

Environment & Countryside

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FAO Chris Johnson

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Our Ref: HoEC/EC3210/SM/LP/CST10701

Your Ref: SMD/2026/0052

Dear Chris,

FORMER ANZIO CAMP, BUXTON ROAD, BLACKSHAW MOOR, LEEK

Thank you for your consultation request regarding the outline planning application for the proposed redevelopment of the former Anzio site for residential dwellings, retail business, amenity space, internal roads, and associated hard/soft landscaping, including the principal means of vehicular access from the A53 Buxton Road (all other matters reserved) at the above site. This letter outlines the response of Staffordshire County Council's Historic Environment Team regarding the historic environment implications of the proposals.

Historic Environment/Archaeological Interest

The application has been reviewed against the information held by the Staffordshire Historic Environment Record (SHER) and the Heritage Impact Assessment (HIA) submitted in support of the application, together with associated datasets such as historic Ordnance Survey mapping and LiDAR. The HIA has not utilised a search of the SHER and offers only a very basic history of the site. As a result, the below history of the site is taken from a desk-based assessment (DBA) produced in 2008 for a different application on the same site (SMD/2008/0573).

A transit camp for anti-aircraft battalions from the USA was opened on the site in 1943. It was apparently known as Blackshaw Moor Camp and aerial photographs taken by the RAF in August 1945 show that the proposed development area had been developed for military use by this date. The camp

extended well beyond the proposed development area and aerial photographs indicate that the area of camp within the proposed development area comprised a number of huts, with hard standing, roads and paths between them. It has been suggested that in 1946 the camp was taken over by Polish troops who had arrived from Italy, and other Polish troops arrived later, and it has also been suggested that from 1944 to 1950 the camp was also used to house German and Italian prisoners of war followed by displaced persons from eastern Europe. However, Historic England have not recorded the camp as being one of the numbered sequence of prisoner of war camps in official records of the 1939 to 1948 period, and given that the camp occupied a far larger area than the proposed development area, and that parts of it were physically removed from others, it may be that it saw various uses in the post war period.

The Blackshaw Moor camp site was cleared during the early 1980s, and in 1983 Anzio Camp was opened there as a training camp for use by the regular army, territorials, and scouts. The 2008 DBA concluded that the construction and subsequent redevelopment of the existing Anzio Camp will have removed any trace of the former Blackshaw Moor camp from within its built footprint, and as a result the proposed development area has a low potential for the survival of below ground archaeological remains.

The HIA submitted in support of this application does not make any consideration of below ground archaeology, other than to repeat the above conclusion from the 2008 DBA. Whilst it is true that the redevelopment of the site would have undoubtedly removed some of the earlier WWII camp, map overlays indicate the 1980s Anzio buildings only cover a portion of the earlier Blackshaw Moor camp buildings. Although the entire Blackshaw Moor camp was cleared to make way for the Anzio camp, there may be significant below ground remains of the earlier camp surviving outside the footprint of the later Anzio camp.

Please note, this advice focusses on the below ground archaeological issues with regards to the application. The HIA has assessed the potential impact of the proposed development on nearby designated heritage assets (namely a Grade II listed milepost located on the A53 near the entrance to the site), and I am happy to defer to your Conservation Officer colleague regarding the efficacy of the assessment.

Archaeological Recommendations

Taking the above into account, it seems evident that there is archaeological potential within the site relating to the WWII Blackshaw Moor Camp. It is considered that pockets of below-ground remains of this camp may survive

outside of the footprint of the later Anzio camp, although we do not feel that this potential has been sufficiently assessed by the applicant. An up-to-date desk-based assessment, utilising historic map regression to identify where elements of the earlier camp may survive, and using relevant historic photos, written documents and other appropriate sources to further understand the purpose of this area of the camp, would address the relevant paragraph (207) of the NPPF (2024), which states that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting....Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment.'

Should permission be granted based on the existing information alone, whilst we do not wish to raise any archaeological-related objections to the application, considering the nature and scale of the proposed development, and the perceived archaeological potential of the site, we are of the opinion that a **staged archaeological evaluation** will be required to better understand and characterise the potential archaeological resource within the application site. This archaeological evaluation will comprise archaeological **trial trenching**, the scale and location of which should be informed by map regression to identify areas of potential, and any ground investigation works carried out associated with the proposed development or previously carried out and available. This work should be carried out at the Outline stage, as a condition of consent, in order for the results to inform the need for further archaeological works and to inform the scale and extent of these further archaeological works (such as excavation, watching brief etc.), if deemed necessary, and indeed the potential for preservation *in situ* (for example through mitigation by design), should significant remains be encountered.

Policy and Standard and Guidance

The above approach, i.e. archaeological evaluation, is supported by NPPF (2024) para 207, which states that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic

environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation’.

Any further archaeological works which stem from the evaluation are supported by para 218 which states that:

‘Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted’.

All archaeological works must be undertaken by an appropriately experienced archaeological organisation (with suitably experienced personnel) or historic environment professional/archaeologist, working to the requirements of the relevant SCCHET Model Brief (which can be found in our [Archaeology Standard](#)), which should inform the production of the conditioned Archaeological Project Design (APD), the Chartered Institute for Archaeologists (CIfA) Code of Conduct (or equivalent), and to a level commensurate with the relevant CIfA Standard and Guidance.

Suggested Condition

The above works* could be most satisfactorily secured via a condition attached to any planning permission for the scheme. This condition should read:

A) Prior to the commencement of the development hereby permitted, an Archaeological Project Design shall be submitted for the written approval of the Local Planning Authority. The Archaeological Project Design shall provide details of the programme of archaeological works to be carried out within the site, including post-fieldwork reporting and appropriate publication.

B) The archaeological site work shall thereafter be implemented in full in accordance with the Archaeological Project Design approved under condition (A).

C) The development shall not be occupied until the site investigation and post-excavation assessment (if deemed necessary) has been completed in accordance with the Archaeological Project Design approved under condition (A) and the

provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

Should you have any queries regarding the content of this letter, please don't hesitate to contact me.

Yours sincerely,

[Redacted signature]

Laura Pritchard

Environment Specialist (Archaeology)

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