

Development Committee



Please contact: Democratic Services

Please email: democraticservices@north-norfolk.gov.uk Direct Dial: 01263 516108

TO REGISTER TO SPEAK PLEASE SEE BOX BELOW

Wednesday, 2 September 2026

A meeting of the **Development Committee** will be held in the **Council Chamber - Council Offices** on **Thursday, 10 September 2026 at 9.30 am.**

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours

Please note that members of the public should not speak to Committee Members prior to or during the meeting.

PUBLIC SPEAKING:

Members of the public who wish to speak on applications must register **by 9 am on the Tuesday before the meeting** by telephoning **Reception on 01263 513811** or by emailing reception@north-norfolk.gov.uk Please read the information on the procedure for public speaking at Development Committee on our website or request a copy of "Have Your Say" from Customer Services.

Anyone may take photographs, film or audio-record the proceedings and report on the meeting. If you are a member of the public and you wish to speak, please be aware that you may be filmed or photographed. Please note that this meeting is livestreamed:

<https://www.youtube.com/channel/UCsShJeAVZMS0kSWcz-WyEzg>

Presentations: If you wish to view the Officers' presentations for the applications being considered by the Committee please follow the following link:

<https://modgov.north-norfolk.gov.uk/ecCatDisplayClassic.aspx?sch=doc&cat=13644&path=0>

Emma Denny
Democratic Services Manager

To: Cllr P Heinrich, Cllr R Macdonald, Cllr M Batey, Cllr A Brown, Cllr P Fisher, Cllr A Fitch-Tillett, Cllr M Hankins, Cllr V Holliday, Cllr P Neatherway, Cllr L Paterson, Cllr K Toye, Cllr L Vickers and Cllr C Rouse

Substitutes: Cllr J Toye, Cllr A Varley, Cllr T Adams, Cllr P Bailey, Cllr K Bayes, Cllr J Boyle, Cllr S Bütikofer, Cllr N Dixon, Cllr T FitzPatrick, Cllr W Fredericks, Cllr J Punchard, Cllr C Ringer, Cllr M Taylor and Cllr L Withington

All other Members of the Council for information.

Members of the Management Team, appropriate Officers, Press and Public



If you have any special requirements in order to attend this meeting, please let us know in advance

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

Chief Executive: Steve Blatch

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A G E N D A

PLEASE NOTE: THE ORDER OF BUSINESS MAY BE CHANGED AT THE DISCRETION OF THE CHAIRMAN

PUBLIC BUSINESS

1. CHAIRMAN'S INTRODUCTIONS

2. TO RECEIVE APOLOGIES FOR ABSENCE

3. SUBSTITUTES

4. MINUTES

(Pages 1 - 8)

To approve as a correct record the Minutes of a meeting of the Committee held on 20 August 2026.

5. ITEMS OF URGENT BUSINESS

(a) To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

(b) To consider any objections received to applications which the Head of Planning was authorised to determine at a previous meeting.

6. ORDER OF BUSINESS

(a) To consider any requests to defer determination of an application included in this agenda, so as to save any unnecessary waiting by members of the public attending for such applications.

(b) To determine the order of business for the meeting.

7. DECLARATIONS OF INTEREST

(Pages 9 - 14)

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest. Members are requested to refer to the attached guidance and flowchart.

OFFICERS' REPORTS

8. HOLT - PF/26/0131 - ERECTION OF A CLASS E FOOD STORE WITH ASSOCIATED CAR PARKING, ACCESS, SUBSTATION, LANDSCAPING AND ASSOCIATED WORKS - LAND AT OLD STATION WAY, HOLT APPLICANT: ALDI STORES LIMITED

(Pages 15 - 42)

9. HOLT - PF/25/1630 - ERECTION OF CLASS E DISCOUNT FOOD STORE WITH ASSOCIATED CAR PARKING, LANDSCAPING, ENGINEERING AND DRAINAGE WORKS - LAND AT GRID

(Pages 43 - 68)

REFERENCE 608931 338823, NIGHTJAR ROAD, HOLT
APPLICANT: LIDL GB LIMITED

- 10. DEVELOPMENT MANAGEMENT PERFORMANCE UPDATE** (Pages 69 - 72)
- 11. APPEALS SECTION** (Pages 73 - 78)
- 12. EXCLUSION OF PRESS AND PUBLIC**

To pass the following resolution, if necessary:-

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

PRIVATE BUSINESS

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DEVELOPMENT COMMITTEE

Minutes of the meeting of the Development Committee held on Thursday, 20 August 2026 in the Council Chamber - Council Offices at 9.30 am

Committee Members Present:	Cllr P Heinrich (Chairman)	Cllr R Macdonald	(Vice-Chairman)
	Cllr M Batey	Cllr M Hankins	
	Cllr P Neatherway	Cllr K Toye	
	Cllr L Vickers		
Substitute Members:	Cllr J Toye		
Officers in Attendance:	Development Manager		
	Solicitor		
	Democratic Services and Governance Officer		
	Senior Planning Officer (SPO-AW)		
	Senior Planning Officer (SPO-RA)		

23 TO RECEIVE APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllr A Brown, Cllr P Fisher, Cllr A Fitch-Tillett, Cllr V Holliday, and Cllr L Paterson.

24 SUBSTITUTES

Cllr J Toye was present as a substitute for Cllr A Brown.

25 MINUTES

The minutes of the Development Committee meeting held Thursday 16 July were approved as a correct record subject to two amendments relating to the Local Members comments for application PF/26/0688 (Fakenham) made by Cllr L Vickers.

1. To amend the wording in the first sentence to reflect that her fellow Ward Member, Cllr J Punchard was also supportive of the application.
2. Include additional wording in the 4th Paragraph to read ‘ Cllr L Vickers reflected that in recent years Fakenham *was undergoing a renaissance*, and had welcomed many independent, enterprising businesses’

26 ITEMS OF URGENT BUSINESS

The Development Manager informed the Committee that subsequent to agenda publication the government had published a revised NPPF. This had come as a surprise to many Local Planning Authorities who had anticipated a new NPPF in September following the summer recess. The Development Manager advised that the NPPF was a material consideration for decision making, and that the 2026 revisions had affected delegated decisions and was a relevant material consideration to applications coming to Development Committee.

The Development Manager assured Members that two of the three applications before Committee today were not impacted. The Scottow application was impacted to some degree by the new NPPF, and the Case Officer would offer advice on the implications when the item was presented to Committee.

Alongside publication of the new NPPF, the government had also published the 2026 Housing Delivery Test, which reflected historic house building over the three-year period and compared it against target levels. In North Norfolk 54% of homes had been delivered, falling short of national targets. As the result fell below the 75% threshold, there was a requirement to apply the presumption in favour of sustainable development as detailed in the new NPPF.

Training was in the process of being arranged for Members regarding the NPPF and other changes to planning.

27 DECLARATIONS OF INTEREST

None declared.

28 POPPYLAND - PF/25/0902 - INSTALLATION OF SECTIONS OF NEW FOOTPATH, ALONG WITH UPGRADE OF SURFACING OF EXISTING AREAS USED AS PERMISSIVE FOOTPATHS TO CREATE A SINGLE NEW CONNECTED WALKWAY WITH REST STOP AREAS AND INTERPRETATION BOARDS (PART RETROSPECTIVE), FOREST PARK, NORTHREPPS ROAD, NORTHREPPS, NORFOLK

Officer's Report

The Case Officer reintroduced the application previously considered, and deferred, by Development Committee on 18 June 2026, and confirmed that the revised NPPF did not materially change the Officer recommendation.

The proposal had been amended following deferral to address concerns relating to privacy and overlooking by residents along the 400m section of footpath adjacent to the properties of Bracken Avenue. The application now proposed planting of a native species of thorn hedge along this section, which would mitigate the impact of the footpath. Officers accepted that, in the short term till the hedge was established, there would remain a level of overlooking and loss of privacy to nearby residential properties which would negatively impact residential amenity. However, Officers concluded that the longevity and extent of the impact would be limited by the proposed boundary treatments, distances to dwellings, frequency of use and the transient nature of the pedestrian activity.

Discussions had taken place to explore the possibility of moving the path; however, this was considered to be economically unviable given the footpath was now in situ.

The SPO-AW took the Committee through the Officer's report and presentation, affirmed the sites' location, provided details of the footpath and rest stop construction, and offered images in and around the site.

Officers concluded that, on balance, the amended proposals would positively mitigate the limited and short-term amenity harm. The scheme would provide an enhanced piece of green infrastructure for the area, providing a new pedestrian link and encouraging outdoor recreation. Further, development would deliver wider

strategic benefits associated with long term resilience of the costal path network, where coastal erosion represents an ongoing challenge to sections of the existing route. Officers therefore recommended approval of the application subject to conditions.

Public Speakers

Sarah Petch – Objecting
Will Woodrow – Supporting

Committee Debate

- a. Cllr J Toye recognised residents concerns, however affirmed that ‘right to a view’ was not a planning consideration. Cllr K Toye reflected that many people lived in properties where one of their windows immediately looked onto a street and could in turn be looked into.
- b. The Development Manager advised that the question of land use should be what the impact of the change was. Officers recognised that the footpath would be a new introduction which would impact residential amenity and cause some degree of harm. Officers concluded, however, that the benefits arising from the scheme outweighed the identified harm.
- c. Cllr K Toye asked whether any anti-social behaviour had been observed on the path. The Case Officer advised there was none so far as she was aware.
- d. The Committee welcomed health and wellbeing benefits the footpath would bring, with Cllr J Toye keen to promote active travel and alternative methods of transport which would diminish the reliance on cars. Cllr R Macdonald and Cllr L Vickers sought assurances that the footpath would be used by pedestrians and would not be used by dirtbikes.
- e. The Applicant was invited to address the Committee. The Applicant confirmed the intention of the footpath was to be for pedestrians and not for motorbikes, the scheme was designed as such with gate restrictions, though these were designed in such a way as to remain wheelchair accessible.
- f. Cllr Vickers expressed sympathy for residents along Bracken Avenue, and asked if there had been a pre-existing footpath, or unofficial trail previously in situ. The Case Officer advised she was not aware of what the prior arrangements may have been.
- g. Cllr M Hankins sought assurances over fire risks, given the recent heat waves and changes to the UK Climate, the SPO-AW detailed the layout of the scheme, and confirmed that the section of footpath being discussed was adjacent to a woodland.
- h. Cllr J Toye proposed acceptance of the Officers recommendation, seconded by Cllr K Toye.

RESOLVED

That Planning Application PF/25/0902 be APPROVED in accordance with the

Officers recommendation.

29 SCOTTOW - PF/25/2438: CONSTRUCTION OF TWO-STOREY DWELLING (RETROSPECTIVE) AT SCOTTOW BARN, NORTH WALSHAM ROAD, SCOTTOW, NORWICH, NORFOLK

Officers Report

SPO-RA introduced the Officers report and recommendation for refusal. The application had previously been before Development Committee on 30 April 2026 and was deferred to enable a review of Enforcement Team action and involvement in the site, as well as outstanding Nutrient Neutrality issues. The Enforcement Case report was detailed on pages 32 and 33 of the agenda pack. The Case Officer confirmed that on the 10 August, the applicant had made an enquiry and received a quote from Norfolk Environmental Credits (NEC) in relation to mitigating the effects of the development on the River Bure SAC.

The Case Officer advised that the 2026 revised NPPF was a material consideration, and noted correspondence received from the agent, circulated to the Committee on 18 August. The agent highlighted policy considerations relating to sections S3 and S5 of the NPPF.

By virtue of the new Housing Delivery Test, it was accepted 54% of the Local Planning Authorities requirement was delivered over the rolling three-year assessment period. Officers did not consider the application could be assessed against policy S51J, as Scottow was not considered a settlement in policy terms, by virtue of Scottow not having a settlement boundary per the settlement hierarchy, nor was it considered a predominantly built-up area, and so did not comply with the criteria for S51J.

However, SPO-RA acknowledged NPPF section S51D could be engaged, and that the land could be considered previously developed or brownfield by virtue of the previous building. The revised NPPF stated that *'Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework' 'The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);'*

The 2026 NPPF removed wording of 'less than substantial harm'. The Conservation Officer opinion was that, on balance, a replacement dwelling would be marginally preferable to the loss of a building without a replacement. A replacement building would reinstate a connection of support back to the primacy Grade II listed building, albeit starting again rather than the result of conservation.

Public Speakers

Stephen Fuller – Scottow Parish Council
Jason Parker – Supporting

Committee Debate

- a. Cllr L Vickers thanked the Case Officer for his report. She supported the

views expressed by the Parish Council that the barn had fallen down and should be replaced. She agreed the proposal was preferable to the alternative.

- b. Cllr J Toye and Cllr P Neatherway were minded to go against the Officer recommendation for refusal, though stressed the importance that the Council should not, in granting permission, look to encourage the dismantling and demolition of heritage buildings. They did not wish for this application to set a precedent. Cllr J Toye sought clarification of the designation of the site in the settlement hierarchy and reflected that in order to meet the housing targets, house building in the designated countryside was to be expected.
- c. The Development Manager advised the site lay within the designated countryside per the Local Plan. The Local Plan sought to deliver growth in sustainable locations in accordance with the Spatial Strategy. The Development Manager reflected that this was a very finely balanced application. The Conservation and Design Officer agreed that a replacement building would be preferable to the alternative, but it was noted that a modern replacement would not replicate what was lost, as modern buildings must comply with modern regulations, therefore a like for like replacement could not be achieved. The Development Manager clarified that, in policy terms, the proposal was considered a new build in the countryside as the former building had fallen down. There was no insinuation that the collapse of the building was deliberate.
- d. The SPO-RA advised the plans submitted were identical to those submitted and obtained permission in 2024. He noted that matters relating to Nutrient Neutrality was not wholly resolved but had progressed from when the Committee last heard the application. If the Committee were minded to approve the application, the historic conditions could be applied.
- e. The Development Manager advised conditions relating to the use of materials could be applied, i.e. use of existing bricks; approximately 8000 original bricks had been saved and cleaned with the Applicant indicating that they intended to reuse these in external facing falls, or preservation of any other historic material.
- f. Cllr M Hankins considered the Housing Delivery Test results tipped the balance in favour of the development.
- g. The Chairman proposed and seconded approval of the Officers recommendation in order to compel a vote.

THE VOTE FELL

- h. The Development Manager advised, if the Committee were minded to approve the application, this would be subject to matters of Nutrient Neutrality being resolved.
- i. Cllr C Rouse proposed acceptance of the application, seconded by Cllr M Hankins. Wording of final conditions to be delegated to the Assistant Director for Planning.

RESOLVED

That Planning Application PF/25/2438 be APPROVED subject to conditions. Final Wording to be delegated to the Assistant Director for Planning.

The meeting was adjourned at 10.55am and resumed at 11.09am.

- 30 FULMODESTON - RV/25/2839 - VARIATION OF CONDITION 8 (WOODLAND MANAGEMENT PLAN) OF PLANNING PERMISSION PF/21/3458 (ERECTION OF TWO ONE-BED TREE HOUSES WITH EXTERNAL WORKS AND SERVICING (TO INCLUDE BIOROCK DRAINAGE SYSTEM AND SOLAR PANELS) - REVISIONS TO THE WOODLAND MANAGEMENT PLAN AT BROWNS COVERT, HINDOLVESTON ROAD, FULMODESTON.**

Cllr C Rouse and The Solicitor to the Council left the meeting following the adjournment.

Officer Report

The Development Manager introduced the Officer report and recommendation for approval. He outlined the sites' location and planning history.

As detailed in the Officer Report, application PF/21/3458 was considered by Development Committee in January 2023. That application was considered before Biodiversity Net Gain (BNG) was a requirement, and proposed the delivery of 6000% BNG, which was secured by condition. The Applicant sought to vary the condition to reduce the BNG requirement to the minimum 10% which would enable them to apply for grant funding.

Having spoken with the Applicant, the Development Manager clarified that the Applicant did not wish to renege on their BNG commitment, but they simply wished not to be formally tied to the commitment in order to achieve grant funding. The intention was for the wider benefits to be achieved on the site, and the grant funding would better enable these to be delivered.

Public Speakers

Delaval Astley – Supporting

Local Member

Cllr M Hankins expressed his support for the application and affirmed that he had received no objections to the scheme from his parish councils.

Committee Debate

- a. Cllr J Toye agreed with the proposal and commented that more would likely be achieved as a result of grant funding. Cllr L Vickers agreed with was an excellent proposal.
- b. Cllr R Macdonald proposed, seconded by Cllr J Toye, acceptance of the Officers recommendation for approval.

RESOLVED

That Planning Application RV/25/2839 be APPROVED in accordance with the Officers recommendation.

31 DEVELOPMENT MANAGEMENT PERFORMANCE UPDATE

The Development Manager introduced the Officer's report and spoke positively of the councils timely decision making, and appeal record.

32 APPEALS SECTION

The Development Manager outlined the Officer's report and noted 3 appeals decisions had been received, all of which were dismissed. The enforcement appeal at Cromer was also dismissed.

33 EXCLUSION OF PRESS AND PUBLIC

Not required.

The meeting ended at 11.25 am.

Chairman

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Registering interests

Within 28 days of becoming a member or your re-election or re-appointment to office you must register with the Monitoring Officer the interests which fall within the categories set out in **Table 1 (Disclosable Pecuniary Interests)** which are as described in “The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012”. You should also register details of your other personal interests which fall within the categories set out in **Table 2 (Other Registerable Interests)**.

“Disclosable Pecuniary Interest” means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in Table 1 below.

"Partner" means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

1. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.
2. A ‘sensitive interest’ is as an interest which, if disclosed, could lead to the councillor, or a person connected with the councillor, being subject to violence or intimidation.
3. Where you have a ‘sensitive interest’ you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

Non participation in case of disclosable pecuniary interest

4. Where a matter arises at a meeting which directly relates to one of your Disclosable Pecuniary Interests as set out in **Table 1**, you must disclose the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a ‘sensitive interest’, you do not have to disclose the nature of the interest, just that you have an interest. Dispensation may be granted in limited circumstances, to enable you to participate and vote on a matter in which you have a disclosable pecuniary interest.
5. Where you have a disclosable pecuniary interest on a matter to be considered or is being considered by you as a Cabinet member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it

Disclosure of Other Registerable Interests

6. Where a matter arises at a meeting which **directly relates** to one of your Other Registerable Interests (as set out in **Table 2**), you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a ‘sensitive interest’, you do not have to disclose the nature of the interest.

Disclosure of Non-Registerable Interests

7. Where a matter arises at a meeting which **directly relates** to your financial interest or well-being (and is not a Disclosable Pecuniary Interest set out in Table 1) or a financial interest or well-being of a relative or close associate, you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.
8. Where a matter arises at a meeting which **affects** –
 - a. your own financial interest or well-being;
 - b. a financial interest or well-being of a relative, close associate; or
 - c. a body included in those you need to disclose under Other Registrable Interests as set out in **Table 2**

you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied

9. Where a matter **affects** your financial interest or well-being:
 - a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
 - b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

10. Where you have a personal interest in any business of your authority and you have made an executive decision in relation to that business, you must make sure that any written statement of that decision records the existence and nature of your interest.

Table 1: Disclosable Pecuniary Interests

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain. [Any unpaid directorship.]
Sponsorship	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the

	councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council — (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
Land and Property	Any beneficial interest in land which is within the area of the council. ‘Land’ excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.
Licenses	Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer
Corporate tenancies	Any tenancy where (to the councillor’s knowledge)— (a) the landlord is the council; and (b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.
Securities	Any beneficial interest in securities* of a body where— (a) that body (to the councillor’s knowledge) has a place of business or land in the area of the council; and (b) either— (i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were

	spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
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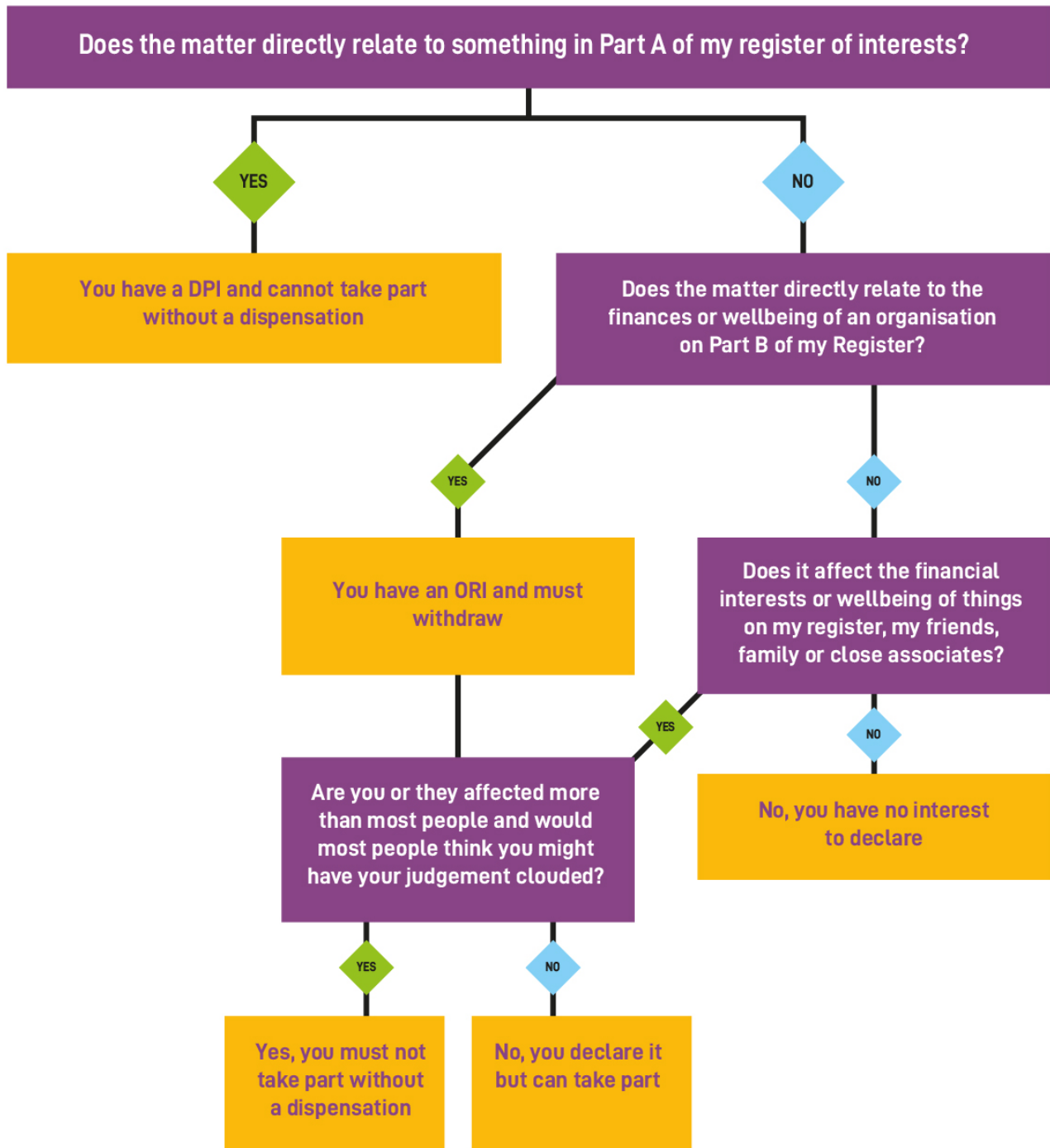
* 'director' includes a member of the committee of management of an industrial and provident society.

* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

Table 2: Other Registrable Interests

You have a personal interest in any business of your authority where it relates to or is likely to affect:

- a) any body of which you are in general control or management and to which you are nominated or appointed by your authority
- b) any body
 - (i) exercising functions of a public nature
 - (ii) any body directed to charitable purposes or
 - (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)



HOLT – PF/26/0131 – Erection of a Class E food store with associated car parking, access, substation, landscaping and associated works – Land at Old Station Way, Holt
Applicant: Aldi Stores Limited

EXECUTIVE SUMMARY

The Development Committee are being asked to determine two separate planning applications for retail development in Holt. In addition to this application (ref: **PF/26/0131**) there is a proposal for a retail supermarket on Nightjar Road (ref: **PF/25/1630**).

This report will consider PF/26/0131, firstly assessing its compliance with the Development Plan before moving to other material considerations including the availability of alternative retail proposal as alluded to above, before reaching an overall conclusion.

With competing retail applications requiring consideration the Council appointed a retail consultant (Nexus) who indicated that, whilst the individual impact of each store is considered to be acceptable, the cumulative impact of two supermarkets has the potential to create a significantly adverse impact on the vitality and viability of Holt Town Centre. This means that only one supermarket could be granted permission without significant adverse impacts arising.

If Members are minded to follow the advice of Officers, (i.e. only one supermarket could be granted permission), the order that the applications are determined, has the potential to impact on the other application.

Having regard to legal advice, the Development Committee are advised to take the applications in an order that considers the proposal relating to the site which is accessible and better connected to the town centre first in accordance with the principles set out Policies TC3 and TC4 of the NPPF (2026). This means that this application (PF/26/0131) should be considered and decided first and application PF/25/1630 considered and decided after.

This report sets out:

- the development proposed (including the range of supporting technical documents);
- identifies the responses received from consultees and public representations;
- Runs through the main planning considerations; and
- Provides an officer recommendation

In the event that the Development Committee reach different conclusions to Officers, regard will need to be given to the impact of that decision on the other application.

RECOMMENDATION: REFUSAL

Major Development

Target Date: 27th April 2026

Extension of Time: 20th August 2026

Case Officer: Joseph Barrow

Full Planning Permission

RELEVANT SITE CONSTRAINTS

The site lies within Holt's Settlement Boundary

The site is wholly within the Old Station Way Employment Area
 The site lies within Holt's Neighbourhood Plan area
 The site lies to the south of the A148 Principal Route
 The site is on potentially contaminated land caused by previous uses
 The site lies within 100m of Holt Conservation Area
 Gravel Pit Lane County Wildlife Site (CWS) approximately 200m to the east of the site

THE APPLICATION

The proposed development for which planning permission is sought is "erection of a Class E food store with associated car parking, access, substation, landscaping and associated works." The application site is between the A148 Holt Bypass and Old Station Way in Holt. The proposal is for a 1,718 sq. m. gross external area (1,638 sq. m. gross internal area) discount food store.

RELEVANT PLANNING HISTORY

App No.	PRE4/25/1780
Description	Erection of Aldi food store and provision of associated parking
Outcome	Advice Given
App No.	PF/14/1373
Description	Demolition of existing timber merchant buildings and erection of A1 (retail) food store, associated accesses, car parking and servicing area
Outcome	Approved
App No.	PF/12/0929
Description	Demolition of existing timber merchant buildings and erection of A1 (retail) food store, associated accesses, car parking and servicing area
Outcome	Approved

REASONS FOR REFERRAL TO COMMITTEE

At the request of the Assistant Director of Planning:

"The planning application is referred to Development Committee at the request of the Assistant Director for Planning owing to the significance of the case and the need for consideration alongside a second retail planning application in the same settlement (PF/25/1630)."

CONSULTATIONS

Anglian Water – No objection – *Advised that AW assets affected and Holt WRC can accommodate flows from the proposal, requested a condition regarding water supply, an informative regarding the connection to sewerage network and objected to the surface water disposal strategy.*

North Norfolk District Council Conservation and Design Officer – No objection – *Condition requested regarding the main red bricks being a warmer and more subtle mix of orangey-red shades (Aldwick Blend or similar)*

North Norfolk District Council Climate and Environmental Policy Officer – No response received

North Norfolk District Council Business Development Officer – Support – *economic benefits from creation of jobs at the retail unit and in construction phase.*

North Norfolk District Council Environmental Health – No objection – Subject to conditions relating to acoustic screen for ASHP, Gas Coolers and refrigeration equipment, delivery hours, limit on construction working hours, compliance with Air Quality report mitigation measures, contamination risk assessment and to stop works if contamination found.

Environment Agency – No response received

Holt Town Council – Support – *Concerned about vehicular access and would prefer prior access from Old Station Way*

Norfolk County Council Highways – Objection – Refusal recommended due to an unacceptable impact on highway safety caused by the access layout and service yard access arrangement plus a lack of adequate provision for pedestrians and cyclists.

North Norfolk District Council Landscape Officer – Objection – *Due to failure to provide reptile surveys.*

Norfolk County Council Lead Local Flood Authority (LLFA) – No Objection – *Conditions requested to secure the drainage strategy as submitted.*

Norfolk Constabulary – No objection – *offered advice on: Layout, Access and perimeter security, landscaping, external lighting, parking, shell of the retail unit*

Norfolk Fire and Rescue – No objection – *Requested a condition for minimum 1 fire hydrant to BS750 standards*

Norfolk County Council Minerals and Waste – No objection – *Proposal considered to be exempt from Policy requirements*

Norfolk County Council Public Rights of Way (PROW) Officer – No objection – *Full legal extent of the footpath must remain open and accessible*

REPRESENTATIONS

A total of **117 representations** were received in relation to the application comprising:

- **112 comments in support**
- **5 comments in objection**

Matters Raised in Support

Supportive representations principally refer to:

- the need for a more affordable supermarket in Holt;
- increased consumer choice and competition;
- reduction in journeys to Cromer, Fakenham and Norwich for food shopping;
- benefits to lower-income households and families during the cost of living crisis;
- local employment opportunities;

- the suitability of the site as a brownfield redevelopment opportunity;
- accessibility to the town centre via the underpass and pedestrian links;
- compliance with the Holt Neighbourhood Plan;
- environmental benefits arising from reduced travel;
- and support for the design and appearance of the scheme.

Matters Raised in Objection

Objections principally relate to:

- highway safety and congestion concerns;
- suitability of the access arrangements from the A148 and Old Station Way;
- servicing and delivery vehicle impacts;
- adequacy of the internal parking layout and circulation;
- impacts on neighbouring residential amenity;
- and concerns regarding the scale and appearance of the building.

HUMAN RIGHTS IMPLICATIONS:

Art. 1 of the First Protocol: The right to peaceful enjoyment of possessions

“Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the condition provided for by law and the general principles of international law.”

Art. 8: The right to respect for private and family life.

1. *“Everyone has the right to respect for his private and family life, his home and his correspondence.”*
2. *“There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.”*

Having considered the above convention rights, REFUSAL of this application as recommended is considered to be justified, proportionate and in accordance with Human Rights Act 1998 (as amended) and planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

LOCAL FINANCE CONSIDERATIONS

Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are not considered to be material to this case.

EQUALITY ACT 2010- SECTION 149

The Council is required to have due regard to the need to—

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Protected characteristics include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Councils must also have due regard to eliminating discrimination arising from marriage or civil partnership status.

The proposal would have no adverse impact on those with protected characteristics or on equality objectives, and advances equality of opportunity by, in particular, making provision for accessible parking spaces.

RELEVANT POLICIES:

Adopted North Norfolk Local Plan (NNLP):

CC1 – Delivering Climate Resilient Sustainable Growth
CC3 – Sustainable Construction, Energy Efficiency and Carbon Reduction
CC4 – Water Efficiency
CC7 – Flood Risk and Surface Water Drainage
CC8 – Electric Vehicle Charging
CC9 – Sustainable Transport
CC10 – Biodiversity Net Gain
CC12 – Trees, Hedgerows and Woodland
CC13 – Protecting Environmental Quality
SS1 – Spatial Strategy
HC5 – Fibre to the Premises (FTTP)
HC7 – Parking Provision
ENV2 – Protection and Enhancement of Landscape and Settlement Character
ENV4 – Biodiversity and Geology
ENV6 – Protection of Amenity
ENV7 – Protecting and Enhancing the Historic Environment
ENV8 – High Quality Design
E2 – Employment Areas, Enterprise Zones and Former Airbases
E4 – Retail and Town Centre Development

Holt Neighbourhood Plan:

HOLT1 – Design Guidance
HOLT4 – Employment Growth in Holt
HOLT6 – Connectivity in and around Holt

Material Considerations:

National Planning Policy Framework (NPPF) (August 2026):

DM1: Preparing development proposals
DM2: Information requirements
DM3: Determining development proposals
DM6: Use of planning conditions and obligations
S3: Presumption in favour of sustainable development
S4: Principle of development within settlements
S6: Neighbourhood plans and the presumption
CC2: Mitigation of climate change
CC3: Adaptation to climate change
TC3: Main town centre uses outside town centres
TC4: Assessing the impact of development on town centres
L2: Making effective use of land
DP3: Key principles for well-designed places
DP4: The design process
TR3: Locating development in sustainable locations

TR4: Street design, access and parking
TR6: Assessing transport impacts
P3: Living conditions and pollution
F4: Assessing flood risk for decision-making
F7: Ensuring development is safe from flooding
F8: Sustainable drainage systems and watercourses
N2: Improving the natural environment
HE4: Securing the conservation of heritage assets
HE9: Conservation areas

Supplementary Planning Documents:
North Norfolk Design Guide (2011)

OFFICER ASSESSMENT:

MAIN ISSUES FOR CONSIDERATION:

1. Principle of development
2. Sequential Assessment
3. Retail Matters
4. Design and Heritage
5. Amenity
6. Highways
7. Flood Risk
8. BNG
9. Landscape
10. Ecology
11. Sustainable Construction, Energy Efficiency, Carbon Reduction and Water Efficiency
12. Fibre to the Premises (FTTP)
13. Conclusion and Planning Balance

THE APPLICATION SITE

Planning permission is sought to develop this site to deliver a Class E Discount food store (1,718sqm gross external area) with associated car parking, access, substation, landscaping and associated works. The site is an area of land between Old Station Way to the south and west, Hempstead Road to the east, and the A148 Holt bypass to the north.

Members will note the previous permissions for a food store granted on the site. The previous commercial operation on the site (timber yard) has ceased and the building was demolished and the site now lays empty. Officers consider that the site is 'previously developed land' (PDL) as per the definition in the National Planning Policy Framework (NPPF 2026).

1. Principle of Development:

In accordance with Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the Development Plan for the area currently includes the North Norfolk Local Plan which was adopted in December 2025, the Holt Neighbourhood Plan which was adopted in August 2023 and the Norfolk Minerals and Waste Local Plan which was adopted in May 2025. At a national level, the National Planning

Policy Framework (NPPF) and the Planning Practice Guidance are other material considerations to which regard should be had.

Policy S3 of the NPPF (2026) establishes a presumption in favour of sustainable development, referring to the later Policies S4 and S5 if applicable, and stating that *“in all locations, development proposals that accord with both an up-to-date Development Plan and the decision-making policies in this Framework should be approved without delay.”*

This site lies within the settlement boundary of Holt – a “Small Growth Town” as defined by Policy SS1 of the Adopted North Norfolk Local Plan (NNLP). This site also falls within the Old Station Way Employment Area, which extends to cover Oakland House and Holt Youth project to the southwest.

Because the site is located within the settlement of Holt, Policy S4 of the NPPF (2026) is relevant, stating that *“Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework”*.

Policy SS1 of the NNLP seeks to direct development toward the district’s more sustainable locations. Holt’s classification as a Small Growth Town establishes it as one of the district’s most sustainable settlements, and reflects the larger population, size and historic economic centre from which the town benefits. Holt is therefore considered an appropriate location for retail supermarket development in principle, subject to compliance with other relevant NNLP policies.

It is noted that the site is wholly within the Old Station Way Employment Area, as designated by Policy E2 of the NNLP. The purpose of Policy E2 is to ensure that designated employment areas, including mixed-use allocations, are protected for the relevant employment uses as identified in the policy, these being: Classes E(g), B2 and B8. Point 2. (f) of Policy E2 sets out that; *“In the case of main town centre uses”* (no development shall be permitted unless) *“it is first demonstrated that no alternative sequentially preferable site is available”*.

Policy HOLT4 of the Holt Neighbourhood Plan (HNP) refers to employment areas in Holt stating that *“An exception is land at Old Station Way (see Plan G), which may also be used as a primarily convenience food retail class E(a) or hotel use (C1) provided it is of a scale which does not harm the vitality and viability of the town centre or neighbouring centres, satisfies the sequential test and conforms to other Development Plan policies.”* HOLT4(1) creates an exception to the policy that proposals to intensify designated employment areas and land allocated for employment development will be restricted to Use Classes B2, B8 and E(g), by providing that the Old Station Way site may be used a primarily convenience food retail use class E(a) (or a hotel use) provided that that meets retail policy tests, namely it is of a scale which does not harm the vitality and viability of the town centre or neighbouring centres, it satisfies the sequential test, and conforms to other Development Plan policies. Those other Development Plan policies include NNLP policy E4.

Policy E4 of the NNLP focuses on retail and town centre development. Among other things, the policy states that *“Proposals for retail and other town centre development of a scale appropriate to the retail hierarchy will be supported provided that development respects the character of the centre, including its special architectural and historic interest, and assists in maintaining its existing retail function”*, and *“Site selection for retail and other town centre uses should follow national policies and guidance”*.

Officers consider that the site meets the NPPF (2026) definition of Previously Developed Land (PDL) (formerly known as “brownfield”). Policy L2 of the Framework states that *‘substantial*

weight should be given to the benefits where a development proposal would achieve... making better use of vacant and underutilised land and buildings’.

The NNLP does not include any policies which specifically address the reuse of PDL, although in a national context it is clear that applications proposing appropriate reuse of such land should be afforded positive weight.

Given the above, Officers consider that the principle of retail development in this designated employment area is acceptable subject to the application demonstrating compliance with local Development Plan and relevant national decision-making policies (including E2(2)(f), E4, and HOLT4). An assessment is made against all relevant policies throughout this report.

2. Sequential Site Assessment

The purpose of NNLP Policy E4 is to maintain and enhance the vitality and sustainability of town centres, enhance local provision within town centres, and encourage local sustainable shopping patterns. The policy provides a retail hierarchy where retail and main town centre uses should be directed towards and sets out the parameters for sequential tests. The policy states that support for out-of-centre development will be dependent on how it reflects capacity available, how it seeks to enhance expenditure retention, consideration of impact on town centres, and accords with locally derived impact thresholds.

Policy TC1 of the NPPF (2026) is a plan-making policy that requires Local Planning Authorities to define the extent of town-centres / primary shopping areas, and to keep them under review when necessary. This exercise has been undertaken and is established within the Council’s Policy Maps which accompany the NNLP (shown in Figure 1 below).

Policy TC3 of the NPPF sets out that Local Planning Authorities should apply a sequential test to planning applications which are neither in an existing centre nor in accordance with an up-to-date plan. This is further considered by Policy HOLT4 of the Holt Neighbourhood Plan which contemplates the development of this site for the convenience retail purposes *‘provided it is of a scale which does not harm the vitality and viability of the town centre, satisfies the sequential test, and conforms to other Development Plan policies’*.

Policy TC3 of the NPPF (2026) further states that town centre uses should be located in town centres in the first instance, then edge of centre locations, before considering out of town centre locations.

It is clear from **Figure 1** (below) that this development site is not within the Town Centre as defined by the Adopted Policy SS1. It is important to therefore consider whether it would be classified as ‘edge of centre’, which is defined within the NPPF’s glossary:

“For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area... In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.”

In order for a location to be considered ‘edge of centre’ when considering retail proposals it must be both well connected to and up to 300m from the primary shopping area. As such, consideration is given to the realistic walking route available for pedestrians, making use of the existing underpass. Using this route, the walking distance would be approximately 450m, as one would need to walk away from the access point to the store in order to make use of the underpass. It is the view of Officers that the site is not well connected to the primary shopping area and does not fall within the definition of an ‘edge of centre’ site. This classification as an out-of-centre site is accepted by the developer at paragraph 4.2 of the

submitted Planning and Retail Statement. On this basis, having regard to the above, this development is assessed as out of centre, and the sequential approach is applied accordingly as per Policy TC3 of the NPPF (2026).

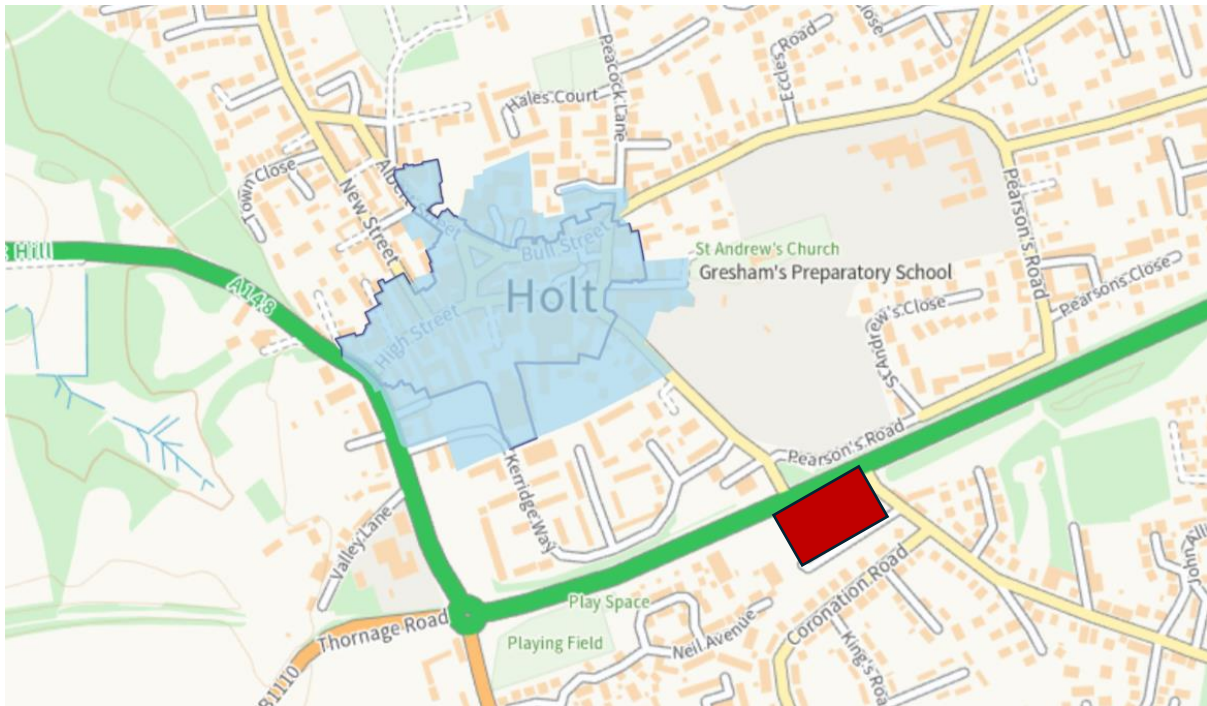


Figure 1 - Map showing Holt's Town Centre designations and the proposed site area in red (approx.).

Light Blue = Town centre Area
Outlined area = Primary Shopping Area

In assessing retail matters of principle, the Council instructed Nexus Planning (as independent retail consultant). Nexus has provided advice individually on this case and PF/25/1630 (the Lidl case) as well as cumulatively on the issue of retail development in Holt.

It is the view of Officers that that this site is an out of centre site, and the NPPF is clear in stating that consideration must be given to sites that are first in the centre, then edge of centre. When considering out of centre sites preference should be given to accessible sites which are well connected to the town centre.

Nexus' advice to the Council (May 2026) covers the sequential test in detail based on the information provided by Avison Young in support of this Aldi store, within it highlighting that relevant case law establishes the following:

- *"sequential alternative sites should be able to accommodate a broadly similar form of development as the application proposal (allowing for flexibility in respect of format and scale) in the 'real world' in which developers operate; and that*
- *operators' distinct models are not generally of direct relevance to the test, and as such sequential alternatives should not be discounted due to individual operator preference."*

Avison Young's approach refers back to Nexus' initial appraisal of the Lidl application, confirming that the catchment area and focus on Holt town centre is appropriate for the purposes of the sequential test. This is to say that when applying the sequential test to this proposal the focus of the search for potential suitable alternative sites should be within and on the edge of Holt town centre.

The applicant has demonstrated flexibility in this application including through proposing a lower quantum of parking spaces when compared against their normal parking requirements.

Avison Young contend that the only alternative site of relevance is the Nightjar Road site, subject of the Lidl application. They conclude that the sequential test is met and Nexus agree with this conclusion in their advice to the Council. Officers therefore conclude that this proposal meets the sequential test.

Taking account of the submitted information, including the advice provided by Nexus, Officers find that the only sites of relevance in Holt for sequential assessment are the two that are currently presented for determination (i.e. Aldi, and the Lidl site). The Lidl site is out of centre and is not sequentially preferable. For the purposes of this Aldi case, with no more sequentially preferable site available or suitable in the centre, on the edge of centre, or in a more well-connected out of centre location, it is considered that the sequential site selection test is met, for this application.

Officers consider that the proposal would accord with the sequential preference requirements of NNLP Policy E4 Holt Neighbourhood Plan policy HOLT4(1) and the NPPF (2026).

3. Retail Matters

NNLP Policy E4 seeks to enhance the vitality and sustainability of town centres and encourage local sustainable shopping patterns. Critical to assessment of this application is the scope of Holt town centre to maintain its vitality and viability under the challenge of potentially competing retail development proposals.

NNLP Policy E4 sets out that:

“Support for out-of-centre development will be dependent on how it reflects:

- a) the capacity available to support the proposal as identified in the Retail Study [which supported the Local Plan] and subsequent permissions; and,
- b) how it seeks to enhance expenditure retention and in relation to the assessment of impacts on the town centre and wider retail catchments, and is in accordance with the locally derived impact thresholds below...”

In making this assessment, footnote 112 to the policy states “Impacts to consider include those on existing, committed and planned public and private investment in a centre(s) and the wider functional catchment area (as applicable to the scale and nature of the proposal) as well as town centre(s) vitality and viability, local consumer choice in the short and medium term 5- 10 yrs.”

This application exceeds the locally set impact threshold for Holt of 500 sqm gross floor area requiring retail impact assessments to be undertaken.

Policy TC4 of the NPPF sets out that:

“Development proposals for retail and leisure uses located outside town centres should be accompanied by an impact assessment if the proposal exceeds a floorspace threshold set out in an up-to-date Development Plan (500qm in this case) and is not on a site which is allocated for the proposed use in the plan.”

This policy continues:

“In circumstances where an impact assessment is required, it should be demonstrated that the development would be unlikely to have a significant adverse impact on:

- a) Existing, committed and planned public and private investment in a town centre or centres in the catchment area of the proposal; and*
- b) Town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)”.*

Policy TC3 of the NPPF indicates that proposals for retail and leisure development that fail the sequential test or are *“likely to have significant adverse impact on one or more of the considerations in Policy TC4”* should be refused.

NNLP Policy E4 accords with the key aims and requirements of Policies TC3 and TC4 of the NPPF.

The Council are advised by Nexus that the following positions are relevant and apply to this application:

- *There is no committed or planned town centre investment that is of relevance to the impact test, and the proposal complies with paragraph 2(a) of Policy TC4 of the NPPF (2026)*
- *Holt Town Centre is performing well and is considered to be vital and viable.*
- *A household survey (dated May 2025) was commissioned to support the Lidl application. Both Avison Young (Aldi) and Carney Sweeney (Lidl) have adopted this survey and Nexus advise Officers that this is appropriate.*
- *The convenience turnover of the proposed Aldi store is £9.5m (Avison Young). This figure is considered to be satisfactory.*
- *Avison Young contend that the potential impact of the proposed Lidl store on Budgens and Holt Town Centre as a whole could be higher than the proposed Aldi due to the increased distance from the centre. That said, it is noted that the Aldi proposal does not maximise its pedestrian connectivity to Holt Town Centre and the difference between the proposed Aldi and Lidl in terms of town centre impact may be exaggerated in Aldi’s submission.*
- *Overall, the assumptions applied in the retail information submitted in support of this application are accepted, and the Council may now move to considering the acceptability of the scheme, both alone and cumulatively.*

It is noted that the Nexus consider the proposal to comply with NPPF Policy TC4 and Officers would concur with this assessment.

When assessing the proposal against NPPF Policy TC4 2(b) the relevant policy test refers to the vitality and viability of the town centre as a whole, as opposed to any individual store or stores. This is important when assessing the information at **Figure 2** below.

Avison Young state that the solus impact (impact of their store if coming forward as the only one permitted in the town) of the proposed Aldi store on Holt town centre would not be significantly adverse. The impact on the town centre in terms of trade diversion in solus model for Aldi is assessed by Avison Young to be 13.0%.

Nexus have considered the information submitted by both applicants and have carried out an independent assessment of the proposals using the pre-development turnover position employed by Avison Young. They considered the solus impact of this store on Holt Town Centre to be -11.1% rather than the -13.0% stated by Avison Young.

Following advice from Nexus, Officers conclude that in solus, this application would not give rise to a significant adverse impact upon the vitality and viability of Holt town centre. As such the proposal is considered to comply with Policy TC4 of the NPPF (2026), Policy E4 of the NNLP, and Policy HOLT4(1) of the HNP if coming forward in isolation.

Cumulative Impacts

In considering whether Holt town centre can withstand the impact of the proposed Aldi **and** Lidl food stores coming forward together, it is noted that Avison Young find the potential cumulative impact of two stores on Holt Town Centre as at 2030 to be -22.6%. Carney Sweeney estimate that this cumulative impact would be -18.5%. This difference comes from Avison Young's use of the latest Retail Planner Briefing Note forecasts.

Nexus have considered the approach used by both developers and find that the trade diversion assumptions are acceptable but the pre-development turnover position that is adopted should be that of Avison Young.

Destination	Pre Development Turnover	AY Diversion to Aldi	AY Diversion to Lidl	AY Solus Impact (Aldi)	AY Cumulative Impact	CS Diversion to Lidl	CS Diversion to Aldi	CS Solus Impact (Lidl)	CS Cumulative Impact
Budgens	12.52	1.67	1.77	13.3%	27.5%	2.12	1.63	16.9%	30.0%
Holt Town Centre	16.81	1.86	1.95	11.1%	22.6%	2.12	1.63	12.6%	22.3%

Notes:

Pre-Development Turnovers taken from Table 20 of Avison Young's Combined Assessment of May 2026

Avison Young Diversion Assumptions taken from Table 20 of their Combined Assessment of May 2026

Carney Sweeney Diversion Assumptions taken from Table 21 of their Cumulative Assessment of April 2026

Figure 2 - Solus and Cumulative Impact Assessment (Nexus Planning Additional Briefing Note – Received 13th July 2026)

Figure 2 above is produced by Nexus using the above-mentioned method. Nexus' advice therefore is that the cumulative impact of both stores on Budgens would be between -27.5% and -30.0% and the cumulative impact of both stores on Holt Town Centre would be between -22.6% and -22.3%. Nexus' advice to the Council is that *'under both cases, the potential cumulative impact on the defined centre is substantial, and one which would be considered to be significantly adverse'*.

These concerns are *'due to the increased competition associated with two additional foodstores in the market in Holt, and the potential that two new entrants into the market would encourage a higher proportion of shoppers to alter their convenience shopping habits, which would ultimately result in a reduction overall in trips to Budgens, and therefore the wider town centre.'*

Nexus advises that if both the Aldi and Lidl stores come forward there is a potential that there would be a significant adverse impact on Holt town centre. Following thorough review by Nexus having regard to their advice, it is the view of Officers that the cumulative impacts from the construction of two food stores in Holt is likely to cause a significant adverse impact on town centre vitality and viability.

Officers are of the view that:

1. There is an advantage in extending the retail offer in Holt.
2. The solus impact of the Aldi store would be -11.1% on Holt Town Centre and -13.3% on Budgens. This is considered to create some disadvantage in that it would draw trade away from the centre but is not considered to be significant adverse.

3. The cumulative impact of both the Aldi and Lidl stores would be between -22.3% and -22.6% on Holt Town Centre and -27.5% and -30% on Budgens. This is considered to be significantly adverse. As a result there would be clear disadvantage from permitting two stores. There is a finite capacity for accommodating out of centre stores without causing a significant adverse impact on Holt town centre.
4. There is an alternative site on which the retail offer in Holt can be expanded, namely the Nightjar Road site where Lidl have put forward planning application PF/25/1630. As a result there are rival proposals.
5. Given the conclusion that the cumulative effect of the proposed Aldi and Lidl stores on Holt town centre would be significant adverse, only one planning permission can be granted.
6. Given those facts and conclusions, the consideration of alternative proposals to extend the retail offer in Holt, and particularly the Lidl application, is a material consideration to be taken into account when considering this Aldi application.
7. This is situation where two proposals are competing for one planning permission, and as result a comparison is to be made between the competing proposals.

Other retail matters

On 13 Aug 2026, a representation was received from Martin Robeson Planning Practice (MRPP) (on behalf of Tesco Stores Limited). This letter, amongst other things, suggested that there were overlaps between the retail catchment areas for Holt and Aylsham and identified concerns that neither the Lidl or Aldi applications in Holt made reference to impact on Aylsham. Both Lidl and Aldi were asked for comment before the Council's retail consultant considered the matter. Only Lidl had responded at the point this report was drafted.

Nexus comment as follows:

'CarneySweeney has provided a response to MRPP's latest representations. The focus of MRPP's representations, made on behalf of Tesco, is on the potential cumulative impact of the proposals in Holt, alongside a new application proposal having been submitted in the neighbouring authority area of Broadland and South Norfolk.

The application proposal is for a Lidl foodstore in Aylsham, where Tesco operates from an out-of-centre location in the context of the town centre.

CarneySweeney notes that two catchments of Holt and Aylsham are principally different and that there is limited overlap between the two. This is indicated in part by the household survey which provides the basis for the findings of the retail assessment for the proposal in Holt, which demonstrates that a limited level of expenditure attracted by the Tesco in Aylsham is drawn from residents in Holt.

CarneySweeney also notes that their assessment indicates that approximately £0.2m will be diverted from the Tesco in Aylsham. As noted above, this Tesco is not a town centre store, is identified as overtrading and does not afford any policy protection. None of the trade is expected to be diverted from the town centre stores in Aylsham.

We note that MRPP also raise a specific concern in respect of the potential impact on Cromer stores in light of the proposals in Holt and Aylsham. This has not been addressed specifically by CarneySweeney but we are satisfied that the level of diversion associated with the three proposals is unlikely to have a significant adverse impact on Cromer town centre. This view has been reached in respect of the nature of the catchments, the offer of the town centre and assumption that the majority of trade will be diverted from existing stores in the respective towns of Holt and Aylsham.

Given the above, we are satisfied with CarneySweeney's additional submissions in response to MRPP's representations and consider that these have appropriately responded to the concerns raised by MRPP. Neither the representations made by MRPP or CarneySweeney's response alters our previous conclusions made in respect of the acceptability of the proposals from an impact perspective.'

On the basis of the above, Officers consider that the late representation on behalf of Tesco Stores Limited does not alter the Council's conclusions on retail matters.

Comparison of the competing applications:

Following the above, the Council are adopting the position that Holt can support only one of the two competing proposed retail developments. Members must therefore be mindful of how the applications compare and keep those factors in mind as they consider the applications before them across the following five key considerations:

1. Both applications (**PF/26/0131 – "Aldi"** and **PF/25/1630 – "Lidl"**) are proposed on sites which are 'out-of-centre'. The proposed Aldi store would be approximately 450m from Holt's Primary Shopping Area. The proposed Lidl store would be approximately 1.4km from Holt's Primary Shopping Area. Officers conclude that the site of the proposed Aldi store is closer to (although not well connected to the town centre) and is better connected to the Town Centre than the site of the proposed Lidl store.
2. Both stores are found to pass the sequential test as required by Policy TC3 of the NPPF (2026) (and Policy HOLT4 of the Holt Neighbourhood Plan in the case of Aldi). This is explained as above in Section 2 for Aldi. For Lidl, the Old Station Way site is not available and is therefore reasonably discounted from their sequential test owing to its clear commitment to an alternative developer (Aldi).
3. Both Aldi and Lidl contend that their store would have no impact on any planned investment in the centre of Holt. Nexus advises the Council that there is no committed or planned investment of relevance and accept this point.
4. Nexus advises the Council that any relevant centre would not be the subject of a significant adverse impact should either store come forward on its own.
5. In terms of retail matters alone Officers find that that this development proposal site is closer to Holt town centre with a likely increased potential for linked trips, makes use of PDL, and is for a use considered to be potentially acceptable in Policy HOLT4 of the Holt Neighbourhood Plan when compared directly to the competing application.

Officers therefore conclude that PF/26/0131 is preferable in terms of retail matters alone. However, it is important bear in mind that (in terms of retail planning policy) if considered in isolation (as single stores) that either site could be acceptable. However, other planning considerations would also have to be taken into account when considering which site is to be preferred.

4. Design and Heritage

Policy DP3 of the NPPF (2026) states the principles that one must apply when looking to deliver '*well-designed places*'. Development proposals should '*respond to their context so that they integrate with and enhance their surroundings*'. This policy continues to establish 7 different principles that should be reflected within the design; liveability, climate, nature,

movement, built form, public space and identity. Lastly, this policy establishes that '*substantial weight should be given to compliance with relevant Development Plan policies when assessing the design quality of proposals*'.

The purpose of NNLP Policy ENV7 is to protect and where possible, enhance the significance of heritage assets, whilst recognising the opportunities for sympathetic reuse and regeneration. The policy provides specific criteria for designated and non-designated heritage assets, conservation areas, archaeology and heritage at risk.

The purpose of NNLP Policy ENV8 is to provide a set of design principles that will result in a high quality of design and ensure the special character and qualities of the district are maintained and enhanced. The policy criteria sets the approach to a number of considerations including the public realm, green infrastructure, landscaping and service facilities, having regard to the North Norfolk Design Guide SPD.

The proposed store is sited in the south-west portion of the site, closer to Old Station Way than the A148. A marshalling yard is proposed in the east of the site accessed from Old Station Way, with the main public access and parking area found to the front of the store, between the building itself, and the new access point proposed onto the Holt bypass.

The store has a monopitch roof design, with the north-west elevation being the structure's high point, before the roof slopes away to the rear. The southeast and northeast elevations are to be fully clad in Kingspan wall cladding with an anthracite grey finish. These elevations are the least publicly visible (except from Old Station Way). The southwest elevation features the main entrance to the store and includes a large amount of full height glazing under a canopy structure covering the trolley bays. The southernmost portion of this elevation is finished with soft red facing brick including an archway detail – a nod to the railway history in the immediate site area.

The northwest elevation is the long elevation that faces the car park, A148, and would form the principal elevation of the store. This elevation is mostly finished with soft red brick and includes repeated archway detailing referred to in the previous paragraph across its full extent. The arch closest to the store is proposed to be fully glazed.

Heritage considerations are relevant for this application given its position within 100m of the Holt Conservation Area. This Conservation Area has been appraised with adoption of the Holt Conservation Area appraisal taking place in 2021. This document sets out the significance of the Conservation Area as a heritage asset noting the following key characteristics (not all selected for the purposes of this report):

- Most of the buildings within the Conservation Area date from the Georgian and early Victorian periods, they have a similar character and scale, and use a common range of building materials.
- The historic core of the town is rectangular in plan, bordered by Market Place, Bull Street, White Lion Street and Shirehall Plain.
- The main thoroughfare through Holt is Market Place and High Steet, which comprise the main commercial centre.
- The Conservation Area is enclosed on the northern, southern and western sides by 20th century development.

Regard is particularly had to the last of the above bullet points, with the southern boundary of the Conservation Area defined by the A148 Holt Bypass. At this time regard is also had to the comments of the Council's Conservation and Design Officer (CDO) who states "*With no listed buildings in close proximity to the site, and with the A148 splitting the development off from*

the Holt Conservation Area, Conservation & Design (C&D) can immediately conclude that the submitted proposals would not have an impact upon any designated heritage assets.”

The CDO continues, finding the archway detailing to be a ‘*respectful nod*’ to the history of the area, and raising no objections to the scheme subject to a condition relating to the specific bricks to be used on site.

Policy ENV7(8) of the NNLP requires development proposals to ‘*conserve and where opportunities arise, enhance the appearance of Conservation Areas*’. Policy ENV8(3d) requires proposals to demonstrate a high quality of design that ‘*preserves and, where possible, enhances the special character of the historic environment*’.

Officers note the proximity to Holt Conservation Area (approx. 100m) but find that the strength of the bypass as a separating feature, along with the single storey scale of the proposal, are sufficient to ensure that the proposed development would not harm the significance of the Conservation Area. The scheme is considered to conserve the appearance of the Conservation Area and preserve the special character of the historic environment as is required by Policies ENV7 and ENV8 of the NNLP and Policies HE4, HE5 and HE9 of the NPPF (2026).

Officers therefore conclude that this development would not have any adverse impact upon the significance of any designated heritage assets. Subject to conditions, the application is found to be acceptable in terms of its design and heritage impacts in accordance with Policies ENV7 and ENV8 of the Adopted NNLP, Policies DP3, HE4, HE5 and HE9 of the NPPF (2026), Policy HOLT1 of the HNP, and the North Norfolk Design Guide SPD.

5. Amenity

The purpose of NNLP Policy ENV6 is to maintain, protect and promote adequate living and working conditions to ensure that all occupants benefit from a good standard of amenity by considering a number of matters including, overlooking, overshadowing, loss of privacy and prevention of disturbance from odour, noise and artificial light pollution. The policy applies to all development proposals, where existing and/or future occupiers may have their standard of amenity affected.

Despite being located within a built urban setting in Holt the proposed development is reasonably well-separated from nearby residential dwellings, with impacts potentially only possible for residents on Coronation Road (whose gardens back directly on to Old Station Way). Properties on Coronation Road are built on a largely uniform alignment, with rear elevations assessed to be a minimum of approximately 25m from the rear of the proposed store. The distance from the rear of the store to the end of the affected gardens is assessed as being a minimum of approximately 12m.

The orientation of the store is important in this assessment, with the main parking areas and store entrance found to the front, away from these sensitive residential properties. The location of the marshalling yard has potential to create disturbance for residents of Coronation Road, whose rear elevations are approximately 28m from the site’s southern boundary adjacent to Old Station Way. The most likely disturbance would be HGV manoeuvring noises including reversing alarms, communication and engine noise along with residents seeing large delivery vehicles manoeuvring as they service the store. Officers find that the timing and quantity of these deliveries could be appropriately mitigated and restricted via condition so as to ensure that any disturbance does not occur at a more sensitive time of day. Subject to this, it is considered that the proposal would not create any ‘unacceptable impacts’ on residential

amenity as per the requirements of Policy ENV6 of the NNLP and Policy P3 of the NPPF (2026).

The structure itself is not of a location, scale or position that is overbearing or dominant on neighbouring properties. Officers consider it would be appropriate to use conditions to ensure that any lighting would be of an appropriate scale to this mixed-use location, both in terms of spill from the store itself, and safety lighting within the car park. It is not anticipated that headlights or engine noise from cars would cause unacceptable amenity impacts.

Consideration is also given to plant and machinery that serves the store, which is to be located to the north-east of the store between the marshalling yard and the existing pedestrian footway between Hempstead Road the bypass. The submitted information demonstrates three air source heat pumps, a gas cooler, and two refrigeration mini packs with their noise levels stated. It is also noted that an acoustic fence is proposed around this area, and existing trees adjacent to the compound would continue to provide screening. It is considered that this approach is sensible, and the location, amount, and specification of plant/machinery is appropriate.

Overall, this application is found to be acceptable in terms of its impact upon residential amenity, and to comply with Policy ENV6 of the Adopted NNLP, as well as Policy P3 of the NPPF (2026) and the North Norfolk Design Guide SPD.

6. Highways

The purpose of NNLP Policy CC9 is to ensure that new development maximises the opportunities for the use of sustainable forms of transport appropriate to its particular location, that the public highway remains safe and convenient to use for all road users.

The purpose of NNLP Policy CC8 is to promote and ensure delivery of appropriate electric vehicle charging infrastructure and to future-proof developments in the District. Requirements for non-residential proposals are set out in CC8(3), which contemplates that there can be a departure from the specified requirement if there is evidence that the viability of the scheme would be significantly affected. Major development must also provide full details of electric vehicle charging points proposed within a scheme and how they will be managed within a Transport Assessment or Transport Statement.

Policy TR6(4) of the NPPF (2026) states that *“Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.”*

Following the publication of the 2026 version of the NPPF the above Policy explicitly includes the construction phase as a new consideration of whether highway safety impacts would be unacceptable, as well as post-completion of the development. In this case the Council are satisfied that (if otherwise granted planning permission) there is sufficient space within the site, as well as an appropriate access route for construction traffic, to enable construction of the development to proceed without an unacceptable impact on highway safety.

Policy HOLT6 of the Holt Neighbour Plan (HNP) states that proposals for major development should include proposals *“to allow people to access the Green Wheel in safe and convenient ways, both within the through its layout, access arrangements and permeability beyond the site boundary”*.

This application proposes a vehicular access point for the store on the south side of the A148 Holt bypass. This access point is around 115m from the centre of the Hempstead Road junction found to the east. The design proposes a break in the central reservation to provide a right turn only lane for eastbound traffic to access the store but has been amended to prohibit traffic exiting the store to travel eastwards. Old Station Way is also utilised to provide an access point for HGVs to enter and exit the marshalling yard to the rear of the store, with these manoeuvres facilitated by a proposed extension of double yellow lines, and the use of a banksman.

On site, the application proposes some internal pedestrian infrastructure, and the following parking provision:

- 94 parking spaces total including;
- 5 accessible spaces (including one electric vehicle charging (EVC) space),
- 6 parent and child spaces (including one EVC space),
- 4 rapid EVC spaces,
- 11 other EVC spaces, and;
- 18 total cycle parking spaces.

The chosen layout differs from that which was proposed under the 2012 and 2014 permissions for a supermarket on the site. The layout discussed at pre-application stage was also different from what is now proposed. The previous consents and the pre-application scheme took their main vehicular access from Old Station Way. Throughout the assessment of this application the Local Highway Authority (LHA) have made clear their willingness to potentially support an access layout which reverts to this previously approved arrangement.

In any case, the scheme submitted has undergone consultation with the LHA which included their carrying out a Stage 1 Road Safety Audit (RSA), Aldi's response to that, with full and final consideration then provided by the LHA.

This section of the bypass is a dual carriageway with two staggered T-junctions nearby enabling traffic to freely move between Station Road, the A148, and Hempstead Road. This is a long-established arrangement with pedestrians utilising an underpass from Hempstead Road to Station Road to avoid issues of conflict and restriction of vehicle's free movement. It is noted that the A148 is part of the Principal Road Network (PRN) and designated as a 'Principal Primary Route'.

The issue of whether safe means of access can be provided to the site is critical in the determination of this application. If no safe means of access can be provided for the proposed foodstore, resulting in an unacceptable impact on highway safety, the proposal will fail to meet key national and local plan policy guidance (NPPF Policy TR6 and NNLP CC9).

The Committee will note the latest response from the Local Highway Authority which identifies the access to be detrimental to highway safety, concluding that "the vehicular movements associated with the use of the access would lead to conflict and interference with the passage of through vehicles and introduce further points of potential conflict." In addition concerns is raised about the internal layout of the site, adequate provision for pedestrian and cyclists as well as concerns about the servicing arrangements within the site.

Firstly, in terms of a new access onto the A148, it is maintained by NCC Highways that principally, *"newly formed accesses onto the major road network are contrary to the aims and objectives set out within the Norfolk County Council's Safe and Sustainable Development Guidance"*.

In terms of the proposed main access arrangements NCC Highways advise that:

“The Highway Authority's Stage 1 Road Safety Audit identified a number of significant highway safety concerns which reinforced the Highway Authority's objection. The Audit concluded that the proximity of the proposed access to Station Road and Hempstead Road, together with the proposed signal-controlled pedestrian crossing, would create an unduly complex highway environment, increasing the likelihood of conflict between highway users. The audit also noted that the spacing between the proposed access and Station Road is below the minimum distance recommended within CD123 (Design Manual for Roads and Bridges) for this form of junction arrangement. The designer's response states that this has been addressed, however the Safety Audit response states it is still not fully compliant.

The Highway Authority's Road Safety Audit additionally identified concerns regarding the proposed junction form. Whilst recognised in design guidance, local experience suggests motorists often find this arrangement difficult to negotiate, particularly where right-turning and merging movements are taking place simultaneously. The audit concluded that the proposed arrangement would increase the potential for conflict between vehicles entering and exiting the development and traffic travelling along the A148. The junction form has been amended and with egress being left turn only but with an all-movement ingress. Whilst the revised plans may have addressed the specific issue identified in the safety audit, a Safety Audit of the revised junction has not been completed. The Highway Authority continues to maintain that a new junction on the A148 is against its policy, however it will potentially accept a left-in/left-out arrangement albeit, although this has not been presented as a potential access strategy by the applicant for consideration.”

In respect of the internal site layout, NCC Highways comment:

“The Highway Authority also notes that the audit identified concerns regarding the internal layout of the site, specifically the proximity of parking spaces to the proposed access. Vehicles manoeuvring from these spaces could conflict with vehicles entering the site, potentially resulting in queues extending back onto the A148. Such circumstances would be detrimental to the safe and efficient operation of this important route. It is also noted that parking provision remains significantly below the level expected by the Norfolk Parking Guidelines 2022. Whilst a balanced view should be taken, insufficient parking provision has the potential to result in overspill parking on surrounding roads, to the detriment of highway safety and the operation of the local highway network. The designer's response has moved parking away from the access and therefore has addressed this initial concern. However, the Highway Authority concerns regarding the shortfall in parking spaces and the potential consequences have not been addressed.

Furthermore, the Highway Authority continues to have significant concerns regarding the layout of the car parking. The Transport Assessment makes reference to NCC standards but does not provide parking in accordance with the standard. The spaces are shown to be 2.4m x 4.8m which is below the NCC standard of 2.5m x 5m. Several spaces look difficult to access and manoeuvre, with either significant turns required or reversing required. The site does not provide any turning areas. Therefore, vehicles could find themselves queueing within the site unable to turn without excessive manoeuvring or reversing. Additionally, powered two wheelers require 5 spaces at 2.5m x 1.2m, currently only 3 are provided within an area that would not be fit for purpose and would likely lead to the adjacent store access being obstructed. In

addition, as there is no way to circulate / turn within the site, it will result in vehicles having to reverse potentially onto the highway if the car park is full. Other recent Aldi sites within Norfolk have circulating areas within the site (William Frost Way and Park Road)."

In respect of the pedestrian and cycle crossing NCC Highways set out that:

The Road Safety Audit also highlighted concerns regarding the increased use of the existing shared pedestrian and cycle facility on the southern side of the A148. The submitted proposals had not adequately demonstrated how the increased pedestrian and cycle movements generated by the development would be safely accommodated, creating the potential for additional conflict between non-motorised users. Whilst the applicant has stated that they will widen the existing foot / cyclepath adjacent to the A148, they have also responded that Old Station Way would be the primary access route used by the majority of pedestrians and cyclists. However, the site has clearly been laid out with the focus for all pedestrian access to be from the A148, not Old Station Way. Additionally, there is no clear safe pedestrian route from Old Station Way to the main store entrance. With regard the cycle parking area, it is poorly located to the store entrance with surveillance from the store, being largely focused on Old Station Way. Additionally, as stated above, there is no safe pedestrian route from the cycle parking area to the store entrance.

In respect of the service yard, NCC Highways comment:

The Highway Authority also remains concerned regarding servicing arrangements within the site. The Road Safety Audit identified extensive existing on-street parking in the vicinity and raised concerns that such conditions could compromise HGV access to the proposed store. The audit further notes that delivery vehicles are expected to reverse into the service area and concludes that such manoeuvres increase the likelihood of collision. This is a particular concern as Old Station Way will be the primary access route for pedestrians and cyclists. The Highway Authority maintains that all servicing operations should be accommodated safely within the site, with delivery vehicles entering and exiting in a forward gear. The applicant has suggested that waiting restrictions will resolve this issue. The Highway Authority still maintains that HGV's reversing into the site is not an acceptable way to service the site especially as Aldi have indicated that 2 deliveries are made daily in an hour but that each delivery will take up to an hour. HGVs cannot be expected to wait on the highway which is not wide enough for two HGVs to pass. The layout of the service access will also result in HGVs exiting blind across the route proposed to be used by pedestrians and cyclists to the detriment of their safety. The foot / cyclepath should have priority over the service access and be of a consistent width. Use of the delivery area by HGVs will also result in the staff parking area being obstructed, resulting in further vehicles waiting / parking on the highway.

In conclusion NCC Highways note:

Having considered the submitted information, it is evident that the proposal still gives rise to a number of highway safety concerns, in addition to being contrary to County Council policy regarding the creation of a new access onto the A148. Whilst a number of issues raised by the safety audit appear to have been addressed, the highway authority has not undertaken a new Stage 1 Safety Audit of the revised scheme. The Highway Authority considers that the development would result in a detrimental impact

on highway safety and the safe and efficient operation of the Holt Bypass, an important route within the county highway network.

NCC Highways suggest three reasons for refusal in accordance with National Planning Policy Framework Section TR6, Paragraph 4; as follows:

- *The proposed development does not adequately provide for pedestrians and cyclists. The proposal is therefore considered detrimental to highway safety and is contrary to the National Planning Policy Framework.*
- *The proposed development would lead to the creation of an access on a stretch of classified highway which carries significant traffic movements. Furthermore, the vehicular movements associated with the use of the access would lead to conflict and interference with the passage of through vehicles and introduce further points of potential conflict. The proposal is therefore considered detrimental to highway safety and is contrary to the National Planning Policy Framework.*
- *The proposal does not incorporate adequate facilities to enable a delivery vehicle to enter in a forward gear, turn within the site and exit in a forward gear. The findings of the Highway Authority's Stage 1 Road Safety Audit also identified concerns regarding servicing arrangements and the requirement for reversing manoeuvres associated with delivery vehicles, which are considered unacceptable in the interests of road safety and is contrary to the National Planning Policy Framework.*

Officers have been engaged in the careful consideration of these proposals alongside the LHA and would fully concur with its points of concern and conclusions.

As set out above, the proposed access arrangements are unacceptable. Regrettably, the revised proposals do not adequately provide for pedestrians and cyclist's access. This proposal would also add unnecessary additional complexity to the immediate highway network. Furthermore, the proposals do not incorporate adequate facilities to enable a delivery vehicle to enter in a forward gear, turn within the site and exit in a forward gear. These factors combining with significant vehicle movements associated with the proposals will increase conflict between road users and would result in an unacceptable impact on highway safety.

For the reasons specified above, Officers conclude that this negative impact is contrary to Policy CC9(1) and (4) of the NNLP. The proposal would give rise to an unacceptable impact on highway safety contrary to the Policy TR6 of the NPPF (2026).

Parking

The purpose of NNLP Policy HC7 is to ensure the provision of adequate safe and secure vehicle and cycle parking. Proposals should take account of the latest Norfolk County Council Parking Guidelines as a starting point, to ensure parking is integrated as a key element of design layouts, including the provision of electric vehicle charging infrastructure.

The applicant identifies a shortfall in terms of parking provision which they state is justified by a parking assessment to match the anticipated demand (see table below). It is noted that the applicants have provided the proposed store's Gross External Area (GEA) as 1,718sqm. Officers are content that this figure is accurate and a reasonable starting point from which to apply the Norfolk Parking Standards, with any difference between GEA and GFA considered negligible for the purposes of this assessment.

	Gross Floor Area Requirement	Actual Provision
Standard Car Parking Spaces	122	94
Accessible Car Parking Spaces	7	5
Powered Two-Wheeler Spaces	6	3
Cycle Spaces	18	8

Policy CC8 requires 20% of all new parking spaces to be electric vehicle charging (EVC) spaces unless there is evidence that viability of the scheme would be significantly affected. The adopted County standards only require 10% of all new spaces to be EVC. This proposal provides provision for 18 EVC spaces (inc. 4 rapid-charging) which is 18.3% of the 98 total spaces provided. This falls short of adopted NNLP Policy CC8 requirement. Officers consider that a shortfall in EVC provision will need to be weighed in the planning balance.

In its wider context and taking account of the table above it is considered that the level of parking provision proposed does not comply with the Norfolk County Council Parking Guidelines. Officers note that policy allows for flexibility to reflect local conditions. Officers have had regard to the applicant's submitted travel plan and the comments of the County Highways Development Management Officer.

Whilst flexibility is allowed within the policy, in this case the parking layout proposed has the potential for negative impacts off site by way of queueing along the A148 to allow cars to exit/enter parking spaces. Officers find that a flexible approach could be taken in terms of parking numbers alone but cannot be permitted on this occasion given the identified consequences for highway safety leading to a layout which is neither 'good quality' or 'safe', contrary to the aims of Policy HC7(3) of the NNLP.

When concluding on matters of highway safety regard is had to the applicant's submission which has been thoroughly considered by the Local Highway Authority through the completion of a Stage 1 RSA and further considered following final revisions made. The access layout proposed is complex and one where the LHA suggests would be difficult to negotiate and overall would be detrimental to highway safety. Adequate provision for pedestrians and cyclists has not been offered. The servicing arrangements are also considered to be unacceptable and unsafe. In conclusion, the proposal is found to be contrary to Policies HC7(3), CC8 and CC9(1) and (4) of the NNLP, Policy TR6 of the NPPF (2026), and Policy HOLT6(1) of the HNP.

7. Flood Risk

The purpose of NNLP Policy CC7 is to ensure flood risk is evaluated in development proposals and to require the appropriate management of surface and foul water disposal in order to reduce flood risk. The policy requires development to avoid areas of flood risk where possible, and to incorporate sustainable drainage systems (SuDS). All proposals must also ensure no increase in flood risk elsewhere. Appendix 1: Flood Risk & Surface Water Drainage of the Plan sets out the required level of supporting documentation and detail required.

Among other things, developments must demonstrate compliance with national policy, a positive impact on the risk of surface water flooding on site and provide adequate foul water drainage facilities.

The applicant site is located within Flood Zone 1. It is a greenfield site (for the purposes of drainage) and the development would result in a change in surfacing materials across the site.

Policy F4(2) of the NPPF (2026) sets out requirements for a site specific flood risk assessment for development in Flood Zone 1.

The application is supported by a site-specific Flood Risk Assessment (FRA) and various technical notes which have been the subject of four rounds of consultation with Norfolk County Council in their role as Lead Local Flood Authority (LLFA). This information aims to demonstrate that the development does not increase flood risk to the site or the wider area.

The submitted information reaches the following conclusions (among others):

- There is no noticeable impact to or from the site in terms of all reasonable flood risk categories.
- Appropriate floor levels, kerb use and on-site landscaping will be used to mitigate any flood risk.
- Rainwater harvesting alone is not sufficient to meet the site's full drainage requirements.
- Infiltration-based SuDS are not feasible for this development.
- Discharge to an above ground surface water body is not appropriate.
- Surface water will discharge in to Anglian Water's system.
- Surface water will be treated by permeable paving, sub-base and catch pits / silt traps.
- An attenuation tank will be used for storage of surface water.
- Foul water drainage will be achieved via a new connection to the Anglian Water network.

Full and detailed consideration of the full information has taken place, with four rounds of consultation as mentioned above. The latest of these comments provided the last reasons for objection that were raised by the LLFA, the information submitted to overcome them, and a new position from the LLFA.

In all cases the LLFA are satisfied that the FRA and drainage strategy is adequate, and addresses the concerns raised.

Officers note the collaborative approach taken by the developer with regard to this area of assessment, the clear guidance from the LLFA, and the lower risk classification of the site in terms of flood risk. Subject to conditions securing the measures proposed in the submitted documents, Officers find the scheme to be acceptable in terms of flood risk and surface water drainage, in compliance with Policy CC7 of the Adopted NNLP and Policies F7 and F8 of the NPPF (2026).

8. Biodiversity Net Gain (BNG)

The purpose of NNLP Policy CC10 is to ensure biodiversity net gain (BNG) is achieved in order to help protect and enhance the natural environment, which supports the overall long-term adaptability and resilience to climate change. The policy requires qualifying development to achieve a minimum of 10% BNG over the pre-development biodiversity value as measured by the relevant biodiversity metric. A BNG strategy should accompany proposals that provides relevant and proportionate information, including biodiversity metric calculations and details of maintenance, and which demonstrate that the Mitigation Hierarchy has been followed and complies with the Biodiversity Gain Hierarchy.

The application is supported by a Biodiversity Net Gain Report, inclusive of pre and post-development maps and figures, as well as the statutory metric. This information has been reviewed by Officers.

The site is not considered to contain any habitats of high or very high distinctiveness. Medium distinctiveness habitats (mixed scrub and urban trees) are present at the site and are proposed to be lost as a result of the development. It is appropriate for off-site compensation to be used to address this habitat loss and this is proposed by the developer.

In this case the proposal also details a small loss in terms of 0.02 hedgerow units, and this will also require off-site mitigation.

For the purposes of making this recommendation the Local Planning Authority need only be in a position to agree the baseline, with compensation / habitat creation agreed after determination in line with legislation. The Council are satisfied that the baseline habitat plan is accurate and corresponds with the statutory metric. The stated approach of using off-site compensation is also considered appropriate, having regard to the distinctiveness of the habitats that will be lost on site.

The submitted report concludes that the off-site compensation will be required to deliver a minimum of 3.22 Biodiversity Units (BU). Officers agree with this conclusion. It is therefore considered that this development is acceptable and complies with BNG legislation subject to conditions requiring the submission of a Net Gain Plan inclusive of on-site habitat creation and off-site compensation.

The proposal is found to be compliant with BNG legislation, and Policy CC10 of the NNLP.

9. Landscape

The purpose of NNLP Policy ENV2 is to require development to respect and enhance local landscape character, settlement patterns and the relationship between settlements and their surroundings. Proposals should be assessed against the Landscape Character Assessment SPD and should be sympathetic to the key characteristics and valued features of the area. Proposals should set out how the development will protect and conserve the defining qualities and distinctiveness of the Landscape Character Type.

The Landscape Character Assessment identifies the site as being within the Wooded Glacial Ridge (WGR1) character type. The site is predominantly viewed within the context of the urban settlement of Holt. The site currently lies empty offering limited positive impacts in terms of landscape quality, save for some existing hedge and tree covering on or outside the boundary of the site. This existing landscaping affords the site some screening benefits, albeit some of which would be removed to provide the vehicular access onto the A148.

The proposed landscaping scheme involves planting of native species across the site, with a focus mostly on the perimeter of the development.

Taking account of the above, and subject to conditions in line with the requests of the Landscape Officer, the application is found to be acceptable in terms of landscape, in accordance with Policies ENV2 and ENV8 of the Adopted NNLP.

10. Ecology

The purpose of NNLP Policy ENV4 is to require the protection, enhancement and net gain for biodiversity and geodiversity. Proposals must avoid harm to designated sites and deliver measurable biodiversity net gain (BNG). The policy requires suitable ecological surveys to

establish the extent of the potential impacts on ancient woodlands, veteran trees, protected species and priority species or priority habitats.

This application is initially supported by a Preliminary Ecological Appraisal (PEA) which has been reviewed by Officers. This PEA concludes the following (among other things):

- Habitats including modified grassland, scrub with trees and hedgerows will all be lost due to the development.
- There is potential for the onsite habitats to support foraging and commuting bats.
- There is suitable nesting habitat for common and widespread bird species on site.
- There is suitable habitat for amphibians, although limited connection to off-site ponds or other suitable habitats.
- There is suitable habitat for refuge and foraging for terrestrial mammals and hedgehogs.

Mitigation and enhancement measures are also recommended, including the following:

- A sensitive lighting plan to reduce to disturbance to commuting and foraging bats and other sensitive wildlife,
- A Construction Ecological Management Plan (CEMP),
- Installation of bat and bird boxes, and;
- The planting of species-rich native hedgerows, native scrub and flowering lawn.

Officers agree with the findings of the PEA and confirm that the mitigation and enhancement measures proposed are acceptable. Officers also note the site's proximity to the Gravel Pit Lane County Wildlife Site (CWS) approximately 200m to the east of the site. This CWS is known as hosting healthy populations of slow worm and common lizard following the translocation of approximately 2,200 individuals across those two species approximately 10 years ago.

Whilst slow worm and common lizard are not European protected species, Officers find that a failure to survey the application site fully in respect of these reptile species would have been a 'significant oversight'. This was put to the applicant who has proceeded to submit a Reptile Reasonable Avoidance Method Statement, subsequently supported by complete reptile surveys. The Council's Landscape Officer has reviewed the submitted information in full and raises no objection subject to conditions.

Officers have reviewed the submitted information and the comments of the Landscape Officer and conclude that the application is acceptable in terms of its impacts on ecology, having regard to Policy ENV4 of the Adopted NNLP as well as Policy N2 of the NPPF (2026).

11. Sustainable Construction, Energy Efficiency, Carbon Reduction and Water Efficiency:

Proposals must demonstrate that they will achieve a progressively higher standard of environmental sustainability in line with Policy CC3 of the NNLP, through the submission of a compliance statement setting out:

- a. the approach taken to address energy efficiency within the design and technical specification of the proposed development;*
- b. comparative target energy performance and carbon emission rates of the proposal in relation to the benchmarked Target Emissions Rate for each dwelling proposed.*

This proposal also exceeds 250sqm in terms of its floor space and must also achieve a minimum of BREEAM very good standard or equivalent.

Further to this, Policy CC4 of the NNLP also requires development to meet BREEAM very good standard or equivalent in terms of water efficiency.

In the case of this proposal a BREEAM pre-assessment report has been submitted which predicts that 'the proposed development is likely to achieve a BREEAM 'very good' rating. The report also includes recommendations which can be conditioned in the event of planning permission being granted.

It is considered that this information satisfies the requirements of Policies CC3 and CC4 of the NNLP.

12. Fibre to the Premises (FTTP):

This application is supported by a letter from Utility Connections confirming that the development has been registered with the Openreach new Sites team to confirm the availability of telecommunications infrastructure. It is concluded that a policy compliant fibre connection is possible and could be secured via condition in the event that permission is granted. This application is therefore considered to comply with Policy HC5 of the NNLP.

13. Conclusion and Planning Balance

In accordance with Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The proposal before Committee is for a Class E Discount food store (1,718sqm gross external area) in an out of centre location. It is a proposal which passes the sequential site assessment and, if coming forward in solus, is not considered to have a significant adverse impact on the vitality and viability of Holt Town centre, having regard to Policy E4 of the NNLP, HOLT4 of the HNP, and Policies TC3 and TC4 of the NPPF (2026).

With this in mind, Officers find that the scheme complies with the Development Plan in the following respects and is acceptable in terms of its impact upon the following planning considerations:

- Sequential site assessment,
- In solus impact on the vitality and viability of Holt town centre,
- Character and appearance of the area,
- Setting and significance of any heritage assets (namely Holt Conservation Area),
- Residential amenity standards in the vicinity of the development,
- Ecology,
- BNG, and;
- Landscape impact.

However, this scheme is found to depart from the Development Plan in terms of the following:

- The unacceptable impact of the proposal on matters of highway safety contrary to Policies CC8, CC9(1) and (4) of the NNLP, Policy TR6 of the NPPF (2026) and Policy HOLT6 of the HNP.

Each of the above departures from the Development Plan remains to be satisfactorily addressed by the applicant.

A matter which goes to the heart of the acceptability of this development is highway safety. Following consideration by the County Highway Authority's Safety Team, Officers advise members that the access arrangement proposed would give rise to an unacceptable impact on highway safety for the reasons referred to within Section 6 this report.

Throughout discussions with the applicant for this development suggestions were made regarding the use of the previously approved (2014) access arrangement from Old Station Way. The applicant has not indicated any willingness to revert to this arrangement finding it not to be feasible. Officers therefore conclude that, given the significant concerns from the LHA about the safety of an access onto the A148 and the applicant's proposal to provide access from the A148 the proposal should be determined as it stands. Officers are of the view that the proposals will give rise to unacceptable impacts on highway safety.

Taking account of the above, Officers conclude that, given the particular importance of the policy relating to highway safety, this proposal fails to comply with NNLP when considered as a whole by virtue of its unacceptable impact on highway safety. In addition, there is a failure to provide adequate information to ensure that there would be no harm to protected species.

Following full consideration of the submitted information and advice from Nexus, Officers conclude that the approval of both planning applications (PF/26/0131 – Aldi and PF/25/1630 – Lidl) would be likely to give rise to significant adverse impacts on the vitality and viability of Holt Town Centre. Only the Solus Model is acceptable in terms of retail impact. As such the applications are competing directly with one another for a single permission.

Officers have considered the benefits of this application, it is spatially closer to Holt town centre than the competing proposal with some potential for linked trips. The proposal makes use of previously developed land and is for a use contemplated as being acceptable under Policy HOLT4 of the Holt Neighbourhood Plan.

However, for the reasons given, above there remains conflict with Local and National Planning Policies relating to highway safety and parking. Officers consider that the proposal does not comply with the Development Plan when taken as a whole. Those conflicts carry significant weight and are not outweighed by other material considerations including the benefits noted above, as such the application should be refused.

RECOMMENDATION:

REFUSAL for the following reasons:

1. The proposed development would lead to the creation of an access on a stretch of classified highway which carries significant traffic movements. Furthermore, the vehicular movements associated with the use of the access would lead to conflict and interference with the passage of through vehicles and introduce further points of potential conflict. The proposal is therefore considered to give rise to an unacceptable impact on highway safety and is contrary to Policy CC9 (4) of the NNLP and Policy TR6 of the NPPF (2026).
2. The proposed development does not adequately provide for pedestrians and cyclists and is therefore considered to give rise to an unacceptable impact on highway safety, contrary to Policy CC9 (1) of the NNLP and Policy TR6 of the NPPF (2026).

3. The proposal does not incorporate adequate facilities to enable a delivery vehicle to enter in a forward gear, turn within the site and exit in a forward gear. The findings of the Highway Authority's Stage 1 Road Safety Audit also identified concerns regarding servicing arrangements and the requirement for reversing manoeuvres associated with delivery vehicles, which are considered unacceptable in the interests of road safety and is contrary to Policy CC9 (1) and (4) of the NNLP and Policy TR6 of the NPPF (2026).

Final wording to be delegated to the Assistant Director – Planning

HOLT – PF/25/1630 – Erection of Class E Discount Food Store with Associated Car Parking, Landscaping, Engineering and Drainage Works – Land at Grid Reference 608931 338823, Nightjar Road, Holt
Applicant: Lidl GB Limited

EXECUTIVE SUMMARY

The Development Committee are being asked to determine two separate planning applications for retail development in Holt. In addition to this application (ref: **PF/25/1630**) there is a proposal for a retail supermarket on land at Old Station Way (ref: **PF/26/0131**).

This report will consider PF/25/1630, firstly assessing its compliance with the Development Plan before moving to other material considerations including the availability of alternative retail proposal as alluded to above, before reaching an overall conclusion.

With competing retail applications requiring consideration the Council appointed a retail consultant (Nexus) who indicated that, whilst the individual impact of each store is considered to be acceptable, the cumulative impact of two supermarkets has the potential to create a significantly adverse impact on the vitality and viability of Holt Town Centre. This means that only one supermarket could be granted permission without significant adverse impacts arising.

If Members are minded to follow the advice of Officers, (i.e. only one supermarket could be granted permission), the order that the applications are determined, has the potential to impact on the other application.

Having regard to legal advice, the Development Committee are advised to take the applications in an order that considers the proposal relating to the site which is accessible and better connected to the town centre first in accordance with the principles of Policies TC3 and TC4 of the NPPF (2026). This means that this application (PF/25/1630) should be considered and decided after the competing application (PF/26/0131).

This report sets out:

- the development proposed (including the range of supporting technical documents);
- identifies the responses received from consultees and public representations;
- Runs through the main planning considerations; and
- Provides an Officer recommendation

In the event that the Development Committee reach different conclusions to Officers, regard will need to be given to the impact of that decision on the other application.

RECOMMENDATION: APPROVAL

Major Development
Target Date: 14th November 2025
Extension of Time: 23rd July 2026
Case Officer: Joseph Barrow
Full Planning Permission

RELEVANT SITE CONSTRAINTS

The site lies within Holt's Settlement Boundary

The site lies within the Holt Neighbourhood Plan Area

The site is adjacent to the A148 Principal Route as designated in the Adopted Local Plan

The site is adjacent to the Land at Heath Farm (H20) Residential Allocation in the Adopted Local Plan

THE APPLICATION

The proposed development for which planning permission is sought is "Erection of Class E discount foodstore with associated car parking, landscaping, engineering and drainage works". The application is to the east of Nightjar Road in Holt. The proposal is for a 1,969 sq. m. gross internal area discount food store.

RELEVANT PLANNING HISTORY

App No. PRE3/25/0807

Description Erection of a new discount foodstore (c. 2,215sqm GEA) at Nightjar Road

Outcome Advice Given

REASONS FOR REFERRAL TO COMMITTEE

At the request of the Assistant Director of Planning:

"The planning application is referred to Development Committee at the request of the Assistant Director for Planning owing to the significance of the case and the need for consideration alongside a second retail planning application in the same settlement (PF/26/0131)."

CONSULTATIONS

Anglian Water – Objection – *Advised that assets are close to the development. Objected to the connection to the foul network and offered no comment on the Surface Water Disposal.*

Conservation and Design – No objection – *No objection to principle, but design could be improved through a more bespoke design to lessen the stark and noticeable presence and improved boundary treatments to soften move from Countryside to built envelope.*

Economic Growth – Support – *Potential economic benefits from 40 permanent jobs, plus construction jobs*

Environmental Protection (Noise, Odour, Lighting) – Objection – *Further information required*

Environmental Protection (Contaminated Land and Air Quality) – No objection – *Subject to a precautionary condition for contaminated land and a Dust Management Plan (DMP)*

Environment Agency – No response received

Holt Town Council – Support – *Consideration given to: Lighting, Delivery times, Pedestrian Access to the store, reduction of A148 speed limit, improved lighting on Heath Farm Roundabout, Impact on local business.*

Highways – No objection – *subject to conditions.*

North Norfolk District Council Landscape Officer – No objection – *Subject to taller shrubs and trees being included either prior to determination or as a condition, requested landscaping conditions. External lighting is acceptable and ecology conditions also requested.*

Norfolk County Council Lead Local Flood Authority (LLFA) – No objection – *All points now satisfied, pre-commencement condition requested regarding site specific construction surface water management plan and a further condition that construction be in accordance with submitted FRA, drainage strategy and water management plan.*

Norfolk Fire and Rescue – No objection – *Requested a condition for minimum 1 fire hydrant to BS750 standards*

Norfolk Police – No objection – *Offered advice regarding landscaping, cycle storage, permitter security, and external lighting*

REPRESENTATIONS:

A total of **228 representations** were received in relation to the application comprising:

- **186** comments in **support**
- **32** comments in **objection**
- **10** were generally **neutral** comments

Matters Raised in Support

Support for the proposal included comments relating to the following considerations:

- The need for a more affordable food store within Holt, particularly in light of cost-of-living pressures
- A perceived lack of retail choice and competition, with existing provision considered limited and comparatively expensive
- The potential to reduce the need to travel to surrounding towns for main food shopping, with associated environmental benefits
- Improved access to food shopping for residents without access to a private car, including elderly and lower-income households
- The provision of local employment opportunities and associated economic benefits
- The need for additional infrastructure to support recent and planned housing growth within the town
- Wider sustainability benefits, including reduced vehicle trips and the inclusion of energy-efficient measures

Matters Raised in Objection

Objections to the proposal focus on the following material planning considerations:

- Concerns regarding conflict with the Development Plan, including policies relating to the location and scale of retail development and the application of the town centre first (sequential) approach
- The potential impact on the vitality and viability of Holt town centre, particularly independent retailers

- Highway safety concerns, including increased traffic movements, the operation of the A148 roundabout, and access arrangements
- The site's limited accessibility by pedestrian and cycle modes, and the reliance on car-based travel
- Potential adverse impacts on residential amenity, including noise, light pollution and general disturbance
- Concerns regarding the design, scale and visual appearance of the building and its compatibility with the local character
- Issues relating to traffic congestion, parking provision and site layout
- Environmental impacts, including localised effects and mitigation measures

Neutral / Conditional Responses

Neutral representations generally recognise the potential benefits of a new food store but raise concerns requiring further consideration, including:

- The need for improved pedestrian and cycle connectivity
- Highway mitigation measures, including traffic management and safety improvements
- Design quality, landscaping and integration with the surrounding area

HUMAN RIGHTS IMPLICATIONS:

Art. 1 of the First Protocol: The right to peaceful enjoyment of possessions

“Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the condition provided for by law and the general principles of international law.”

Art. 8: The right to respect for private and family life.

1. *“Everyone has the right to respect for his private and family life, his home and his correspondence.”*
2. *“There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.”*

Having considered the above convention rights, and taking account, in particular, of the amenity impacts discussed below which engage Article 8 rights APPROVAL of this application as recommended is considered to be justified, proportionate, justified in the public interest, and necessary in a democratic society in the interests of the economic well-being of the country and in accordance with Human Rights Act 1998 (as amended) and planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

LOCAL FINANCE CONSIDERATIONS

Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are not considered to be material to this case.

EQUALITY ACT 2010- SECTION 149

The Council is required to have due regard to the need to—

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Protected characteristics include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Councils must also have due regard to eliminating discrimination arising from marriage or civil partnership status.

The proposal would have no adverse impact on those with protected characteristics or on equality objectives, and advances equality of opportunity by, in particular, making provision for accessible parking spaces.

RELEVANT POLICIES:

Adopted North Norfolk Local Plan (NNLP):

CC1 – Delivering Climate Resilient Sustainable Growth
CC3 – Sustainable Construction, Energy Efficiency and Carbon Reduction
CC4 – Water Efficiency
CC7 – Flood Risk and Surface Water Drainage
CC8 – Electric Vehicle Charging
CC9 – Sustainable Transport
CC10 – Biodiversity Net Gain
CC12 – Trees, Hedgerows and Woodland
CC13 – Protecting Environmental Quality
SS1 – Spatial Strategy
HC5 – Fibre to the Premises (FTTP)
HC7 – Parking Provision
ENV2 – Protection and Enhancement of Landscape and Settlement Character
ENV4 – Biodiversity and Geology
ENV6 – Protection of Amenity
ENV8 – High Quality Design
E4 – Retail and Town Centre Development
Residential Allocation: Land at Heath Farm (H20)

Holt Neighbourhood Plan (HNP) (2023):

HOLT1 – Design Guidance
HOLT4 – Employment Growth in Holt
HOLT6 – Connectivity in and around Holt

Material Considerations:

National Planning Policy Framework (NPPF) (August 2026):

DM1: Preparing development proposals
DM2: Information requirements
DM3: Determining development proposals
DM6: Use of planning conditions and obligations
S3: Presumption in favour of sustainable development
S4: Principle of development within settlements
S6: Neighbourhood plans and the presumption
CC2: Mitigation of climate change
CC3: Adaptation to climate change
TC3: Main town centre uses outside town centres
TC4: Assessing the impact of development on town centres

L2: Making effective use of land
DP3: Key principles for well-designed places
DP4: The design process
TR3: Locating development in sustainable locations
TR4: Street design, access and parking
TR6: Assessing transport impacts
P3: Living conditions and pollution
F4: Assessing flood risk for decision-making
F7: Ensuring development is safe from flooding
F8: Sustainable drainage systems and watercourses
N2: Improving the natural environment

Supplementary Planning Documents:
North Norfolk Design Guide (2011)

OFFICER ASSESSMENT:

MAIN ISSUES FOR CONSIDERATION:

1. Principle of development
2. Sequential Site Assessment
3. Retail Matters
4. Design
5. Amenity
6. Highways
7. Flood Risk
8. Biodiversity Net Gain (BNG)
9. Landscape
10. Ecology
11. Sustainable Construction, Energy Efficiency, Carbon Reduction and Water Efficiency
12. Fibre to the Premises (FTTP)
13. Conclusion and Planning Balance

THE APPLICATION SITE

Planning permission is sought to develop this site to deliver a Class E Discount food store (1,969 sqm Gross Internal Area (GIA)) with associated car parking, landscaping, engineering and drainage works. The site is an area of land to the south-east of the roundabout connecting the A148 Holt Bypass and Nightjar Road, bound to the north by the bypass, with residential development to the west, a care home to the south, and a residential allocation to the east.

1. Principle of Development:

In accordance with Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the Development Plan for the area currently includes the North Norfolk Local Plan which was adopted in December 2025, the Holt Neighbourhood Plan which was adopted in August 2023 and the Norfolk Minerals and Waste Local Plan which was adopted in May 2025. At a national level, the National Planning Policy Framework (NPPF) and the Planning Practice Guidance are other material considerations to which regard should be had.

Policy S3 of the NPPF (2026) establishes a presumption in favour of sustainable development, referring to the later Policies S4 and S5 if applicable, and stating that *“in all locations, development proposals that accord with both an up-to-date Development Plan and the decision-making policies in this Framework should be approved without delay.”*

This site lies within the settlement boundary of Holt – a “Small Growth Town” as defined by Policy SS1 of the Adopted North Norfolk Local Plan (NNLP).

Because the site is located within the settlement of Holt, Policy S4 of the NPPF (2026) is relevant, stating that *“Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework”*.

Policy SS1 of the NNLP seeks to direct development toward the district’s more sustainable locations. Holt’s classification as a Small Growth Town establishes it as one of the district’s most sustainable settlements, and reflects the larger population, size and historic economic centre from which the town benefits. Holt is therefore considered an appropriate location for retail supermarket development in principle, subject to compliance with other relevant NNLP policies.

Policy E4 of the NNLP focuses on retail and town centre development. Among other things, the policy states that *“Proposals for retail and other town centre development of a scale appropriate to the retail hierarchy will be supported provided that development respects the character of the centre, including its special architectural and historic interest, and assists in maintaining its existing retail function”,* and *“Site selection for retail and other town centre uses should follow national policies and guidance”*.

The application site is a greenfield site located at the eastern edge of the settlement boundary. Members may recall the site benefitting from an allocation under the previous Core Strategy as employment land, but this has now fallen away following the adoption of the NNLP.

The site is not located within an employment area, on previously developed land, or on land specifically referred to in the Holt Neighbourhood Plan (HNP) as a site potentially spatially accepted for retail development. That is not to say that the proposal is not acceptable in principle, rather that the assessment turns more straightforwardly on application of, amongst other things, the sequential test, and consideration of retail impact matters.

Given the above, Officers consider that retail development may be acceptable subject to the application demonstrating compliance with relevant Development Plan policies. Such assessment is made against those relevant policies throughout this report.

2. Sequential Site Assessment

The purpose of NNLP Policy E4 is to maintain and enhance the vitality and sustainability of town centres, enhance local provision within town centres, and encourage local sustainable shopping patterns. The policy provides a retail hierarchy where retail and main town centre uses should be directed towards and sets out the parameters for sequential tests. The policy states that support for out-of-centre development will be dependent on how it reflects capacity available, how it seeks to enhance expenditure retention, consideration of impact on town centres, and accords with locally derived impact thresholds.

Policy TC1 of the NPPF (2026) is a plan-making policy that requires Local Planning Authorities to define the extent of town-centres / primary shopping areas, and to keep them under review

when necessary. This exercise has been undertaken and is established within the Council's Policy Maps which accompany the NNLP (shown in Figure 1 below).

Policy TC3 of the NPPF sets out that Local Planning Authorities should apply a sequential test to planning applications which are neither in an existing centre nor in accordance with an up-to-date plan. This is further considered by Policy HOLT4 of the Holt Neighbourhood Plan which contemplates the development of this site for the convenience retail purposes *'provided it is of a scale which does not harm the vitality and viability of the town centre, satisfies the sequential test, and conforms to other Development Plan policies'*.

Policy TC3 of the NPPF (2026) further states that town centre uses should be located in town centres in the first instance, then edge of centre locations, before considering out of town centre locations.

It is clear from **Figure 1** (below) that this development site is not within the Town Centre as defined by the Adopted Policy SS1, nor is it considered to be an edge of centre location which is defined within the NPPF's glossary:

"For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area.... In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances."

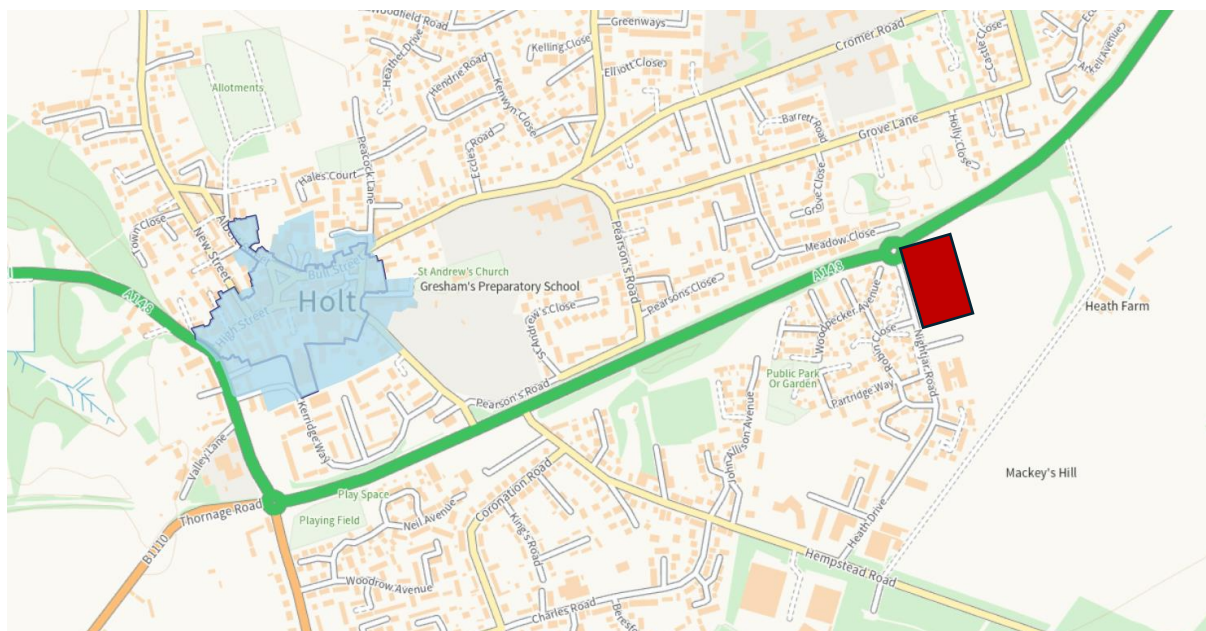


Figure 1 - Map showing Holt's Town Centre designations and the proposed site area in red (approx.).

Light Blue = Town centre Area
Outlined area = Primary Shopping Area

On this basis, it is agreed that this application site is to be assessed as out of centre which is defined within the NPPF's glossary:

"A location which is not in or on the edge of a centre but not necessarily outside the urban area."

The NPPF is clear in stating that the sequential approach to site selection is applied accordingly as per Policies TC3 and TC4 of the NPPF (2026) meaning that consideration must first be given to proposals that are in the centre, then edge of centre. When considering out of

centre sites preference should be given to accessible sites which are well connected to the town centre.

Nexus' advice to the Council (October 2025) covers the sequential test in detail based on the information provided by Carney Sweeney in support of this Lidl store, within it highlighting that relevant case law establishes the following:

- *“sequential alternative sites should be able to accommodate a broadly similar form of development as the application proposal (allowing for flexibility in respect of format and scale) in the ‘real world’ in which developers operate; and that*
- *operators’ distinct models are not generally of direct relevance to the test, and as such sequential alternatives should not be discounted due to individual operator preference.”*

Carney Sweeney outline their search parameters clearly, and restrict their search to Holt town centre only, adopting a 20-minute drivetime from the site as an appropriate catchment for the proposal. These parameters are found to be acceptable, and alternative sites should only be considered if they are within, on the edge of, or out of (but better connected to) Holt town centre.

Carney Sweeney consider various unsuitable sites across Holt, ruling each site out for reasons that are agreed by Officers. Consideration is also given to the Old Station Way site that is subject of the competing planning application (PF/26/0131).

In assessing this site, the Council are informed by the case *R (on the application of Tesco Stores Limited) v Stockport Metropolitan Borough Council and Lidl Great Britain Limited [2025] EWCA Civ 610 (9 May 2025)* (hereafter referred to as ‘The Stockport Case’). In this case the Court of Appeal dismissed an appeal by Tesco against the decision of the High Court to dismiss a judicial review of a planning permission that Stockport Metropolitan Council issued for Lidl to erect a new food store.

In the Stockport Case permission was granted for an out of centre food store in the context of two other sites that were said by objectors to otherwise be ‘*sequentially preferable*’. The Council subsequently gave extensive consideration as to whether these sites were ‘*available*’ in line with the requirements of paragraph 87 of the NPPF (2021), which stated (the same policy is now set out in Policy TC3 of the 2026 NPPF):

“Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.”

Previously, the Judge in the High Court had dismissed the application by Tesco on the basis that the alternative “site was not “*available*” for the purposes of the sequential test if it was “*already committed to an occupier*”. This position was upheld by the Court of Appeal.

Nexus advises the Council that Carney Sweeney have appropriately considered and ruled out all other sites within the search area. The Old Station Way site is an out-of-centre site like this and could be suitable for this development but is clearly considered to be unavailable given its commitment to Aldi. There are no other suitable or available sites within the search area, even when applying a sufficient degree of flexibility in accordance with Policy.

Officers conclude that the Old Station Way site can be considered 'unavailable' for the proposed development given that it is already committed to Aldi, and subject of a competing planning application.

Officers therefore conclude that this application meets the sequential site selection test in accordance with Policies TC3 and TC4 of the NPPF (2026).

3. Retail Matters

NNLP Policy E4 seeks to enhance the vitality and sustainability of town centres and encourage local sustainable shopping patterns. Critical to assessment of this application is the scope of Holt town centre to maintain its vitality and viability under the challenge of potentially competing retail development proposals.

NNLP Policy E4 sets out that:

"Support for out-of-centre development will be dependent on how it reflects:

- a) the capacity available to support the proposal as identified in the Retail Study [which supported the Local Plan] and subsequent permissions; and,
- b) how it seeks to enhance expenditure retention and in relation to the assessment of impacts on the town centre⁽¹¹²⁾ and wider retail catchments, and is in accordance with the locally derived impact thresholds below..."

In making this assessment, footnote 112 to the policy states "Impacts to consider include those on existing, committed and planned public and private investment in a centre(s) and the wider functional catchment area (as applicable to the scale and nature of the proposal) as well as town centre(s) vitality and viability, local consumer choice in the short and medium term 5- 10 yrs."

This application exceeds the locally set impact threshold for Holt of 500 sqm gross floor area requiring retail impact assessments to be undertaken.

It is noted that the Carney Sweeney assessment submitted in support of the application identifies that a large proportion of the convenience spend generated in Holt is being spent elsewhere and that the proposed store will clawback expenditure leakage. Officers accept those elements of the Carney Sweeney assessment.

Policy TC4 of the NPPF sets out that:

"Development proposals for retail and leisure uses located outside town centres should be accompanied by an impact assessment if the proposal exceeds a floorspace threshold set out in an up-to-date Development Plan (500qm in this case) and is not on a site which is allocated for the proposed use in the plan."

This policy continues:

"In circumstances where an impact assessment is required, it should be demonstrated that the development would be unlikely to have a significant adverse impact on:

- a) Existing, committed and planned public and private investment in a town centre or centres in the catchment area of the proposal; and*

- b) *Town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)*”.

Policy TC3 of the NPPF indicates that proposals for retail and leisure development that fail the sequential test or are “likely to have significant adverse impact on one or more of the considerations in Policy TC4” should be refused.

NNLP Policy E4 accords with the key aims and requirements of paragraphs 94 and 95 of the NPPF.

The Council are advised by Nexus that the following positions are relevant and apply to this application:

- *There is no committed or planned town centre investment that is of relevance to the impact test, and the proposal complies with the first part of paragraph of 94 of the NPPF (2024) (Now Policy TC4 of the NPPF (2026)).*
- *Holt Town Centre is performing well and is considered to be vital and viable.*
- *A household survey (dated May 2025) was commissioned to support the Lidl application. Both Avison Young (Aldi) and Carney Sweeney (Lidl) have adopted this survey and Nexus advise officers that this is appropriate.*
- *The estimated turnover of the proposed Lidl store is £8.9m (Avison Young). Nexus advise that the Avison Young pre-development turnover figure is to be preferred to the Carney Sweeney figure as it reflects the latest published Retail Planner Briefing.*
- *Overall, the assumptions applied in the retail information submitted in support of this application are accepted, and the Council may now move to considering the acceptability of the scheme.*

It is noted that Nexus considers the proposal to comply with NPPF paragraph 94(a) and Officers would concur with this assessment.

When assessing the proposal against NPPF Policy TC4 2(b) the relevant policy test refers to the vitality and viability of the town centre as a whole, as opposed to any individual store or stores. This is important when assessing the information at **Figure 2** below.

Carney Sweeney states that the solus impact (impact of their own store if coming forward as the only one permitted in the town) on Holt town centre would not be significantly adverse. The impact on the town centre in terms of trade diversion in solus model for Lidl is assessed by Carney Sweeney to be -9.9%.

Nexus advises the Council that Carney Sweeney’s assumptions do not reflect the latest published Retail Planner Briefing Note forecasts. Consequently, Nexus’ advice to the Council is that each developer’s trade diversion assumptions can be accepted, but Avison Young’s pre-development turnover position should be adopted. Nexus have carried out an independent assessment of the proposals using this, with a solus impact of this store on Holt Town Centre assessed to be -12.6% rather than the -9.9% stated by Carney Sweeney. Officers accept the advice given by Nexus.

Following advice from Nexus Officers conclude that the solus impact of this application would not give rise to a significant adverse impact upon the vitality and viability of Holt town centre. As such the proposal is considered to comply with Policy TC4 of the NPPF (2026) and Policy E4 (including E4(4)) of the NNLP if coming forward in isolation.

Cumulative Impacts

In considering whether Holt town centre can withstand the impact of the proposed Lidl and Aldi food stores coming forward together, it is noted that Carney Sweeney find the potential cumulative impact of two stores on Holt Town Centre as at 2030 to be -18.5%. Avison Young estimates the same impact to be -22.6%. This difference comes from Avison Young's use of the latest Retail Planner Briefing Note forecasts.

Nexus have considered the approach used by both developers and find that the trade diversion assumptions are acceptable but the pre-development turnover position that is adopted should be that of Avison Young.

Destination	Pre Development Turnover	AY Diversion to Aldi	AY Diversion to Lidl	AY Solus Impact (Aldi)	AY Cumulative Impact	CS Diversion to Lidl	CS Diversion to Aldi	CS Solus Impact (Lidl)	CS Cumulative Impact
Budgens	12.52	1.67	1.77	13.3%	27.5%	2.12	1.63	16.9%	30.0%
Holt Town Centre	16.81	1.86	1.95	11.1%	22.6%	2.12	1.63	12.6%	22.3%

Notes:

Pre-Development Turnovers taken from Table 20 of Avison Young's Combined Assessment of May 2026

Avison Young Diversion Assumptions taken from Table 20 of their Combined Assessment of May 2026

Carney Sweeney Diversion Assumptions taken from Table 21 of their Cumulative Assessment of April 2026

Figure 2 - Solus and Cumulative Impact Assessment (Nexus Planning Additional Briefing Note – Received 13th July 2026)

Figure 2 above is produced by Nexus using the above-mentioned method. Nexus' advice therefore is that the cumulative impact of both stores on Budgens would be between -27.5% and -30.0% and the cumulative impact of both stores on Holt Town Centre would be between -22.6% and -22.3%. Nexus' advice to the Council is that *'under both cases, the potential cumulative impact on the defined centre is substantial, and one which would be considered to be significantly adverse'*.

These concerns are *'due to the increased competition associated with two additional foodstores in the market in Holt, and the potential that two new entrants into the market would encourage a higher proportion of shoppers to alter their convenience shopping habits, which would ultimately result in a reduction overall in trips to Budgens, and therefore the wider town centre.'*

Nexus advises that if both the Aldi and Lidl stores come forward there is a potential that there would be a significant adverse impact on Holt town centre. Following thorough review by Nexus and having regard to their advice, it is the view of Officers that the cumulative impacts from the construction of two food stores in Holt is likely to cause a significant adverse impact on town centre vitality and viability.

Officers are of the view that:

1. There is an advantage in extending the retail offer in Holt.
2. The solus impact of the Lidl store would -12.6% on Holt Town Centre and -16.9% on Budgens. This is considered to create some disadvantage in that it would draw trade away from the centre, but is not considered to be significant adverse.
3. The cumulative impact of both stores would be between -22.3% and -22.6% on Holt Town Centre and -27.5% and -30% on Budgens. This is considered to be significantly adverse. As a result there would be clear disadvantage from permitting two stores. There is a finite capacity for accommodating out of centre stores without causing a significant adverse impact on Holt town centre.

4. There is an alternative site on which the retail offer in Holt can be expanded, namely the Station Way site where Aldi have put forward planning application PF/26/0131. As a result there are rival proposals.
5. Given the conclusion that the cumulative effect of the proposed Aldi and Lidl stores on Holt town centre would be significant adverse, only one planning permission can be granted.
6. Given those facts and conclusions, the consideration of alternative proposals to extend the retail offer in Holt, and particularly the Aldi application, is a material consideration to be taken into account when considering this Lidl application.
7. This is situation where two proposals are competing for one planning permission, and as result a comparison is to be made between the competing proposals.

Other retail matters

On 13 Aug 2026, a representation was received from Martin Robeson Planning Practice (MRPP) (on behalf of Tesco Stores Limited). This letter, amongst other things, suggested that there were overlaps between the retail catchment areas for Holt and Aylsham and identified concerns that neither the Lidl or Aldi applications in Holt made reference to impact on Aylsham. Both Lidl and Aldi were asked for comment before the Council's retail consultant considered the matter. Only Lidl had responded at the point this report was drafted.

Nexus comment as follows:

'CarneySweeney has provided a response to MRPP's latest representations. The focus of MRPP's representations, made on behalf of Tesco, is on the potential cumulative impact of the proposals in Holt, alongside a new application proposal having been submitted in the neighbouring authority area of Broadland and South Norfolk.

The application proposal is for a Lidl foodstore in Aylsham, where Tesco operates from an out-of-centre location in the context of the town centre.

CarneySweeney notes that two catchments of Holt and Aylsham are principally different and that there is limited overlap between the two. This is indicated in part by the household survey which provides the basis for the findings of the retail assessment for the proposal in Holt, which demonstrates that a limited level of expenditure attracted by the Tesco in Aylsham is drawn from residents in Holt.

CarneySweeney also notes that their assessment indicates that approximately £0.2m will be diverted from the Tesco in Aylsham. As noted above, this Tesco is not a town centre store, is identified as overtrading and does not afford any policy protection. None of the trade is expected to be diverted from the town centre stores in Aylsham.

We note that MRPP also raise a specific concern in respect of the potential impact on Cromer stores in light of the proposals in Holt and Aylsham. This has not been addressed specifically by CarneySweeney but we are satisfied that the level of diversion associated with the three proposals is unlikely to have a significant adverse impact on Cromer town centre. This view has been reached in respect of the nature of the catchments, the offer of the town centre and assumption that the majority of trade will be diverted from existing stores in the respective towns of Holt and Aylsham.

Given the above, we are satisfied with CarneySweeney's additional submissions in response to MRPP's representations and consider that these have appropriately responded to the concerns raised by MRPP.

Neither the representations made by MRPP or CarneySweeney's response alters our previous conclusions made in respect of the acceptability of the proposals from an impact perspective.'

On the basis of the above, Officers consider that the late representation on behalf of Tesco Stores Limited does not alter the Council's conclusions on retail matters.

Comparison of the competing applications:

Following the above, the Council are adopting the position that Holt can support only one of the two competing proposed retail developments. Members must therefore be mindful of how the applications compare and keep those factors in mind as they consider the applications before them across the following five key considerations:

1. Both applications (**PF/25/1630 – "Lidl"** and **PF/26/0131 – "Aldi"**) are proposed on sites which are 'out-of-centre'. The proposed Aldi store would be approximately 450m from Holt's Primary Shopping Area. The proposed Lidl store would be approximately 1.4km from Holt's Primary Shopping Area. Officers conclude that the site of the proposed Aldi store is closer to (although not well connected to the town centre) and is better connected to the Town Centre than the site of the proposed Lidl store.
2. Both stores are found to pass the sequential test as required by Policy TC3 of the NPPF (2026) (and Policy HOLT4 of the Holt Neighbourhood Plan in the case of Aldi). This is explained as above in Section 2.
3. Both Aldi and Lidl contend that their store would have no impact on any planned investment in the centre of Holt. Nexus advises the Council that there is no committed or planned investment of relevance and accept this point.
4. Nexus advises the Council that any relevant centre would not be the subject of an unacceptable impact should either store come forward on its own.
5. In terms of retail matters alone Officers find that this development proposal site is further from Holt town centre with a likely decreased potential for linked trips. It is a proposal on a greenfield site rather than Previously Developed Land and the use is not contemplated in the Holt Neighbourhood Plan when compared directly to the competing application.

Officers therefore conclude that in retail policy terms proposal PF/26/0131 is marginally more preferable. However, it is important to bear in mind that (in terms of retail planning policy) if considered in isolation (as single stores) that either site could be acceptable. However, other planning considerations would also have to be taken into account when considering which site is to be preferred.

4. Design

Policy DP3 of the NPPF (2026) states the principles that one must apply when looking to deliver '*well-designed places*'. Development proposals should 'respond to their context so that they integrate with and enhance their surroundings'. This policy continues to establish 7 different principles that should be reflected within the design; liveability, climate, nature, movement, built form, public space and identity. Lastly, this policy establishes that '*substantial weight should be given to compliance with relevant Development Plan policies when assessing the design quality of proposals*'.

The purpose of NNLP Policy ENV8 is to provide a set of design principles that will result in a high quality of design and ensure the special character and qualities of the district are maintained and enhanced. The policy criteria sets the approach to a number of considerations including the public realm, green infrastructure, landscaping and service facilities, having regard to the North Norfolk Design Guide SPD.

The proposed store is positioned in the south-east corner of the site. It is a monopitch roof design with a heavily glazed elevation to the north. The glazed store entrance will be at the northern end of the east elevation. The remainder of the building is proposed to be faced in orange blend brick slips with pillars and ivory render (RAL 1015). Customer Parking will wrap around the structure from the south-west to the north, with landscaping buffering the highway and the parking area. Vehicular traffic would access and exit the site through a T-junction access point towards the south of the site, connecting onto Nightjar Road.

The site is visually prominent sited adjacent to the first roundabout on the A148 for traffic entering Holt from the east. This is reflective of its edge of settlement classification in the Local Plan. It will be important to consider the development in the context of the adopted site allocation to the east as well (Land at Heath Farm) – this site may currently read as prominent within a mostly rural setting to the east of Nightjar Road, but this character will change to meet the strategic needs of Holt and the wider district. As such, members are requested to view the proposals in terms of this strategic spatial context and physical change that is expected to arrive from it.

The comments of the Council's Conservation and Design Officer are noted with concerns initially raised about the choice of render colour, as well as the visual prominence of the parking area rather than the store. Given those early stage concerns the proposed render colour has been amended to one which has greater commonality with the residential dwellings to the west. Officers are minded that the positioning of the store and its parking and servicing areas within the site is appropriate.

It is considered that the scale, massing, materials and layout of the development are all acceptable and in accordance with Policies ENV2 and ENV8 of the NNLP, as well as Policy DP3 of the NPPF (2026) and the North Norfolk Design Guide SPD.

5. Amenity:

The purpose of NNLP Policy ENV6 is to maintain, protect and promote adequate living and working conditions to ensure that all occupants benefit from a good standard of amenity by considering a number of matters including, overlooking, overshadowing, loss of privacy and prevention of disturbance from odour, noise and artificial light pollution. The policy applies to all development proposals, where existing and/or future occupiers may have their standard of amenity affected.

Due to the siting and orientation of the building it is considered that the built form causes no substantive harm in terms of loss of light, loss of privacy, visual dominance, or reflective glare. Aside from these matters, consideration is given to the comments of the Council's Environmental Protection Officer (EPO). summarised concerns will now be discussed in turn.

Mechanical Services Plant

Following receipt of the acoustic survey it is considered that appropriate conditions should be used to control the plant and equipment types used, as well as its installation, maintenance, retention and boundary treatments.

Delivery, reversing warning and unloading noise

It is noted that disturbance caused by deliveries is expected, particularly if in the later evening, early morning, or at weekends. It is common practice to use conditions to control delivery hours, a draft condition is attached to this recommendation.

Car parking noise

There are concerns raised about the prospect of overnight use of the car park. The applicant has agreed to a condition requiring the installation of a gate (or similar) to be installed across the entrance(s) to the site and its nightly use so as to prohibit unnecessary use of the parking area. Officers are content that suitable conditions will address these concerns.

Odour control

It is considered that the development could accommodate an extraction system (if necessary) that would be acceptable in terms of odour disturbance. Officers are therefore content to control extraction via condition.

Refuse storage and collection

It is noted that the EPO finds the submitted information to be acceptable. Officers suggest in inclusion of a condition securing the agreed waste management strategy.

Lighting

The proposal has the potential to adversely impact properties in terms of light pollution, particularly the easternmost properties found to the north of Robin Close, west of Nightjar Road. The car park being positioned to the west of the store and benefitting from some streetlighting has the potential to cause some disturbance in terms of light pollution. Officers note existing streetlights are a known feature on local estate roads. In addition, the "Highways" lighting on the adjacent roundabout on the A148. The proposals sit in an urban area with existing light pollution. Finally, there is mitigation in store design with the main glazed elevation of the store positioned facing north, limiting light pollution from the store itself in the crucial western (or in future; eastern) directions.

As with other considerations, Officers are content that an acceptable layout / design / specification can be submitted that would not result in an unacceptable amenity disturbance. This recommendation subsequently includes a condition relating to illumination across the car park, with a focus on its intensity, direction and hours of operation.

Contaminated land and air quality

It is considered reasonable for each of these topics to be controlled via planning condition.

This proposal must be viewed in a residential context, with regard to the proximity of the existing residential neighbours over Nightjar Road, and the likely future residential development to come forward to the east. It is vital, therefore, that this development is neighbourly, and proceeds only if impacts upon those future residents is found to be acceptable.

Officers have reviewed the comments of the Council's EPO, with consideration given to the requests for additional information that are made throughout those comments. It is considered that the building's position within the site, and its structural relationship with neighbouring properties as a built structure is acceptable as submitted. Technical review has been undertaken of amenity issues and it is considered that those concerns are either already "designed out" or are otherwise controllable via suggested planning conditions that are attached to this recommendation.

Taking account of the above, and having full regard to the submitted information, as well as the comments of the Council's EPO, it is considered that this application is acceptable in terms

of its impact on residential amenity, having regard to Policies CC13 and ENV6 of the NNLP, as well as Policy P3 of the NPPF (2026) and the North Norfolk Design Guide SPD.

6. Highways

The purpose of NNLP Policy CC9 is to ensure that new development maximises the opportunities for the use of sustainable forms of transport appropriate to its particular location, that the public highway remains safe and convenient to use for all road users and that proposals are served by safe and suitable access without detriment to the amenity and character of the local area.

The purpose of NNLP Policy HC7 is to ensure the provision of adequate safe and secure vehicle and cycle parking taking account of active travel objectives. Proposals should take account of the latest Norfolk County Council Parking Guidelines as a starting point, to ensure parking is integrated as a key element of design layouts, including the provision of electric vehicle charging infrastructure.

The purpose of NNLP Policy CC8 is to promote and ensure delivery of appropriate electric vehicle charging infrastructure where vehicle parking forms part of a proposal. Requirements for non-residential proposals are also set out with allowance for viability evidence to be considered. Major development must also provide full details of electric vehicle charging points proposed within a scheme and how they will be managed within a Transport Assessment or Transport Statement.

Policy TR6(4) of the NPPF (2026) states that *“Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.”*

Following the publication of the 2026 version of the NPPF the above Policy explicitly includes the construction phase as a new consideration of whether highway safety impacts would be unacceptable, as well as post-completion of the development. In this case the Council are satisfied that there is sufficient space within the site, as well as an appropriate access route, to enable construction of the development to proceed without an unacceptable impact on highway safety.

The application proposes vehicular access from Nightjar Road through a T-junction on the east side of the highway. This access location requires the removal of an existing pedestrian island, with a new parallel pedestrian/cycle crossing now proposed in lieu of that feature to be lost. Off site, the scheme also proposes the provision of a 3m wide cycleway between the A148 roundabout and the new crossing, a widening of the roundabout splitter island, and bus stop improvements to introduce raised kerbs and a shelter.

These improvements are noted and attract positive weight in the assessment of this application. That said, the submission fails to maximise opportunities for off-site improvements, with particular focus on Policy HOLT6 of the Holt Neighbourhood Plan (HNP), which refers to the Holt Green Wheel. This concept is an aspirational model for green infrastructure in and around Holt, including footpath and bridleway connectivity around and through the town, a bus hopper route, and a new crossing of the A148 bypass in the east of the town, specifically at the north-east corner of the site allocated for residential development under Policy H20 of the NNLP.

The Lidl site, given its edge of settlement location, is important to the Holt Green Wheel as an idea, with potential commitments highlighted at pre-application stage. Officers consider that this application could have included greater footpath connectivity in accordance with the aspirations of the Holt Green Wheel. The application is also brought to Committee without any financial contributions in support of this as well. Officers find that this is a departure from HNP Policy HOLT6. This should be weighed in the planning balance including against the off-site improvements that are secured and specified above.

On site, the development proposes 120 car parking spaces inclusive of 14 Electric Vehicle Charging (EVC) (2 of which are accessible), 6 total accessible parking spaces (including the 2 EVC) and 9 parent and child (P&C) spaces. A zebra crossing near the store entrance is proposed to enable pedestrians and cyclists to access the store, and the store provides adequate pedestrian facilities around its perimeter to accommodate trolley bays etc. A central section of the parking area is prohibited from providing bays to enable HGV access into the loading bay. This facilitates HGVs entering and exiting the site in a forward gear for marshalling of goods in and out of the store.

	Gross Floor Area Requirement	Sales Area Requirement	Actual Provision
Total Car Parking Spaces	140	96	120
Accessible Car Parking Spaces	7	5	6
Powered Two-Wheeler Spaces	7	6	0
Cycle Spaces	22	20	12

The Council note the guidance within the Norfolk Parking Standards which states that *'the number of parking spaces for any given development is related to gross floor area (GFA)'*. The gross internal area (GIA) figure proposed (taken from the application form) is 1,969 sqm. Officers agree with this measurement and find it akin to GFA for the purposes of the Norfolk parking standards. The applicant considers that the parking requirement should be derived from the sales area only (1,347 sqm). There is a professional difference of opinion on this matter.

The above table demonstrates the proposal's parking provision when compared with the requirements depending on deriving them from the Gross Floor Area or the Sales Area. Despite the agent's claims it is the view of Officers that GFA should be used to calculate parking space requirements. In this case, the stated GIA figure is considered to be the same as the assessed GFA figure.

Policy HC7 of the NNLP states that the latest Norfolk County Council Parking Guidelines should be applied to proposals as a *'starting point'* with deviation from the guidelines permitted depending on local conditions.

In addition, within the introduction section of the Parking Guidelines it also states that *'Generally, developers should not be expected to provide more spaces than they themselves wish but sufficient spaces must be provided to avoid on-street parking and road safety problems as well as fully catering for disabled drivers and/or disabled passengers and non-car modes.'*

In this case, when applying the standards to the GFA of the proposal as required, Officers find that there is an identified shortfall of 20 parking spaces, 1 accessible space, 7 powered two-wheeler spaces and 10 cycle spaces. That said, the adopted Development Plan allows for some flexibility as is highlighted above. Officers have regard to the applicant's submitted travel

plan and the comments of the County Highways Development Management Officer. No objections are raised based on parking provision.

It is Officer's advice to members that the identified shortfall in parking numbers is not so large as to fail to provide 'adequate' parking facilities or give rise to 'inappropriate on-street parking' or 'highway safety problems' as required by Policy HC7(1) of the NNLP. The Development Plan allows for flexibility when assessing parking, and it is considered that a flexible approach can be accepted in this case.

Policy CC8 requires 20% of all new parking spaces to be EVC unless there is evidence that viability would be affected. The adopted County standards only require 10% of all new spaces to be EVC. This proposal provides provision for 14 EVC spaces, which is 11.6% of the actual number of spaces provided on site. This is compliant with the County standards, as the requirement is only 10%, however adopted NNLP policy CC8 requires 20%. It is considered that the NNLP attributes more weight in this assessment, and a shortfall in EVC provision is therefore noted.

Overall, this scheme is found to conflict with Policy CC8 of the NNLP and HOLT6 of the HNP. However, the scheme is considered to comply with Policies CC9 and HC7 of the NNLP, when flexibility as allowed by the Development Plan. Officers find that the proposal would not result in an 'unacceptable impact on highway safety'. Consequently, this application is, on balance, found to be acceptable in terms of its impacts on highway safety and parking provision.

7. Flood Risk

The purpose of NNLP Policy CC7 is to ensure flood risk is evaluated in development proposals and to require the appropriate management of surface and foul water disposal in order to reduce flood risk. The policy requires development to avoid areas of flood risk where possible, and to incorporate sustainable drainage systems (SuDS). All proposals must also ensure no increase in flood risk elsewhere. Appendix 1: Flood Risk & Surface Water Drainage of the Plan sets out the required level of supporting documentation and detail required.

Among other things, developments must demonstrate compliance with national policy, a positive impact on the risk of surface water flooding on site and provide adequate foul water drainage facilities.

The applicant site is located within Flood Zone 1. It is a greenfield site and the development would result in a significant change in surfacing materials across the site.

Policy F4(2) of the NPPF (2026) sets out requirements for a site specific flood risk assessment for development in Flood Zone 1.

The application is supported by a site-specific Flood Risk Assessment (FRA) and Outline Drainage Strategy which has been the subject of three rounds of consultation with Norfolk County Council in their role as Lead Local Flood Authority (LLFA). This document aims to demonstrate that the development does not increase flood risk to the site or the wider area.

The FRA concludes that the site is at low risk from sewer flooding and groundwater flooding, with all other flood types either very low risk, or not applicable (e.g. coastal). SUDs features are also detailed, as per the below table, taken directly from the FRA.

SuDS	Proposed site	Reason / Comments
Soakaways	Yes	3x Infiltration tanks proposed.
Attenuation underground cellular storage Tank	Yes	3x Infiltration tanks proposed.
Pond	No	There is not sufficient space within the site plan to provide above ground attenuation.
Flow Control	No	No flow control required
Oil / petrol interceptors	Yes	Petrol interceptor proposed
Landscape Relief areas	No	No space to provide this as infiltration tank sizing requires to be placed beneath car-park. Silt Traps
Silt Traps	Yes	Gullies with sumps and catchpits proposed
Green Roofs	No	Not proposed due to their structural weight on the store's foundation. Green roofs require additional concrete foundations and steel due to weight of feature.
Water Butts	No	Rainwater harvesting has been proposed and deemed as more appropriate and effective than water butts.
Rainwater Harvesting	Yes	Rainwater harvesting storage proposed for reuse within internal site as non-potable water.
Filter Strips	No	There is not sufficient space to provide this as well as rainwater gardens, and rainwater gardens & tree pits achieve 4 pillars of SuDS.
Raingardens	Yes	3x Raingardens proposed
Tree Pits	Yes	7x tree pits proposed
Swales	No	There is not sufficient space within the site plan to provide above ground attenuation.
Permeable Pavement	Yes	Permeable pavements proposed in plenty of car parking bays
Infiltration Basins	No	There is not sufficient space within the site plan to provide above ground attenuation.
Detention Basin	No	There is not sufficient space within the site plan to provide above ground attenuation.

Surface water drainage is considered with a climate change growth factor of 45% applied. The scheme will comply with Building Regulations Part H in that all surface water shall be discharged via infiltration (ahead of watercourses and public sewer respectively). Hydraulic modelling is used to calculate the size of attenuation tanks used across the development site.

Water quality is also managed through the use of permeable pavements, rainwater gardens, gullies and tree pits. A petrol / oil interceptor is also proposed. Lastly, the Drainage Strategy proposed the construction of a new foul water connection to serve the store.

Full and detailed consideration of the FRA and Outline Drainage Strategy has taken place, with three rounds of consultation as mentioned above. The latest of these comments provides a running list of points of objection that were retained by the LLFA during the consultation process, with attention drawn to the documents provided by the developer to overcome the objections.

In all cases, the LLFA are satisfied that the FRA and Drainage Strategy is adequate, and addresses the concerns raised.

Officers note the collaborative approach taken by the developer with regard to this area of assessment, the clear guidance from LLFA, and the lower risk classification of the site in terms

of flood risk. Subject to conditions securing the measures proposed in the submitted documents, Officers find the scheme to be acceptable in terms of flood risk and surface water drainage, in compliance with Policy CC7 of the Adopted NNLP and Policies F7 and F8 of the NPPF (2026).

8. Biodiversity Net Gain (BNG)

The purpose of NNLP Policy CC10 is to ensure biodiversity net gain (BNG) is achieved in order to help protect and enhance the natural environment, which supports the overall long term adaptability and resilience to climate change. The policy requires qualifying development to achieve a minimum of 10% BNG over the pre-development biodiversity value as measured by the relevant biodiversity metric. A BNG strategy should accompany proposals that provides relevant and proportionate information, including biodiversity metric calculations and details of maintenance, and which demonstrate that the Mitigation Hierarchy has been followed and complies with the Biodiversity Gain Hierarchy.

The application is supported by a Biodiversity Net Gain Report, inclusive of pre and post-development maps and figures, as well as the statutory metric. This information has been reviewed by Officers.

The site is not considered to contain any habitats of high or very high distinctiveness. A medium distinctiveness habitat is present at the site (Bramble Scrub) which is proposed to be lost as a result of the development. It is appropriate for off-site compensation to be used to address this habitat loss and this is proposed by the developer.

With regard to linear units, the development proposal includes information which demonstrates onsite creation, resulting in an uplift in hedgerow biodiversity. This would be secured as part of the Net Gain Plan to be agreed with the Local Planning Authority in the event of permission being granted.

For the purposes of making this recommendation the Local Planning Authority need only be in a position to agree the baseline, with compensation / habitat creation agreed after determination in line with legislation. The Council are satisfied that the baseline habitat plan is accurate, and corresponds with the statutory metric. The stated approach of using off-site compensation is also considered appropriate, having regard to the distinctiveness of the habitats that will be lost on site.

The submitted report concludes that the off-site compensation will be required to deliver a minimum of 0.28 Biodiversity Units (BU) of medium scrub as well as an additional 1.22BU of any habitat type. Officers agree with this conclusion. It is therefore considered that this development is acceptable and complies with BNG legislation subject to conditions requiring the submission of a Net Gain Plan inclusive of on-site habitat creation and off-site compensation.

The proposal is found to be compliant with BNG legislation, having regard to Policy CC10 of the NNLP.

9. Landscape

The purpose of NNLP Policy ENV2 is to require development to respect and enhance local landscape character, settlement patterns and the relationship between settlements and their surroundings. Proposals should be assessed against the Landscape Character Assessment SPD and should be sympathetic to the key characteristics and valued features of the area.

Proposals should set out how the development will protect and conserve the defining qualities and distinctiveness of the Landscape Character Type.

The Landscape Character Assessment identifies the site as being within the Wooded Glacial Ridge (WGR1) character type. The site is predominantly viewed within the context of the urban settlement of Holt to the west, north and south but to the east the site is currently agricultural fields, albeit land to the east is allocated for residential development and specialist elderly persons accommodation expected to be delivered across the 2024-2040 plan period. The site currently lies empty and fenced offering limited positive impacts in terms of landscape quality when approaching from the west. When approaching from the east along the A148, there is an existing deciduous boundary hedge incorporating semi mature trees which, will screen the site to some degree when in leaf but reducing in effect during winter. Retention of this hedgerow is dependent on the allocated site (H20) securing its retention.

The southern boundary of the development site is to be bound with a 1.25m high galvanised steel fence, screened inside the site by 'low-growing species'. The eastern boundary of the site is to be bound with a 2.1m high close boarded fence. This screens the rear of the store which currently feels the least sensitive direction, however the allocation in this direction must be considered fully. It is understood that a more substantive boundary treatment can be appropriate here with health and safety / security concerns.

To the north and west the landscaping measures are softer, making use of trees / shrubs. This approach will provide intermittent screening of headlights at a low level, provide a boundary to the site, soften the appearance of the development, and assist with compliance in terms of BNG and drainage.

The comments of the Council's Landscape Officer are noted, and attention is drawn to the plant choice along the southern boundary in particular, with use of taller species recommended. It is considered appropriate to consider this, notwithstanding the submitted information, via condition.

Consideration is also given to external lighting, with amendments received during the course of the application to reduce the intensity and increase the warmth of the lighting. The proposed lighting is also directional to limit upward glow, with hours of use restrictions, and movement activated lighting in the marshalling yard. Regard is also had to the Institute of Lighting Professionals (ILP) guidance in relation to environmental zones. Officers might disagree with the submission based on current information, however in light of the allocation to the east lightly enclosing the development, this alone is not considered sufficient to warrant an objection based on lighting, having regard to the information provided.

Taking account of the above, and subject to conditions in line with the requests of the Landscape Officer, the application is found to be acceptable in terms of landscape, in accordance with Policies ENV2 and ENV8 of the Adopted NNLP.

10. Ecology

The purpose of NNLP Policy ENV4 is to require the protection, enhancement and net gain for biodiversity and geodiversity. Proposals must avoid harm to designated sites and deliver measurable biodiversity net gain (BNG). The policy requires suitable ecological surveys to establish the extent of the potential impacts on ancient woodlands, veteran trees, protected species and priority species or priority habitats.

The application is supported by an Ecological Assessment (EA), with supplementary surveys also provided following recommendations originally made in the EA. These surveys focus on

bats and reptiles, with reptiles considered likely to be absent from the site, but precautionary working practices recommended during site clearance.

Six species of bat were identified as using the site for foraging, and as such a sensitive lighting condition is recommended. This condition would comply with the lighting scheme specified and referred to in the previous section of this report.

There are no other concerns in relation to ecology, and subject to the conditions requested by the Landscape Officer, the application is found to be acceptable in accordance with Policy ENV4 of the NNLP and Policy N2 of the NPPF (2026).

11. Sustainable Construction, Energy Efficiency, Carbon Reduction and Water Efficiency:

Proposals must demonstrate that they will achieve a progressively higher standard of environmental sustainability in line with Policy CC3 of the NNLP, through the submission of a compliance statement setting out:

- a. the approach taken to address energy efficiency within the design and technical specification of the proposed development;*
- b. comparative target energy performance and carbon emission rates of the proposal in relation to the benchmarked Target Emissions Rate for each dwelling proposed.*

This proposal also exceeds 250sqm in terms of its floor space and must also achieve a minimum of BREEAM very good standard or equivalent.

Further to this, Policy CC4 of the NNLP also requires development to meet BREEAM very good standard or equivalent in terms of water efficiency.

In the case of this proposal, submitted information confirms commitments to reductions in carbon dioxide emissions and energy reduction surpassing Part L of the Building Regulations referred to in Policy CC3. Further information is also provided confirming appropriate water fittings to be used across the development to meet BREEAM equivalent standards as per the requirements of Policies CC3 and CC4 of the NNLP.

Subject to conditions, it is considered that this proposal would comply with Policies CC3 and CC4 of the NNLP.

12. Fibre to the Premises (FTTP):

The applicant has committed in writing to the providing a fibre connection in accordance with the national building regulations, as per Policy HC5 of the NNLP. Officers note this commitment and find that it could be secured via condition in the event of planning permission being granted.

13. Conclusion and Planning Balance

In accordance with Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The proposal before Committee is for a Class E Discount food store (1,969sqm GIA) in an out of centre location. It is a proposal which passes the sequential site assessment and, if coming forward in solus, is not considered to have a significant adverse impact on the vitality and viability of Holt Town centre, in compliance with Policy E4 of the NNLP, HOLT4 of the HNP, and Policies TC3 and TC4 of the NPPF (2026).

Officers find that the scheme complies with the Development Plan in the following respects and is acceptable in terms of its impact upon the following planning considerations:

- Sequential site assessment,
- In solus impact on the vitality and viability of Holt town centre,
- Character and appearance of the area,
- Residential amenity standards in the vicinity of the development,
- Highway safety,
- Flood risk and drainage
- BNG,
- Landscape impact,
- Ecological impact,
- Construction standards,
- Energy efficiency,
- Carbon reduction,
- Water efficiency, and;
- Fibre to the Premises (FTTP)

Officers note the conflict with policy identified within this report in terms of parking provision and EV charging provision and the Holt Green Wheel. There are no other identified departures from the Development Plan.

Taking account of the policies which are complied with and those which are not complied with, it is the view of Officers that the proposal complies with the Development Plan when considered as whole.

Following full consideration of the submitted information and advice from Nexus, Officers conclude that the approval of both planning applications (PF/26/0131 – Aldi and PF/25/1630 – Lidl) would be likely to give rise to significant adverse impacts on the vitality and viability of Holt Town Centre. This is to say that the applications in question are competing for one permission. The grant of one permission therefore has a direct impact on the assessment of another

As noted above Officers find that the Aldi site at Old Station Way site, for the given reasons, is (in retail policy terms) marginally more preferable as an out of centre site than this application site. However, Officers assessment is that the proposal for development of the Aldi site would give rise to unacceptable impacts on highway safety (see report PF/26/0131). It is Officers' advice to members that the Old Station Way site proposal does not comply with the Development Plan when considered as a whole and should be refused on highway safety grounds. As such Officers find that this (Lidl) proposal, which complies with the Development Plan when considered as a whole, is to be preferred.

Officers have considered all wider technical merits of the proposals and find that subject to imposition of suitably worded planning conditions that the proposal accords with the Development Plan when taken as a whole. Other material considerations also indicate that planning permission should be granted for the reasons given above.

RECOMMENDATION:

APPROVAL subject to the imposition of the following conditions and any other conditions considered to be necessary by the Assistant Director for Planning:

1. Time Limit
2. Approved Plans
3. Approved Materials
4. Precautionary Contaminated Land
5. Dust Management Plan
6. Details of plant, machinery and ventilation etc
7. Store Opening Hours
8. Delivery Hours
9. Visibility Splays
10. Layout of parking, turning and servicing etc areas
11. Construction worker parking
12. Construction Traffic Management Plan
13. Off-site highway improvement works
14. Surface Water Management Plan
15. Landscape Implementation
16. External Lighting
17. Ecological Mitigation and Enhancement
18. Construction Environmental Management Plan
19. Fire Hydrant Provision

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DEVELOPMENT MANAGEMENT PERFORMANCE UPDATE – 10 SEPTEMBER 2026

1. INTRODUCTION:

- 1.1 This report briefly sets out performance in relation to the determination of planning applications in Development Management the period **June 2026**.
- 1.2 This report sets out the figures for the number of cases decided and percentage within time set against the relevant target and summary of 24-month average performance.
- 1.3 The tables also set out the percentage of the total number of decisions made that are subsequently overturned at appeal as 24-month average performance.
- 1.4 In addition, the tables set out the number of cases registered and validated within the specified months.

Performance Measure	Actual Performance	Target	Comments
(Speed) Decisions Made (Period June 2026)	Major 1 decision issued 100% within time	60% (80% NNDC)	24 month average to 30 June 2026 is 97.00% 
	Non-Major 66 decisions issued <i>89% within time period (7 cases over time)</i>	70% (90% NNDC)	24 month average to 30 June 2026 is 93.00% 
(Quality) % of total number of decisions made that are then subsequently overturned at appeal (Period June 2026)	Major	10% (5% NNDC)	24 month average to 30 June 2026 is Zero 0% 
	Non-Major	10% (5% NNDC)	24 month average to 30 June 2026 is 0.86% 

Performance Measure	Actual Performance	Target	Comments
Validation (Period June 2026)	Information not currently available for this period	3 days for Non- Major from date of receipt 5 days for Majors from date of receipt	Datasets do not currently breakdown validated apps by Major / Minor or those on PS2 returns, but performance data retrieval being reviewed.

2. S106 OBLIGATIONS

- 2.1 A copy of the list of latest S106 Obligations is attached. There are currently eight S106 Obligations being progressed, six of which have been completed (highlighted in green) and can be removed from the list.

3. RECOMMENDATIONS:

- 3.1 Members are asked to note the content of this report.

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OFFICERS' REPORTS TO DEVELOPMENT COMMITTEE 10-September-2026

*Appeals Information for Committee between
05/08/2026 and 01/09/2026*

APPEALS SECTION

NEW APPEALS

COLBY AND BANNINGHAM - PF/22/2209 - Change of use of detached annexe to holiday let

Pond Cottage, North Walsham Road, Banningham, Norwich, Norfolk, NR11 7DU

For Mr & Mrs Hewitt

WRITTEN REPRESENTATION

Appeal Start Date: 18/08/2026

Appeal Decision:

Appeal Decision Date:

INQUIRIES AND HEARINGS - IN PROGRESS

LUDHAM - TW/25/0472 - T1 - Large Sycamore, Remove along with the mound as causing drainage issues and replace with a smaller tree

2 Malthouse Lane, Ludham, Great Yarmouth, Norfolk, NR29 5QL

For Mrs Rebecca Studd

INFORMAL HEARING

Appeal Start Date: 13/10/2025

Appeal Decision:

Appeal Decision Date:

WRITTEN REPRESENTATIONS APPEALS - IN HAND

ALDBOROUGH - PF/20/0578 - Demolition / removal of 4no. existing livestock units; erection of 2no. replacement livestock units for rearing 1900 pigs, relocation of 1no. existing building to serve as a general purpose storage area, installation of hardstanding, 2no. feed bin hoppers, underground foul water tanks, landscaping, and revised access

Rectory Farm, Doctors Corner, Aldborough Road, Aldborough, Norwich, NR11 7NT

For Mr Filby

WRITTEN REPRESENTATION

Appeal Start Date: 14/04/2026

Appeal Decision:

Appeal Decision Date:

HOLT - PF/26/0404 - Change of use of cafe (Class E) to self-service commercial holiday accommodation (Class C1) incorporating internal alterations.

3 Appleyard, Holt, Norfolk, NR25 6AR

For Mr N Bruce-Lockhart

WRITTEN REPRESENTATION

Appeal Start Date: 17/07/2026

Appeal Decision:

Appeal Decision Date:

MELTON CONSTABLE - EF/23/2472 - Lawful Development Certificate for proposed conversion of loft to bedroom and installation of rooflights

Sloley House, 27 Briston Road, Melton Constable, Norfolk, NR24 2DG

For Mr & Mrs Dean & Sonia James

WRITTEN REPRESENTATION

Appeal Start Date: 18/11/2024

Appeal Decision:

Appeal Decision Date:

RAYNHAM - TW/26/0113 - To remove a Cherry tree to rear boundary and re-plant

Cherry Corner, 31 Stephenson Close, West Raynham, Fakenham, Norfolk, NR21 7DH

For Mr Tim Hickmott

WRITTEN REPRESENTATION

Appeal Start Date: 03/06/2026

Appeal Decision:

Appeal Decision Date:

SALTHOUSE - PF/25/0941 - Demolition of farm buildings and erection of 3 dwellings and associated access arrangements and landscaping

Land To The East Of , Cross Street , Salthouse, Holt, Norfolk

For Mr James Bunn

WRITTEN REPRESENTATION

Appeal Start Date: 26/05/2026

Appeal Decision:

Appeal Decision Date:

SEA PALLING AND WAXHAM - CL/25/0080 - Certificate of Lawfulness for an existing use of land by fishermen / women who fish from Sea Palling Beach and casual boats for fishing and recreation, including but not limited to the storage of vessels and tractors (to facilitate the launching and recovery of the fishing vessels and others), sheds to enable shelter in adverse weather conditions and any other equipment not mentioned

Beach Cottage, Boat Yard, The Marrams, Sea Palling, Norwich, Norfolk, NR12 0UN

For Mr F Page

WRITTEN REPRESENTATION

Appeal Start Date: 08/06/2026

Appeal Decision:

Appeal Decision Date:

SHERINGHAM - TW/25/2596 - T1 - Macrocarpa, remove.

23 Cremers Drift, Sheringham, Norfolk, NR26 8HY

For Mrs Gail Cranshaw

FAST TRACK - HOUSEHOLDER

Appeal Start Date: 07/05/2026

Appeal Decision:

Appeal Decision Date:

THORPE MARKET - PF/25/1471 - Change of use from bed-and-breakfast / small hotel to holiday let (sui generis) (retrospective)

Green House, Cromer Road, Thorpe Market, Norwich, Norfolk, NR11 8TH

For Optimum Patient Care Ltd

WRITTEN REPRESENTATION

Appeal Start Date: 14/04/2026

Appeal Decision:

Appeal Decision Date:

THORPE MARKET - PF/26/0639 - Proposed dwelling with detached garage (self-build) on site of demolished farm house

The Farm House, Hall Farm Barns, Station Road, Thorpe Market, Norwich, Norfolk, NR11 8UD

For Mark Mayes

WRITTEN REPRESENTATION

Appeal Start Date: 13/07/2026

Appeal Decision:

Appeal Decision Date:

TRIMINGHAM - PF/25/2776 - Change of use of detached garage to use for the sale of food and drink to visiting members of the public for consumption on the premises (ClassE(b)) (retrospective).

Cliffhanger Tiki Bar At, The Old Post House, Mundesley Road, Trimmingham, Norwich, Norfolk, NR11 8DZ

For Mr Philip Reeves

WRITTEN REPRESENTATION

Appeal Start Date: 06/05/2026

Appeal Decision:

Appeal Decision Date:

WELLS-NEXT-THE-SEA - PF/25/2763 - Conversion and extension to detached outbuilding to form an annexe

38 Theatre Road, Wells-next-the-sea, Norfolk, NR23 1DJ

For Mr & Mrs P Baker

FAST TRACK - HOUSEHOLDER

Appeal Start Date: 15/04/2026

Appeal Decision:

Appeal Decision Date:

APPEAL DECISIONS - RESULTS AND SUMMARIES

NORTH WALSHAM - PF/25/2503 - Replacement of 8 garages/storage sheds with 5 shipping storage containers (part retrospective)

Land Rear Of 1 Nelson Road, North Walsham, Norfolk, NR28 9HL

For Mr Gavin Payne

WRITTEN REPRESENTATION

Appeal Start Date: 05/05/2026

Appeal Decision: Appeal Dismissed

Appeal Decision Date: 24/08/2026

Total Number of Appeals listed: 14

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**OFFICERS' REPORTS TO
DEVELOPMENT COMMITTEE (ENFORCEMENTS)**

*Appeals Information for Committee between
05/08/2026 and 01/09/2026*

10-September-2026

APPEALS SECTION

WRITTEN REPRESENTATIONS APPEALS - IN HAND

ALDBOROUGH - ENF/21/0234 - Siting of pig bungalows

Land Adjacent Rectory Farm House, Rectory Farm, Doctors Corner, Aldborough, Norfolk, NR11 7NT

WRITTEN REPRESENTATION

Appeal Start Date: 17/09/2025

Appeal Decision:

Appeal Decision Date:

BLAKENEY - ENF/24/0158 - Change of use of the land for the siting of a static caravan

Villeroche, Langham Road, Blakeney, Holt, Norfolk, NR25 7PW

WRITTEN REPRESENTATION

Appeal Start Date: 26/02/2025

Appeal Decision:

Appeal Decision Date:

FAKENHAM - ENF/25/0168 - Installation of uPVC windows in a conservation area.

First and Second Floor 12 - 14 Norwich Street, Fakenham, Norfolk, NR21 9AE

WRITTEN REPRESENTATION

Appeal Start Date: 21/05/2026

Appeal Decision:

Appeal Decision Date:

HOLT - ENF/24/0026 - Material change of use of the land for the siting of shipping containers.

Oakhill House, Thornage Road, Holt, Norfolk, NR25 6SZ

WRITTEN REPRESENTATION

Appeal Start Date: 06/02/2025

Appeal Decision:

Appeal Decision Date:

SHERINGHAM - ENF/25/0062 - Installation of a flue

37 Station Road, Sheringham, Norfolk, NR26 8RG

WRITTEN REPRESENTATION

Appeal Start Date: 18/05/2026

Appeal Decision:

Appeal Decision Date:

SHERINGHAM - ENF/25/0062 - Installation of a flue

37 Station Road, Sheringham, Norfolk, NR26 8RG

WRITTEN REPRESENTATION

Appeal Start Date: 28/05/2026

Appeal Decision:

Appeal Decision Date:

SHERINGHAM - ENF/25/0062 - Installation of a flue

37 Station Road, Sheringham, Norfolk, NR26 8RG

WRITTEN REPRESENTATION

Appeal Start Date: 28/05/2026

Appeal Decision:

Appeal Decision Date:

THORPE MARKET - ENF/24/0144 - Unauthorised material change of use of property to holiday let for large parties

Green House, Cromer Road, Thorpe Market, Norwich, Norfolk, NR11 8TH

WRITTEN REPRESENTATION

Appeal Start Date: 18/05/2026

Appeal Decision:

Appeal Decision Date:

WEYBOURNE - ENF/23/0278 - Change of use of barn to a pilates studio

Weybourne House, The Street, Weybourne, Holt, Norfolk, NR25 7SY

WRITTEN REPRESENTATION

Appeal Start Date: 29/04/2024

Appeal Decision:

Appeal Decision Date:

Total Number of Appeals listed: 9