

Dealt with by: Environmental Health

Our Ref: SMD/2026/0052

Direct Dial: (01538) 395400

Your Ref: as above

Email: EHealth.Consultation@highpeak.gov.uk

Date: 29th April 2026

MEMORANDUM: PLANNING CONSULTATION
--

LOCATION	Former Anzio Camp Buxton Road, Blackshaw Moor Leek
PROPOSED DEVELOPMENT	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).

Potential Areas of Environmental Concern -

1. Construction Impacts (Condition)
2. Land contamination risk (Insufficient information -Objection)
3. Lighting Impacts (Condition)
4. Shooting Ground Noise (Objection)
5. Road Traffic Noise (Condition sound insulation)

Recommendation

Environmental Health recommend refusal of the application due to predicted adverse noise impacts to future residents and the potential likelihood for unreasonable restrictions being placed on the existing shooting club.

In addition, no information has been provided regarding the potential contamination status of the site or reference to how the large amounts of baled waste that are prevalent through the site are to be disposed of.

Supporting Comments:

Noise:

A noise impact assessment has been submitted to demonstrate the suitability of the site for residential purposes due to the proximity of the Leek and District Shooting Centre. It was undertaken by Noise Assessments Ltd (Proj. ref. NALPRO081025.01 dated 6/1/26).

1. This proposal is significantly different to that which was granted planning permission in 2015 (SMD/2014/0683). That permission was for extra care housing, live work units and holiday homes. It was expected these residents would be mainly based indoors, working on the premises or be short term holiday residents at the site so not significantly inconvenienced by the shooting club noise.
2. Residents in this proposed housing estate would use their homes in a significantly different way to the previous proposed use. They would be likely to use their garden areas regularly and open windows for ventilation causing them to experience the shooting noise on a more regular basis. It would be likely their amenity would be significantly impacted by loud shooting noise.
3. Since the original permission was granted the Agent of Change Principle has been incorporated into the NPPF ref. section 200 and the proposal as set out would not comply with the requirements of that section.

“Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. 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.”

The submitted NIA does not contain any obvious reference to this principle or any mitigation which might address the shooting noise.

4. The NIA is insufficient to assess the noise impacts from the shooting club. It was undertaken over a 16-hour period. This does not constitute a long enough timeframe to properly consider the noise environment at the site given the substantial nature of the proposal and the significant sound levels emitted from the shooting club.
5. It is not clear from the submitted assessment if shooting was ongoing during the monitoring period. It is noted from an objector letter that shooting was not happening during the monitoring period.

Contamination and Waste

The site is a former Army Base, with known / likely contamination activities e.g. munitions/ firing range, chemicals mustard gas, and the former camp itself**.

The camp itself was also subject to a major fly tipping event in 2017, involving plastic bailed waste. This waste remains onsite and will require removal (at considerable expense) e.g.



There is a lack of information presented about these issues making it difficult to evaluate this proposal – Refusal Recommended.

** It is noted in the Staffs CC archaeological team response regarding the potential significance of the old army camp, and that although this has been demolished may still be present beneath the site. The Pollution team understands that (based on coequal evidence from army officer) that the when the old camp was demolished it was pushed into a mound north of the now sports hall, covered with earth and left.

Advisory Note/ Informative:

- Please be aware that the responsibility for safe development and secure occupancy of the site rests with the developer.
- A Demolition or refurbishment asbestos survey and risk assessment should be carried out prior to the demolition of the existing buildings. The enforcing authority for this type of work is the Health and Safety Executive (HSE) and it is recommended that you contact them directly to discuss their requirements: <http://www.hse.gov.uk/>
- Any approved noise scheme and measurements should pay due regard to the Professional Guidance on Planning and Noise (ProPG), British Standard BS8233: Sound insulation and noise reduction for buildings (Code of Practice), BS 4142 (2014 +A1:2019)(Method for Rating and assessing industrial and commercial sound) and/or the Building Regulations 2010 Document E or other appropriate guidance
- The lighting scheme should comply with the Institution of Lighting Professionals Guidance Note for the reduction of obtrusive light 2011(or later versions). It should be designed so that it is the minimum needed for security and operational processes and be installed to minimise potential pollution caused by glare and spillage.

Illuminated area m ²	Zone E1	Zone E2	Zone E3	Zone E4
Up to 10.00	100	600	800	1000
Over 10.00	n/a	300	600	600

Environmental Zones			
Zone	Surrounding	Lighting Environment	Examples
E0	Protected	Dark	UNESCO Starlight Reserves, IDA Dark Sky Parks
E1	Natural	Intrinsically dark	National Parks, Areas of Outstanding Natural Beauty etc.
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Small town centres or suburban locations

E4	Urban	High district brightness	Town/city centres with high levels of night-time activity
----	-------	--------------------------	---

The guidance advises that, where an area to be lit lies on the boundary of two zones or can be observed from another zone, the limits used should be those applicable to the most rigorous zone. This area is positioned in an E2 Zone close to Peak District National Park (E1)

- During any demolition and construction activities (including landscaping) the contractor shall take all reasonable steps to prevent dust formation and prevent any dust formed from leaving the site boundary.
 - The control of dust and emissions from construction and demolition Best Practice Guidance, produced by the greater London councils <http://www.london.gov.uk/sites/default/files/BPGcontrolofdustandemissions.pdf>
 - Building Research Establishment Guidance Document 'Control of Dust from Construction and Demolition Activities' (BR456)
- If required, contamination risk assessments shall be carried out in accordance with UK policy the Land contamination risk management framework (LCRM), published by the Environment Agency <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>
 - Submission of reports should also be made to the Environment Agency for comment with regard to their remit to protect ground and surface waters from pollution and their obligations relating to contaminated land.
 - The Local Planning Authority will determine the acceptability of reports on the basis of the information made available to it. Please be aware that should a risk of harm from contamination remain post development, where the applicant had prior knowledge of the contamination, the applicant is likely to be liable under Part II (a) of the Environmental Protection Act 1990 and as such become an "appropriate person". In this event the applicant will be lawfully responsible to remove the risk posed by the contamination.
 - Equally if during any site works a pathway for any contaminant on site is created and humans, waters, property or ecological systems are exposed to this, the applicant or those acting on behalf of the applicant will be liable under part II (a) of the Environmental Protection Act 1990 if the risks are not adequately addressed during the site redevelopment.
 - During investigation and remediation works the applicant and those acting on behalf of the applicant must ensure that site workers, public property and the environment are protected against noise, dust, odour and fumes
 - The applicant is advised that should there be a requirement as part of the Remediation Strategy to treat, reuse or remove contaminated material on the site, the Environment Agency must be consulted, as these activities may need to be licensed or permitted. Contaminated materials identified for removal off site must be disposed of in an appropriately licensed landfill site.
 - Staffordshire Moorlands District Council is keen to liaise with all stakeholders involved in this application. As such, we recommend that a proposed scope of works is forwarded to the

Environmental Health Department and agreed in principle prior to site investigation works being undertaken. The Environmental Health Department is also prepared to review draft copies of reports prior to final submission to the Planning Department in order to ensure that works undertaken are sufficient to discharge the contaminated land conditions.

Regards,

Environmental Health