

Chris Johnston
Planning Officer
Staffordshire Moorlands DC
Stockwell Street
Leek, ST13 6HQ

Date: 22 May 2026

Planning Ref: SMD/2026/0052

Our ref: 25-038-ltr-001_AnzioCamp

Re: Design Officer Consultee Response to outline application SMD/2026/0052 - Former Anzio Camp, Buxton Road, Blackshaw Moor, Leek, Staffordshire, ST13 8TN

Dear Chris

Context for this review

These comments are provided following a review of the materials submitted with the above application and follow on from detailed design comments provided during pre-application discussions. As you will recall we had some significant concerns over the scheme and felt that the approach taken, and the detail provided was insufficient to provide any confidence that a. the site was developed to an appropriate scale and density, and b. that it would respond to the local context.

It is clear that some work has been done by the applicant to address the design feedback provided at the pre-application advice stage within the illustrative masterplan, however, the scheme remains a long way from being acceptable in design terms. In short, from an urban design perspective there is insufficient information provided and there is a strong concern that what might be delivered on site as part of a future reserved matters application would not be well designed. It fails to take account of best practice and government guidance on design quality. **In this respect we are unable to support the application as it stands from a urban design perspective.**

Notwithstanding this, an assessment has been undertaken of the illustrative site plan against the national design code and local policies. This review has been undertaken by two separate qualified urban designers and town planners (myself and colleague Jo Gregory MCTP (Hons) MSc: UD, MRTPI) to ensure that a comprehensive and balanced review has been presented. The comprehensive feedback detailed and tabulated under the heading design assessment below.



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Key matter – lack of design parameters

Of primary concern to design officers is the lack of design parameters - in other words a design framework - which is approved at the outline stage and within which the detailed Reserved Matters design will sit. The applicant states that design principles cannot be provided due to the outline nature of the application. Officers strongly disagree and cite that the approach taken is far from best practice, especially in such a sensitively located site. It is standard practice for design parameters to form part of the approved plans at outline and are the best way of demonstrating how a scheme can respond to the local context and character – requirements of local and national policy.

Without this there are no guarantees that an appropriate design would be forthcoming, at an appropriate density, character and layout. The submitted Design and Access Statement is also inadequate and whilst it is acknowledged that matters are reserved, there is no legislative requirement for such a document at reserved matters stage. The planning practice guide sets out that they should “*provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users.*” The submitted document falls somewhat short of this.

Revisiting the design principles

The following seven Design Principles were drafted by officers at the pre-application stage in accordance with paragraph 137 of the Framework. They were provided so that the clarity of the vision and expectations of the design for this site in line with paragraph 132 / 133 of the Framework. These should have been used to inform a series of design parameters and provide the framework for how the design evolves at Reserved Matters stage. In the absence of anything from the applicant themselves, these have formed the basis of any assessment of the scheme as presented.

These Design Principles are listed below for completeness:

1. *Create a strong green infrastructure network of spaces and parks that is based on the existing landscape features (including trees and hedgerows) on and around the site and integrates a strong network of sustainable urban drainage.*



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2. *Provide an appropriate and positive landscape edge to the north, east and southern edges of the development that includes opportunities for public open space and recreation and biodiversity enhancements.*
3. *Deliver a range of built character areas and densities that transition from west to east across the site, based around the higher densities and formality to the west along the A53, and a more informal vernacular led style to the east against the landscape edge.*
4. *Create a network of pedestrian and cycle routes which are focused on a series of key east and west routes which link to bus stops and existing footpaths along the A53, the new proposed retail unit, parks and the woodland area to the north east.*
5. *Provide a clear hierarchy of streets that create strong urban blocks which provide residential frontage to all parks, routes and streets, coupled with a range of different parking typologies and fully integrated with sustainable urban drainage features.*
6. *Provide a strong frontage and gateway to the site from the A53 that would focus on the new retail unit, provision of bus waiting, hard landscaping and cycle parking which will act as a new heart for the proposed development.*
7. *Ensure that a mix of housing types and tenures are delivered, including affordable housing, all with secure private amenity space that that is well defined and easy to manage and maintain.*

Additional information required

Returning to the key matter above, there is insufficient information that would allow such design principles to be robustly tested. As a minimum the following parameters and additional materials would need to be provided:

- A. Updated Design and Access Statement – that sets out the design evolution of the proposal and options explored (requirements of the PPG guidance)
- B. Green infrastructure strategy – demonstrating the retention of existing features and their integration into the scheme along with new planting, with a particular focus on boundary edges.
- C. Hierarchy of routes and open spaces – encouraging the use of sustainable modes and providing safe, convenient access for those on foot and on bikes across the site



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- D. Character assessment and Character areas plan - including study of local vernacular – and including information on materials and planting
- E. Landscape visual appraisal – to explain how the site sits within the landscape context and character, how the design responds to this (officer notes the response from the National Park Authority which echoes these concerns)
- F. Indicative Housing Mix – which is important to understand densities and character that is being provided.

In line with guidance within paragraph 134 a design guide or design code (which sets out clear design parameters) would be justified and this would allow these matters to be addressed in a collective manner. At the very least the applicant should provide a clear and precise parameters plan meeting points 2, 3 and 4 which should be secured by condition. Should these be provided, their content would obviously need to be fully justified in the Design and Access Statement.

Design assessment

Notwithstanding the comments above, the design comments within the table below assess the illustrative site plan proposal against Local Plan policies, the national design guide and the planning practice guidance and are grouped under the ‘*Ten Characteristics of Well Designed Places*’ as set out within the National Design Guide¹. Comments and feedback within this has been related to the Local Plan criteria set out in policy DC1 (specifically criteria 1 – 10). As noted, the only material on which this can be based is the illustrative site plan – which is not fixed or identified to be ‘approved’ - and a very brief and simple design and access statement.

Characteristic	Comments
Context - enhances the surroundings	The submitted Illustrative Site Plan shows some transition from west to east in terms of the formality of the urban blocks. There is a higher density and more rigid block form beside the A53, and towards the east the block form becomes looser and more organic. This variation needs to be emphasised more through the creation of multiple character areas

¹ We are aware of the draft design guidance that has been published by the MLCHG to work alongside the new national planning framework. In this document there are only seven ‘features of well-designed places’. However the topics covered by these are clearly derived from the original national design guide and as such until adopted the ten characteristics remain relevant and in force, but the conclusions reached here are directly relevant to the emerging policy direction.



	and a green infrastructure network that sensitively transitions through the site into the surrounding countryside. No evidence has been provided to demonstrate how the proposal will relate to the site's context. This information needs to be provided within an updated Design and Access Statement or through other design documentation. A character and local vernacular assessment would ideally be prepared to inform the creation of the character areas. There doesn't need to be a high number of character areas (though a minimum of three would be preferable) but they do need to be well evidenced and sufficiently distinct from one another through block form, use of materials and use of planting. These character areas should be based around key features of the site such as landscape features, public open spaces and land use. Currently, without this information and design justification the proposal conflicts with policies NE2, DC1 and DC3 of the Local Plan. More importantly, there is little confidence that the number of units proposed can be effectively accommodated on this site to meet the design requirements of policy.
Identity – attractive and distinctive	The lack of consideration of context also results in the scheme lacking its own identity. Whilst there is a change in density and building arrangement from west to east across the site, no evidence has been provided to support this approach or explain the rationale for the design. As requested above, work assessing local character and vernacular is required to inform a series of character areas. These character areas should reinforce identity and could reference the historic use of the site. Character areas can be provided whilst ensuring enough flexibility for the design to evolve at the Reserved Matters stage, the key aim is to provide the principles of the design, not design detail. As proposed, without the work identified above, the scheme remains in conflict with policy DC1 and the Staffordshire Moorlands Design Guide.
Built Form – a coherent pattern of development	The arrangement of buildings and spaces as depicted on the Illustrative Site Plan result in some poor relationships between dwellings and a lack of passive surveillance along key routes. A simplification of the routes around the site would significantly improve this issue. There are currently considered to be too many vehicular routes and they are almost



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	all designed to accommodate all sizes of vehicle. A new route hierarchy with clearly defined main routes, secondary routes and tertiary routes (in addition to pedestrian and cycle routes) would significantly improve the layout. Routes within the top tier of the hierarchy should have buildings fronting onto them along their entire length in order to ensure maximum passive surveillance and to aid in wayfinding. Secondary routes can be narrower and tertiary routes narrower still, serving only a few houses. Changes in surfacing material and planting style (in line with the relevant character area would aid in defining this hierarchy). Ideally all dwellings will form part of a fully formed urban block with houses facing outwards and gardens / private amenity space contained within the block. Public open space and pedestrian routes should not be located within the centre of an urban block because there is no passive surveillance. The toddler play area and parts of the woodland walk are located behind dwellings which will create secluded spaces which are hard to find and do not feel safe for users. These parts of the layout need to be redesigned. At present, the design is not a strong response to local plan policies (specifically DC1 criteria 3 and 8), nor the national design guide. Therefore, in our view the illustrative site plan may still require wholesale redesigning especially to the east and north of the site. This is almost certain to impact on the density and numbers. Officers are not convinced that the suggested numbers can be can effectively be provided in design terms.
Movement - <i>accessible and easy to move around</i>	The need for a well-defined route hierarchy and character areas is especially clear when assessing how people will move through the scheme. The current design would be difficult to navigate due to all roads being the same width and there being no clear 'main route'. This, in conjunction with the winding nature of the streets results in there being no views or vistas within the site to help people find their way around. For example, finding the woodland walk would be extremely difficult as it begins behind dwellings and only spans a very small part of the site.



	The route towards the woodland needs to be integrated across the site and, through the use of planting and positioning, draw people through the site towards the woodland. This provides an opportunity for a leisure route for pedestrians and cyclists that connects the site's open spaces and encourages walking and cycling around the site and to neighbouring assets. This route could also connect with possible bus waiting facilities, proposed retail unit, and encourage those who utilise these facilities to explore the woodland to the north east. At present this opportunity is squandered. A hierarchy of streets, spaces and defined character areas together will greatly improve the layout and work to address the lack of identity discussed in the previous section of this table. The layout is currently confusing to navigate and does not provide opportunity for walking and cycling. We have no confidence that a quality development could therefore come forward at the reserved matters stage.
Nature – enhanced and optimised	The Illustrative Site Plan and application package includes no information about the retention and integration of existing landscape features, enhancement of biodiversity and management of the edges of the site as they transition from built form into the surrounding landscape. The Illustrative Site Plan appears tokenistic with its positioning of trees, and there remains no strategy for green infrastructure. Given the location of this site the provision of a green infrastructure strategy (high level parameters) is crucial in demonstrating the appropriate capacity of the site and how it will sit within the landscape context. Networks and areas need to be defined across the layout for enhanced planting, retention of existing features, justification of loss of landscape features and biodiversity enhancement. Again, this should be integrated with the proposed route hierarchy and defined character areas. Green infrastructure should be used to define the hierarchy of streets and to help give each character area its own distinct feel. Furthermore, it is not sufficient to simply state that planting will screen the proposed development (if indeed that is considered to be the preferred design approach), this needs to be demonstrated through a Landscape Visual Appraisal and a strategy for the retention and enhancement of planting. This can be provided at a level of detail



	appropriate for an outline planning application through illustrative sections, planting parameters and the use of best practice. As proposed, the scheme fails to consider green infrastructure (existing and proposed) sufficiently. This is especially concerning given the rural location of the site and its landscape setting. This conflicts with Local Plan policy DC1, but also DC3 (criteria 1).
Public Space – safe, social and inclusive	The arrangement of public spaces / public realm across the site is confused and haphazard. It is an afterthought which suffers due to the arrangement of routes and dwellings. As noted, the creation of a route hierarchy with at least three tiers of vehicular route, plus pedestrian/cycle only routes, that connects into a hierarchy of open space will greatly improve the functionality of the scheme. The revised illustrative site plan positions the key open spaces in a more central location which is considered beneficial. Officers also welcome the large ‘playing field’ open space is surrounded by properties which front it. Whether this is the best location for playing fields is a matter for other officers, but it would be beneficial to the proposal if this space – as the largest within the site - contained areas for play, socialising and even events. The smaller open space labelled ‘public park’ is also welcomed however, the vehicular routes around the space to the north reduce passive surveillance of the space and create a barrier for those accessing the space. The positioning of the ‘toddler play’ is unacceptable. It is tucked away to the rear of dwellings. It is not on route to anywhere and it is totally secluded. This space needs to be relocated to a location where there is a good level of passing footfall and properties facing it. The same is true for the unlabelled space located to the north east of the site that forms part of the access to the woodland walk. This space is not overlooked at all. As previously discussed, there is a missed opportunity to connect all open spaces across the site along a pedestrian / cycle only leisure route which connects into access to the woodland walk. A recurring issue is that there is no hierarchy of open space and each space does not have a clearly defined purpose – something that a clear parameter plan would solve. For example, to the south east of the site



	are two spaces with no clear purpose. It is unclear if the green area to the far south east is open space or a drafting error. Provision of a route hierarchy that links into a hierarchy of spaces and work on character areas will dramatically improve the layout and should remove the functionality issues of the open spaces as detailed above. This is direct conflict with policies DC1 and DC3 of the Local Plan. It is vitally important that the role, function, size and location of green spaces is fully considered at this outline stage to ensure that the number of dwellings can be accommodated on this site.
Use – mixed and integrated	The proposal appears to be limited in terms of housing type and tenure, and more detail on housing mix would be beneficial. The Illustrative Site Plan suggests a mix of detached, semi-detached and terraced properties, but there appears to be very little variation in terms of the size of these dwellings and their layout. It is strongly recommended that a corner turning unit (or units) are added to the layout to aid in surveillance and wayfinding. Whilst it is accepted that this is a detail matter, setting clear design aspirations at the outline stage is vital to ensuring quality design. The inclusion of a retail unit is welcomed and will undoubtedly provide a crucial service for residents but also a useful service for those passing the site. The positioning of the unit close to the A53 is understood, however, its location to the far south west corner of the site is not as convenient as it could be for many future residents. It is suggested that the retail unit is located more centrally along the western boundary of the site to make it more accessible for a greater number of residents. It could be located beside the public park to form a ‘hub’ of activity and a gateway into the development. This would be beneficial for the success of the retail unit, and encourage social interaction for residents. The footpath links to the bus stop on the A53 need to be clearly marked on the Illustrative Site Plan and access to it integrated into the layout.
Homes / Buildings - functional, healthy and sustainable	The creation of character areas will in turn inform the architectural style and detailing of buildings within each area – including the retail unit. At outline stage the level of detail provided could be as simple as a broad materials palette (buildings and hard surfacing) and an indication of housing types. It remains unclear whether the development will take a lead from local vernacular styles, or seek to create something more



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	contemporary, taking inspiration from the former use of the site. These were again points highlighted during the pre-application discussions.
Resources – <i>efficient and resilient</i>	The application contains no information relating to biodiversity enhancement, a green infrastructure strategy or how residents will be encouraged to walk, cycle and use the bus. There is also limited information on energy resources, sustainable drainage and other measures to address climate change. The location of a retail unit is a significant benefit in terms of reducing everyday car journeys, however as stated above, it should be better positioned within the site to encourage maximum accessibility and use.
Lifespan – <i>made to last</i>	No information is provided within the application package.

The above assessment is intended to provide guidance to the applicant for improvement of the proposal in order to comply with design policy and best practice. The illustrative site plan still fails to address some very basic urban design qualities. Addressing this at outline stage hinges on the provision of the parameters plans, as outlined previously. Without these, we would have very little confidence that an appropriate design response for this site could be delivered for the number and density of development proposed. Furthermore, in accepting the material as presented there is a high likelihood that this could result in incongruous patterns of development.

These documents do not need to be as detailed as would be expected at Reserved Matters stage, however, they are needed to provide the framework for how the development is to be delivered. They would also form part of the associated conditions of any permission. Without this information, assessment against key planning policy tests and guidance is not possible and furthermore, demonstration by the applicant that the proposal complies with policy is not possible. This is especially true when considering policies relating to landscape, character, housing mix and the creation of sustainable communities.

Concluding points and recommendation

In its current form this application is not supportable from a design perspective and cannot be considered to be good design. It is strongly recommended that the applicant is encouraged to provide a much wider range of design supporting documentation to demonstrate how the site



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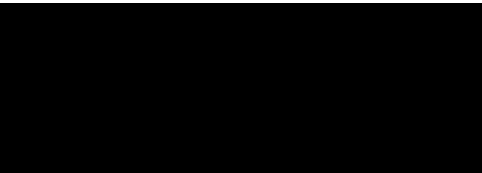
relates to the local context and reflects the local character. These are requirements of local and national policy. Other sections of this response have outlined what would be required to begin to address and evidence the acceptability of the design solution.

The illustrative site plan is insufficient to ensure the design quality of any reserved matters application, and as noted has a series of shortcomings that do not provide the confidence that an appropriately designed scheme could be delivered. It is considered that the number of dwellings proposed cannot be satisfactorily accommodated on this site whilst meeting the requirements of local policy – specifically policies DC1 and DC3, and national policy including paragraph 135 of the Framework as well as the national design guide.

Recommendation: The application as submitted lacks sufficient detail on matters of design, specifically related to the sites relationship with the wider context, landscape setting and character, and therefore there is no way of securing a robust design framework (via conditions) that could result in an appropriate design for the number of dwellings proposed. The illustrative site plan is insufficiently detailed and includes several fundamental flaws. As a result it is considered that this development is not well designed and should be refused.

Should you be minded to approve this application, we strongly recommend that additional conditions regarding design are imposed on any permission which will require the submission of a detailed design code and assessment for the site alongside any reserved matters submission to ensure that the concerns raised are effectively considered and controlled as part of the final scheme – this is in lieu of the requirement for a design and access statement.. We would be happy to advise further on this condition if required.

Yours sincerely



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