

UKGAP Theme 2: Influencing planning policy, legislation and development design

UKGAP Indicator 2: Local Policy Recognition - The number of statutory Development Plans in which geodiversity issues (and issues relevant to similar disciplines) are formally recognised

Relevance

Recognition for geodiversity at the local level would suggest that there is some success in gaining recognition for geodiversity at higher levels within the planning system and that the policy hierarchy system is working effectively in translating planning requirements. It may also indicate the effectiveness of local voluntary geoconservation groups in raising awareness and support for geodiversity.

Data Sources

A limited number of local planning authorities within England were selected to include both a range of local authority types (county, unitary, metropolitan or London borough and national park) and settings (urban, rural, coastal and including a World Heritage Site, European Geopark, Heritage Coast and Area of Outstanding Natural Beauty). These local planning authorities were also selected as it was anticipated that policy would give recognition for geodiversity and useful examples could be cited. In each case the statutory plans were reviewed and policies and strategies that related to geodiversity identified and, where possible, discussed with a local authority planning officer through the use of a short email survey and follow-up telephone conversations during February 2012. The local planning authorities selected were:

- North Yorkshire County Council;
- Dorset County Council;
- Greater London and the London Boroughs of: Lambeth, Royal Greenwich, Brent and Southwark;
- Dudley Metropolitan Borough Council;
- Torbay Unitary Authority; and,
- South Downs National Park Authority.

In addition, a short email survey of all existing local geoconservation groups within England was completed in February 2012, primarily to collect data in relation to Indicators 14, 15 and 16. However the local groups were also asked to consider how they may have increased the recognition given to geodiversity within local statutory development plans. This email survey was sent to all groups affiliated to the Geology Trusts and all groups affiliated to GeoConservation UK, a total of 43 groups, of which 17 (40%) responded with information.

Background to the Data

It is currently difficult to gather statistics in relation to Indicator 2 as there is no central repository for the information. However, consideration of the policy and strategies for geodiversity adopted by a select number of local authorities in England assists in identifying common approaches, good practice and potential issues.

NB. The data presented here were collected before the introduction of the [National Planning Policy Framework](#) in March 2012. The aim of this indicator report is to highlight good practice up to March 2012, in the hope that these will be carried forward into future local planning documents.

Local Planning Policy Approaches within England

The term 'geodiversity' has not often been used within local planning policy to date, although it is encouraging to see some use within the London Plan and the more recently prepared Local Development Framework (LDF) Core Strategies. However geodiversity is considered implicitly or explicitly in a variety of policies and approaches and these are discussed below.

Policies relating to Nature Conservation

Geoconservation is usually considered, at least implicitly, through the use of generic policies concerning sites of national importance for nature conservation (including Sites of Special Scientific Interest, SSSIs) and sites of local importance for nature conservation (Local Geological Sites and Local Wildlife Sites). For example, North Yorkshire's Minerals Plan (1997) includes now expired *Policy 4/6 Nature Conservation and Habitat Protection - National/International*: '*Proposals for mining operations and the associated depositing of mineral waste which affect declared or potential Ramsar Sites, Special Protection Areas, Special Areas of Conservation, National Nature Reserves, and Sites of Special Scientific Interest will be subject to the most rigorous examination, and planning permission will only be granted where there would not be an unacceptable effect on the nature conservation interest.*' The need to protect geological interests is not clearly stated, although it is inherent for two reasons: it forms part of the wider term 'nature conservation' and SSSIs include those designated for their geology.

Sometimes geoconservation is considered explicitly through direct reference to: geological SSSIs; geological interest at National Nature Reserves or Local Nature Reserves; and, Local Geological Sites (LGS) or their precursor: Regionally Important Geological Sites (RIGS). For example, North Yorkshire's Minerals Plan (1997) includes *Policy 4/6 Nature Conservation and Habitat Protection – Local*: '*In making decisions on planning applications, the Mineral Planning Authority will protect the nature conservation or geological interest of Local Nature Reserves and of other sites having a nature conservation interest or importance, and will have regard to other wildlife habitats*'.

Geoconservation within the wider environment may also be considered within more recently prepared statutory plans. The London Borough of Greenwich LDF Core Strategy 2011 includes *Policy OS4 Biodiversity*: '*The Borough's rich biodiversity and geodiversity will be protected, restored and enhanced.*' The need to protect geological interests is clearly stated, although the policy title is ambiguous.

More unusually, there may be policies that deal with geoconservation separately from biodiversity. For example, The London Plan – Spatial Development Plan for Greater London (2011) includes *Policy 7.20A Geological Conservation - Planning Decisions*: '*Development proposals should: a. wherever possible, make a positive contribution to the protection and enhancement of geodiversity, b. be resisted where they have significant adverse impact on sites with existing or proposed European or national designations in accordance with Government guidance, c. protect regionally important geological sites (RIGS), d. give locally important geological sites (LIGS) the level of protection commensurate with their importance.*' The need to protect geological interests is clearly stated both for specific sites and in relation to geodiversity within the wider environment.

Policies relating to Open Space

Within London boroughs, whilst the earlier and usually still adopted Unitary Development Plans more rarely include policies related to geoconservation, the Local Development Framework (LDF) Core Strategies may consider geoconservation, particularly within policies relating to open space.

For example Lambeth's LDF Core Strategy (2011) includes *Policy S5 – Open Space (c)*: '*Improving the quality of, and access to, existing open space, including the range of facilities available and its biodiversity and nature conservation value and heritage value through various means including the implementation of the Lambeth Open Spaces Strategy. Where appropriate in major developments, financial contributions will be sought towards improvements in the quality of, and access to, open*

space in the borough. Lambeth confirmed that this policy is taken to include aspects of geodiversity by both the Parks Project Officer and the Planning Officers. Where relevant, developers would be encouraged to promote geological interests or landforms and planning conditions may be used.

Southwark's LDF Core Strategy (2011) has *Strategic Policy 11 – Open Spaces and Wildlife*. Text to accompany this policy includes explicit explanation of- and reference to geodiversity, the London Geodiversity Partnership and the London Geodiversity Action Plan: *'Geodiversity influences our landscapes and heritage. It is the variety of rocks, minerals, fossils, soils and landscape, together with the natural processes that form them. ... A Geodiversity Action Plan is being developed for London by the London Geodiversity Partnership. This will help us prepare detailed policies and guidance on how development should consider geodiversity.'*

Policies relating to Landscape

Particularly where the local planning authority includes Areas of Outstanding Natural Beauty or Heritage Coast, geodiversity issues may be included implicitly as part of the underlying geology's contribution to landscape. For example the Eastbourne Borough Plan (2001-2011) *Policy D2: Heritage Coast* includes the statement: *'... Planning permission will not be granted for development within this designated area. However in exceptional circumstances proposals which facilitate and enhance public access to the Coast will be permitted provided that: b) the development would not be detrimental to the landscape...'* North Yorkshire's Minerals Plan (1997) includes *Policy 4/4 Heritage Coasts*: *'Within Heritage Coast areas proposals for mining operations, and the associated depositing of mineral waste, will only be permitted where there would not be an unacceptable effect on the natural environment and landscape.'*

Policies relating to Geomorphology

Whilst policies that explicitly reference geomorphology are rare, geomorphological processes may be considered within other policies relating to flood risk, coastal processes or ecology for example. The London Borough of Greenwich LDF Core Strategy 2011 *Policy OS9 Ecological Factors* includes the statement: *'Development proposals will be expected to take account of ecological factors, in particular paying attention to the need for: .. the protection and enhancement of natural river features and corridors by appropriate landscaping and design.'*

Policies relating to Geological Hazards

Where there are particular geological hazards that may have an effect on the built environment, specific procedures linked to a development guidance map may be developed, such as that included within the Harrogate District Local Plan (2001) relating to gypsum dissolution. These matters may also be considered within Supplementary Planning Guidance (SPG) as for Torbay: *'Solution cavities occur in the limestones. Some may have poorly consolidated fill. These cavities are a potential problem which need to be addressed when planning for development in areas with limestone bedrock.'*

Supplementary Planning Guidance (SPG)

Geodiversity may also be considered more broadly within SPG, which whilst not carrying the same weight as statutory plans does form a material consideration in the planning process. One of the advantages of supplementary guidance is the opportunity to explain procedures and promote good practice. Torbay, Dudley and Greater London all have SPGs that include consideration of geodiversity, respectively:

- *Environmental Guide: Supplementary Planning Guidance to the Torbay Local Plan 2005 – 2011* (September 2004), Torbay Council;
- *Nature Conservation Supplementary Planning Document* (September 2006), Dudley Borough Council

- *Green Infrastructure and Open Environments: London's Foundations – Protecting the Geodiversity of the Capital* (March 2012) Supplementary Planning Guidance, London Plan 2011 Implementation Framework, Mayor of London.

From the titles, it is clear that the three SPGs include geodiversity within different aspects of planning – the environment broadly, nature conservation specifically whilst the most recent SPG for London includes geodiversity as part of green infrastructure and open environments.

Within the Torbay SPG and Dudley SPG, there is a separate chapter for 'geology' and in both cases the geological resource and its formation is described followed by the procedures developers should follow. The Torbay SPG more simply states that '*Consultation at pre-application stage is necessary to enable the assessment of the geological potential of any developments*' and gives the local geoconservation group as the contact. The Dudley SPG has a series of 11 bullet points for developers to consider and presents the procedures as a flow diagram. Defra has recognised the approach adopted by Dudley as an example of good practice.

The SPG for London is more extensive in its consideration of geodiversity and as well as providing detail on London's geological resource also provides details on individual sites (Regionally Important Geological Sites and Locally Important Geological Sites) and the assessment criteria used in their designation. Policy 7.20B within the London Plan relates to how geodiversity should be considered within LDF preparation by the boroughs. However the SPG provides greater detail with a section devoted to '*Geodiversity Guidance to Boroughs*'.

The Dudley SPG and London SPG in particular place an emphasis on: the way in which the geodiversity of the area has shaped economic growth; the need for proposals to '*maintain, and enhance, restore or add to geological conservation interests*'; and the need '*to consider geological interests within the wider landscape*'.

Assessment of Approaches

It is clear that generic policies relating to nature conservation within designated sites are, at the very least, included within statutory local plans. However, often geoconservation is only considered *implicitly*. This means that whilst national policy for nature conservation is being translated to the local statutory plans, it is possible for geodiversity to be overlooked, especially beyond the boundaries of designated sites.

Within the more recently prepared or adopted spatial plans and LDF core strategies, the recent shift in national policy to give consideration to nature conservation (including geodiversity) within the wider environment is also being reflected. The term 'geodiversity' is being used and it is being considered within broader aspects of planning such as green infrastructure and open space. Recognition for geodiversity is considered *explicitly* (such as in the case of the London Borough of Greenwich) or local interpretation of policy (such as in the case of the London Borough of Lambeth) recognises geodiversity as one of the aspects that developers have to consider and where relevant promote within their design.

However, it is clear that the greatest recognition for geodiversity at the local level is influenced not only by national policy, but by the dedication and petition of local geodiversity partnerships, local geoconservation groups and more rarely geological specialists within local authorities. It is in these situations that policies that are explicit in their consideration of geodiversity and useful SPG for geodiversity seems to be prepared.

For example, it is evident that the clear policy set out in the London Plan and guidance set out in the accompanying SPG is being taken into account by the London boroughs in their LDF Core Strategy preparation. The work of the London Geodiversity Partnership and the preparation of the London Geodiversity Action Plan have been instrumental in ensuring that geodiversity has been considered at each level of the planning hierarchy within London.

It is interesting to note too, that the statutory plans where geodiversity is most recognised are not limited to areas of great landscape beauty or upland geology, but may include urban areas (such as Dudley and London) even though the rocks themselves are less evident.

Future Recommendations

In the future, a count of the statutory development plans with specific types of policy relevant to geodiversity (those relating to geoconservation, geological hazards or landscape for example) would need to be completed together with regard to whether these policies gave implicit or explicit recognition for geodiversity. It would also be useful to monitor the extent to which SPG is used to assist in gaining recognition for geodiversity issues. Now the UKGAP website is launched, it is hoped that local planning authorities, geodiversity partnerships and local geoconservation groups may be willing to share their contribution to the UKGAP in this way and data could be provided to make an assessment against this indicator.

Appendix: Questions Asked in Surveys

Questions asked in Survey to Local Planning Authorities

We are collecting data for the current development plans only. Please see our attached document which identifies the policies we consider make formal recognition of geodiversity. Have we listed these correctly or have we missed relevant plans or policy?

Please indicate any development plans and policies that we have missed that formally make recognition of geodiversity.	
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As well as collect the data, we are interested in the background to the processes, for example:

Has national policy or local groups or individuals influenced local policy and decision making in relation to geodiversity? Please comment.	
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Questions asked in Survey to Local Geoconservation Groups

Please comment on how your local group has contributed to the increased recognition of geodiversity within statutory Development Plans. For example, has your group directly influenced the inclusion of a policy relating to local geological sites?	
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