policy on nature conservation in the Core Strategy. However, given the importance of these designated sites, it must clearly remain as one of the criteria for site selection.
Wickham Market Parish Council	Essential consideration	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature conservation sites, this criterion will be retained.
Bucklesham Parish Council	This should be considered	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature

		conservation sites, this criterion will be retained.
Broads Authority	There needs to be a hierarchy of protection with no development in the most protected sites unless exceptional circumstances defined in PPS7	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature conservation sites, this criterion will be retained.
Withersfield Parish Council	Oh yes!	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature conservation sites, this criterion will be retained.
Exning Parish Council	Agree	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature conservation sites, this criterion will be retained.
Federation of Suffolk Byways and Bridleways Groups	Essential	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature conservation sites, this criterion will be retained.
Forest Heath District Council	Agree	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting internationally designated nature conservation sites, this criterion will be retained.
RSPB	<p>European sites are protected by The Conservation (Natural Habitats &c.) Regulations 1994. The Regulations state that plans or projects likely to adversely affect the integrity of a European site can only proceed if there are no alternative solutions and that the plan or programme must be carried out for imperative reasons of overriding public interest.</p> <p>Sites of international importance for nature conservation (SPAs and SACs) should be protected from minerals development unless there is no alternative means of meeting the development need and the minerals development must be carried out for imperative reasons of overriding public interest.</p>	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) and the Habitats Regulations on protecting internationally designated nature conservation sites, this criterion will be retained.

10. National nature conservation/geological designation constraints

Responses		Action
Allen Newport Ltd	See 9 above	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
Stradbroke Parish Council	Nature conservation and geological issues of the highest importance	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
Kersey Parish Council	Yes	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
Brett Aggregates	<p>The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not.</p> <p>With this criteria impacts may be offset by overall improvements making decisions as to whether or not to allocate inappropriate</p> <p>As stated in PPS9 paragraph 9, Regional and Local Sites should be judged on "criteria-based policies established in local development documents which should be distinguished from those applied to nationally important sites." Such policies should reflect the guidance in paragraphs 42 and 43 of the Good Practice Guidance which states that relevant and effective planning conditions are an effective way of mitigating environmental impacts.</p>	Diasgree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
Dedham Vale AONB and Stour Valley Project	National landscape designations should also be considered- e.g. AONBs, Broads National Park	Criteria have been revised to include the Broads National Park
Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature	Essential consideration	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.

conservation sites, this criterion will be retained.		
Bucklesham Parish Council	This should be overriding	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
Withersfield Parish Council	Be considerate	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
Exning Parish Council	Agree	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
Federation of Suffolk Byways and Bridleways Groups	Essential	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
Forest Heath District Council	Agree	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.
RSPB	National designated site (SSSI) are protected by the Wildlife and Countryside Act 1981. Development of land within these should not be permitted unless there are no reasonable alternative means of meeting the development need and the reasons for the development clearly outweigh the value of the site itself and the national policy to safeguard the intrinsic nature conservation value of the national network of such sites.	Agree - in view of the advice in PPS9 (<i>Nature Conservation</i>) on protecting nationally designated nature conservation sites, this criterion will be retained.

11. Local nature conservation designation constraints		
	Responses	Action
Allen Newport Ltd	Development control criterion rather than site selection criterion	It is important that development is sympathetic to local nature conservation constraints and it is therefore proposed this criteria be retained (as amended)
Stradbroke Parish Council	Nature conservation of the highest importance	It is important that development is sympathetic to local nature conservation constraints and it is therefore proposed this criteria be retained (as amended)
Kersey Parish Council	Yes	It is important that development is sympathetic to local nature conservation constraints and it is therefore proposed this criteria be retained (as amended)
English Nature	We recommend that this criterion be amended to "local nature conservation/geological designation constraints"	Agree – the criterion will be amended accordingly
Brett Aggregates	<p>The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not.</p> <p>With this criteria impacts may be offset by overall improvements making decisions as to whether or not to allocate inappropriate</p> <p>As stated in PPS9 paragraph 9, Regional and Local Sites should be judged on "criteria-based policies established in local development documents which should be distinguished from those applied to nationally important sites." Such policies should reflect the guidance in paragraphs 42 and 43 of the Good Practice Guidance which states that relevant and effective planning conditions are an effective way of mitigating environmental impacts.</p>	<p>It is important that development is sympathetic to local nature conservation constraints and it is therefore proposed this criteria be retained (as amended).</p> <p>Agreed. Conditions of planning permissions may be effective in enhancing existing habitats which may offset other adverse impacts.</p> <p>There will be a policy in the Core Strategy covering nationally and/or internationally designated sites and a Generic Development Control policy covering local/regional nature conservation/geological designation constraints</p>
Wickham Market Parish Council	Essential consideration	

Bucklesham Parish Council	This should be absolute	Development of designated Local Nature Conservation Sites cannot prohibit development damaging them, because national policy guidance (in PPS9) states clearly that such sites should enjoy a lower level of protection than nationally-designated sites. However, the importance of such sites to local quality of life is recognised and protection still afforded; there will be a criteria-based policy in the generic development control policy section of the Core Strategy setting out the protection to be afforded to such sites
Withersfield Parish Council	Be sympathetic	
Exning Parish Council	Agree	
Federation of Suffolk Byways and Bridleways Groups	Essential	
Forest Heath District Council	Agree	
RSPB	Locally designated sites, e.g. County Wildlife Sites, receive no statutory protection other than that afforded to them in Structure and Local Plans. However, the RSPB believe as good practice, development should not take place over County Wildlife Sites unless there are reasons for the proposal which clearly outweigh the need to safeguard the intrinsic nature conservation value of the site or feature and that there are no reasonable alternative means of meeting that development need.	Agree – a draft generic development control policy will say this
Environment Agency	The inclusion of non-statutory designated sites as a component of the site selection is welcomed because they are equally valuable as statutory sites and often support BAP species and habitats.	Agree

12. Impact on biodiversity

Responses		Action
Allen Newport Ltd	Development control criterion rather than site selection criterion	The impact on biodiversity and geodiversity is considered an important element at site selection stage and will facilitate consideration

		and comment on relevant local species and habitats. However, it will also remain a development control criterion
Stradbroke Parish Council	Must be taken into account	The impact on biodiversity and geodiversity is considered an important element at site selection stage and will facilitate consideration and comment on relevant local species and habitats.
Kersey Parish Council	Yes	The impact on biodiversity and geodiversity is considered an important element at site selection stage and will facilitate consideration and comment on relevant local species and habitats.
English Nature	We recommend that this criterion be amended to “impact on species and habitats listed in the UK BAP” to provide an explicit, relevant and measurable aspect of biodiversity	Agreed – the criterion will be altered to reflect this.
Brett Aggregates	The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not. The minerals industry is probably unique in its achievement in creating and maintaining a wide range of habitats benefiting from enhanced biodiversity. For example more than 700 of the UK’s Sites of Special Scientific Interest (SSSI’s) have their origins in the quarrying industry. The work related to the maintenance and potential enhancement of biodiversity will form an important part of the Environmental Impact Assessment at the planning application stage of a site. PPS9 makes it clear that “planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests.” Therefore the maintenance of the existing biodiversity on a site will be perfectly acceptable. Indeed PPG9 also makes clear that the “aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests.”	The impact on biodiversity and geodiversity is considered an important element at site selection stage and will facilitate consideration and comment on relevant local species and habitats. Conditions of planning permissions may be effective in enhancing existing habitats and may offset otherwise damaging or adverse impacts.
Wickham Market Parish Council	Essential	The impact on biodiversity and geodiversity is considered an important element at site selection stage and will facilitate consideration and comment on relevant local species and habitats.
Bucklesham Parish	Important	The impact on biodiversity and

Council		geodiversity is considered an important element at site selection stage and will facilitate consideration and comment on relevant local species and habitats.
Broads Authority	There should be a presumption against but which will have an impact against a hierarchy of protection is useful	The impact on biodiversity and geodiversity is considered an important element at site selection stage and will facilitate consideration and comment on relevant local species and habitats.
Withersfield Parish Council	Uncertain what this criterion means	It is important to recognise the impact of potential development on sites with evidence of recognised wild life and or geological importance at an early stage.
Exning Parish Council	Agree	The impact on biodiversity and geodiversity is considered an important element at site selection stage and will facilitate consideration and comment on relevant local species and habitats.
Forest Heath District Council	Agree	The impact on biodiversity and geodiversity is considered an important element at site selection stage and will facilitate consideration and comment on relevant local species and habitats.
RSPB	<p>The RSPB recommend that sites are selected to minimise the impact on existing biodiversity in an area, or in areas adjoining or close to proposed development.</p> <p>Important habitats and populations of species do exist outside the network of protected sites and it is important that any minerals development takes this into account. Information on important species and habitats outside the network of protected sites is often incomplete, and thus appropriate environmental assessment is essential.</p> <p>The RSPB recommend that site selection does not isolate or fragment existing habitats and we actively support the benefit of providing new links between areas of habitat to enhance their biodiversity value.</p>	<p>The comments are useful and reflect the aims of the MPA. As well as measures aimed at protecting existing biodiversity, opportunities to improve or increase biodiversity on new or extended sites will also be explored.</p> <p>The Sustainability Appraisal results will help in assessing the biodiversity</p>

13. Potential for promoting biodiversity		
	Responses	Action
Allen Newport Ltd	Development control criterion rather than site selection criterion	<p>Although it is correct to state that opportunities for promoting biodiversity during restoration are a development control criterion, they also need to be taken into account of at the site selection stage.</p> <p>Criterion will be altered in the light of comments from English Nature, Lafarge and Brett Aggregates</p>
Stradbroke Parish Council	Important	<p>Although it is correct to state that opportunities for promoting biodiversity during restoration are a development control criterion, they also need to be taken into account of at the site selection stage.</p> <p>Criterion will be altered in the light of comments from English Nature, Lafarge and Brett Aggregates</p>
Kersey Parish Council	Yes	<p>Although it is correct to state that opportunities for promoting biodiversity during restoration are a development control criterion, they also need to be taken into account of at the site selection stage.</p> <p>Criterion will be altered in the light of comments from English Nature, Lafarge and Brett Aggregates</p>
English Nature	We recommend that this criterion be amended to “potential for habitat regeneration and/or recreation” as the meaning of “promoting biodiversity” is not clear	Agreed – the requested change will be made
Brett Aggregates	<p>The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not.</p> <p>PPS9 and ODPM Circular 06/2005 actively promote biodiversity and geological interests</p>	Geodiversity will be added to the criterion

	through all stages of a minerals development beginning with site preparation through to restoration and aftercare. English Nature Research Report No. 279 identifies the potential contribution of the mineral extraction industries to the UK BAP, this together with a joint publication with the QPA and SAMSA entitled biodiversity and minerals provides clear guidance to “planning, operating, restoring and managing mineral sites for biodiversity.” SCC should therefore endorse and give strong encouragement to potential minerals sites which promote opportunities for enhanced biodiversity at each development stage.	
Wickham Market Parish Council	Important	Although it is correct to state that opportunities for promoting biodiversity during restoration are a development control criterion, they also need to be taken into account of at the site selection stage. Criterion will be altered in the light of comments from English Nature, Lafarge and Brett Aggregates
Lafarge Aggregates	It is considered that in addition to “Potential for promoting biodiversity” consideration should be made to the geodiversity as per PPS9	Agreed – geodiversity will be added to the criterion
Bucklesham Parish Council	Important	Although it is correct to state that opportunities for promoting biodiversity during restoration are a development control criterion, they also need to be taken into account of at the site selection stage. Criterion will be altered in the light of comments from English Nature, Lafarge and Brett Aggregates
Broads Authority	There is always potential! A requirement to improve biodiversity should be a standard policy	Opportunities to improve biodiversity and geodiversity will always be explored and it will be for operators to demonstrate why increased biodiversity is not practicable for their site or application
Withersfield Parish Council	The aim of the criterion is to ensure that new minerals sites contribute to improved biodiversity	The opportunities for promoting biodiversity during restoration need to be taken into account at the outset and this criteria should be retained

Exning Parish Council	Agree	<p>Although it is correct to state that opportunities for promoting biodiversity during restoration are a development control criterion, they also need to be taken into account of at the site selection stage.</p> <p>Criterion will be altered in the light of comments from English Nature, Lafarge and Brett Aggregates</p>
Forest Heath District Council	Agree	<p>Although it is correct to state that opportunities for promoting biodiversity during restoration are a development control criterion, they also need to be taken into account of at the site selection stage.</p> <p>Criterion will be altered in the light of comments from English Nature, Lafarge and Brett Aggregates</p>
RSPB	<p>We recommend sites are identified that can provide the greatest environmental benefit, particularly though beneficial afteruse of the site, e.g. habitat creation. Restored sites have the potential for valuable contributions towards local and national BAP targets, and biodiversity enhancements should be proposed regardless of the location. The RSPB is supportive of biodiversity enhancements, both during and particularly as part of restoration schemes following minerals extraction.</p> <p>Suffolk County Council has targets under the Suffolk BAP to create habitats and meet objectives for a variety of habitats and species; we feel that the restoration of mineral extraction sites provides a valuable opportunity to achieve this. All opportunities for biodiversity enhancements should be fully explored and fulfilled, in additions to any mitigation works undertaken. The potential exists to incorporate habitat creation and environmental enhancements into a wide range of afteruses.</p>	<p>All opportunities for minerals sites to contribute to biodiversity enhancements will be explored, in particular for the creation of BAP habitats and species</p>

14. Impact on the water environment		
	Responses	Action
Allen Newport Ltd	Development control criterion rather than site selection criterion	Notwithstanding the opportunities for mitigation measures, there may be sites where the impact is identified as unacceptable in the first instance.

		The criterion will be amended to refer to effects on both water quality and water quantity (flooding)
Stradbroke Parish Council	Very important	
Kersey Parish Council	And existing dwellings which may be affected by drainage/water table changes resulting from excavations	
Brett Aggregates	<p>The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not.</p> <p>For Mineral extraction proposals in excess of 25ha an Environmental Impact Assessment will be prepared and will include an assessment of the potential hydrological and hydrogeological impacts. Where impacts are predicted mitigation measures will be proposed both for the extraction and the restoration of the proposed development. Potential sites below 25ha will still require an EIA if, without any mitigatory measures they would be likely to have any significant environmental effects. Applicants will therefore be required under current legislation (Town and Country Planning Environmental Regulations) to determine the potential impacts of the proposed development on the water environment; the MPA will need to be satisfied that any proposed mitigation measures are acceptable at the planning application stage. When a site is first presented to the MPA the promoter should be encouraged to provide initial information on the surrounding water environment, e.g. is the site within a Groundwater Source Protection Zone. The absence of detailed mitigation measures at the early site promotion stage should not prevent a site being identified by the MPA. The absence of a hydrological hydrogeological report with a site submission should not be a reason to prevent allocation.</p>	<p>Notwithstanding the opportunities for mitigation measures, there may be sites where the impact is identified as unacceptable in the first instance.</p> <p>The criterion will be amended to refer to effects on both water quality and water quantity (flooding)</p>
Wickham Market Parish Council	Essential	
Bucklesham Parish Council	Vital, particularly in light of likely water shortages	
Broads Authority	This must include off-site impacts e.g. dewatering and impact on ground water, as well as potential for pollution	
Withersfield Parish Council	Yes	
Exning Parish Council	Agree	
Federation of Suffolk Byways and Bridleways Groups	One assumes this would be a priority	

Forest Heath District Council	Agree	
RSPB	The RSPB believes that any new proposal should have no adverse impacts on the quantity or the biological or chemical quality of water. Proposals for mineral extraction should not increase the flood risk to an area. Applications should be able to fully demonstrate this. Any change in the quantity or quality of water available for abstraction for the management of land for nature conservation interests can have significant impacts on the biodiversity value of the land and the condition of designated sites.	All applications, particularly those which will involve penetrating the water table or working in floodplains/river valleys, will be required to undertake a Flood Risk Assessment. They will also be required to demonstrate that the workings will not have detrimental impacts on water quality and nature conservation interests
Environment Agency	<p>We consider that there needs to be a definition to selection criteria 14. We are not sure whether the Council are referring to the environment that lives in or depends on water, or rather the quality and quantity of water in the environment. It is important that this definition is made clear to applicants. For instance, the Environment Agency Policy and Practice for the Protection of groundwater includes a policy statement aimed at preventing physical disturbance of aquifers and groundwater flow. The site selection criteria should preferably make it clear that minerals operators must take into account possible impacts on groundwater resources, notably major and minor aquifers, when investigating potential minerals sites. A definitions of water in the environment is therefore, in our view, an essential aspect of the site selection criteria.</p> <p>Continuing with the theme of selection criteria 14, we would like to see included a reference to whether the minerals are likely to require dewatering, which can have a significant impact on the water table and subsequently on biodiversity features in and around a proposed minerals site.</p>	<p>The criterion is referring mainly to the quality and quantity of water in the environment. Potential ecological impacts will be assessed through the criteria on nature conservation and biodiversity.</p> <p>It would be appreciated if the Environment Agency could, when responding to the submitted sites, raise any issues of groundwater resources and quality in order to help the MPA consider any potential issues at the Preferred Options stage.</p> <p>As well as being addressed at the Preferred Options stage, they would also be material considerations at the planning application stage.</p>

15. Visual impact		
Responses		
Allen Newport Ltd	Development control criterion rather than site selection criterion	<p>Visual impact will be considered along with an assessment of landscape character.</p> <p>Although this will also be a development control criterion,</p>

		landscape impact is an important consideration at the site submission stage
Stradbroke Parish Council	Important	Visual impact will be considered along with an assessment of landscape character.
Kersey Parish Council	Including additional over head power supplies to new sites	Visual impact will be considered along with an assessment of landscape character. This would include the impact of any new overhead power lines
Brett Aggregates	<p>The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not.</p> <p>The supporting at paragraph 9.5 onwards in the East of England Plan relating to Policy "EV2: Landscape Character" states that "the landscape has been shaped by people over the centuries, meaning that very little of what is seen today is truly natural." The policy itself directs planning authorities to develop criteria based policies, informed by character assessments to ensure that all development wherever possible respects and enhances landscape character. PPS 7 at paragraph 22 advocates the use of criteria-based policies utilising landscape character assessment which should "provide sufficient protection for these areas without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas. Landscape Character Assessments together with ecological surveys as part of an EIA should determine the impact of the development on the existing landscape and biodiversity and identify mitigation measures if required."</p>	<p>Landscape Character Assessments have been carried out for the whole of Suffolk and a criteria-based (draft) development control policy has been formulated.</p> <p>Nonetheless, visual impact and landscape character remain import considerations in the site selection process</p>
Dedham Vale AONB and Stour Valley Project	Would noise impact be a consideration? Landscape Character Assessment will be used for development control purposes in future, would the same be true of minerals applications?	There will be development control policy on noise generated within the site. Wider noise questions (e.g. from traffic) will be covered via the transport criterion (and development control policy).
Wickham Market Parish Council	Considered to be of the utmost important	Visual impact will be considered along with an assessment of landscape character.
Bucklesham Parish Council	This should be kept to a minimum	Visual impact will be considered along with an assessment of landscape character.
Broads Authority	This is a key criteria- and the impact of "mitigation" resources must be taken into account	Visual impact will be considered along with an assessment of landscape

		character. Any mitigation measures will obviously be taken into account.
Withersfield Parish Council	To a degree	Visual impact will be considered along with an assessment of landscape character.
Exning Parish Council	Agree	Visual impact will be considered along with an assessment of landscape character.
Federation of Suffolk Byways and Bridleways Groups	Sites should have natural screening	Natural screening of sites would normally be the preferred option, but it is not always possible
Forest Heath District Council	Agree	Visual impact will be considered along with an assessment of landscape character.
Countryside Agency	<p>"visual impact"... could be interpreted in a number of ways with varying degrees of rigour and contrasts with the 5 criteria relating to biodiversity considerations.</p> <p>In commenting on the Core Strategy Issues and Options Consultation Report in March of this year, we expressed concern at the suggestion that further workings might be permitted in Suffolk's two AONBs and urged that the Core Strategy should place greater emphasis on the need to protect and enhance the character of the of the wider landscape outside designated areas. We pointed out the clear national policy steer against significant development in nationally designated landscapes. We advocated the use of landscape character assessment to evaluate the ability of the landscape to absorb minerals developments and to help in determining appropriate mitigation measures and restoration proposals.</p> <p>We could therefore like to see Criterion 15 replaced with:</p> <ul style="list-style-type: none"> • National Landscape designation constraints • Impact on local landscape character • Potential for promoting landscape enhancement 	<p>There will be a Core Strategy policy covering development in Suffolk's two Areas of Outstanding Natural Beauty.</p> <p>A criteria-based (draft) development control policy has been formulated to cover local landscape character and the any enhancement potential.</p>

16. Agricultural Land Quality

Responses		
Allen Newport Ltd	Should be in accordance with Government policy and guidance	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7
Stradbroke Parish Council	Each case to be decided on its merits	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7

Kersey Parish Council	Yes	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7
Brett Aggregates	The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not. The MLP policy obligation to restore Grade 1 and 2 land to a similar classification should continue. But the obligation to restore Grade 3a to a similar classification should be discontinued to encourage more flexibility when designing restoration schemes. For example part of a site may be restored to a similar proportion of Grade 2 land with the remainder of the site being restored of amenity feature, thus maximising the opportunity for both features of the restoration.	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7
Wickham Market Parish Council	The higher the quality the less desirable the extraction	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7
Bucklesham Parish Council	Best/good quality secondary land should not be used	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7
Withersfield Parish Council	Do not do anything so it can't be restored to former glory; or make a lake plan from the start!	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7
Exning Parish Council	Agree	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7
Forest Heath District Council	Agree	This criteria will be removed as the requirements will be in accordance with Government policy in PPS7

17. Restoration and afteruse(s)

Responses		
Allen Newport Ltd	Development control criterion rather than site selection criterion	Restoration and after-use of sites is very significant and although it is a development control issue, it is a matter of sufficient importance to be assessed at the site selection stage Issues regarding restoration will be considered alongside the potential opportunities for public access, enjoyment and nature conservation

Stradbroke Parish Council	Very important	Issues regarding restoration will be considered alongside the potential opportunities for public access, enjoyment and nature conservation
Kersey Parish Council	Yes	Issues regarding restoration will be considered alongside the potential opportunities for public access, enjoyment and nature conservation
Brett Aggregates	The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not. Operators should be encouraged to promote alternative afteruses including Non-agricultural, see MIRO report "quarries and Built Afteruses" January 2006	Issues regarding restoration will be considered alongside the potential opportunities for public access, enjoyment and nature conservation
Wickham Market Parish Council	Restoration is considered to be of high importance and should be subject to strict time scales for completion	Issues regarding restoration will be considered alongside the potential opportunities for public access, enjoyment and nature conservation
Lafarge Aggregates	The cumulative impact and capacity for certain restoration schemes should also be considered to ensure compatibility with surrounding land uses. This issue should be considered within this criterion	The need for restoration schemes to be compatible with surrounding land-uses is a fundamental issue
Bucklesham Parish Council	Should be sympathetic and compatible to surrounding area	Issues regarding restoration will be considered alongside the potential opportunities for public access, enjoyment and nature conservation
Broads Authority	Need to take account of viability of schemes- an acceptable scheme does not become acceptable because of a beneficial restoration	All submitted sites (and planning applications) are considered in "the round". Although a beneficial restoration may not always be sufficient to overcome other site issues, the potential for restoration to improve the status quo (for e.g. biodiversity and landscape) cannot be ignored and will sometimes result in a recommendation for approval
Withersfield Parish Council	Imperative	Issues regarding restoration will be considered alongside the potential opportunities for public access, enjoyment and nature conservation
Exning Parish Council	Agree	Issues regarding restoration will be considered alongside the potential

		opportunities for public access, enjoyment and nature conservation
Federation of Suffolk Byways and Bridleways Groups	Sites to be restored within time allowed	All minerals planning permissions are time-limited, and this includes the restoration
Forest Heath District Council	Agree	Issues regarding restoration will be considered alongside the potential opportunities for public access, enjoyment and nature conservation
RSPB	<p>We recommend sites are identified that can provide the greatest environmental benefit through beneficial afteruse of the site e.g. habitat creation. Restored sites have the potential for valuable contributions towards BAP targets and biodiversity enhancements should be proposed regardless of the location.</p> <p>High quality minerals afteruse can deliver significant biodiversity benefits as evidenced by the restoration of existing minerals sites in the county, e.g. Cavenham Heath Quarry.</p> <p>If there is the potential for restoration to a BAP Priority habitat, for example lowland heathland/acid grassland, reedbed, wet grassland or wet woodland, the RSPB recommends a presumption towards restoration to nature conservation habitat unless there is an over-riding need for an alternative afteruse.</p> <p>The RSPB believe that a nature conservation afteruse whose implementation and future management can be assured should be sought.</p>	<p>These points are agreed with. Net improvements for biodiversity, with particular reference to BAP habitats and species, will be required for all sites, where practicable</p> <p>PPS7 states that the presence of 'best and most versatile' agricultural land (grades 1,2 and 3a) should be considered alongside other sustainability considerations, so different potential after-uses will be assessed in this light</p>

18. Potential for public access and enjoyment after restoration

Responses

Allen Newport Ltd	Not relevant for identifying mineral bearing land for mineral extraction	Whilst not necessarily the most important site selection factor, increased public access to restored sites can be a major benefit and it is right that it is explored through the site selection process
Stradbroke Parish Council	Very important	
Kersey Parish Council	Including criteria 22 which may be adequate for site activities but not subsequently for public after restoration	
Brett Aggregates	The following comments are made in the context that this criteria is not of sufficient	It is agreed that this is mainly a

	<p>importance to influence whether a site should be allocated or not.</p> <p>The potential for future public access can only be addressed at the time of a planning application. Following a period of aftercare and satisfaction of planning conditions the site is returned to a "greenfield" status. It is not identified as developed or "brown land." Therefore the long term management possibly involving public access and welfare facilities may require permanent planning consent as opposed to the time limited permissions for minerals developments.</p>	development control matter, but it is nonetheless useful to explore potential at the earliest stage
Wickham Market Parish Council	A useful bonus	To be extended to take Nature conservation into account
Bucklesham Parish Council	Only important if relevant i.e. previous agricultural/forestry use preferred	
Broads Authority	LDF policies should promote this- will converse to (b) where needs to be close to properties to be enjoyed	To be extended to take Nature conservation into account
Withersfield Parish Council	Return to former use, no extra public access, as you create a rod for your own back	All opportunities are considered on a site-by-site basis, and for many sites improved public access may not be feasible. However, where additional public access can be secured, this can be a major positive
Exning Parish Council	Agree	To be extended to take Nature conservation into account
Federation of Suffolk Byways and Bridleways Groups	Important for horse riders as Suffolk lacks bridleways; especially if can provide a link to other suitable areas	To be extended to take Nature conservation into account
Forest Heath District Council	Agree	To be extended to take Nature conservation into account
RSPB	Mineral extraction sites restored for nature conservation after use offer opportunities for quiet recreation and education. At such sites, public access can be given to an amenity that has the potential to increase quality of life, and benefit both biodiversity and people, and the RSPB supports public access and enjoyment after restoration where appropriate.	Noted and agreed

19. Bird strike potential for aircraft

Responses		Action
Allen Newport Ltd	Should be in accordance with Government policy and guidance	It is important that site working and restoration proposals do not endanger air traffic safety by encouraging bird activity in such a

		way as to provide potential for bird strike and this criteria must clearly be retained
Stradbroke Parish Council	Don't understand this point	New minerals sites can, particularly if restoration includes areas of open water, attract significant numbers of waterfowl. If located near airports/air bases or flight routes, this can increase the risk of birds being sucked into engines with potentially catastrophic consequences
Kersey Parish Council	Yes	
Brett Aggregates	<p>The MPA should have regard to the ODPM circular 1/2003 which specifies a 13km radius around safeguarded aerodromes within which consultation with the Civil Aviation Division must take place for any development that might attract birds.</p> <p>There are no officially safeguarded civil aerodromes in Suffolk but there are a significant number of military aerodromes. It is not considered appropriate to extend safeguarding to smaller privately owned airfields without appropriate guidance from Government.</p>	<p>The 13km radius will be adhered to for consultation with the Ministry of Defence.</p> <p>Although safeguarding to privately-owned airfields is not considered necessary, it is prudent to assess any such risks on a site-by-site basis</p>
Wickham Market Parish Council	Clearly an important consideration	
Defence Estates	I would like to take this opportunity to reiterate that we would be looking to ensure any mineral schemes and their subsequent restorations do not provide attractants to birds which could increase bird strike risk. We are keen to work with Suffolk County Council to ensure any mineral and waste schemes in the vicinity of our safeguarded zones are technically assessed and where infringements or increases to risk are likely to occur we can wherever possible suggest mitigating measures or planning conditions to make schemes workable for us.	Noted
Bucklesham Parish Council	Relevant near airports	
Broads Authority	This can be addressed by on-site management	Some issues can be dealt with by
Withersfield Parish Council	Don't understand what this means	New minerals sites can, particularly if restoration includes areas of open water, attract significant numbers of waterfowl. If located near airports/air bases or flight routes, this can increase the risk of birds being sucked into engines with potentially

		catastrophic consequences
Exning Parish Council	Agree	
Federation of Suffolk Byways and Bridleways Groups	Don't understand what this means	New minerals sites can, particularly if restoration includes areas of open water, attract significant numbers of waterfowl. If located near airports/air bases or flight routes, this can increase the risk of birds being sucked into engines with potentially catastrophic consequences
Forest Heath District Council	Agree	
RSPB	The RSPB strongly believe that there should be a presumption towards nature conservation as a restoration afteruse for spent minerals sites. Afteruse considerations must take into account bird strikes potential for aircraft, and valuable habitat can be created that does not involve large areas of open water, such as wet grassland, heathland/acid grassland, reedbed or wet woodland.	Noted

20. Access arrangements		
Responses		Action
Allen Newport Ltd	Access in accordance with the relevant highways standards should be achievable	This is obviously a very important consideration. Appropriate highways access to sites is not always achievable, however
Stradbroke Parish Council	Important	
Kersey Parish Council	Including access by third party vehicles using any public facilities such as public weigh bridges	Not a relevant matter
Brett Aggregates	The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not The site selection criteria for access should broadly reflect Policy SMLP 3 (b) and (c)	Safe and appropriate access to sites is a non-negotiable issue. If satisfactory access cannot be achieved, then the site should not be allocated
Bucklesham Parish Council	Vital	
Withersfield Parish Council	To be suitable	
Exning Parish	Agree	

Council		
Federation of Suffolk Byways and Bridleways Groups	Assumed to be a priority	Access is one of the most significant issues
Forest Heath District Council	Agree	

21. Direct/convenient access to the Suffolk Strategic Lorry Route Network		
	Responses	Action
Allen Newport Ltd	Appropriate but no arbitrary distance to the network should be identified	Agree that arbitrary distances would be inappropriate
Stradbroke Parish Council	Important	
Kersey Parish Council	Yes	
Brett Aggregates	<p>The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not</p> <p>The suitability of the site access/access road or the potential to improve an unsuitable access/road is the key factor as opposed to the status of the road</p>	<p>The Suffolk Strategic Lorry Route Network is a network of roads through the county which are judged most suitable to handle HGV traffic (e.g. avoiding narrow country lanes, environmentally sensitive areas etc). As far as is practicable, lorry movements to and from sites should use Strategic Lorry Route roads, and then Zone Distributor Lorry Route roads</p>
Wickham Market Parish Council	This should be a major consideration	
Bucklesham Parish Council	Vital	
Withersfield Parish Council	Vital	
Exning Parish Council	Agree	
Forest Heath District Council	Agree	
RSPB	The RSPB believe that increased building of roads and use of transport can have an adverse effect on the environment, and support measures to reduce additional transport infrastructure by appropriate direct/convenient access to the Suffolk Strategic Lorry Route Network	Noted. Some new local access roads for sites may need to be constructed, however

22. Impact on existing road network and users		
Responses		Action
Allen Newport Ltd	Development control criterion rather than site selection criterion	Although this is a development control matter, it is clearly a vital issue as a site selection criterion
Stradbroke Parish Council	Important	This criterion will take safety and routing in local areas into account
Kersey Parish Council	Including access by third party vehicles using any public facilities such as public weigh bridges	Not a relevant matter
Brett Aggregates	The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not For larger developments a transport assessment may be required as part of an Environmental Statement however support is given to the creation of a standard mineral site transport assessment pro forma if a significant increase in traffic above existing levels is proposed. A suitable pro forma would only be effective if the minerals industry was closely involved with the detailed design.	Although this is a development control matter, it is clearly a vital issue as a site selection criterion
Wickham Market Parish Council	Another major consideration which should be capable of vetoing the application	Noted
Lafarge Aggregates	Some mineral operations require associated highways improvements. Such improvements can have benefits to the wider users of those roads and can be retained beyond the life of the mineral operation. This should be considered as part of criterion 22	Noted and recognised
Bucklesham Parish Council	To be kept to a minimum	
Withersfield Parish Council	Vital	
Exning Parish Council	Agree	This
Forest Heath District Council	Agree	
RSPB	The RSPB believes that the identification and development of mineral extraction sites should be directed towards existing sites where the additional impact on the road network and users will be minimised, providing that there are no additional adverse impacts on the environment.	Many of the sites submitted are for extensions to existing sites. However, the impacts of each site will be considered on their own merits

23. Impacts on public rights of way		
Responses		Action
Allen Newport Ltd	Development control criterion rather than site selection criterion	Agreed – this criterion will be deleted

Stradbroke Parish Council	Should not impact on public rights of way	Whilst rights of way are an important consideration temporary diversions are often acceptable to achieve opportunities for access as part of reinstatement proposals. This criteria will be deleted
Kersey Parish Council	Yes	Whilst rights of way are an important consideration temporary diversions are often acceptable to achieve opportunities for access as part of reinstatement proposals. This criteria will be deleted
Brett Aggregates	The following comments are made in the context that this criteria is not of sufficient importance to influence whether a site should be allocated or not It is believed that the MPA in conjunction with the County Council Highways Authority has been perfectly successful in protecting public rights of way.	This criterion will be deleted, but it will remain a development control criterion
Wickham Market Parish Council	A major consideration	Whilst rights of way are an important consideration temporary diversions are often acceptable to achieve opportunities for access as part of reinstatement proposals. This criteria will be deleted
Bucklesham Parish Council	This should be temporary i.e. only for life of extraction	Most impacts are merely temporary. However, it may be necessary for the permanent diversion of some rights of way. There can be net gains to the rights of way network through restoration of sites, though
Broads Authority	Take opportunities to enhance rights of way and access	All such opportunities will be explored
Withersfield Parish Council	Vital	Whilst rights of way are an important consideration temporary diversions are often acceptable to achieve opportunities for access as part of reinstatement proposals. This criteria will be deleted
Exning Parish Council	Agree	Whilst rights of way are an important consideration temporary diversions are often acceptable to achieve opportunities for access as part of

		reinstatement proposals. This criteria will be deleted
Federation of Suffolk Byways and Bridleways Groups	R.O.W should be protected and any diversions be of suitable width and suitable surface	Whilst rights of way are an important consideration temporary diversions are often acceptable to achieve opportunities for access as part of reinstatement proposals. This criteria will be deleted
Forest Heath District Council	Agree	Whilst rights of way are an important consideration temporary diversions are often acceptable to achieve opportunities for access as part of reinstatement proposals. This criteria will be deleted

Any other comments		
Allen Newport Ltd	All responses stating "Development control criterion rather than site selection criterion" could well be taken together and a judgement made as to whether the site could be considered appropriate for identification	The site selection criteria will all be considered together when assessing individual sites
Kersey Parish Council	Impact on unemployment situation in area of new development	This is one of the objectives that will be assessed as part of the Sustainability Appraisal
English Nature	We are pleased to see that national, international and non-statutory designations have been considered in criteria 9,10 and 11	Noted
Brett Aggregates	<p>It is noted that the Preferred Options following the Minerals Core Strategy Issues and Options Consultation Paper will not be published until Aug-Sept 2006. The Core strategy consultation paper included "generic development control policies" but Planning Policy 12 paragraph 2.16 makes it clear that policies relating to the delivery of the site specific allocations should not form part of the core strategy and should be contained in a separate document.</p> <p>Confirmation is therefore requested that:</p> <ol style="list-style-type: none"> 1. All comments relative to sites allocation within the recent Core Strategy consultation will be carried forward into this Site Selection Criteria (copy response attached) 2. When and how will the County Council produce a separate development plan document containing policies relevant to the delivery of specific site allocations? 	<ol style="list-style-type: none"> 1. Relative comments have been considered 2. These site selection criteria will be amended in the light of comments made during this consultation process. Consultation on specific sites will commence in July and contributors will be encouraged to use the criteria to assist in completing a selection form for each site 3. Paragraph 2.28 of PPS12 makes clear that generic development control policies can be included as part of the Core Strategy
Dalham Parish	"impact on the locality of Noise generated on site" should be added.	This will be addressed through

Council		development control policies
Wickham Market Parish Council	These comments are compiled after consultation with members of the Parish Council. They are generic as currently we are unaware of any such potential for mineral extraction in our Parish	Noted
Lafarge Aggregates	It is possible, through mineral extraction and subsequent restoration, to reinstate historic landscape characters that have been lost through more modern land use practices. Potential for this should be considered as a site selection criterion.	These issues will be addressed as part of restoration proposals
Depden Parish Council	When formally considering any site the Parish Council (to include Town Councils and Parishes with Parish Meetings) in which the site lies and the surrounding Parish Councils will be consulted for their opinions about the development	Noted. All parish councils in Suffolk will be consulted throughout the process of developing the Minerals Development Framework planning documents and given opportunities to comment
Bucklesham Parish Council	Extraction sites should not be used for landfill. Possible restoration as fishing/wildfowling lakes/ponds should be considered. Wildfowling is a proven encouragement to overall conservation and natural habitat improvement.	Waste Local Plan Policy WLP5 restricts the disposal of inert waste by landfill to mineral sites as being only acceptable where it can be demonstrated that landfill is the preferred means of restoration of the site. Restoration uses of sites will be considered sympathetically with the local habitats and character. The need for landfill of non-hazardous waste will be a matter for the Waste Development Plan Documents
Broads Authority	Criteria needed to cover national and local landscape designation- a hierarchy is required with no dent in the highest level unless in exceptional circumstances as in PPS7	Landscape Character will be included as an assessment criteria
Chelmondiston Parish Council	The Planning Committee of the Parish Council, trust that all these criteria, 1-23, would be in place and non of them look irrelevant	Noted. See above comments
Exning Parish Council	This document has been discussed at a Parish Council Meeting and we agree the draft site selection criteria	Noted
Suffolk Preservation Society	The criteria does not contain any reference to potential impacts on built heritage (listing buildings, conservation areas, historic parks and gardens and scheduled ancient monuments) assets. This appears a fairly major omission	These will be considered as a contribution to landscape character assessment and also to archaeological assessments. In addition, this will be assessed through the Sustainability Appraisal
	Please consult Suffolk R.O.W Improvement plan staff re public access, they have to	The staff will be consulted

	provide additional bridleways under this plan and any future possibility of public access after site restoration could be of interest.	
Little Horkesley Parish Council	The draft site selection criteria does not appear to have included protection of the Dedham Vale AONB Developments up the A134 towards Sudbury is making an already busy road particularly dangerous and needs to be protected against heavy lorry traffic	The protection of AONBs is given the very highest priority and a (draft) Core Strategy policy will describe this. In addition, there is a revised criterion on AONBs for the site selection process
Forest Heath District Council	There are noise and dust issues as well, do you anticipate this will be covered by criteria 6?	This will be addressed largely through development control policies
RSPB	The RSPB would like to see the intention to identify workable deposits in areas where mineral extraction will not affect areas of nature conservation importance. We recommend that this could be taken further by actively looking to identify sites that can provide greatest environmental benefit through beneficial afteruse of the site, i.e. habitat creation schemes. We believe that restoration of mineral sites provides a valuable opportunity to contribute to BAP targets of habitat creation. Protection of the environment must revolve around protection of statutory designated sites. These are Ramsar sites, SPAs and SACs at international level and SSSIs at national level. These sites must be afforded utmost protection when identifying mineral extraction sites and adverse impacts on them must be avoided. Environmental protection should include policies to ensure there are no adverse impacts on biodiversity, including both habitats and species; protection of water quantity and quality; or flood risk.	Site selection will need to take a range of criteria into account to ensure the best possible opportunities for mineral abstraction. DC Policies will identify and prescribe operational constraints including environmental considerations. Nationally and internationally designated sites will be given the very highest levels of protection. The plan, as a whole, will also ensure protection & enhancement of biodiversity, water quality protection, and that flood risk concerns are taken into account fully.
QPA	The Quarry Products Association is the national trade association representing the aggregate quarrying industry. Our members produce almost 90% of the total UK output of aggregates and are also responsible for producing agricultural and industrial lime, ready mixed concrete, mortar and blacktop for roads. Details of the Suffolk consultation have been circulated to our members with an interest in the area. This response is based on their views as follows: 1. In summary, we would point out that the list entitled "Draft Site Selection Criteria" sets out a list of <u>issues</u> that could be addressed when identifying sites but does not put forward <u>criteria</u> . To function as criteria, the list must set out the standards that Suffolk County Council will apply in making their decisions. They should constitute clear guidance on the evidence that the MPA would need to consider in order to justify the inclusion of a site in the Preferred Options Plan. The QPA comments should be viewed in the light of that position.	A review of criteria has been undertaken and four categories have been identified. Criteria have been amended to take into account comments received during this consultation period. This point is conceded

	<p>2. We would also point out that this is a very early stage in the production of this document and criteria should be adopted that focus on assessing the acceptability of the sites in principle. It is for all the other processes (Sustainability Appraisal, public consultation, independent examination etc.) which your Minerals Specific Site Allocations document must undergo, to consider issues at the level of detail implied by some of the statements in your list.</p> <p>3. Therefore the QPA believe that items 5, 6, 7, 9, 10, 11, 12, 14, 15, 16, 20, 21, 22 and 23 should be addressed at this stage by considering them all under one criterion:</p> <p><i>IN PRINCIPLE could mineral working take place at this location, taking into account any practicable mitigation and/or compensation measures that could be applied, without an unacceptable level of impact on the environment, amenity or other natural resources ?.</i></p> <p>4. Items 13, 17, 18 and 19 could be addressed by the criterion:</p> <p><i>IN PRINCIPLE would it be possible and economically viable for the site to be restored to an after use which is compatible with the surrounding areas and in accord with all other standards, plans and strategies pertinent to that area ?</i></p> <p>5. The QPA would strongly support the proposal to address the issues set out in 1. and 2. of your consultation document before any of the other points mentioned above are considered. What should be understood and addressed somewhere within your system is that geological evidence can exist in many forms which have varying levels of confidence attributed to them. Suffolk CC need to consider, for example how measured, inferred and indicated geological information will be treated for site selection purposes</p> <p><i>Is geological evidence available to indicate with sufficient confidence, that a mineral is present at a suitable quality and in workable quantities ?</i></p> <p>6. Bearing in mind that at some stage in the life of the Plan, applications may be submitted to ensure continuity of supply after the end date of the plan, Suffolk CC should re-consider the 2021 extraction end date as the long term limit for evidence on availability. For aggregates, the aim should be to identify sufficient sites to maintain the landbank above the minimum level specified in MPS1 for the period up to the date when the first revision of Mineral Site Specific DPD is likely/scheduled to</p>	<p>It is agreed that the final decisions will not be made until the Preferred Options document is published (and then the Submission document). However, in the spirit of frontloading, it is useful to be considering these issues at this time</p> <p>Applications to ensure continuity of supply after the end date of the Plan will be considered on their own merits. Formal reviews of the Plan will also ensure that the situation is kept under constant review</p>
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	<p>be adopted.</p> <p>7. Further detail needs to be given of the standard of evidence that would be acceptable to Suffolk CC as proof of the availability of land for extraction. For purposes of including a site at this early stage in the process we would suggest that the criterion should be:</p> <p><i>Is there is any known reason why the land in question could not become available for extraction before the stated end date of the plan?</i></p> <p>8. The inclusion of "Not designated for other development" at 8. of Appendix1 implies that mineral sites cannot be identified on land previously designated for some other use. That is not true. The designation of a site for other forms of development should not preclude it being considered as a potential mineral site, particularly during the initial stages of producing a Minerals Plan. How it is eventually designated in the Development Plan will depend upon the results of Sustainability Appraisal and on the relative need for the mineral over the need for any other designated land use. This should not be a criterion for site selection.</p> <p>9. Finally, we do not believe that items 3 and 4 of Appendix 1 are matters for consideration at the site allocation stage. They are matters of detail which should be left until much later in the planning process; possibly until the consideration of individual planning applications.</p>	<p>Agreed – the suggested wording is helpful</p> <p>Agree – this criterion has been dropped</p>
Environment Agency	<p><u>Flood risk issues</u> Any proposed mineral extractions located in an area shown at risk of flooding according to the Flood Map (2006) will require a flood risk assessment to be produced. This should be in accordance with PPG25 and ensure that there will be no off-site or on-site increase in the flood risk.</p> <p>The potential for increasing flood risk at other locations in the river catchment through the deposition of spoil in the floodplain should be avoided with any mineral extraction works. The development sites should also be reinstated so that ground levels after excavation are no higher than the pre-extraction levels.</p> <p>The physical integrity of watercourses will also need to be safeguarded by allowing adequate margins between the river bank and the excavations. A distance of 30m between the main river and the excavations is recommended unless the developer can demonstrate that a smaller distance is adequate and that there are no adverse impacts</p>	<p>PPS25 (currently in draft form), sets out the need for FRAs when mineral workings are proposed.</p> <p>A preliminary assessment of flood risk at the submitted sites will be made as part of the Sustainability Appraisal.</p> <p>All other comments noted</p>

	<p>on the environment.</p> <p>Under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 9 metres of the top of the bank of the main rivers.</p> <p><u>Pollution prevention and control</u></p> <p>Our Environmental Management Team have no specific comments to make other than stating that the site selection process needs to consider whether extraction could lead to direct harmful impacts to controlled waters and secondary impacts on statutory and non-statutory nature conservation sites.</p>	
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