

The Leek and District Shooting Centre
Thorncliffe Lane
Blackshaw Moor
Leek
Staffordshire
ST13 8TP

Mr C. Johnston (Planning Case Officer),
The Planning Department,
Staffordshire Moorlands District Council,
Moorlands House,
Stockwell Street,
Leek,
Staffordshire
ST13 6HQ

20 March 2026

By email only to: planning@staffsmoorlands.gov.uk

Dear Mr Johnston,

**Re: Planning Application Reference Number SMD/2026/0052
Letter of Objection to the Proposed Development**

1. The Shooting Centre

1.1 I write on behalf of **The Leek and District Shooting Centre** of Thorncliffe Lane, Blackshaw Moor, Leek, Staffordshire ST13 8TP ("**the Shooting Centre**") in respect of the above-mentioned planning application which has been submitted by Telford One Limited ("**the Applicant**") for:

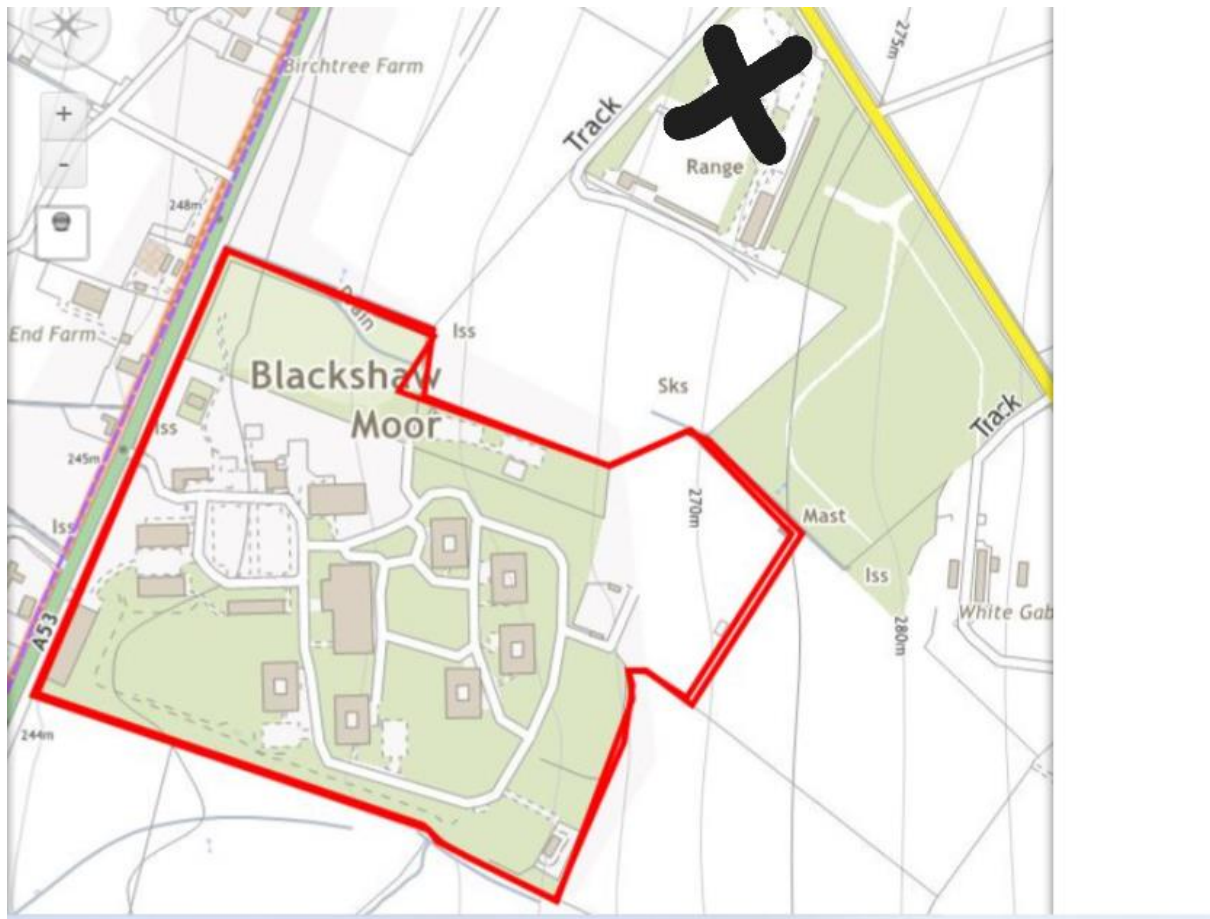
Outline permission for redevelopment of the former Anzio site for residential dwellings, retail business, amenity space, internal roads, and associated hard/soft landscaping. Including the principal means of vehicular access from the A53 Buxton Road (all other matters reserved)

on the former British Army training centre known as 'Anzio Camp', Thorncliffe Lane, Blackshaw Moor, Leek, Staffordshire ST13 8TN ("**the Site**").

1.2 As the Council is aware:

- (1) the Shooting Centre was established in 1969 and has been shooting at its Thorncliffe Lane site, on which we have both indoor and outdoor ranges, for approximately fifty five (55) years; and moreover
- (2) a Certificate of Lawfulness, issued on 1st August 2007 under reference 07/00265/CL-EXG, confirmed the lawfulness of both the Shooting Centre's facilities and its activities.

- 1.3 The Shooting Centre is a successful club and is proud of the fact many of its members (which total approximately 260) participate in most national UK target shooting competitions, with some also competing very successfully in international events.
- 1.4 The close proximity of the Shooting Centre to the Site is shown in the plan below, with the location of the Shooting Centre shown marked by a black 'X'.



2. General basis of concerns

- 2.1 As the Shooting Centre has previously stated in response to planning applications regarding Anzio Camp, we have no objection in principle to the redevelopment of any part of the former training centre.
- 2.2 However, we consider it essential that any new use of the Site properly takes in to account the existing and long-established uses of the adjacent and neighbouring land.
- 2.3 Accordingly, **we are very concerned by any proposed developments in the vicinity which potentially have an adverse impact on our established sporting activities – either in the short or long term.**

- 2.4 As you shall undoubtedly appreciate, residential developments are a particular concern to us because:
- (1) the occupants shall undoubtedly (and understandably) expect a reasonable degree of peaceful enjoyment of their new homes, when both inside and outside in their gardens, and may consider any noise emanating from the Shooting Centre to be an unwelcome nuisance;
 - (2) the Environmental Protection Act 1990 allows local authorities and property owners/occupiers to take action to abate and/or prevent the recurrence of noise that amounts to a statutory nuisance;
 - (3) a statutory nuisance is defined to include “noise emanating from premises so as to be prejudicial to health or a nuisance”; and
 - (4) although a “nuisance” is not defined, where a statutory nuisance is found to exist the local authority is required to issue an abatement notice.
- 2.5 Our current understanding is the key elements of the proposed development at Anzio Camp are to be:
- (1) **45 leisure retirement lodges**; and
 - (2) **248 residential units**
- although the supporting documentation states the proposed development is expected to be revised to:
- (a) remove the leisure lodges; and
 - (b) increase the residential dwellings to **298 units**.
- 2.6 The Shooting Centre considers this proposed residential development to be a ‘quantum leap’ in comparison to the current permitted use of the Site and, as such, one which raises a number of concerns with the key issue being that it shall bring with it a much-increased potential risk of:
- (1) future residents making allegations/complaints of noise nuisance; and
 - (2) for such complaints to possibly have adverse consequential impacts on the Shooting Centre’s hitherto unrestricted activities.

3. Noise & Noise Impact Assessments

- 3.1 We do not propose to reiterate Government guidance etc. on the subject, and consider it sufficient to state that **noise issues are a critical environmental consideration** in the planning process and so:
- (1) Noise needs to be considered when development may create additional noise or would be sensitive to the prevailing acoustic environment (including any anticipated changes to that environment from activities that are permitted but not yet commenced).
 - (2) Good acoustic design needs to be considered early in the planning process to ensure that the most appropriate and cost-effective solutions are identified from the outset.

- (3) Planning decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs).
 - (4) Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.
 - (5) Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.
- 3.2 To put the point more succinctly, **developers are required to ensure that noise sensitive occupiers of new developments are protected from existing noise.**
- 3.3 In broad terms, in order for the local planning authority ("LPA") to be able to apply the relevant planning policies and guidance regarding noise to the assessment and determination of a particular planning application, the LPA shall require the submission of a noise impact assessment ("NIA").
- 3.4 In similarly broad terms, in order for existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs) and/or residents to avoid having unreasonable restrictions being placed on them as a result of development permitted after they were established (i.e. being the subject of noise nuisance complaints (at some later date) made by the new residents/occupiers of the development) they are entirely reliant on:
- (1) the applicant submitting an accurate NIA; and
 - (2) the LPA making a proper evaluation of the NIA and determination of the mitigation measures which must be put in place on the application site (if any).
- 3.5 Noise impact assessments evaluate how proposed developments affect local noise-sensitive receptors (like residential areas) and vice versa, in accordance with the relevant standards, which include BS 4142:2014 (commercial/industrial noise) and BS 8233 2014 (residential amenity), focusing on avoiding adverse impacts on health and quality of life.
- 3.6 It is apparent that an accurate and representative NIA must cover the noisiest periods and also take into account:
- (a) the character of an area (e.g. the shifting patterns of a local noise generator); and
 - (b) special circumstances (e.g. the number of and loudness of individual events & weather conditions etc).

4. Anzio Camp

- 4.1 The requirement for noise from the Shooting Centre's ranges to be mitigated by new developments has been acknowledged and accepted for some time.
- 4.2 When granting planning permission in respect of **Planning Application SMD/2014/0683** on 9th November 2015 the Council imposed a number of planning conditions, including the following:

Condition 24

Before the commencement of the construction of the extra care cottages a precise specification (to include details of the proposed materials, heights and profiles) of the proposed acoustic fencing within the approved earth bund and around the north western corner of the site and the timber crib wall has been submitted to and approved by the Local Planning Authority. The acoustic fencing shall be erected in accordance with the approved details before the extra care cottages are first occupied.

Reason: In the interests of the amenity of occupiers of the properties and the character and appearance of the area in accordance with Policies DC1, DC3, SS1, SS6c and SD4 of the Staffordshire Moorlands Core Strategy.

Condition 30

No development of any phase approved under Condition 3 shall commence until a site specific scheme for protecting the proposed development from noise, has been submitted to, and approved in writing by the Local Planning Authority. The submitted scheme shall have due regard for the British Standard BS8233:2014 Guidance on Sound Insulation for Buildings and World Health Organisation Guidelines for Page 11 Community Noise 1999 and be designed to achieve noise levels of less than 35 dB LAeq, 8hr, in bedrooms, less than 40 dBLAeq, 16hr, in living areas and less than 55dBLAeq, 16 hr, in outside living areas. Pre completion tests shall be carried out to verify compliance with this scheme/condition. A report shall be produced containing all raw data and showing how calculations have been made. A copy of such report shall be submitted to the Local Planning Authority for its approval. The agreed scheme shall be fully implemented prior to any part of the approved development coming into use.

Reason: To protect the occupiers from noise in the interest of residential amenity in accordance with Policies SS1, SS6c and SD4 of the Staffordshire Moorlands Core Strategy.

- 4.3 In view of the issue and the Shooting Centre's concerns (as outlined above) we have reviewed the NIA submitted in support of this outline planning application (prepared by Noise Assessments Limited dated 6th January 2026) ("**the 2026 Anzio NIA**") and would comment and respond as set out in paragraphs 5.1 to 5.11 below.

5. Assessment

5.1 The 2026 Anzio NIA states:

- Noise Assessments Ltd was commissioned to undertake a noise impact assessment with the development at Anzio Camp, Blackshaw Moor, Leek, ST13 8TL (herein referred to as the site), to assess the impact of commercial noise (Live Shooting from the Leek & District Shooting Centre) on proposed additional residential dwellings. (see para 1.1, page 3)
- An assessment of noise was undertaken to assess noise from the shooting range. (see para 1.7, page 3)
- The Leek and District Shooting Centre operate the ranges as private ranges for their members. A variety of firearms are used at the site, ranging from .22 calibre rimfire through to .45 long colts together with black powder events. The club operates under a certificate of lawful use which restricts use of the outdoor firing ranges to hours of daylight only. (see para 1.9, page 5)

5.2 We are grateful that the 2026 Anzio NIA recognises the Shooting Centre is a rifle and pistol shooting club and not a clay pigeon shooting club as the distinction between these very different shooting disciplines is important in terms of the noise generated.

5.3 However, the statement that “The club operates under a certificate of lawful use which restricts use of the outdoor firing ranges to hours of daylight only” could be misleading as it is only an extract from the decision which states:

- *The building and engineering works are lawful by reason of implemented planning consents and being in existence for a continual period in excess of four years.*
- *The use of the firing ranges in the case of the outside shooting ranges is limited to hours of daylight whilst members have had unrestricted use of indoor facilities for a period in excess of ten years.*
- *For a period exceeding ten years, there has been occasional use of the site by non-members, including overnight camping, for shooting practice events.*

5.4 During the summer months, when the days are longer, the use of the outdoor ranges increases significantly.

5.5 In relation to:

- (1) the potential number of users of the outdoor ranges; and also
- (2) the type of ammunition which can be being fired on these ranges the Shooting Centre has:
 - (a) a 100 yards range (the AB range) with **sixteen (16) lanes** on which members are able to fire **.22 rimfire** ammunition. However, it is important to note this range is in the process of being approved for use with

- centrefire pistol calibre ammunition (e.g. **9mm, .45 ACP, .357 Magnum, .44 Magnum etc**) and black powder pistols and rifles; and
- (b) a 50 yards range (the lower 50 yards range) with **eight (8) lanes** on which members are able to fire black powder and full-bore (high velocity) centrefire (rifle) ammunition with calibres up to **308 inch (or 7.62mm)**.
- 5.6 Accordingly, the facts of the matter are:
- (a) the Shooting Centre may have up to **twenty four (24)** people shooting on the outside ranges at any one time; and
- (b) the ammunition being used can vary from **.22 Short (rimfire) to high velocity .308/7.62mm**, with much of it being more powerful than the (antiquated) .45 Long Colt which the 2026 Anzio NIA appear to suggest is the largest/most powerful cartridges in use.
- 5.7 The 2026 Anzio NIA states:
- An assessment of noise during a weekend was undertaken to assess noise from the shooting range. (paragraph 10.7)
 - Noise monitoring equipment for measuring sound levels was set up to capture daytime noise on 13th December 2025. The location of the measurement position is shown in Figure 1. (paragraph 4.1)
 - *Noise levels were measured from the **13th December 2025**. Full measurement times and durations can be found in Appendix A.*
 - **Appendix A** states the recording period to be **09.30hrs to 23.00hrs**.
 - The data collected during this period has been used to characterise the existing acoustic environment at the proposed development site. (paragraph 4.2)
- 5.8 In view of the statements made in the 2026 Anzio NIA, we have checked the club's (mandatory) 'Shooting Record' for Saturday 13th December 2025, which everyone (both members and visitors) must sign on arrival at the Shooting Centre.
- 5.9 A heavily redacted extract of the Shooting Record for the period of 12th December 2025, 13th December 2025 & 14th December 2025 is provided below for your information. (Note: As the Council's Case Officer, you may examine the original document should you wish to do so.)
- 5.10 The entries for 13th December 2025 are marked for ease of identification with a black 'X'.

LEEK SHOOTING CENTRE

SHOOTING REGISTER

PAGE NUMBER.....

A RANGE CONTROL OFFICER (RCO) MUST BE APPOINTED ON EACH RANGE (AND SIGN BELOW) BEFORE SHOOTING MAY TAKE PLACE. PLEASE SEE RANGE STANDING ORDERS. ALL VISITORS, MEMBERS ETC (INCLUDING NON-SHOOTERS) MUST SIGN THIS REGISTER. IT IS THE SHOOTERS RESPONSIBILITY TO ENSURE THE SAFETY OF ALL EQUIPMENT USED (GUN AMMO & TARGET ETC) - REF CLUB RULES. SIGNING IN BELOW CONFIRMS THAT ALL HANDLOADS COMPLY WITH THE NSRA CODE OF PRACTICE FOR HANDLOADING. COPIES OF ALL RELEVANT DOCUMENTS (CLUB RULES ETC) ARE AVAILABLE IN THE CLUBHOUSE. IF IN DOUBT ASK!!!

DATE	TIME AM/PM	NAME/SIGN	FEE PAID	RANGE TO BE USED	REASON FOR VISIT PRAC/COMP/MAINT	CALIBRE(S)	RCO NAME(S)
12-12-24	0835			T	PRAC	125	
"	"			T	A	6-5'	
12/12/25	11.50			T	PR	222	
12/12/25	11.50			T	PR	7-62	P.D.
12-12-25	12:48			T	"	223	J.C.
12-12-25	13:05			T+C	"	223	J.C.
13/12/25	08:30				CLUBHOUSE		
13/12/25	14:30				HSR G/P		
13/12/25	15:45				Admin		
14/12/25	735			C	PRAC	22	
14/12/25	735			C	ZERO	22	VR
14.12	8-00			C	PRAC	352	
14/12	805			C	PRAC	22	
14.12	9.10			C	PRAC	2230	

- 5.11 It can be seen from the three (3) entries made in the Shooting Register on 13th December 2025 that no shooting took place at the Shooting Centre on that day.

6. Summary & Conclusion

- 6.1 It is disappointing that Noise Assessments Limited did not contact the Shooting Centre prior to conducting their 'assessment', as we would have been pleased to advise them as to when shooting was most likely to take place.
- 6.2 It is deeply concerning, for all the reasons outlined above, that:
- (1) a noise impact assessment which itself states it was conducted "to assess the impact of commercial noise (Live Shooting from the Leek & District Shooting Centre) on proposed additional residential dwellings" was carried out on a day when no shooting took place; and
 - (2) the applicant's acoustic experts have not realised, either on the day of the assessment or subsequently (through their analysis of the data captured/recorded) that there was a problem and/or an anomaly; and
 - (3) a 'positive' report has been submitted to the Council (in the form of the 2026 Anzio NIA).

6.3 In conclusion:

- (1) I confirm that, for the reasons outlined above, the Shooting Centre objects to this planning application; and
- (2) due to the obvious inadequacy of the NIA submitted in support of the planning application, we must put the Council (and the Applicant) on notice that:
 - (a) the 2026 Anzio NIA cannot, for reasons which should now be obvious and not require further explanation and/or analysis, be relied upon by the Council for the purposes of determining this planning application; and
 - (b) any decision to grant planning permission which takes into consideration the representations made in the 2026 Anzio NIA shall be made the subject of a formal challenge by the Shooting Centre in the form of judicial review proceedings in the High Court.

Yours sincerely

Mr Dean Thornley
Secretary
Leek & District Shooting Centre