

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

EXECUTIVE SUMMARY

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

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

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

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

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

This report sets out:

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

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

RECOMMENDATION: REFUSAL

Major Development

Target Date: 27th April 2026

Extension of Time: 20th August 2026

Case Officer: Joseph Barrow

Full Planning Permission

RELEVANT SITE CONSTRAINTS

The site lies within Holt's Settlement Boundary

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

THE APPLICATION

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

RELEVANT PLANNING HISTORY

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

REASONS FOR REFERRAL TO COMMITTEE

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

CONSULTATIONS

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

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

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

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

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

Environment Agency – No response received

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

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

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

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

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

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

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

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

REPRESENTATIONS

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

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

Matters Raised in Support

Supportive representations principally refer to:

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

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

Matters Raised in Objection

Objections principally relate to:

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

HUMAN RIGHTS IMPLICATIONS:

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

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

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

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

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

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

LOCAL FINANCE CONSIDERATIONS

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

EQUALITY ACT 2010- SECTION 149

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

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

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

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

RELEVANT POLICIES:

Adopted North Norfolk Local Plan (NNLP):

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

Holt Neighbourhood Plan:

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

Material Considerations:

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

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

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

Supplementary Planning Documents:
North Norfolk Design Guide (2011)

OFFICER ASSESSMENT:

MAIN ISSUES FOR CONSIDERATION:

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

THE APPLICATION SITE

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

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

1. Principle of Development:

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

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

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

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

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

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

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

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

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

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

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

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

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

2. Sequential Site Assessment

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

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

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

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

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

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

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

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

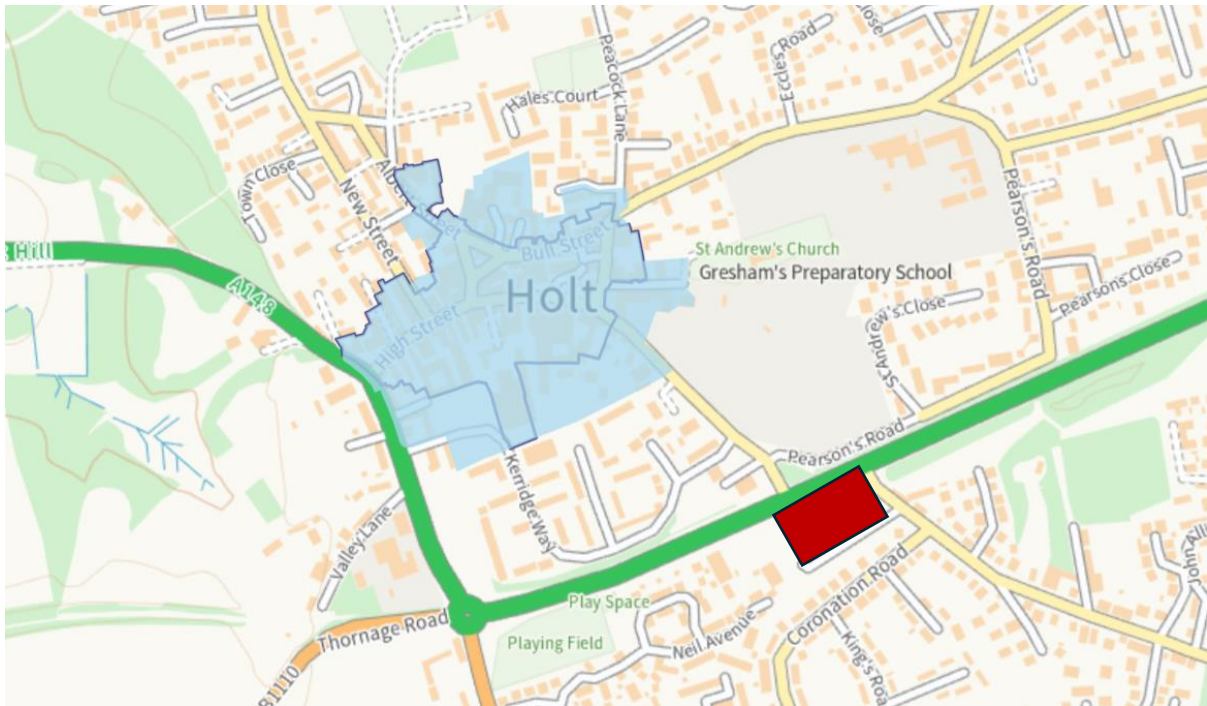


Figure 1 - Map showing Holt's Town Centre designations and the proposed site area in red (approx.).

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

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

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

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

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

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

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

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

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

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

3. Retail Matters

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

NNLP Policy E4 sets out that:

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

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

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

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

Policy TC4 of the NPPF sets out that:

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

This policy continues:

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

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

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

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

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

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

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

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

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

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

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

Cumulative Impacts

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

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

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

Notes:

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

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

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

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

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

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

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

Officers are of the view that:

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

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

Other retail matters

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

Nexus comment as follows:

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

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

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

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

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

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

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

Comparison of the competing applications:

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

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

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

4. Design and Heritage

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5. Amenity

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

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

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

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

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

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

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

6. Highways

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In respect of the service yard, NCC Highways comment:

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

In conclusion NCC Highways note:

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

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

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

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

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

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

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

Parking

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

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

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

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

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

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

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

7. Flood Risk

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

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

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

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

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

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

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

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

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

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

8. Biodiversity Net Gain (BNG)

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

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

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

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

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

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

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

9. Landscape

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

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

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

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

10. Ecology

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Fibre to the Premises (FTTP):

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

13. Conclusion and Planning Balance

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

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

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

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

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

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

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

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

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

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

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

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

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

RECOMMENDATION:

REFUSAL for the following reasons:

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

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

Final wording to be delegated to the Assistant Director – Planning