

Planning Committee

7 November 2025

Agenda item number 10

Consultation responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently, and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed response.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 16 October 2025

Appendix 1 – Planning Policy consultations received

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Norfolk County Council

Document: [Draft transport strategies for Great Yarmouth and King's Lynn - Norfolk County Council \(norfolk.citizenspace.com\)](https://norfolk.citizenspace.com)

Due date: 5 November 2025, we have an extension to 7 November.

Status: Draft

Proposed level: Planning Committee endorsed

Notes

The Great Yarmouth Transport Strategy (GYTS) sets out the transport vision and infrastructure needs for Great Yarmouth and the surrounding area. It supports the Norfolk Local Transport Plan (LTP), adopted by Norfolk County Council (NCC) in 2022, by providing a local context for its delivery

Proposed response

Throughout – the Broads is the LPA for part of the area. And is producing a Local Plan. Seems prudent to mention the Broads.

Throughout – images are blurry

Throughout – I think you need to say ‘Great Yarmouth Borough’ when referring to the borough, ‘Great Yarmouth Town’ when referring to the town and ‘Great Yarmouth study area’ when referring to the area this study applies to.

Throughout – a lot of objectives or policies say Norfolk County Council ‘...will seek to...’. What does using the word ‘seek’ actually mean in this instance? For example, Policy 9 says: ‘Norfolk County Council, working with partners, will seek to reduce road traffic collisions and transport related casualties’. What does ‘seek’ mean in this instance?

Generally, very car orientated. The section called ‘connectivity’ is mostly about cars and is first in the report, rather than being last sending a message that the car is more important. In the rail section, para two is about cars and then para three about cycles.

Page 7: Policy 10 Supporting Culture, Heritage and Tourism: this specifies protecting green infrastructure but does not actually mention promoting culture or enhancing the experience of the town’s rich heritage. Pedestrian routes and wayfinding to the town’s heritage sites could be improved.

Page 9, second para of introduction – part of the area is the Broads as well

Introduction – think you need to clarify that this is not for the entire Borough but centred on Great Yarmouth town with an area around it.

Page 11 – the Broads is a key leisure use as well and is in the study area.

Page 19, under 'local policy', need to refer to the Local Plan for the Broads, the Broads Plan and the Broads Integrated Access Strategy.

Page 57 – the future section is randomly in the public transport section, but the future section is not about public transport. Might need moving. Also, are there deliveries in Great Yarmouth using robots?

Page 59 says 'Most key locations are accessible within a 25-minute bicycle ride from Great Yarmouth Town Centre'. I am not sure what this statistic means as one would not cycle into the centre of town to then cycle to a key location. It seems a misleading and not relevant fact.

Page 60 – cycling conditions – behaviour of some drivers can also cause issues such as not giving space required when passing.

Page 60 'Secure cycle storage: There is a lack of secure and covered cycle storage across Great Yarmouth, with most facilities consisting of Sheffield stands'. So is that good or bad that most facilities consist of Sheffield stands? I am not sure how the two parts of the sentence fit together? If most facilities have Sheffield stands, that sounds good to me... this needs re-wording.

Figure 14 and 15 – isn't it more logical to identify typical destinations and then do the distance/time colour approach from those destinations? This could be schools, employment areas, rail station, bus station, supermarkets etc. The town centre has been done through figure 14 and 15 to some extent. This would give an indication of the residential areas that could walk or cycle for some journeys to those particular destinations. It could be that there is targeted behaviour change to those residential areas that are within walking or cycling distance to certain destinations? Perhaps you focus on those that are within walking distance to several destinations first?

Page 78 – challenges and opportunities section. What about behaviour and respect? For example, cars and cyclists jumping red lights? Speeding? Cyclists on footways? Cyclists not using lights? Very fast home-made (sometimes) electric bikes? General respect between road users?

Page 82 Culture and Heritage – describes how tourism is key industry in GY and how there are significant increases in traffic during peak season. It is appreciated that the vast majority of tourists visit for the town's seaside attractions but there is potential for the town's heritage attractions (Time and Tide; the Elizabethan House, the town walls, the Rows, the Tolhouse etc) to provide an attraction all year round. Again wayfinding, promotion and improvements to the setting of these special places could help to achieve the first objective listed at the bottom of page 82.

Page 84 The project to improve GY railway station should also include repair of the grade II listed Vauxhall Bridge which is in a poor state of repair and currently detracts from this key entry point to the town.

The implementation plan – there is no timeline for when each project will be undertaken. There is nothing about the likely cost or where the funding will come from.

Whilst security of bicycles is covered to some extent, does this need to be more prominent? For example, working with the police somehow to try and reduce cycle thefts? Indeed, what are the statistics around cycle thefts and is there an issue in Great Yarmouth?

Generally, have not noted the S.245 Duty of Regard under LURA, which is applicable as the Bure Navigation runs through the study area, and they are considering transport links to areas in the North of the Borough that are within the Executive Area. - [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#) . In particular they need to have regard to Theme E – Promoting Understanding and enjoyment, and Theme E1 “Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities”

Targets are not SMART.

The strategy doesn't take into account residents access to rural spaces and the Broads – it notes briefly on page 60 that there is poor active travel links to the northern villages. It also notes that there are a very high proportion of households with no car or van. The leap that they should be looking to improve residents car free access to recreation through better bus/active travel to the Broads areas has not been made.

Under localised needs (page 4) they state “Develop and implement schemes in the Local Cycling and Walking Infrastructure Plan (LCWIP)” – it is not clear if this is the Great Yarmouth LCWIP only, or if they are also looking at the wider links identified in the Countywide LCWIP that relate to the Borough of Great Yarmouth. Although these are mostly outside the study area, they have included the A47 and rail links that are also outside the study area.

DEFRA

Document: [Review of Water Efficiency Standards in the Building Regulations 2010 \(Defra.gov.uk\)](#)

Due date: 16 December 2025

Status: Draft

Proposed level: Planning Committee endorsed

Notes

- Defra is working with the Ministry of Housing, Communities and Local Government (MHCLG) and the Building Safety Regulator (BSR) to explore whether the Building Regulations 2010 could be amended to tighten water efficiency standards and enable consumers to use less water and save on their water and energy bills. There will be three phases to the review of the water efficiency standards within the Building Regulations with this consultation focused on Phase 1:
 - To consult on a reduction of the maximum value from 125 l/p/d (or 110 l/p/d where this optional requirement applies) to 105l/p/d and 100 l/p/d respectively.
 - To consult on a revision of the Water Calculator approach, and Fittings-based approach.
 - To update AD-G which contains out of date information. These could pose a risk to building standards and affect safety and should be updated to ensure that they reflect current industry practice and adapt to future challenges. A draft amended AD-G will accompany this consultation at Annex A.

Phase 2 will consist of a technical review of Approved Document H (AD-H) to ensure this information reflects current industry practice. Phase 3 will consider water scarcity and re-use including Greywater Reuse (GWR) and Rainwater Harvesting (RWH) capability.

- Subject to the outcome of this consultation and Parliamentary approval, the Government proposes to amend the Building Regulations 2010 in 2026. It is proposed that the changes will be followed by a 6-month transitional period.
- In addition to the Government's currently proposed reform package it is considering further phases of amendments to the Building Regulations Part G. This call for evidence seeks views and evidence that will inform these future phases. Specifically:
 - Amending the mandatory water efficiency standard from 125 l/p/d to 100 or 95 l/p/d.

- As well as the ‘optional technical water efficiency standard’, from 110 l/p/d, where there is a clear local need such as in areas of serious water stress, to 90 or 85, or 80 l/p/d.

Proposed response

Comments

Para 5 – rather than a glancing mention of these examples of LPAs using a tighter water efficiency standard, have a case study box to explain details.

Para 9 – the Written Ministerial Statement encouraged going beyond building regulations for Local Plans ‘where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes’, so not all Local Plans.

Page 14 – The majority of houses in existence now and in the future have already been built. How about an education campaign? If some usage is as high as 195 l/h/d, it implies people are not aware of the water issue or do not care. Also, what about retrofit exercises? Perhaps initially targeting Council owned homes, MOD owned homes and perhaps Registered Provider owned homes?

Q10. Do you agree that the ‘mandatory water efficiency standard’, should be amended from 125 l/p/d to 105 l/p/d? Y/N a. If you answered no to the previous question, please provide additional information to explain your answer. Q11. Do you agree that the ‘optional technical water efficiency standard’, should be amended from 110 l/p/d, where there is a clear local need such as in areas of serious water stress, to 100 l/p/d? Y/N b. If you answered no to the previous question, please provide additional information to explain your answer.

Agree with reducing the l/h/d. It should be noted that in the East, AWS and E&S Water and the EA are advocating for 90l/h/d or even less. Is there scope to include some provision for a lower l/h/d than that proposed if there is local evidence and there are no viability concerns?