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

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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:

Stockwell Street
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Submission: Objection

Comments: The amended plans are not considered sufficient to overcome the concerns previously raised in respect of the substantial arboricultural and landscape harm that would arise from the proposed development. Accordingly, the objection is maintained on arboricultural and landscape grounds.

The proposal is considered to conflict with the relevant provisions of the Local Plan, including Policies C3, NE2 and DSR5, insofar as the development would fail to adequately retain and incorporate existing landscape features and green infrastructure. It would not enhance nor preserve the character and appearance of its rural setting, and would result in unacceptable harm to the established landscape character of the area.

Whilst it is acknowledged that the application is made in principle and that the submitted plans are indicative, the parameters plan nevertheless establishes the broad spatial framework and quantum of development that is proposed. The plan indicates a substantial level of built development across the site, with comparatively limited provision for meaningful green infrastructure outside of residential curtilages.

This is a significant arboricultural and landscape concern. The retention of trees and vegetation principally within individual residential plots provides considerably less certainty over their long-term retention than where trees and associated landscape infrastructure are incorporated within areas of communal or public open space, protection notwithstanding. The long-term retention of existing vegetation should therefore be considered as an integral component of the development framework rather than being reliant upon individual residential gardens.

The site is located within a rural landscape and less than one kilometre from the boundary of the Peak District National Park. Consequently, particular importance should be attached to ensuring that any development is appropriately assimilated into its landscape setting. A substantial and appropriately distributed network of trees, woodland, hedgerows, structural planting and open space would be necessary to soften the visual presence of the development. Thereby maintaining landscape continuity and providing an appropriate transition between the built form and the surrounding rural landscape.

Although the submitted parameters indicate the retention of vegetation and additional planting along the site boundaries, this would provide only limited mitigation in the context of the scale and extent of development proposed. Boundary planting alone would not adequately compensate for the loss and fragmentation of the existing vegetation within the site or provide sufficient green infrastructure throughout the development.

The site currently benefits from a diverse and established tree resource, including trees of differing ages and maturity which collectively exhibit characteristics of a developing and structurally diverse woodland resource. The presence of trees representing different stages of succession contributes to the ecological, visual and landscape value of the site and provides an established green framework upon which a sensitively designed development could be based.

The fact that the site is allocated for development, and that areas of existing development and hardstanding are present, does not remove the requirement for the development to respond appropriately to the site's existing landscape and arboricultural characteristics. Rather, the existing tree stock, woodland characteristics, hedgerows and other vegetation should inform the disposition, density and form of development from the outset.

At present, the parameters proposed do not demonstrate that sufficient space has been retained within the development framework to accommodate the existing tree resource, meaningful new planting, connected green infrastructure and usable areas of open space alongside the proposed development. This creates a fundamental concern that the arboricultural and landscape objectives could not be satisfactorily secured at reserved matters stage.

Green infrastructure should not be considered solely as a means of screening the development from external viewpoints; it should form an integral part of the layout and contribute to the creation of a high-quality, well-integrated and distinctive place. The limited provision indicated would result in a development in which green infrastructure is subordinate to built development rather than forming a meaningful component of its structure and character.

The location and extent of development indicated by the parameters plan would therefore erode the existing rural character of the site and its surroundings. In particular, the limited retention and integration of existing trees and vegetation, together with the restricted provision of meaningful green infrastructure, would result in a development that responds poorly to the established landscape character of Blackamoor and the rural approach to Leek.

The proposed development would consequently appear as a more prominent and urbanising feature within the surrounding rural landscape, rather than successfully integrating with its existing landscape context. This is particularly important given the site's proximity to the Peak District National Park and the sensitivity of the surrounding rural landscape.

It is recognised that detailed planting proposals, tree protection measures and the precise arrangement of development may be addressed at reserved matters stage. However, the fundamental issue at this stage is whether the parameters established by the application provide sufficient scope for these matters to be satisfactorily resolved. In this case, the spatial distribution of development does not provide sufficient confidence that the existing arboricultural resource and the necessary landscape and green infrastructure framework can be retained and incorporated without unacceptable harm.

Conclusion

For the reasons set out above, the proposal would result in unacceptable arboricultural and landscape harm. The development parameters fail to demonstrate sufficient retention and integration of the site's existing tree and vegetation resource and do not provide an adequate framework for the establishment of meaningful, connected and multifunctional green infrastructure.

The proposal would consequently fail to integrate satisfactorily with the existing landscape character of Blackamoor and its wider rural setting, including the sensitive landscape context associated with the proximity of the Peak District National Park. The development would also provide an inadequate framework for the provision of usable amenity and green infrastructure for future residents.

The objection is therefore maintained on arboricultural and landscape grounds. The proposal does not demonstrate that the identified arboricultural and landscape impacts can be satisfactorily avoided, mitigated or compensated for at reserved matters stage and is therefore considered unacceptable in these respects.

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