

A Response to Greater Norwich Development Partnership, Joint Core Strategy, Examination.

Submitted on behalf of Norfolk Geodiversity Partnership (including Norfolk RIGS).
October 2010

Dear Sir,

As it stands we think that this Core Strategy document is still not adequate to meet the requirements for geodiversity, as laid out by PPS9, and therefore is still not sound.

I understood, when I attended the Exploratory Meeting in May, that changes had been made to the submission JCS document that would amend the deficiencies that we had found. However the only relevant document that I have been able to find that addresses our initial problems is the Schedule of Proposed Minor Changes. This indeed does make one change that puts right one of the deficiencies: the word geodiversity has been inserted into Objective 9 on p28. However the objective still has not been translated into Policy 1, which is intended to enact Objective 9.

Therefore most of my initial reasons given as to why this document is not sound for geodiversity still stand:

The place of Geodiversity within the Strategy is still not constant or adequate:

- Section 03 the *Spatial portrait* compresses all the natural world information into a single paragraph, 3.3, and still makes no mention of geodiversity.
- Objective 9 *To protect, manage and enhance the natural, built and historic environment ..* **Now does include the word geodiversity, but ...**
- Policy 1 is the policy which is intended to enact Objective 9. This policy includes biodiversity sustainability and so ought also to include geodiversity sustainability. We request that geodiversity sustainability be included within Policy 1. (see PPS9). (I should point out that protecting and enhancing geodiversity is not the same as "... protecting minerals and other natural resources ..." Geodiversity like biodiversity has value in its own right.)
- 5.10 concerns the Norwich Fringe area. Geodiversity is of significance here as well as biodiversity and should be included within this paragraph. (The Chalk with its extensive worked tunnels is close under the surface; the Norwich area marks the inland extent of the Crag sea; there are several glacial tills; and the Broadland peats reach up to the eastern fringe. It is this amazing diversity of the geology, combined with the erosive action of the rivers which produces the variety of landscape types which converge at Norwich.)

- Appendix 1, p97, County Strategies. The new Norfolk Geodiversity Action Plan is now complete. This plan should be included here.
- Appendix 8, Monitoring Framework, Objective 9 p143, has no geodiversity indicators, nor are they placed anywhere else within the Monitoring Framework. We request that Geodiversity indicators are included within this Monitoring Framework.

Until the omissions are made good, we consider the Submission Document and its subsequent amendments are still not sound for geodiversity.

Jenny Gladstone
Norfolk Geodiversity Partnership

6th October 2010

