

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

EXECUTIVE SUMMARY

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

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

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

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

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

This report sets out:

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

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

RECOMMENDATION: APPROVAL

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

RELEVANT SITE CONSTRAINTS

The site lies within Holt's Settlement Boundary

The site lies within the Holt Neighbourhood Plan Area

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

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

THE APPLICATION

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

RELEVANT PLANNING HISTORY

App No. PRE3/25/0807

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

Outcome Advice Given

REASONS FOR REFERRAL TO COMMITTEE

At the request of the Assistant Director of Planning:

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

CONSULTATIONS

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

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

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

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

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

Environment Agency – No response received

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

Highways – No objection – *subject to conditions.*

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

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

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

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

REPRESENTATIONS:

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

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

Matters Raised in Support

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

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

Matters Raised in Objection

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

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

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

Neutral / Conditional Responses

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

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

HUMAN RIGHTS IMPLICATIONS:

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

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

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

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

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

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

LOCAL FINANCE CONSIDERATIONS

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

EQUALITY ACT 2010- SECTION 149

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

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

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

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

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

RELEVANT POLICIES:

Adopted North Norfolk Local Plan (NNLP):

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

Holt Neighbourhood Plan (HNP) (2023):

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

Material Considerations:

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

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

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

Supplementary Planning Documents:
North Norfolk Design Guide (2011)

OFFICER ASSESSMENT:

MAIN ISSUES FOR CONSIDERATION:

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

THE APPLICATION SITE

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

1. Principle of Development:

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

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

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

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

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

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

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

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

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

2. Sequential Site Assessment

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

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

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

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

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

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

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

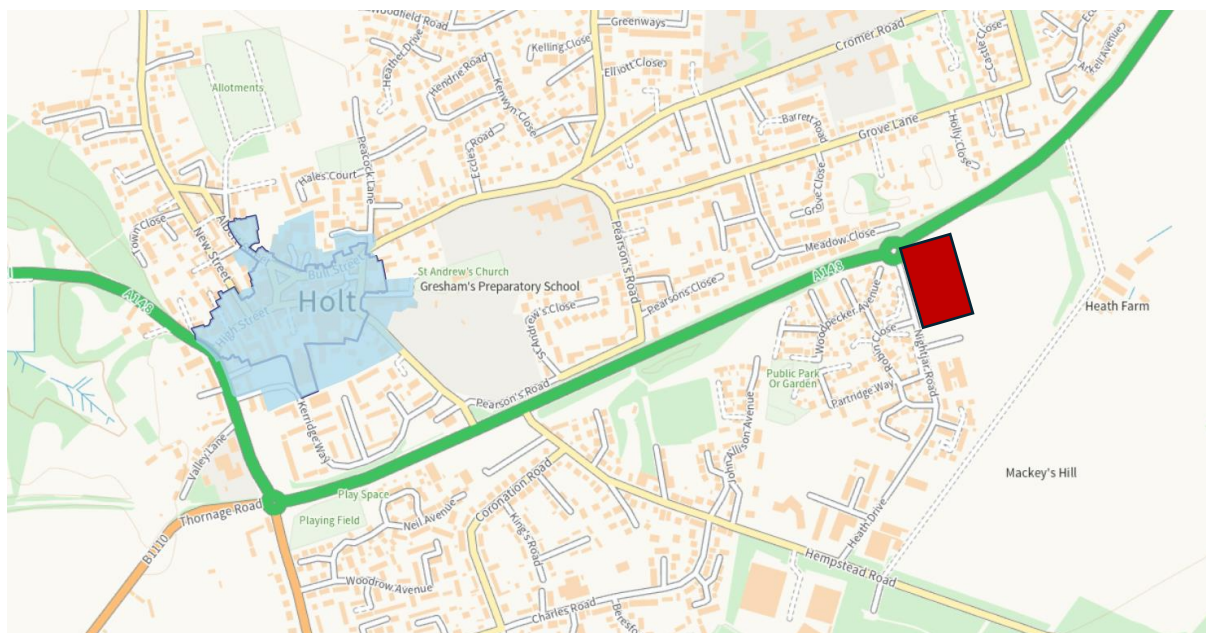


Figure 1 - Map showing Holt's Town Centre designations and the proposed site area in red (approx.).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3. Retail Matters

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

NNLP Policy E4 sets out that:

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

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

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

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

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

Policy TC4 of the NPPF sets out that:

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

This policy continues:

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

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

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

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

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

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

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

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

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

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

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

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

Cumulative Impacts

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

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

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

Notes:

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

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

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

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

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

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

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

Officers are of the view that:

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

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

Other retail matters

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

Nexus comment as follows:

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

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

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

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

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

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

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

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

Comparison of the competing applications:

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

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

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

4. Design

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

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

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

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

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

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

5. Amenity:

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

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

Mechanical Services Plant

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

Delivery, reversing warning and unloading noise

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

Car parking noise

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

Odour control

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

Refuse storage and collection

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

Lighting

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

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

Contaminated land and air quality

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

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

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

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

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

6. Highways

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7. Flood Risk

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

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

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

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

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

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

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

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

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

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

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

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

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

8. Biodiversity Net Gain (BNG)

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

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

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

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

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

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

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

9. Landscape

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

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

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

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

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

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

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

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

10. Ecology

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

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

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

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

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

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

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

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

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

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

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

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

12. Fibre to the Premises (FTTP):

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

13. Conclusion and Planning Balance

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

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

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

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

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

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

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

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

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

RECOMMENDATION:

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

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