

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.128.001

What is your Name: Sheffield Area Geology Trust

If you are making this representation as a member of an organisation, what is the name of your organisation:

Sheffield Area Geology Trust

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Chapter 8: A Green City – Responding to the Biodiversity Emergency

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Not completed by respondent

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Not completed by respondent

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

Not completed by respondent

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.128.002

What is your Name: Sheffield Area Geology Trust

If you are making this representation as a member of an organisation, what is the name of your organisation:

Sheffield Area Geology Trust

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS8: Safeguarding Geodiversity

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

3 An Environmentally Sustainable City - Responding to the Climate Emergency
Managing Natural Resources
Safeguarding of Mineral Resources and the Exploration, Appraisal
and Production of Fossil Fuels
Page 19

Statement 3.21. New development and the redevelopment of sites may provide opportunities to extract minerals before construction commences. A number of surface minerals, such as building stone, are present across Sheffield, although there

has been no recent working of any of these resources. It is likely that there

will be few (if any) applications for mineral extraction across the duration of the Plan.

Sheffield Area Geology Trust (SAGT) suggest Statement 3.21 is unsound because the statement does not suggest include the value of sites developed to extract surface minerals as potentially invaluable sources of scientific geological knowledge.

Exposure of surface minerals by new development or redevelopment, however temporary, is likely to offer opportunity for the scientific examination of geology not previously revealed, which may result in new knowledge and a greater understanding of geological interest and assets elsewhere within the city and the region, or at a national or international level. Acceptable plans for extraction of surface minerals should include access by geoscientists with local expertise to conduct an appropriate survey before restoration work is commenced. Including such a condition for development would accord with Policy GS8.

If the statement and associated policy ES7 were to include minor amendments that set the opportunity to records the geology at new development sites to extract surface minerals before construction commences as a condition of such developments being permitted, then SAGT would consider the plan in this respect sound.

8. A Green City – responding to the Biodiversity Emergency

Safeguarding Geodiversity

Statement 8.29 and Geodiversity Policy GS8

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Sheffield Area Geology Trust (SAGT) welcomes inclusion of Geodiversity in the Local Development Plan and, in general, we support this policy, but suggest it is unsound because statement 8.29 and and policy GS8, as worded in the plan, gives the misleading impression that geodiversity and geo-conservation is of lesser value than 'heritage' (i.e old building) conservation, as it prioritises stone extraction for heritage purposes over any geo-conservation issues.

There are cases where new extraction of stone can be potentially damaging.

If a potential stone extraction site contains features of significant local, regional or national geological interest, it is possible that indiscriminate and uninformed extraction could destroy such features. In such cases, a balanced assessment should be undertaken. In many cases this may not prohibit the extraction of stone, but an assessment would likely identify and delimit more exactly particular locations within sites where extraction would not be likely to cause any irreversible damage or compromise the geological interest.

If such an geological assessment were, through minor amendment, to be included within statement 8.29 and as a condition of the policy GS8, then SAGT would consider the plan, in this respect, to be sound.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

3 An Environmentally Sustainable City - Responding to the Climate Emergency
Managing Natural Resources

Safeguarding of Mineral Resources and the Exploration, Appraisal
and Production of Fossil Fuels

Page 19

Statement 3.21.

SAGT suggest a minor amendment by adding the following paragraph to the statement:

Exposure of surface minerals by new development or redevelopment, however temporary, is likely to offer opportunity for the scientific examination of geology not previously revealed, which may result in new knowledge and a greater understanding of geological interest and assets elsewhere within the city and the region, or at a national or international level. Acceptable plans for extraction of surface minerals should include access by geoscientists with local expertise to conduct an appropriate survey before restoration work is commenced. Including such a condition for development would accord with Policy GS8.

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SAGT suggest the following minor amendment as an insertion to Policy ES7 (given here in "quotation marks") :

Where a site is likely to have surface mineral resources, applicants should investigate the economic potential of the site for extraction of these resources before development. Extraction of non-fossil fuel mineral resources will be permitted where it is practicable, "where it includes opportunity to record the geology", where it would not have unacceptable environmental impacts and where appropriate plans are made for the restoration of the site.

8. A Green City – responding to the Biodiversity Emergency

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Safeguarding Geodiversity

Statement 8.29 and Geodiversity Policy GS8

Statement 8.29

SAGT suggest a minor amendment is inserted into the statement (given here in "quotation marks"):

Sheffield has 48 sites designated as Local Geological Sites. This total includes 6 sites which are additionally designated as national Sites of Special Scientific Interest (SSSIs). Some sites of geological importance were originally quarries for building stone, which has been used in local buildings. Some further limited extraction of stone in order to repair buildings may be permitted in specific limited circumstances where another viable source cannot be found "and where the geological interest at the extraction site is not compromised".

Policy GS8

SAGT suggest a minor amendment to the final paragraph with two insertions (given here in "quotation marks"), as follows

Where stone from a site of geological importance is needed for the repair of historic buildings in the area, consideration "may" be given to the limited extraction of stone where there is no viable alternative source available "and the geological interest is not compromised".

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.128.003

What is your Name: Sheffield Area Geology Trust

If you are making this representation as a member of an organisation, what is the name of your organisation:

Sheffield Area Geology Trust

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS8: Safeguarding Geodiversity

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Safeguarding Geodiversity

Statement 8.29 and Geodiversity Policy GS8

Sheffield Area Geology Trust (SAGT) welcomes inclusion of Geodiversity in the Local Development Plan and, in general, we support this policy, but suggest some minor amendments.

This statement and policy, as worded in the draft plan, gives the misleading impression that geodiversity and geo-conservation is of lesser value than 'heritage' (i.e old building) conservation, as it prioritises stone extraction for heritage purposes over any geo-conservation issues.

There are cases where new extraction of stone can be potentially damaging.

If a potential stone extraction site contains features of significant local, regional or national geological interest, it is possible that indiscriminate and uninformed extraction could destroy such features. In such cases, a balanced assessment should be undertaken. In many cases this may not prohibit the extraction of stone, but an assessment would likely identify and delimit more exactly particular locations within sites where extraction would not be likely to cause any irreversible damage or compromise the geological interest.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Statement 8.29.

SAGT suggest minor amendment by insertion of the following (given in "quotation marks"):

Sheffield has 48 sites designated as Local Geological Sites. This total includes 6 sites which are additionally designated as national Sites of Special Scientific Interest (SSSIs). Some sites of geological importance were originally quarries for building stone, which has been used in local buildings. Some further limited extraction of stone in order to repair buildings "may" be permitted in specific limited circumstances where another viable source cannot be found "and where the geological interest at the extraction site is not compromised".

Policy GS8

SAGT suggest minor amendment by insertion of the following (given in "quotation marks") to the wording at the end of the final paragraph of the policy:

Where stone from a site of geological importance is needed for the repair of historic buildings in the area, consideration may be given to the limited extraction of stone where there is no viable alternative source available "and the geological interest is not compromised".

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A