

From: planningcomments@staffsmoorlands.gov.uk
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To: Planning Comments (SMDC)
Subject: Comment Received from Public Access

Application Reference No. : SMD/2026/0052 Site Address: Former Anzio Camp Buxton Road Blackshaw Moor Leek
Staffordshire ST13 8TN Leek Comments by: Gregory Coppenhall Staffordshire Moorlands District Council
From:

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Submission: Objection

Comments: In assessing this proposal, regard has been given to the provisions of the National Planning Policy Framework. Which seeks to protect and enhance the natural environment, requiring planning decisions to recognise the contribution that trees and green infrastructure make to the character, amenity and environmental quality of an area.

Consideration has been given to statutory protections afforded to trees protected by Tree Preservation Order and trees located within Conservation Areas. In addition, guidance contained within BS 5837:2012 Trees in relation to design, demolition and construction - Recommendations has been considered, which provides the methodology for assessing potential impacts of development on existing trees and establishing appropriate protection and mitigation measures.

The Local Development Framework Consideration: Staffordshire Moorlands Local Plan (Adopted 2020), specifically policies NE 2: Trees, Woodlands and Hedgerows has also been considered whilst assessing the proposal.

The proposed layout constitutes a significant overdevelopment of the site, resulting in the likely removal of the majority, if not all, existing trees. This approach fails to demonstrate any meaningful retention of arboricultural features, including those of high quality, and gives rise to substantial harm to the site's arboricultural value.

The site currently functions effectively as a woodland, contributing not only to its intrinsic arboricultural value but also to wider ecological, landscape, and visual amenity benefits. The loss of this tree cover would therefore represent an unacceptable degradation of the local environment, contrary to the principles of sustainable development and established good practice.

Furthermore, the proposal makes inadequate provision for usable amenity space for future occupiers, resulting in a poor quality and uninspired sense of place.

The development would also result in harmful landscape impacts when viewed from elevated and sensitive viewpoints within the Peak District National Park, particularly from The Roaches and Hen Cloud. The existing tree cover currently provides effective screening and softens the visual presence of the site. Its removal would expose the development, creating a conspicuous and discordant feature within the landscape, to the detriment of the character and appearance of the wider area.

In the absence of a design-led approach that prioritises tree retention and integrates development sympathetically within the existing landscape framework, the proposal is considered unacceptable.

With reference to the previous scheme and its ultimately evolved form, the following points may be of note, which contributed strongly to it being considered acceptable at that time:

- The layout provided for retention of a significant amount of existing tree/shrub/understorey vegetation along the A53 Buxton Road frontage, and avoided unduly opening up the main access, in order to retain/enhance screening and protect rural character.
- The layout generally kept development well back inside site boundaries, in order to allow maximum retention of existing trees/hedges etc and allow spatial opportunity for new planning.
- The layout was designed to maximise the retention of better quality trees wherever reasonably practicable, together with significant numbers of other trees/shrubs which, although individually of moderate or even low quality, collectively comprised significant screening and/or landscape structure function.
- The layout avoided development footprint encroachment into the existing screen mound along the western half of the southern boundary, thereby fully retaining this mound together with its associated existing vegetation and opportunity to accommodate new planning, in order to minimise visual impact on views when approaching the site along the A53 from the south.
- The layout provided for the retention of good sized undeveloped areas around and within the scheme to reduce density/increase visual permeability, create more of a sense of place, and, again, allow retention of existing trees/landscape structure and create spatial opportunity for new planning.
- An informal, flowing, 'organic' layout evolved which better suits the open countryside location and existing site structure and gradients, and appropriately moved away from earlier proposals of a more formal regimental development layout being imposed on the site and its landscape structure.
- It was noted that in association with existing vegetation and its optimised retention within the new development, visually muted external building materials for walls, roofs, windows and doors help the existing army camp buildings to recede somewhat into the landscape structure of the site and its surroundings, and would similarly contribute to a new development being more successfully assimilated and therefore, generate less visual impact from close and distant external viewpoints.

The proposal is considered materially different from the previously approved proposal and therefore raises new and significant concerns. Further to this point, the site is significantly different in its form from the 2014 approval, with a significant increase in tree coverage. Accordingly, an objection is raised.

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