

**HOLT - PF/24/0265 (Application 1) - Creation of new Preparatory School (Use Class F1(a)) at Holt Hall to comprise the restoration of Holt Hall, including demolition of existing kitchen and stable blocks to create a new North Wing Extension; removal of existing modern pre-fabricated timber teaching block and greenhouses, including demolition of pig sty and wall adjacent to the greenhouses, to create a new Multi-purpose Hall; removal of existing modern greenhouse and timber shed to create a new Music Hall; removal of existing LPG tank, temporary container-type toilet and ancillary buildings and repositioning of the existing equipment shed to create a new Field Studies Centre (Use Class F1(a)); reconfiguration and refurbishment of the Walled Garden; creation of a new ancillary Sports Pavilion and Sports Pitches; adoption of a 30-year Woodland Management Plan; car parking areas; hard and soft landscaping; and associated infrastructure.**

**HOLT - LA/24/0264 (Application 2) - Creation of a new Preparatory School at Holt Hall to comprise the restoration of Holt Hall, including demolition of the existing kitchen and stable blocks to create a new North Wing Extension; removal of existing modern pre-fabricated timber teaching block and greenhouses, including demolition of pig sty and wall adjacent to the greenhouses, to create a new Multi-purpose Hall; removal of existing modern greenhouse and timber shed to create a new Music Hall; removal of existing LPG tank, temporary container-type toilet and ancillary buildings and repositioning of the existing equipment shed to create a new Field Studies Centre; reconfiguration and refurbishment of the Walled Garden; creation of a new ancillary Sports Pavilion and Sports Pitches; car parking areas; and associated infrastructure.**

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## **EXECUTIVE SUMMARY**

The development Committee are being asked to determine two separate applications (Full Planning Permission and Listed Building Consent) which together propose significant development at Holt Hall, in Holt.

This report sets out:

- the developments 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 for each application

The Committee are being asked to consider planning and listed building applications which intend to provide new life and purpose for the grade II listed Holt Hall site. The proposals involve significant change at the site including an extensive range of buildings and facilities needed to transform the site into a fully functioning and effective prep-school for Greshams.

The principle of use of the site as a C2 Use Class facility (residential institution) is considered acceptable, so the central question for the Committee is whether the extent of demolition and new-build elements proposed are acceptable in relation to identified impacts on heritage assets, ecology and ancient woodland and whether the material considerations in favour of the proposal are sufficient to outweigh identified harms.

Having regard to the public benefits identified in support of the proposal, Officers consider that these benefits are sufficient to outweigh the harm to heritage and ecological interests and to outweigh any conflict with Development Plan policy.

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Application 1: PF/24/0265	Application 2: LA/24/0264
<p><b>Major Development</b>  - Target Date: 14 May 2024  - Extension of Time till: 30 Aug 2024  Case Officer: Mr Olivia Luckhurst  Full Planning Permission</p>	<p><b>Listed Building Consent</b>  - Target Date: 09 April 2024  - Extension of Time till: 30 Aug 2024  Case Officer: Mr Olivia Luckhurst</p>

**RELEVANT SITE CONSTRAINTS (both applications):**

- Countryside
- Norfolk Coast National Landscape
- Glaven Valley Conservation Area
- Landscape Character Assessment - Old Pollard Wood
- Ancient Woodland – Old Pollards Wood
- County Wildlife Site – Old Pollard Wood
- Grade II Listed Building
- Tourism Asset Zone
- Contaminated land
- Within Holt Neighbourhood Plan Area

**RELEVANT PLANNING HISTORY (both applications)**

DE21/23/2686

Holt Hall, Kelling Road, Holt, Norfolk, NR25 7DU

Screening Opinion in relation to development proposals for new teaching facilities (The applicant considers the proposal is a development that fall within Schedule 2 Part 10 (b) Urban Development Project of the EIA Regs and the site exceeds 5 hectares and the site is within the AONB)

Advice Given

Advice Given (for pre-apps)

DE21/19/0012

Holt Hall & Woodland, Kelling Road, Holt, NR25 7DU

Use of Holt Hall as residential activity centre (C2 use) or holiday accommodation (C1). Use of clearings within the woodland as a Campsite for both the public, schools and exempt groups, for tent camping and yurt/bell tent glamping. Use of clearings for public events. Erection of yurts, platforms and gazebos, shop building, washing up block, toilets, showers and portacabins.

Advice Given

Advice Given (for pre-apps)

**THE APPLICATIONS**

APPLICATION 1 – PF/24/0265

Planning permission is sought for the creation of a new Preparatory School (Use Class F1(a)) at Holt Hall. The development would comprise of the restoration of Holt Hall, including the demolition of the existing kitchen and stable blocks to create a new north wing extension; the

removal of an existing modern prefabricated timber teaching block and greenhouses, including the demolition of the pig sty and wall adjacent to the greenhouses, to create a new multi-purpose Hall. The existing greenhouse and timber shed would be demolished to create a new music hall along with the removal of an existing LPG tank, temporary container-type toilet and ancillary buildings and repositioning of the existing equipment shed to create a new field studies centre (Use Class F1(a)). The proposals further include reconfiguration and refurbishment of the Walled Garden; creation of a new ancillary sports pavilion and sports pitches; adoption of a 30-year Woodland Management Plan; car parking areas; hard and soft landscaping; and associated infrastructure.

#### APPLICATION 2 – LA/24/0264

Listed building consent is sought for the creation of a new Preparatory School at Holt Hall to comprise the restoration of Holt Hall, including demolition of the existing kitchen and stable blocks to create a new North Wing Extension, the removal of existing modern pre-fabricated timber teaching block and greenhouses, including demolition of the pig sty and wall adjacent to the greenhouses, to create a new Multi-purpose Hall; removal of existing modern greenhouse and timber shed to create a new Music Hall; removal of existing LPG tank, temporary container-type toilet and ancillary buildings and repositioning of the existing equipment shed to create a new Field Studies Centre; reconfiguration and refurbishment of the Walled Garden; creation of a new ancillary Sports Pavilion and Sports Pitches; car parking areas; and associated infrastructure.

The following list of documents and drawings have been submitted with the applications:

- Existing and Proposed Elevations and Floor Plans (Received 06.02.2024 & 02.07.2024)
- Design and Access Statement (Received 06.02.2024)
- Archaeological Desk-Based Assessment (Received 06.02.2024)
- Arboricultural Impact Assessment (Received 06.02.2024)
- Biodiversity Metric Calculation Tool (Received 06.02.2024)
- Core Campus Masterplan (BNG) - drg no. 1009 P03 (Received 06.02.2024)
- Energy Statement (Received 06.02.2024)
- Ecological Impact Assessment Report (Received 06.02.2024)
- Heritage Statement (Received 06.02.2024)
- Interim Travel Plan (Received 06.02.2024)
- Lighting Impact Assessment (Received 06.02.2024)
- Planning Statement (Received 06.02.2024)
- Statement of Community Involvement (Received 06.02.2024)
- Transport Statement (Received 06.02.2024)
- Woodland Management Plan – drg no. 1014 REV C02 (Received 02.07.2024)
- Tree Planting Strategy Plan - drg no.1015 REV P03 (Received 06.02.2024)
- Drainage Strategy Report (Received 02.07.2024)
- Boundary Treatment, Security Features and Signage Plan (Received 02.07.2024)

The applicant has submitted a Statement of Community Involvement on behalf of Gresham's School, outlining the voluntary public consultation conducted by the applicant and their project team. The report indicates that a public consultation took place on Monday, 20<sup>th</sup> November, 2023, lasting for 28 days. During this time, a dedicated public consultation website was launched, offering a summary of the proposals and guidance for viewers on how to submit their feedback via email or post. This demonstrates that the public was informed about the potential development of Holt Hall prior to the formal application submission, enabling community members to share their opinions. The applicant assures that all feedback received was duly considered.

## **REASONS FOR REFERRAL TO COMMITTEE**

At the discretion of the Assistant Director - Planning, to enable democratic engagement with wider interested parties within the decision-making process.

## **CONSULTATIONS:**

### **Holt Town Council – No objection**

Holt Town Council fully supports the planning proposal and welcomes the proposed changes to the building and grounds of Holt Hall. The Hall is in much need of restoration and proposals look to completely enhance the site. The Field Study Centre is a welcome addition and will be of huge benefit to the community. Councillors have some concerns regarding Kelling Road, they note that the road would have to cope with far more traffic than it does now, as such Councillors would support the request for double yellow lines along the section closest to town, this is to ensure good visibility at all times. Councillors would also like the junction with Cromer Road to be assessed by Highways for improvement, this junction has been problematic with near misses often being reported. When exiting the junction onto Cromer Road there is a blind spot, which means vehicles have to pull out to see any oncoming traffic. Cllrs have long campaigned for a mini roundabout here which would not only make the junction safer, but reduce speeding on Cromer Road, which has been something Gresham's have raised with the Town Council and NCC Highways in the past.

### **Conservation and Design (NNDC) – Object**

The Local Planning Authority has revised its proposal for the demolition of service wing and ancillary structures, stating that the support cast of these structures is no longer appealing from a Conservation & Design perspective. The north wing extension proposal has been revised, but it does not equate to heritage acceptability.

The multi-purpose hall's retraction has been positive, but the modest reduction in length and set back would not prevent it from becoming a significant 'front-of-house' eye-catcher. The reconfiguration of the walled garden has been revised, but it is not considered to fundamentally alter the overriding impression of the walled garden being hemmed in by new build.

The music hall's retraction has been clarified, and the reductions in length and openings in the existing wall have been considered acceptable. The field study centre and sports pavilion and energy centre are now considered acceptable. The formation of parking areas has been revised, but the removal of laybys and lighting along the driveway is welcomed.

The revisions in relation to the erection of a music hall, field study centre, sports pavilion, and energy centre are noted. These changes have been considered acceptable, and the need for a previously suggested condition has been removed. The erection of parking areas has also been approved, but the removal of laybys, lighting, and footpath widths is welcomed.

The main staircase at Holt Hall has been revised to complement the historic fabric, striking a balance between conservation and necessary adaptation. However, the new staircase at the southern end of the building is considered questionable from a heritage perspective, as it would affectively drive through and out of the existing building, causing significant visual and physical implications for the heritage asset. The statement about reusing demolished materials has also been noted, but a significant amount of fabric could theoretically be retained on site.

The application remains a balancing exercise under para 208 of the National Park Preservation Policy (NPPF). The overall level of heritage harm across the scheme has been

reduced, but the harm originally identified was relatively high by listed building standards.

A copy of the full response is available to view at **Appendix 1**.

### **Economic And Tourism Development Manager (NNDC) – No objection**

#### **Environmental Health – No objection**

The applicant/developer is advised that in view of the history of the site it could potentially be "contaminated" (as defined in Part IIA of the Environmental Act 1990). Consideration should be given towards any potential risks to building materials and services, and during construction the risks to workers and the general public should be considered. In the event of potential contaminants being found, it is advised that construction work should cease, and the District Council's Environmental Protection Team should be contacted.

#### **Landscape (NNDC) – Advice given**

The proposed development on a 35ha site in Norfolk Coast National Landscape will have minimal wider landscape and visual impact on the designated landscape and prevailing landscape character. The new build elements will negatively impact the Grade II listed Hall, losing its functional and visual link with ancillary buildings. The proposed information builds on previous draft proposals, retaining key views, respecting the wider woodland setting, and retaining formal features. The Sports Pavilion and Energy Centre are located outside the Ancient Woodland, requiring minimal vegetation removal.

The revised tree planting strategy for a school site has been approved, with a focus on more varied tree species and larger canopy trees. The revised tree planting strategy includes boundary treatments, signage, and security ANPR cameras in treed areas, which need to be considered for arboricultural impact. The woodland Management Plan outlines controls for pupils' access to the woods to avoid damaging sensitive areas and perceived hazards.

Further ecological information on badgers has been submitted, with the WMP recommending the removal of rhododendrons across the site. However, this work has the potential to adversely impact protected species. Additional ecological input is recommended before rhododendron clearance work is carried out, and a five-year annual badger monitoring survey should be undertaken. Highway improvement works at the site frontage off Kelling Road, including the removal of trees and hedgerows, are not considered in the AIA documentation. Additional information on the arboricultural impact of these changes is needed.

The north-facing soakaway in the music centre conflicts with the RPA of retained trees, requiring relocation further east. The south-facing soakaway may also conflict with the RPA of T15. The field study centre soakaway also needs careful placement. All drainage and soakaway works should protect trees and roots.

The Landscape section considers there to be significant ecological constraints at the site, some of which remain to have survey work carried out to fully inform the impact assessment. As such, the Landscape section does not consider the applicant to have provided sufficient information or that the Council is in a position to positively determine the application in accordance with its statutory duties.

Additionally, it is also worth noting that where further protected species survey work will be required prior to management works taking place, these should be clearly identified and stated within the relevant management documents (e.g. the Woodland Management Plan).

The Landscape section appreciates the precarious balancing act which must be achieved in order to deliver the proposed development whilst taking into consideration all relevant biodiversity interests. However, at present, the Landscape section must maintain a holding

objection to the proposed development due to insufficient information being provided and therefore not being in compliance with Policy EN 9 of the adopted Core Strategy.

A copy of the full response is available to view at **Appendix 2**.

**Norfolk County Council Highways – No objection subject to conditions**

A copy of the full response is available to view at **Appendix 3**.

**Norfolk County Council Historic Environment Service – No objection**

**Norfolk County Council Flood & Water Management (LLFA) – No Objection**

**Historic England – Object**

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 195, 205, 206, 208) of the NPPF. In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess; and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice.

A copy of the full response is available to view at **Appendix 4**.

**Norfolk Coast Partnership – No comments received**

**Joint Committee of The National Amenity Societies – Object**

Holt Hall, built in the 1840s for Walter Hamilton Pemberton, is listed grade II and located within the Glaven Valley Conservation Area. The Victorian Society opposes the proposed demolition of the northern service building and ancillary buildings, which hold high evidential and historical value. The demolition would negatively impact the heritage asset and the site's understanding, as it would remove tangible evidence of the original site layout and planform. The society suggests building recording to mitigate the removal of these buildings, but this does not outweigh the heritage harm. The society also opposes the proposed construction of a new northern two-storey extension near the current service and ancillary buildings. The extension's scale and massing may overshadow the principal asset and remove the legibility of the building hierarchy. The Victorian Society believes the extension is not in line with the Glaven Valley Conservation Area Appraisal (2024) guidance and policies on new development. They suggest the extension should be subsidiary to the existing buildings, use traditional local vernacular materials, and not compete with or overshadow existing buildings, particularly historic ones.

A copy of the full response is available to view at **Appendix 5**.

**Natural England – No objection**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

**Anglian Water – No objection**

**Norfolk Fire & Rescue (Water Resources & Planning Manager) – No objection subject to conditions**

### **Norfolk Wildlife Trust – Object**

The new proposals are welcomed and are considered to be an improvement; however, we still consider that significant harm would result unless mitigation is put in place.

A copy of the full response is available to view at **Appendix 6**.

### **REPRESENTATIONS:**

Public consultation of the application took place for a period of 21 days between 04.03.2024 and 25.03.2024. Five letters of **objection** have been received as summarised below:

- The proposed replacement gate would be out of keeping with the adjacent property and has potential to cause noise pollution
- The proximity of the ANR surveillance camera is intrusive.
- Proposed gate at G06 has no purpose as there is no right of access to the adjacent properties for either party.
- Introduction of mesh deer fence would result in the loss of privacy.
- Flood lights from the proposed sports pitches would disturb the dark skies.
- Noise disturbance created from the sports pitches
- Noise and vibrations from the Energy Centre
- Disturbance during the construction phase
- Flood risk as a result of the levelling and drainage of the bottom field and installation of services.
- Increase in traffic and congestion throughout the town.
- Insufficient visibility
- Poor design

### **HUMAN RIGHTS IMPLICATIONS**

It is considered that the proposed development may raise issues relevant to Article 8: The Right to respect for private and family life.

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

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with 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.

### **RELEVANT POLICIES:**

#### **North Norfolk Core Strategy (September 2008)**

SS 1 (Spatial Strategy for North Norfolk)

SS 4 (Environment)

SS 5 (Economy)

SS 6 (Access and Infrastructure)

SS 9 (Holt)  
EN 1 (Norfolk Coast Area of Outstanding Natural Beauty and The Broads)  
EN 2 (Protection and Enhancement of Landscape and Settlement Character)  
EN 4 (Design)  
EN 5 (Public Realm)  
EN 6 (Sustainable Construction and Energy Efficiency)  
EN 7 (Renewable Energy)  
EN 8 (Protecting and Enhancing the Historic Environment)  
EN 9 (Biodiversity & Geology)  
EN 10 (Development and Flood Risk)  
EC 2 (The Re-use of Buildings in the Countryside)  
CT 5 (The Transport Impact of New Development)  
CT 6 (Parking Provision)

### **Holt Neighbourhood Plan**

HOLT1 (Design Guidance)  
HOLT3 (Green Infrastructure)  
HOLT5 (Community Facilities)

### Material Considerations

#### **Supplementary Planning Documents:**

North Norfolk Landscape Character Assessment (January 2021)  
North Norfolk Design Guide (December 2008)

#### **National Planning Policy Framework (NPPF) (December 2023)**

Section 2 (Achieving sustainable development)  
Section 4 (Decision-making)  
Section 8 (Promoting healthy and safe communities)  
Section 12 (Achieving well-designed places)  
Section 14 (Meeting the challenge of climate change, flooding and coastal change)  
Section 15 (Conserving and enhancing the natural environment)

### **OFFICER ASSESSMENT:**

#### **The Site and Application**

The application site is host to Holt Hall, a two storey Grade II listed building comprising of a rectangular shape and incorporating a number of modern additions such as stable blocks, storage containers and the kitchen area. Situated to the north of the stable blocks adjacent to Holt Hall, there is a walled garden. It is oriented on a slight northeast/southwest axis and has a rectangular shape. The site is also located within the Holt Conservation Area, Norfolk Coast National Landscape, Country Wildlife Site and is identified as Old Pollard Wood.

Holt Hall is positioned within 86.48 acres of land incorporating mainly Ancient Woodland. The Site is framed between Kelling Road to the east and agricultural land to the west with Cley Road beyond. The Ancient Woodland surrounds the Walled Garden to the north and west with lawns positioned either side.

Ancillary buildings, an equipment shed, LPG tank and a temporary container are positioned within the Ancient Woodland to the northeast of the Walled Garden. Two fields located to the southeast of Holt Hall share similar shapes and areas. The field to the west will be known as the 'Bottom Field', while the field to the east will be referred to as the 'Top Field'.



Holt United Football Club's facilities are situated to the southeast, while residential properties are found to the southwest. Access for both pedestrians and vehicles to Holt Hall is provided via a private access track from Kelling Road. Additionally, there is a second access point from Cley Road to the northwest, although it is limited by a narrow bridge at the entrance to the site.

The Site is located to the northeast of the Gresham's Senior School and north of the Prep School and Pre-Prep School. Gresham's Prep School, including Nursery, and Pre-Prep School, is located in the centre of Holt with Cromer Road to the north and Pearsons Road to the south. The Senior School is located to the east of Holt and sits outside of the defined settlement boundary.

### **Site History**

Holt Hall was originally built in the 1840s and served as a private residence until it was sold in 1946. The Norfolk Education Committee purchased the Hall and surrounding land, operating it as a boarding school from 1950 to 1972. In 1974, it transitioned into a Field Study Centre and later expanded to offer weekend leisure courses in the 1990s. Due to financial constraints, the site was listed for sale in 2020 after Norfolk County Councillors decided to discontinue its use for outdoor education.

Whilst no previous planning applications have been submitted to authorise the use of the Hall as an educational institution or a Field Study Centre, Officers consider that the existing site at Holt Hall would fall within a C2 Use Class (residential institutions) and would most likely be immune from enforcement action, on the balance of probability. The proposal will therefore be assessed on the basis of the site have an existing C2 use class.

Pre application advise was sought from the Council during the period June to December 2023 as part of a Planning Performance Agreement.

## **MAIN ISSUES FOR CONSIDERATION**

- 1. Principle of development**
- 2. Design**
- 3. Impact On Heritage Assets including Listed Buildings and Conservation Area**
- 4. Amenity**
- 5. Landscape (including impact on the Norfolk Coast National Landscape and Ancient Woodland)**
- 6. Highways and Parking**
- 7. Ecology**
- 8. Biodiversity Net Gain**
- 9. Drainage**
- 10. Energy and Construction**
- 11. Public Benefits**
- 12. Planning Balance and Conclusion**

### **1. Principle of Development**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out a statutory requirement that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF at paragraphs 2 and 12 restates this requirement.

The development plan for North Norfolk comprises:

- The North Norfolk Core Strategy (adopted 2008),
- The North Norfolk Site Allocations Development Plan Document (adopted 2011),
- Holt Neighbourhood Plan (made August 2023)
- Norfolk Minerals and Waste Core Strategy and Development Management Policies 2010-2026 DPD (adopted September 2011).

Paragraph 12 of the NPPF states that ‘the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.’

Paragraph 11 of the NPPF emphasises the importance of a presumption in favour of sustainable development as the central principle of the Framework. For decision-taking, this means: “approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole

Core Strategy Policy SS 1 sets out the spatial strategy for North Norfolk. Holt is designated as a Principal Settlement with a Small Town Centre within Policy SS 9 of the Core Strategy. However, the application site is located outside of a defined settlement boundary and is therefore considered as countryside. Policy SS 2 relates specifically to the countryside area, limiting development to that specified in the policy which is recognised to require a rural location. These are strategic policies that set out the overarching approach for distributing development across the district, promoting sustainable patterns of development and protecting the countryside. These policies are fundamental to the effective operation of the Development Plan.

The NPPF actively expects strategic policies to set out an overall strategy for the pattern, scale and quality of development. Broad locations for development should be indicated and land use designations and allocations identified. The intrinsic character and beauty of the countryside should be recognised. That is precisely what these policies do, along with the North Norfolk Site Allocations Development Plan Document.

This application seeks permission to convert and expand an existing C2 Use Class facility (residential institution) at Holt Hall including a grade II listed building within the designated Countryside policy area where Core Strategy Policy SS 2 would permit the preservation of listed buildings, the re-use and adaption of buildings for appropriate purposes as well as extensions to existing businesses subject to compliance with other relevant Core Strategy including Policies EN 8 ‘Protecting and Enhancing the Historic Environment’, Policy EC 2 ‘The Re-Use of Buildings in the Countryside’ and EC 3 ‘Extensions to Existing Businesses’.

Policy EN 8 sets out that “The re-use of Listed Buildings...will be encouraged and the optimum viable use that is compatible with the fabric, interior and setting of the building will be permitted”.

Policy EC 2 sets out that “the re-use of buildings in the Countryside for non-residential purposes in accordance with the following:

- economic uses (including holiday accommodation) must be appropriate in scale and nature to the location.
- it can be demonstrated that the building is soundly built and suitable for the proposed use without substantial rebuilding or extension and the proposed alterations protect or enhance the character of the building and its setting;
- the proposal is in accordance with other policies seeking to protect biodiversity, amenity and character of the area”.

In addition to Core Strategy Policies EN 8 and EC 2, proposals to extend Holt Hall would need to demonstrate compliance with other relevant Core Strategy policies and demonstrate compliance with relevant policies within the Holt Neighbourhood Plan which together form a suite of Development Plan policies. Where proposals do not accord with the Development Plan, the Committee will need to consider whether material considerations advanced in favour of the proposal attract sufficient weight to justify the departure from the Development Plan.

In the context of this proposal, the applicant has explained that Gresham’s have grown considerably over the last 10 years with an increase of new pupils attending the school. There has also been a significant increase in the number of day pupils as well as the school wanting to provide a wider range of vocational courses to the Senior School pupils along with increasing the range of sports currently offered. This has created an urgent demand for newly designed facilities for the Senior School, which includes the construction of two new day/boarding houses, a structure suitable for vocational courses, and extra sports fields.

Even though pupil numbers are increasing, the school has seen a drop in Prep School boarders and alterations in the way the school operates. The existing Prep School location (in the town centre) is suitably sized to fulfil the development needs of the Senior School and is regarded as the sole viable site within Holt to address this requirement. Transforming the current Prep School into a Senior School Day and boarding houses, along with vocational education facilities, would require moving the Prep School. This proposed relocation to Holt Hall would enable the school to consolidate its current facilities, a change that has been needed for some time.

Holt Hall is already open for use by the school and can be adapted to house the teaching and administrative facilities of the Prep School, reducing the necessity for additional new construction beyond that proposed.

The conversion and extension of Holt Hall to provide a new Prep School comes with challenges relating to scale, design, impact on the Ancient Woodland, Conservation Area and Norfolk Coast National Landscape as well as ecological issues.

The proposed development would involve the reuse of an existing building (Holt Hall) located within the countryside for a non-residential purpose. Information has been provided to evidence that the building is soundly built and suitable for conversion however, some extensions and alterations are required in order to effectively function as a school. The impact of these works is discussed in the relevant report sections below.

Paragraph 99 of the NPPF states ‘It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted’.

The applicant has identified a need for a new Preparatory School to enable development of the school as a whole and would result in the conversion of an existing building located within the countryside. In terms of principle, Officers consider that, subject to compliance with other relevant development plan policies, the principle of development would broadly comply with Core Strategy policies SS 2 and SS 9. Further assessment of the proposal against other relevant policies is set out below.

## 2. Design

Core Strategy Policy EN 4 states that all development will be of a high-quality design and reinforce local distinctiveness. Design which fails to have regard to local context and does not preserve or enhance the character and quality of an area will not be acceptable. Proposals will be expected to have regard to the North Norfolk Design Guide, incorporate sustainable construction principles, make efficient use of land, be suitably designed within their context, retain important landscape and natural features and incorporate landscape enhancements, ensure appropriate scale and ensure that parking is discreet and accessible amongst other matters.

Holt Neighbourhood Plan Policy Holt 1 – Design Guidance sets out that:

“The design of development proposals should be in conformity with the North Norfolk Design Guide and relevant Conservation Area Appraisals, and should have regard to the following special interest and character of the Neighbourhood Area as relevant to the location, nature and scale of the proposals:

...

### 3) Elsewhere within the Neighbourhood Area:

- The definitive role played by the appearance and topography and key characteristics of the Glaven Valley Conservation Area in forming the open landscape character of the setting of the town to its south and west
- The large fields, rolling hills and woodlands forming the agricultural landscape that surrounds the town in framing its rural setting, most notably the Norfolk Coast Area of Outstanding Natural Beauty to its north
- The prominence on the edge of town of the distinctive Gresham’s School set within large, formally laid out grounds.

### 4) In the whole Plan area:

- The presence of listed buildings or non-designated heritage assets”.

The most significant and fundamental element of the proposed development involves the creation of a new teaching block and dining hall at ground floor with classrooms at first floor created via the demolition of the existing stables and annexe positioned to the north of Holt Hall. The connector between the new structure and the main hall would feature fixed glazing, while the new building would be constructed using a combination of perforated polished steel panels, perforated brushed steel panels, and reflective glazing. The west elevation of the addition will showcase elements of solid brick and flint. This design approach aims to create a structure that harmonises transparent and reflective characteristics, effectively conveying its

purpose while mitigating its presence by mirroring the surrounding woodland at the first-floor level.

Whilst Officers fully recognise that the extension is extremely large it would, nonetheless, sit lower than the existing building and be connected by a link. The chosen materials present a striking contrast to the traditional architecture of Holt Hall, establishing a distinct separation between the old and the new, yet allowing them to coexist (albeit involving demolition of part of the supporting cast of listed buildings).

The scale of the north wing extension was reduced after receiving feedback from the Conservation Officer. While this revision is appreciated, it does not fully address the concerns regarding a potentially disproportionately large addition to a listed building.

New music rooms are proposed to the north of the walled garden at the edge of the woodland and therefore, the structures would be well screened. The building would be constructed from flint to reflect the surrounding buildings and to harmonise with the boundary of the Walled Garden. The structure is considered to be of an acceptable scale and design.

New sport pitches are proposed to the southeast of the Hall and to the west of the new sports pavilion. Steps would be provided directly down to the pitches with a ramped access circulating the edge of the pitch to the north.

Four rugby pitches and two cricket pitches are proposed on the bottom field and two rugby pitches and one cricket pitch on the top field. There is also space to accommodate a running track and other athletics facilities. Some earth works are required to ensure that the topography is flat to accommodate the sports pitches, but this is not considered to have a detrimental impact on the character or setting of the listed building or conservation area given the screening provided by mature trees and new planting.

The sports pavilion is designed to offer changing rooms, storage, and a plant room. It will feature timber cladding with 'living screens' and glazed openings. The proposed energy centre building will be located adjacent to the sports pavilion and will use similar materials and be of a comparable scale. Both structures will be situated within the larger grounds of the Hall, with the existing woodland belt to the South-East of the Hall providing an effective separation distance between these buildings and the heritage asset. The tree belt will create a self-contained quality that will minimise any impact on significance.

Access to the site will continue to be available from Kelling Road, with the access drive being expanded to facilitate the passage of two vehicles simultaneously. Two parking areas will be established on the premises: one situated to the east of the hall for staff and disabled parking, and the other positioned to the north of the sports pitches for public use. By their very nature, the new staff and public car parks would have an urbanising affect upon the wider grounds of the hall, and thus the rural qualities of the wider conservation area. However, as the two areas in question would be nestled recessively into their respective settings, the actual impacts would be contained and relatively modest in practice.

The field study centre will be situated north of the hall in the Ancient Woodland environment and will be positioned on or very near to the footprint of current temporary structures. The centre will include restroom facilities, a shower block, office space, classrooms storage, and a plant room. The additions would incorporate simple timber framed blocks enclosing mono pitched roofs with large sections of glazing, allowing a connection between the surrounding woodland setting. It is believed that the new buildings will better complement the surroundings than the current temporary structures on site, making the proposal a positive addition to the overall setting of the Hall.

A new multipurpose school hall is planned to be located to the east of the walled garden, necessitating the removal of the glasshouses, pigsty, and timber teaching blocks. The hall will be positioned away from the wall, featuring a minimal floor-to-ceiling height to mitigate excessive views into the walled garden. This multipurpose hall was one of the components modified during the review of the amended plans. The changes led to a reduction in the building's scale and its repositioning away from the entrance of the walled garden. While these modifications are a positive enhancement, the proposed hall will still stand out as a prominent feature on the site. However, its offset placement behind the existing tree line will allow it to harmonise with the extension of the main hall, given their close proximity and similar aesthetic characteristics.

Extensive discussions were held prior to the application regarding the design and layout of the proposed development. The hope was to minimise the impact on heritage assets by limiting and spreading the core new build elements across the site. Various options were considered including subterranean extensions. However, due to a combination of site constraints, project viability and a need to provide the necessary accommodation and teaching spaces needed for a functional school, it has not been possible to present a solution which addresses all potential impacts. The applicant has made the difficult decision to prioritise reduction of impacts on ancient woodland, landscape and ecology but this has come at the expense of increased heritage harm (see Section 3 below).

Nevertheless, with the further reduction in the scale of extensions achieved by the applicant, it becomes a matter of planning judgment as to whether the scheme before Committee is acceptable in planning and listed building terms recognising that the main listed building will mostly be preserved and will continue to have uninterrupted views over its landscaped grounds to the West, South, and East.

The development brings some benefits to the listed building and associated structures, such as the long-term maintenance and repair of Holt Hall and the Walled Garden, as well as the removal of harmful, inappropriate interventions. Therefore, despite identified harm in certain aspects of the development, overall, the proposal is seen to have numerous advantages for the hall and the surrounding site. The design has faced significant challenges due to the extreme complexities of the site however it is deemed to effectively utilise the land while respecting the density, character, landscape, and biodiversity of the area. Whilst some elements may not be completely satisfactory, in general the proposals are suitably designed for the context within which they are set and the scheme as a whole complies with policy EN 4 of the Core Strategy and Policy HOLT1 of the Holt Neighbourhood Plan.

### **3. Impact on Heritage Assets including Listed Buildings and Conservation Area**

When considering applications for listed building consent, Section 16(2) of the of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

'In considering whether to grant listed building consent for any works the local planning authority....shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

When considering proposals or works affecting listed buildings, Section 66(1) of the of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

'In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority....shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

This obligation, found in Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, applies to all decisions concerning listed buildings. Preservation in this context means not harming the interest in the building, as opposed to keeping it utterly unchanged.

In drafting the legislation, Parliament's intention was that *'decision makers should give "considerable importance and weight" to the desirability of preserving the setting of listed buildings' when carrying out the balancing exercise'.*

When considering development proposals located within a Conservation Area, Section 72 of the of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

'In the exercise, with respect to any buildings or other land in a conservation area,.....special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

Core Strategy Policy EN 8 'Protecting and Enhancing the Historic Environment' sets out a requirement for development proposals including alterations and extensions to "preserve or enhance the character and appearance of the designated assets....and their settings through high quality, sensitive design. Development that would have an adverse impact on their special historic or architectural interest will not be permitted."

The strict "no harm" test contained within Core Strategy Policy EN 8 is superseded by guidance set out within the National Planning Policy Framework (NPPF) as set out below and which weighs any identified harm against public benefits.

The NPPF (Dec 2023) Chapter 16 considers "Conserving and enhancing the historic environment". Paragraph 200 sets out a requirement for applicants to "describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.

Paragraph 201 states that "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

Paragraph 203 sets out that "In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness".

Paragraph 205 sets out that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance".

Paragraph 206 states that “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional...”

Paragraph 208 states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

The applicant has submitted a Heritage Statement (Feb 2024) and an Archaeological Desk-Based Assessment (Dec 2023) in support of their proposal. These documents assist in helping to understand the significance of any heritage assets affected, including any contribution made by their setting.

Starting with the wider visibility of the site, Officers consider that views of Holt Hall and its associated buildings and land are shielded from Kelling Road to the east and Cley Road to the west by the dense woodland surrounding the area. As a result, the buildings are not widely visible within the Glaven Valley Conservation Area. The green space between the Hall and the extension will be preserved, with two mature trees acting as a natural divider between the structures. A small plaza will be created in front of the new extension, featuring a curved line of trees and planting beds to enhance and soften the building's facade. This means that the views of the hall from the site's entrance, which is considered one of the most significant viewpoints, will remain largely unchanged and obscured by both new and existing landscaping.

Holt Hall, as originally constructed, was a relatively modest mansion facing west, complete with a walled garden, constructed between 1844 and 1845. Major renovations and expansions took place between 1863 and 1864, which involved both external and internal modifications. The entrance facade was reoriented to face east towards a new approach, and two wings (north and south) were added, along with a service range to the north and various outbuildings. Following 1946, the buildings transitioned to institutional use, leading to additional internal and external modifications.

A condition assessment was conducted by the applicant on the main hall, its outbuildings, and the walled garden. The findings indicated that the interior of the building had been reasonably well-maintained, although some areas showed signs of impact and water damage. The solid brick walls and chimneys were generally considered to be in good condition, albeit with some wear. The applicant has identified that building's exterior is in need of refurbishment, particularly the roof, rainwater systems, and joinery, which require repairs. Additionally, some repointing work is necessary. The report indicated that the brickwork of the walled garden showed no significant damage, although some salt deposits were present.

All existing access points to the hall will be preserved, and some original access doors will be restored to reflect the 1845 layout, ensuring compliance with statutory requirements. Original windows and external doors will be retained, with their frames and operational components repaired and restored to their original condition as much as possible, while adhering to current regulations.

The applicant has indicated that a demolition survey will be conducted to identify materials that can be reused in the new project. Among the desired reuse strategies is the incorporation of slates for the new roof.



Pre-application discussions confirmed that the current external fire escape on the south facing elevation has a negative impact on the appearance of the hall. To achieve a notable heritage benefit, it is proposed to remove the staircase and create a new internal staircase at the southern end of the hall. While this would result in the loss of an unappealing addition to the building, the new staircase would have significant visual and physical implications for the heritage asset as it would effectively drive its way up through and out of the existing building. It is acknowledged that alternative locations for the staircase are limited.

To facilitate the key new build elements, it is proposed to demolish a range of 'accessory' buildings and structures on the north side of the Hall. Most notably these would include the existing single storey kitchen block with its attractive chimneystacks, the stable block and the greenhouses with their related enclosures. The structures date back to 1860s when the 'principal' Hall was being enlarged. They therefore not only have their own intrinsic, evidential and aesthetic value, but they also make a positive contribution to the collective understanding and appreciation of how the overall site has developed over time. However, it is appreciated that the buildings have been altered and added to overtime and are therefore, considered to have a lower status of architectural merit, although their retention along with appropriate alterations would have been welcomed.

In terms of quantifying the level of harm, Officers recognise that the 'principal' listed building would for the most part be retained as is. It would also largely continue to enjoy the uninterrupted views out over its landscaped grounds to the West, South and East. Consequently, the harm must be classified as 'less than substantial' for NPPF purposes. However, it is appreciated that the wholesale loss of the ancillary buildings, and the cumulative impacts of the new build elements means that the degree of 'less than substantial harm' would be at the upper end of the scale. Paragraph 208 of the NPPF is therefore engaged as part of the overall planning balance and, given the degree of heritage harm, considerable public benefits would be needed to offset the identified heritage harm.

Officers fully recognise that, in pure heritage terms, the works to the listed building, including large elements of demolition, have drawn concerns both from Historic England and the Conservation Officer, amongst others. These proposals have required careful balance across a need to provide a new school facility that can perform its essential function balanced against reducing negative impacts as much as possible on heritage assets. The applicant has responded with some amendments to the proposed extensions to make them as small as reasonably possible whilst still enabling the school to perform its function. At pre-application stage various alternative scenarios were considered by the applicant. Substantial amendments seeking to reduce the heritage impact of the proposal beyond what is currently proposed would likely result in other undesirable impacts. The applicant has made a conscious choice, when considering all issues together, to prioritise trees/woodland and landscape impacts at the unfortunate consequence of increasing heritage harm concerns. These are difficult choices and the Committee will need to consider carefully the range of issues before you.

Ultimately, having regard to the statutory duties placed on the Council under Sections 16(2), Section 61(1) and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, securing the grade II listed building and surrounding buildings into active use will enable extensive renovation which will see the primary heritage asset brought back into active economic use for the foreseeable future. This in of itself attracts considerable positive weight in favour. However, in securing the future of the building, harm to the heritage asset will be caused through demolition and substantial changes to the setting of the listed building which weigh against the grant of permission. Nonetheless, taken as a whole and having regard to the public benefits set out in the section below, the proposed works to the listed building are considered, on balance, to be acceptable. Various planning conditions will be required to

ensure proposed works to the listed building are undertaken in an appropriate manner in order to safeguard historical integrity.

Officers consider that the proposals would, on balance, preserve the character and appearance of the Glaven Valley Conservation Area.

Subject to the imposition of conditions, the proposal would accord with the relevant aims of Core Strategy Policy EN 8 and those set out in the NPPF including at paragraph 208 in relation to weighing harms vs public benefits.

#### **4. Amenity**

Core Strategy Policy EN 4 sets out a requirement that “proposals should not have a significantly detrimental effect on the residential amenity of nearby occupiers”.

Core Strategy Policy EN 13 sets out that “All development proposals should minimise , and where possible reduce, all emissions and other forms of pollution, including light and noise pollution...”

To the southeast of Holt Hall, there are two fields that are comparable in shape and size, bordered by Ancient Woodland that provides natural screening. This area is adjacent to the northernmost boundary of the Holt settlement, located to the south. Holt United Football Club's grounds are situated to the southeast, while residential properties are found to the southwest. Access to Holt Hall is primarily from Kelling Road via a private access track. Additionally, there is a second access point from Cley Road to the northwest, although it is limited by a narrow bridge at the entrance to the site. While the School does not own this access, it does possess a right of way.

The pedestrian pathway extending from Holt Hall southward to the town centre, located on the western side of Woodfield Road, will largely remain the same. Overgrown vegetation will be trimmed to ensure the path remains clear, and additional surfacing will be installed as necessary. The school will oversee the management of this access, implementing gates to restrict entry along the pathway. Whilst it remains a possibility for use of this footpath to increase as a result of the proposal, Officers consider that use of the footpath is unlikely to result in significant adverse effects on the amenity of adjacent residents, especially given that the school will retain control of the path to where it joins Woodfield Road.

The closest residential properties are approximately 257m south of the hall, separated by open fields and woodland. Other residential homes and agricultural structures are located about 415 meters to the west along Cley Road.

The installation of fencing around the perimeter, along with the retention of certain boundary treatments, aims to maintain a secure and suitable environment for the new school. A new 1.9m high timber post and galvanised steel mesh deer fence would be erected to the south of the site along with the retention of existing fencing to the south east. Despite concerns regarding privacy, the existing fencing close to residential properties is deemed adequate based on historical usage.

Whilst the use of the site for a prep school will likely lead to an intensification of activities taking place on site and will increase the potential for noise to travel beyond the boundary of the site for some activities such as use of the sports pitches, given the relative distances between the main part of the proposed prep school and residential dwellings to the south, Officers consider that the proposal is unlikely to result in significant adverse impacts for the closest neighbours and school term times will mean that, during the summer holiday period,

significant school activities would effectively cease, further lessening potential for adverse effects..

The proposal would therefore accord with the aims of Core Strategy Policies EN 4 and EN 13.

## **5. Landscape (including impact on the Norfolk Coast National Landscape and Ancient Woodland)**

Core Strategy Policy EN 1 sets out that the impact of individual proposals, and their cumulative effect, on the Norfolk Coast National Landscape (formerly known as Norfolk Coast AONB),...and their settings, will be carefully assessed.

“Development will be permitted where it:

- is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area;
- does not detract from the special qualities of the Norfolk Coast AONB or The Broads; and
- seeks to facilitate delivery of the Norfolk Coast AONB management plan objectives.

Opportunities for remediation and improvement of damaged landscapes will be taken as they arise.

Proposals that have an adverse effect will not be permitted unless it can be demonstrated that they cannot be located on alternative sites that would cause less harm and the benefits of the development clearly outweigh any adverse impacts.

Development proposals that would be significantly detrimental to the special qualities of [the Norfolk Coast National Landscape]...and their settings will not be permitted”.

Core Strategy Policy EN 2 sets out that:

“Proposals for development should be informed by, and be sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment and features identified in relevant settlement character studies.

Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance:

- the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character)
- gaps between settlements, and their landscape setting
- distinctive settlement character
- the pattern of distinctive landscape features, such as watercourses, woodland, trees and field boundaries, and their function as ecological corridors for dispersal of wildlife
- visually sensitive skylines, hillsides, seascapes, valley sides and geological features
- nocturnal character
- the setting of, and views from, Conservation Areas and Historic Parks and Gardens...”

Paragraph 180 of the NPPF states 'Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.

Paragraph 182 of the NPPF states: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas".

Paragraph 183 of the NPPF states: "When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated".

Holt Hall is situated on 86.48 acres of land, primarily consisting of Ancient Woodland known as Old Pollard Wood. The area is home to a variety of trees and shrubs, including a few mature sessile and pedunculate oak, sweet chestnut, and Robinia trees that may date back to the same time as the house or even earlier. Additionally, there are conifers and specimen broadleaves that were planted later on.

The planning application includes a Landscape and Visual Appraisal. The assessment of the landscape impact of the proposed development shows that the impact on the broader landscape is minimal due to the natural woodland enclosure.

The application site sits near to the southern edge of the Norfolk Coast National Landscape. The existence of woodland screening surrounding the site provides a natural buffer that significantly restricts views into and out of the site. As such, whilst the proposal could be said to amount to "major" development in the Norfolk Coast National Landscape (the applicant does not consider it would amount to "major" development), subject to conditions to control the extent of external lighting, Officers consider that the proposal would not detract from the special qualities of the Norfolk Coast National Landscape and would accord with aims or Core Strategy Policy EN 1.

In terms of localised landscape, the site is divided into five main sections, which are the East, South, and West Lawn, the Valley Lawn, and the Walled Garden. The Ancient Woodland surrounding the hall contains numerous significant and veteran trees that are essential to the overall landscape of the area.

While preserving the Ancient Woodland is crucial, some landscaping work is necessary to facilitate development. The works include the removal of seven individual B category trees (T3

T9, T10, T11, T12, T18 and T19), part of the B category yew hedge (G3b), one tree in G2b, eight individual C category trees (T4, X12, X13, T55, T56, T201, T3698 and T3699), 1 C category tree group (G1a) and three trees in the C category tree group G73. All other trees on or adjacent to the site will be retained and protected throughout the works. All Veteran trees in the vicinity of the development will also be protected.

New buildings have been strategically placed outside the Root Protection Area (RPA), with minor encroachment addressed through root pruning. Temporary ground protection measures will be implemented to safeguard the RPA (Root Protection Area) of adjacent trees during construction, and No-Dig surfacing will be used for new car parks and woodland paths.

In addition to preserving existing trees, the plan includes extensive replacement and new planting of native and ornamental species, including *Acer rubrum*, *Prunus avium*, and *Sorbus aucuparia*. Within the Walled Garden, new half-standard and espalier fruit trees will be introduced, while the Yew hedge to the west will be preserved. The site will also feature new ornamental and native hedging, as well as planting beds. Furthermore, the multipurpose hall will boast a biodiverse green roof seeded with various plant species.

Regarding hard landscaping, the site will include a range of surfacing options, such as Riven sandstone at the front of the hall and Raven sandstone flag paving to the east of the new teaching garden. Key pedestrian pathways will utilise resin-bound gravel, and the existing footpaths located to the south and west will be maintained. Additional features will include dining furniture, benches, and bicycle stands.

The approach to the Hall represents a significant viewpoint, marking the initial moment of arrival. To the north, the driveway ascends towards the existing tennis court area, which is designated for staff and disabled parking. Additionally, there will be a designated area for coach and minibus parking, along with a turnaround space. Beyond this point, access is restricted to service vehicles and a limited number of cars leading to the Hall and the new school building. Here, the driveway surface will change to signify this restricted access and prioritise pedestrian movement. The surrounding parkland will be preserved, with mature trees remaining prominent in the landscape. Footpaths have been strategically placed along the lawn's edge to minimise alterations to this landscape feature and the introduction of wildflowers will enhance the biodiversity of the lawn, particularly adjacent to the woodland edge.

Revisions to the proposal are welcomed and have brought advantages to the site's landscaping, including preserving the south wall and decreasing the building's footprint to make room for the veteran *Robinia* tree, T5. The decision to raise the yew hedge height from 1.2m to 1.8m is also favourable and endorsed. The updated tree planting plan introduces a wider variety of tree species and larger canopy trees. It outlines a preferred species selection, emphasising the planting of high-quality, large stock trees, which is also backed by support.

A Woodland Management Plan has been provided with the application and identifies areas restricted from access along with pedestrian routes and full access areas. The document states *'Access to the woods by pupils will be controlled to avoid damaging the most sensitive areas and avoid perceived hazards. For example, there will be no access to the ancient and semi natural woodland other than for supervised ecological studies. In other areas, including the ancient woodland replanted areas, access will range from unlimited to focused.'*

The applicant has indicated that the proposed location for the soakaways will be carefully chosen to avoid any interference with the root protection areas of nearby trees. Furthermore, the highway improvement works will necessitate the removal of trees and hedging along

Kelling Road in order to create a large stretch of visibility splay. More information about this aspect of the proposal will be confirmed through specific conditions.

While there will be a lasting alteration in the land use in certain parts of the site due to development, the focus on landscape and ancient woodland in the development process has aimed to reduce negative impacts as far as reasonably possible on the surrounding landscape.

Overall, Officers consider that the proposed planting initiative will enhance the area's character and ensure an adequate replacement for the trees that have been removed. Although it is recognised that the development entails some unfortunate losses and alterations, it will also bring several advantages, including much-needed woodland management and upkeep, which ultimately surpasses the minor drawbacks. In summary, the proposal aligns with policies EN 1, EN 2, EN 4, and EN 9 of the Core Strategy.

## **6. Highways and Parking**

Core Strategy Policy CT 5 considers the transport impact of new development and sets out that:

“Development will be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to its particular location. Development proposals will be considered against the following criteria:

- the proposal provides for safe and convenient access on foot, cycle, public and private transport addressing the needs of all, including those with a disability;
- the proposal is capable of being served by safe access to the highway network without detriment to the amenity or character of the locality;
- ...
- the expected nature and volume of traffic generated by the proposal could be accommodated by the existing road network without detriment to the amenity or character of the surrounding area or highway safety; and
- if the proposal would have significant transport implications, it is accompanied by a transport assessment, the coverage and detail of which reflects the scale of development and the extent of the transport implications, and also, for non-residential schemes, a travel plan”.

Core Strategy Policy CT 6 considers parking provision and sets out that:

“Adequate vehicle parking facilities will be provided by the developer to serve the needs of the proposed development. Development proposals should make provision for vehicle and cycle parking in accordance with the Council's parking standards, including provision for parking for people with disabilities”.

The NPPF (Dec 2023) sets out at Paragraph 115 sets out that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.

The application has been supported by a Transport Statement and Travel Plan.

The site will maintain the existing primary access off Kelling Road, which will be widened to accommodate two cars passing simultaneously. Two parking areas will be designated on the premises - one to the east of the hall for staff and disabled parking, and another to the north of the sports pitches for public use (event car park). Access to these parking areas will be through a one-way system from the existing access road. The event car park route will allow

for two-way movements and will include passing places. Access to the staff/disabled car park will mainly be for maintenance vehicles, with limited access for visitors. Sufficient cycle parking is also proposed.

The current main access gate will be moved approximately 1.8m to the west to facilitate coach movements. A grasscrete access road is proposed opposite the main site access to serve Gresham's School Estates Department. This access will be gated, with the gate offset about 13m from the carriageway edge to accommodate tractor/trailer combinations waiting off the highway while the gate is operated.

Kelling Road currently has a 60mph speed limit, which will be reduced to 40mph (subject to Traffic Regulation Order) near the site access (to the north extents of the visibility splay) with informal crossing. This speed limit change will be enforced by a feature gateway and 'SLOW' road marking. Pedestrian crossing signs will also be installed, with specific details to be confirmed via condition.

Visibility splays of 132m x 2.4m have been provided at all vehicle access points in line with highway recommendations for 46mph speeds. The pedestrian crossing will be located 63m south of the proposed vehicular access location, with 2m wide footways on the east and west sides of Kelling Road for pedestrian access between the existing Gresham's school and the proposed school. Although the pedestrian crossing will be uncontrolled, part-time 20mph signs are proposed with flashing lights.

Another new route will be created on the opposite side of the pedestrian crossing (east) within the existing Gresham's site. This route will allow for pupils to walk to and from the existing and proposed school safely. The access will be secured via a controlled gate.

The initial proposal suggested implementing a zebra crossing with chicane traffic calming measures and lowering the speed limit to 30mph. However, due to Kelling Road's rural setting and straight layout, meeting a 30mph speed limit was deemed unlikely. Additionally, installing chicanes was seen as unsafe as they would introduce new obstacles. A zebra crossing was deemed unsuitable and unnecessary in a high-speed area where pedestrian activity is sporadic, and the urban nature of a zebra crossing did not fit the characteristics of the location. Therefore, the updated revisions are deemed significantly improved and offer a more suitable and practical resolution for establishing a pedestrian crossing that complements the site's rural character.

Overall, subject to conditions, the proposed development is considered to be compliant with Core Strategy Policies CT 5 and CT 6.

## **7. Ecology**

Policy EN9 of the adopted Core Strategy states that "All development proposals should... protect the biodiversity value of land and buildings", and that development proposals will not be permitted unless "the benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats".

Holt Neighbourhood Plan Policy HOLT3 - Green Infrastructure sets out that:

"The Neighbourhood Plan identifies a Green Infrastructure Network comprising a wide range of existing assets: open spaces, woodlands, water bodies, sustainable drainage land, amenity land, allotments, significant and clusters of mature trees, hedgerows.

- 1) Development proposals that lie within or adjoin the Network will not harm the habitat connectivity present in that part of the Network.

- 2) Proposals within or adjoining the Network shall identify and pursue opportunities for securing measurable net gains for biodiversity, including habitat connectivity, proportionate to their scale and impact”.

The majority of the site is designated as a County Wildlife Site known as Old Pollard Wood. The woodland areas to the north and west of the Hall are acknowledged as ancient woodland, comprising a mix of ancient semi-natural and ancient replanted woodland. Within a 2km radius outside of the site, there is one statutory designated site; Holt Lowes/Norfolk Valley Fens, a Site of Special Scientific Interest and Special Area of Conservation located 1.6km south-east of the site.

The Extended UK Habitat Survey identified Priority Habitats on the site, including lowland mixed deciduous woodland and a large pond. Additionally, valuable habitats such as veteran trees, neutral grassland with a diverse waxcap fungi assemblage, indicative of unimproved grassland, were recorded. Modified grassland and small areas of recently planted woodland were also documented.

Reptile surveys submitted with the application have documented the presence of both slow worm and common lizard on the site, with peak counts reaching 21 and one, respectively. The majority of the site provides an optimal habitat for these species, with slow worms being found across the site’s grassland/woodland edges and common lizards being recorded in rough grassland within the camping field to the north of the Hall.

Great Crested Newt (GCN) surveys identified two ponds on the site and one offsite pond within 250m of the site. The onsite pond (Pond 1) yielded a negative environmental DNA (eDNA) result, indicating an absence of breeding GCN in Pond 1. Pond 2 was dry and therefore unsuitable for breeding GCN. The offsite pond was not accessible for survey. Terrestrial GCN were observed in woodland to the south of the Hall during reptile surveys, and one individual was also found in the cellar of Holt Hall.

Bat surveys revealed a maternity colony of Brown Long-Eared bats in the loft voids of Holt Hall. Additionally, a small Soprano Pipistrelle maternity roost was found in the loft of the Stables. A Common Pipistrelle day roost was recorded in the chimneys of Holt Hall, and the roost of an unidentified bat species was discovered in the laboratory building.

Following assessment of the documentation submitted with the application additional surveys and information was requested by the Ecology Officer. These included the following:

- Hibernating bats in the cellar of Holt Hall and the boiler room.
- Ground level tree assessments for trees proposed for removal in the Arboricultural Impact Assessment.
- Bat emergence surveys of low potential buildings including the stores, toilet block (tower behind), toilet block 2 and the laboratory.
- Check of barn owl box on the Stables for signs of use.
- Bat activity surveys in grasslands G8 and G9 as well as woodland W1a (for all habitat parcel locations; and
- Botanical surveys.

Following receipt of the requested information, the Ecology Officer confirmed that the botanical survey revealed a variety of near threatened, scarce, and vulnerable plant species. Although small populations of corn spurrey and corn mint would be lost due to the proposed development, both are considered widespread (though declining) in the UK. Populations of common cudweed and mossy stonecrop will also be reduced.



The Badger and Barn Owl Impact Assessment (BaBOIA) details an inspection of an existing barn owl nest box and evaluates site habitats for their potential to support barn owls. The box was found to not be in use, nor show signs of any previous use by the species, therefore, enhancements are recommended. No evidence of red kite nesting was recorded.

In terms of badgers, a main sett and outlier sett were identified at the site. Given the distance from the construction zone, direct impacts are considered unlikely and Reasonable Avoidance Measures (RAMs) are recommended to mitigate the risk of harm to badgers. However, woodland management prescriptions (i.e. removal of rhododendron) close to badger setts may affect their function and sensitive working methods will need to be followed to avoid the requirement for licensing. Ongoing ecological input and long-term monitoring of badger activity will be required to inform woodland management in the future. Therefore, it is considered that impacts on badgers have been sufficiently considered and mitigated effectively from recommendations made within the report.

Further bat emergence surveys were conducted and concluded that the development would lead to the loss of a small soprano pipistrelle maternity roost, disturbance to a brown long-eared bat maternity roost, the loss of a hibernation roost for individual Natterer's bat and Daubenton's bat, and the loss of day roosts for soprano pipistrelle (three) and brown long-eared bats (one). The majority of impacts would occur upon common and widespread species.

The ongoing recreational disturbance impacts will affect Old Pollard Wood CWS and areas of grassland supporting notable fungi. The operation will result in significant increases in light, visual, and noise disturbance at the site, deterring wildlife and causing behaviour changes for some species. Additionally, the proposed works will involve the translocation of reptiles and the destruction of several minor bat roosts. However, the proposed development also offers beneficial outcomes for biodiversity, including positive management of woodland and grassland habitats, increased foraging resources for various species, and the conservation of the roof structure and void of Holt Hall, which supports a maternity roost of brown long-eared bat.

The Landscape Team's objection to the proposed development on a site with significant historical and ecological importance raises notable concerns. Ultimately the decision on how much weight to apply to the issues raised is a matter for the Committee as decision maker.

While ecological impacts are regrettable, the reality is that a project of this magnitude will unavoidably cause some harm within the site's constraints. Nevertheless, the proposal offers valuable public benefits and biodiversity enhancement as required by policy HOLT3 of the Holt Neighbourhood Plan 2023.

Holt Hall, left unused since 2020, can be revitalised for better use, with careful consideration of its environmental impacts. Officers consider, on balance, that the restoration and sustainable management of the site, along with economic investment and habitat preservation efforts, outweigh the residual ecological harm caused by the project, and the proposal would therefore accord with the aims of Core Strategy Policy EN 9.

## **8. Biodiversity Net Gain**

Biodiversity net gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites had to deliver at least 10% biodiversity net gain from 12 February 2024. BNG is measured using Defra's biodiversity metric and all off-site and significant on-site habitats will need to be secured for at least 30 years.

The applications in question were submitted on 06 February 2024 and therefore are **not** subject to mandatory BNG requirements to provide any Biodiversity gains. However, the applicant has decided to provide onsite gains as set out below.

The proposed enhancements to the extensive woodlands on the site, which are classified as a County Wildlife Site, Priority Habitat, and partially designated as ancient woodland—an irreplaceable habitat—will primarily contribute to the overall biodiversity net gain.

Collectively, these proposals are expected to achieve a biodiversity net gain of 10.47% for Habitat Units and 317.39% for Hedgerow Units, surpassing the 10% requirements applicable for mandatory BNG (which do not apply to this application). These enhancements can be counted as positive benefits in support of the proposal.

The enhancement and sustained management (over 30 years) of the ancient woodland within the Site will involve the removal of invasive species that have negatively impacted the site's arboricultural and biodiversity value. The planned activities aim to strengthen the structural integrity of this non-designated heritage asset while providing benefits to the landscape, ecology, and biodiversity. The benefits and improvements will be secured through the approved drawings and landscaping plans secured through the imposition of planning conditions.

The proposed benefits are regarded as a favourable outcome of the development, and a public benefit, contributing to the improvement of the site and its natural habitats in accordance with policy EN9 and section 15 of the NPPF.

## **9. Drainage**

Core Strategy Policy EN 10 seeks to direct most new development to areas of lower risk of flooding (Flood Zone 1). A site-specific flood risk assessment is required for development proposals of "1 hectare or greater in Flood Zone 1." Moreover, in relation to surface water drainage, the Policy sets out that appropriate surface water drainage arrangements dealing with surface water run-off from the new development will be required.

The site is located in Flood Zone 1 which means there is a 'low probability' of flooding, and there is a 'very low' probability of surface water flooding at the site. Nonetheless, as the area for the site exceeds 1 hectare, a Drainage Report, incorporating a Flood Risk Assessment, has been submitted as part of this planning application.

The planned strategy for development utilises soakaways as the main SuDS devices to be implemented throughout the site. The applicant has indicated that a soakaway is suggested to be installed for the existing Holt Hall building to redirect rainwater away from the lake, unless infiltration rates do not allow for it, in which case the existing arrangements will be maintained. Additionally, soakaways are proposed for the proposed Music Hall, Multi-purpose Hall, and the North Wing Extension to gather rainwater from the roofs. The proposed Field Studies Centre and Sports Pavilion will also have rainwater soakaways. Details of the soakaway locations will be secured via condition. Permeable paving is recommended for the new car parking areas across the Site. A new pumping station and associated rising main is proposed to replace the existing, to accommodate additional flows generated through the proposals.

Officers consider that the proposed draining arrangements, subject to condition, are acceptable and in accordance with the aims of Policy EN10 of the Core Strategy.

## **10. Energy and Construction**

Policy EN6 states 'All developments are encouraged to incorporate on site renewable and / or decentralised renewable or low carbon energy sources, especially in those areas with substation capacity issues.'

"Development proposals over 1,000 square metres...(new build or conversions) will be required to include on-site renewable energy technology to provide for at least 10% of predicted total energy usage... These proposals will be supported by an energy consumption statement"

The applicant has submitted an Energy Statement with the application.

Passive design measures and features are proposed in order to reduce the energy demand and associated CO2 emissions of the development. These include the following:

- Optimising building form, orientation, and site layout.
- Use of natural ventilation.
- Maximising daylighting.
- Use of high-performance glazing.
- Use of solar shading and consideration given to glazing ratios.
- Use of enhanced thermal insulation and improvements to U-Values.
- Improvements to fabric air permeability.
- Minimising thermal bridging.
- Installation of low energy LED lighting with photocell/timer clock/presence detection controlling where possible.
- The use of smart meters for heat and electricity

The proposed works to the Hall will significantly enhance its energy efficiency and thermal performance. This will be achieved through the implementation of sustainable practices, including the use of low-energy and low or zero carbon technologies (73% of the developments regulated energy), as well as designs that prioritise thermal efficiency. These efforts reflect a constructive and forward-thinking approach to addressing the climate emergency.

An 83.29% reduction of CO2 emissions over the national building requirement under Part L (2021) would also be achieved as a result of the development, complying with policy EN6.

The development would also incorporate a photovoltaic system providing renewable, photovoltaic generated electricity for an estimated 58% of the general energy consumption of the existing Hall and proposed north wing extension.

The proposed development demonstrates a significant commitment to sustainability by incorporating low energy, low or zero carbon technologies, along with a design that prioritises thermal efficiency and therefore complies with policy EN6.

## **11. Public Benefits**

The applicant has set out that the planned establishment of a new Prep School for Gresham's School at Holt Hall aims to meet a pressing demand for modern teaching facilities. The applicant considers this will enhance operational effectiveness and enable the Senior School to grow by utilising the vacant buildings and spaces at the existing Prep School location.

As set out within this report, whilst the proposal will result in a number of adverse impacts including in relation to heritage and biodiversity interests, the proposal would also enable delivery of a number of positive benefits and public benefits many of which are capable of being material planning considerations. The applicant has set out the public benefits at Section 8 of the Planning Statement (dated February 2024).

Whilst ultimately the weight to be attributed to material planning considerations is a matter for the Committee to consider, Officers consider that the following public benefits should attract the following weight:

**Significant positive weight in favour:**

- The development would bring Holt Hall back into use along with its sustainable long-term maintenance through direct economic investment.
- The improvement and long-term management (30 years) of the ancient woodland within the Site which includes removing invasive species that have resulted in a deterioration of the Site's arboriculturally and biodiversity value

**Modest positive weight in favour:**

- Direct and indirect economic investment in the Site and the local economy through the provision of temporary construction jobs and a commitment to involve local contractors in the build process, where possible.
- The removal of a number of unsympathetic modern interventions and additions to the Grade II listed Hall that currently detract from its significance to notable heritage gain. This includes ensuring that the Grade II listed Hall remains in good order, securing the future of the heritage asset.
- The potential to allow access into the Site for Heritage Open Days once or twice per year.
- 73% of the proposed development's regulated energy will be provided by Low Zero Carbon ground source heat pumps for space heating and hot water preparation.
- The provision of a purpose-built Field Study Centre at the Site, to be made available for visiting school and / or educational groups for 50 weeks of the year. The new facility will expand upon the school's current outreach programme, focusing on the delivery of environmental education and allowing visiting groups to learn from the Site as an invaluable ecological and heritage resource.
- The provision of biodiversity net gains of 10.47% for Habitat Units and 317.39% for Hedgerow Units.

**Limited positive weight in favour:**

- Significantly improving upon the visual amenity of the Site through the removal of ad hoc structures and the provision of buildings of high-quality design and considerable hard and soft landscaping improvements.
- The potential to allow access into the Site for Heritage Open Days once or twice per year.

Having regard to the above benefits, Officers consider that collectively these positive benefits and public benefits attract considerable weight in favour of the proposal and need to be weighed when making the overall planning balance.

## **12. Planning Balance and Conclusion**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out a statutory requirement that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

The Committee are being asked to consider planning and listed building applications which intend to provide new life and purpose for the grade II listed Holt Hall site. The proposals involve significant change at the site including an extensive range of buildings and facilities needed to transform the site into a fully functioning and effective prep-school for Greshams.

The principle of use of the site as a C2 Use Class facility (residential institution) is considered acceptable, so the central question for the Committee is whether the extent of demolition and new-build elements proposed are acceptable in relation to identified impacts on heritage assets, ecology and ancient woodland and whether the material considerations in favour of the proposal are sufficient to outweigh identified harms.

Delivery of the project has presented numerous challenges in balancing the need to provide the necessary functions of the school whilst seeking to reduce adverse impacts on heritage interest features, ecological features and ancient woodland. Officers recognise that it is likely impossible to satisfactorily address all of the consultee comments and concerns.

In terms of design, officers consider that the scheme, as a whole would accord with the aims of Core Strategy Policy EN 4 and Policy HOLT1 of the Holt Neighbourhood Plan.

In terms of amenity, the proposal would not give rise to significant detrimental impacts and would accord with the aims of Core Strategy Policy EN 4.

In respect of landscape impacts, the proposal would not affect the special character of the Norfolk Coast National Landscape and the securing of a Woodland Management Plan would secure the long term maintenance of the ancient woodlands surrounding the site.

In respect of highway and parking, the would accord with Core Strategy Policies CT 5 and CT 6.

In respect of biodiversity net gain, the proposal would provide enhancements and gains beyond 10% despite not being a mandatory requirement.

In respect of drainage the proposal would accord with Core Strategy Policy EN 10.

In respect on Energy and Construction, the proposal would accord with the aims of Core Strategy Policy EN 6.

In respect of heritage impacts, it is fully recognised that harm will result to the grade II listed Holt Hall and its setting and this weighs against the grant of permission requiring sufficient public benefits to outweigh the identified "less than substantial" harm.

In respect of ecological impacts, some harm will arise to ecological features on the site and this harm must be weighed in the planning balance.

Having regard to the public benefits identified in support of the proposal, Officers consider that these benefits are sufficient to outweigh the harm to heritage and ecological interests and to outweigh any conflict with Development Plan policy.

## **RECOMMENDATIONS:**

### **HOLT - PF/24/0265 (Application 1)**

**APPROVAL subject to the imposition of planning conditions relating to the following matters:**

- 1) Time Limit
- 2) Approved Plans
- 3) Fire Hydrant
- 4) Means of Access
- 5) Visibility Splays
- 6) On-Site parking/servicing/loading
- 7) Cycle Parking
- 8) On-Site Parking for Construction Workers
- 9) Construction Traffic Management Plan
- 10) Construction Management Plan Compliance
- 11) Off-site Highway Improvement Works
- 12) Off-site Highway Improvement Compliance
- 13) Speed Restriction Order (TRO)
- 14) Traffic and Parking Assessment
- 15) Travel Plan
- 16) Materials
- 17) Pedestrian Sign
- 18) No Clearance, Demolition, Modifications
- 19) CEMP (Construction Management Plan)
- 20) Great Crested Newts
- 21) Reptile Mitigation Strategy
- 22) Woodland Management Plan
- 23) Badger Mitigation & Monitoring Strategy
- 24) Arb Impact and Tree Protection Plan
- 25) Habitat Management and Monitoring Plan
- 26) Hard and Soft Landscaping
- 27) Fence, ANPR Camera & Entrance Works
- 28) External Lighting
- 29) Securing of public benefits

**Final wording of conditions and any others considered necessary to be delegated to the Assistant Director – Planning**

**HOLT - LA/24/0264 (Application 2)**

**APPROVAL subject to conditions relating to the following matters:**

- 1) Time Limit
- 2) Approved Plans
- 3) Samples
- 4) Re-use Materials
- 5) Acoustic Treatments

**Final wording of conditions and any others considered necessary to be delegated to the Assistant Director – Planning**