



Planning and Architecture | advice | applications | drawings

## Non-Technical Summary of Environmental Statement.

**Anzio Camp, Buxton Road, Blackshaw Moor,  
Leek, Staffordshire ST13 8TL**

**Planning Application for:  
Extra care housing, Holiday Park, Live/work  
units, Social building and ancillary facilities  
building.**

**For Enhanced Developments Limited.**

Our Ref: 9651 NTS ES. JD  
Date: October 2014



**tylerparkes** drawing on experience. planning for approval.

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# 1. Introduction

## Instructions

- 1.1. The Tyler-Parkes Partnership Ltd is a Town Planning and Development Consultancy, covering all aspects of development including commercial, retail, industrial, residential, recreational and leisure uses. The Practice acts for a wide range of clients including PLC companies, landowners, local authorities, government agencies, private individuals and development companies, in connection with a wide variety of planning matters.

## Background

- 1.2. A planning application for the redevelopment of the former army training site at Anzio Camp, Buxton Road, Blackshaw Moor, Leek, Staffordshire ('the site') is to be submitted to Staffordshire Moorlands District Council (SMDC). The applicant is Enhanced Developments Limited.
- 1.3. The proposal is for the redevelopment of the site to provide extra care housing, a holiday park, live/work units, social building and ancillary facilities building.
- 1.4. An outline application for a Continuing Care Retirement Community (CCRC) (LPA ref 08/01272/OUT) was made in 2008 which was subject to an Environmental Impact Assessment (EIA). The EIA was undertaken by 'RPS Health, Safety and Environment' in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (the '1999 EIA Regulations').
- 1.5. The findings of the Environmental Impact Assessment (EIA) are reported in full in the 2008 Environmental Statement (ES), to which readers requiring technical information may refer.
- 1.6. In 2012 an application was submitted for the redevelopment of the site to provide extra care housing, a holiday park, live/work units, social building and ancillary facilities building. The 2008 ES document, its accompanying Appendices and Non-Technical Summary (NTS) were submitted in full as part of the 2012 application. The 2012 application used the considerable work that was undertaken as part of the 2008 ES, but updated a number of the environmental assessments. These took into account changes in the nature of the development scheme proposed, changes to advice/best practice, or because the nature of the previous assessments were in any event time limited.

- 1.7. The updated technical reports of the 2012 submission were:
- Planning Policy Context,
  - Alternative Sites Assessment,
  - Visualisations as part of the LVIA,
  - Transport Assessment,
  - Ecology, and
  - Noise.
- 1.8. The same approach has been undertaken for the 2014 application. All these assessments have now been updated other than 'alternative sites assessments'. This is no longer necessary as the application site has since been identified as a strategic site, suitable for employment, extra care housing and tourist accommodation within the SMDC Core Strategy Development Plan Document (adopted 2014). Further clarification is set out in section 5 below.
- 1.9. In some cases the 2012 and now 2014 environmental assessments are to be read in conjunction with the original (2008) assessments, and some are to be stand-alone, replacing in its entirety the equivalent assessment undertaken in 2008 and/or 2012. Collectively these documents form the ES.
- 1.10. The 2014 updates have been carried out by:
- Transport Assessment (Savoy Consulting),
  - Landscape & Visual Impact (LVIA) (Landscape Matters),
  - Ecology (SLR), and
  - Noise (Sharps Redmore, Acoustic Consultants).
- 1.11. See Appendix 1 for a full list of relevant assessment chapters and accompanying figures/ documents and how they are now to be read.
- 1.12. This NTS briefly describes the proposals, and summarises the findings of the original and now updated ES.

## 2. The Environmental Impact Assessment (EIA) Process

- 2.1. Environmental Impact Assessment (EIA) is a process that involves collecting information about the existing environment likely to be affected by a project. The nature and scale of the project's effects on the

environment are then assessed in an impartial manner, and presented systematically in an Environmental Statement (ES). The process is designed to allow environmental concerns and opportunities to be addressed during the planning and design of a project, by incorporating into the proposals measures to mitigate adverse effects or enhance beneficial ones. Also critical to the design and assessment process is the consultation that has been carried out throughout the development of the project.

- 2.2. In 2011 the EIA regulations were updated into a consolidated version that incorporated previous amendments, this being the 'Town and Country Planning (Environmental Impact Assessment) Regulations 2011' SI 2011 no. 1824 (the '2011 EIA Regulations').
- 2.3. The 2011 EIA Regulations require the developer to compile an ES and describe any likely significant effects of the development on the environment, together with proposed mitigation measures to be implemented to eliminate or reduce these effects. The ES should be undertaken using established methods and using competent and experienced consultants, addressing a number of environmental topic areas agreed in advance with the appropriate planning authority.
- 2.4. The ES must be circulated to statutory consultation bodies and made available to the public for comment. The NTS forms part of this process, and provides a summary of the main findings of the main ES but in a more streamline and non-technical manner.

## 3. Description of the Site and Proposals

- 3.1. The site is located some 3 km to the north-east of the centre of Leek, in a predominantly rural setting (Figure 1). The topography of the site generally mirrors the westerly fall of the surrounding land, which is characterised by agricultural usage (rough pasture). The site is accessed directly off the A53 Buxton to Leek road, which defines the site's western boundary.
- 3.2. The Anzio Camp site is a former army residential training base that was de-commissioned and vacated in about 2004. It comprises a number of vacant single and two storey buildings constructed between 1980 and 1983 that were used for offices, training and accommodation purposes, together with a number of subsidiary buildings including a guard house and caretaker's bungalow. In the south west corner of the site is the camp's sports hall. The other areas of the site include a parade ground, car parking, assault course, small arms firing range, and a secure ammunition store, together with areas of soft landscaping and area of

woodland. This site provided residential accommodation and training facilities for 500+ army personnel.

- 3.3. Since de-commissioning in 2004 little active management has occurred on site. In consequence the existing buildings are in a very poor state of repair and trees and other vegetation have been allowed to grow and self-seed across the site.
- 3.4. The planning application site is a roughly rectangular parcel of land occupying an area of approximately 10.78 hectares. The entire area forming part of the former camp including the land edged blue is approximately 15.4 hectares.
- 3.5. The proposal is to develop 'Extra care housing, holiday park, live/work units, social building, and ancillary facilities building'.
- Extra Care Housing;  
42 extra care cottages – 1 and 2 bedroom;  
2 residential/nursing homes with a total of 80 extra care ensuite bedrooms;
  - Holiday Park;  
45 holiday lodges;
  - 4 Live/ Work units;
  - Social Centre Building housing a shop, café and community meeting rooms;
  - Facilities building for maintaining the extra care development;
  - Associated Proposals;  
Car parking;  
Extensive landscaping, managing neglected trees;  
Ecological improvements;  
Upgrading of A53 (Buxton Road), including right turn lane;  
2 new bus stops and pedestrian crossing on Buxton Road;  
A Travel Plan to encourage travel to and from the site by sustainable travel modes; and  
Potential noise mitigation works to the buildings on the external ranges to the Leek & District Shooting Centre.
- 3.6. Public consultation has informed the development of the proposals. In early March 2012 the applicant held an exhibition of ideas and preliminary proposals at a local venue with the assistance of the parish council. The event was well attended, with visitors contributing

information, ideas, and discussing the proposals. The feedback was incorporated into the 2012 scheme.

- 3.7. The scheme was again subject to a similar community consultation in early October 2014. The design team also discussed and obtained feedback from a number of statutory and non-statutory organisations. The scheme has sought to incorporate these various contributions.

## 4. Planning Policy Context

- 4.1. The applicable Development Plan for the application site comprises the following documents:
- The Adopted Core Strategy Development Plan Document for Staffordshire Moorlands (Adopted March 2014),
  - The saved policies of The Minerals Local Plan 1994-2006 (Adopted December 1999), and
  - Staffordshire and Stoke-on-Trent Joint Waste Core Strategy 2010 – 2026 (Adopted March 2013).
- 4.2. Anzio Camp is identified as a ‘Major Regeneration Opportunity’ site and is considered to be suitable for employment, extra care housing and tourist accommodation in the adopted Core Strategy Development Plan Document (Policy SS6c - Other Rural Areas Area Strategy).
- 4.3. Neither the Joint Waste Core Strategy, nor the Minerals Plan contain any site-specific proposals for the site or its surroundings.

## 5. Assessment of Environmental Effects

### Alternative Sites

- 5.1. A list of information to be included in Environmental Statements (ES) is set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (S.I. 2011 No. 1824) at Schedule 4, Part 1, at paragraph 2. This includes:

*“An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for the choice made, taking into account the environmental effects.”*



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- 5.2. The term ‘main alternatives’ and the level of detail required in reporting them are not defined in either the Regulations or other guidance documents.
- 5.3. For the 2012 application research was undertaken to assess availability of viable alternative site(s) in the Staffordshire Moorlands area which could have provided for the quantum and mix of uses proposed within the planning application.
- 5.4. SMDC adopted its Core Strategy in March 2014. This identifies the site as a strategic site, suitable for employment, extra care housing and tourist accommodation. The Core Strategy was subject to a Sustainability Appraisal (SA) as an integral part of the production of the Core Strategy. SAs help to predict the environmental and socio-economic effects of policies and proposals of a plan and are used to inform decisions on plan preparation. As such an assessment of the availability of alternative sites is unnecessary as part of the ES for the 2014 application.
- 5.5. The Design & Access Statement (D&AS) explains the proposed alternative options for the configuration/layout to the proposed development site, and considers how the scheme design proposed was decided upon. It takes into account, amongst other things, the site’s constraints and land form, feed-back from the community events, the landscape & visual impact, noise assessment, and ecology report. Please see the Design & Access Statement for further details.

## Highways and Transportation

- 5.6. A technical review (‘the 2014 technical review’) of the Transport Assessment (TA) and Travel Plan (TP) has been undertaken by Savoy Consulting. It considers the TA and TP previously produced by WSP in connection with the planning application of 2012, having regard to the revised form of application now proposed, changes in local circumstances and policies as may have occurred in the interim and to make sure all the documentation is up-to-date and suitable to support a fresh planning application. Thus the 2014 technical review is to be read in conjunction with the 2012 TA.
- 5.7. A summary of the information forming the 2012 assessment is given below, along with the 2014 updates undertaken by Savoy Consulting. The WSP (2012) TA and TP entirely superseded the assessments undertaken as part of the 2008 application.
- 5.8. The description of the proposals and the assessment arising (as set out in the WSP report para 4.2.2) was undertaken having regard to the quantum

and mix that was proposed at that time, before the details of the 2012 scheme were finalised.

### ***Chapter 2. Policy Context (2012 WSP report)***

- 5.9. The report considers the planning policy context, including NPPF, the Staffordshire Local Transport Plan 3 (2011), and Policies SS6 (c) and T1 of the Core Strategy. Policy T1 relates to development and sustainable transport, and states that the council will promote and support development which reduces reliance on private car for travel journeys and reduces the need to travel generally.

#### 2014 technical update

- 5.10. None of the relevant transport policies in relation to the afore-mentioned documents have changed since the TS was produced in 2012.

### ***Chapter 3. Existing Situation (2012 WSP report)***

- 5.11. The existing site currently has a priority junction access to the A53 Buxton Road, including a slip road of approximately 60 metres, and a gated access road leading to the site.
- 5.12. Assessment of the existing situation finds that the amenities in the locality and the local bus stop on the Buxton Road can be reached within a 10 minute walk, or 5 minutes by cycle. The facilities within Leek are approximately 15 minutes away using a bicycle.
- 5.13. It is concluded that the existing sustainable transport options at the site do provide opportunities for the various users at the site to travel by sustainable modest.
- 5.14. The analysis of Personal Injury Accident (PIA) data has shown that there are no road safety issues in the local area, and as such, no safety mitigation measures are required for the proposed development.

#### 2014 technical update

- 5.15. In terms of local amenities, apart from the seasonal stores at the camping and Caravan Club sites, WSP identified a local store 2.5 kilometres from the application site and other convenience stores in Leek, together with a post office, dentist, pharmacy and doctor.
- 5.16. Again Savoy Consulting has checked on these local amenities and can confirm nothing has changed since the report was produced in 2012. The social building will also be available to the local community.
- 5.17. Savoy Consulting has liaised with the local highway authority and as of July 2014 (the most up-to-date information available) Staffordshire County Council confirmed there has been no further recorded PIAs in the study area in the last two years.

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***Chapter 4. Development Proposals, and Chapter 5. Access for Sustainable Travel (2012 WSP report)***

- 5.18. The site access arrangement takes the form of a ghost island staggered T junction on the A53 Buxton Road, with the Blackshaw Moor Caravan Club site opposite the development site.
- 5.19. The proposed site access incorporates footways linking the internal site footways to the existing footway on the A53 Buxton Road. This will allow connectivity from the site onto the existing pedestrian facilities on the opposite side of the carriageway.
- 5.20. A Travel Plan has been produced that seeks to minimise the impact of development-generated traffic by encouraging those that live, work or visit the site to travel by sustainable transport modes.
- 5.21. A local sustainable travel pack is envisaged that will highlight sustainable travel options available including, minibuses for the residents and employees, car sharing initiatives and production of travel leaflets and information.
- 5.22. Within the TP are various measures and strategies developed to realise the aim of the TP, including a 'Local Sustainable Travel Pack' which will highlight the sustainable transport options available at the development site, including:
- Car sharing initiatives; and
  - The production of travel leaflets and information.
- 5.23. As part of the development proposals WSP stated that it was intended to provide a range of dedicated transport services for the residents of the care home and the employees working at the care home. It was also proposed to provide dedicated taxi services for residents of the care home to cater for one-off trips such as doctor's appointments or visiting the dentist.
- 5.24. The development will also benefit from a dedicated minibus service as an outreach system facilitating access to the site and for organising outings from the proposed development. It was noted that all these sustainable travel measures were intended to maximise opportunities for the use of sustainable modes of travel, particularly for the residents of the care home.
- 5.25. The minibus will also be used to pick up and drop off employees of the care home that do not have ready access to a private car or who cannot car share.

2014 technical update

- 5.26. Savoy Consulting has examined this drawing and can confirm that it still accords with current highway design standards, including the Design Manual for Roads and Bridges.
- 5.27. It is also noted that highway works for the access at the site's entrance and pedestrian puffin-crossing within the A53 has been accepted by the highway authority.
- 5.28. No changes to the TP are proposed.
- 5.29. The proposed additional bus stops in close proximity to the entrance of the development on the A53 carriageway will assist with the sustainability of the site.

***Chapter 6. Traffic Flow Analysis (2012 WSP report)***

- 5.30. The TS dealt with traffic flows in the area both in terms of establishing a 2012 baseline and a future forecast year of 2017. WSP used the NTM adjusted TEMPRO growth factors for rural Staffordshire Moorlands to predict traffic growth between 2008 and 2017. TEMPRO showed that in the AM peak traffic growth would be less than 6% and in the PM peak period it would be less than 7%.
- 5.31. The TA predicted the traffic generation from the proposed development using the TRICS data base. The full TRICS outputs were included in the original TS but in summary WSP predicted that in the AM peak the total number of 2-way trips would be 46 vehicles and in the PM peak would be 57 vehicles.

2014 technical update

- 5.32. Savoy Consulting has examined the TRICS outputs again and can confirm that the figures used by WSP are both robust and fit for purpose. Savoy Consulting can also confirm that they are satisfied with the way the trip distribution and trip assignment were made for the development traffic.

***Chapter 7. Junction Capacity Analysis (2012 WSP report)***

- 5.33. Based upon the estimated numbers of tourist and extra care accommodation and other uses proposed, analysis concludes that the proposed site access junction arrangement operates within acceptable capacity thresholds in the future year assessment. Additionally the proposed redevelopment will not have a detrimental impact on the surrounding highway network.
- 5.34. A junction capacity analysis for the priority junction site access was undertaken in 2012. Even in the future assessment year of 2017 the RFC (ratio of flow to capacity) was only a maximum of 0.032 in the AM peak and 0.037 in the PM peak. The maximum RFC that is acceptable is 0.85.

2014 technical update

- 5.35. It has been demonstrated that the junction operates well within capacity thresholds, and this includes the very low increase in traffic growth that will have occurred in the last two years.
- 5.36. It is anticipated that this junction will continue to operate entirely satisfactorily in the foreseeable future.

***Chapter 8. Summary and Conclusion (2012 WSP report)***

- 5.37. The 2012 report concludes there are no sustainable highway reasons why planning permission for the proposed development should not be granted.

2014 technical update

- 5.38. The work undertaken in 2012 by WSP was robust and acceptable to the local highway authority.
- 5.39. Conditions have not changed materially since the original work was undertaken and having reviewed the original work and examined existing conditions at the site, Savoy Consulting is satisfied that the original transport statement's findings are still relevant and can be relied to support the proposed planning application.

## **Landscape and Visual Impact**

***2008 Assessment***

- 5.40. An assessment was undertaken in 2008 as part of that application.
- 5.41. The landscape and visual impact assessment considers the effects of the proposed development scheme on the surrounding landscape and the people living, working and visiting the location with views of the existing site or proposed development. The character of the area around Anzio Camp is distinctive and contains prominent natural features, most notably the Roaches. Although the existing development is at odds with the rural character of the immediate area, the application seeks to replace this existing brownfield development with an improved site layout and mitigation measures to ensure improved integration into the surrounding landscape.
- 5.42. In policy terms the principal landscape effects would be the impact of the proposed development on the landscape character of the Special Landscape Area and the setting of the National Park. The development would take place in an area which presently contains limited built development and which is important in terms of landscape character and views. There is currently a strong contrast between the character and land use of the site and its immediate surroundings, although other

development in the form of a camping/caravan site is located nearby. The redevelopment of the site gives opportunities to enhance the landscape, visual characteristics and biodiversity of the site in accordance with both national and local planning policy.

- 5.43. The nature of the proposed development is such that the scheme does not break the skyline in any of the key views assessed. The views of the site from viewpoints agreed with Staffordshire Moorlands District Council and sensitive receptors have been assessed resulting in a range of impacts from a moderate adverse to no effect in the first year of the new development. By Year 15 of the development, allowing for the landscape proposals to become semi-mature, the impacts would be reduced to a range from slightly adverse to slightly beneficial. In those locations where a slight adverse impact has been predicted, it is considered that this would be reduced to no effect over time as the new site vegetation matures resulting in a situation which closely reflects the situation in 2008.
- 5.44. The proposed mitigation of the development includes new native tree planting on the site to integrate the development within its landscape context and strengthen screening of ground level activity and the proposed buildings. The principal focus of the mitigation of the development has been to ensure that the more widely visible roofscape presents a positive and appropriate image within the landscape and visual context. The detailed design of both the structures and surrounding landscape framework would therefore present a unique opportunity to integrate this site into its surroundings in both landscape and visual terms.

#### 2014 update

- 5.45. An updated assessment has been undertaken by Landscape Matters having regard to the 2014 scheme, including the proposed built form, and landscaping scheme. It is agreed with SMDC that the viewpoint locations used for the 2008 visual impact assessment, and again in 2012 are applicable, with no requirement for additional viewpoints to be used for the assessment.
- 5.46. The updated assessment notes there has been little change in the character and appearance of the site and its surroundings since 2008. Changes occurring within the site itself have been the proliferation of a number of self-seeded trees and other vegetation, and the deterioration of a number existing buildings together with meadow areas through lack of maintenance. These changes are not necessarily noticeable from the agreed viewpoints other than at the site entrance at the A53.
- 5.47. There have been no new development/buildings of significance constructed in this rural location since 2008. Neither have there been any changes to the public accessibility of the nature of the viewpoints, for example they remain public highway, or footpaths/bridleway.

- 5.48. Thus the baseline assessment undertaken in 2008 remains of relevance.
- 5.49. Planning policy in relation to the Special Landscape Area contained in the SMDC Local Plan of 1998 no longer applies since its replacement by the Core Strategy of 2014.
- 5.50. The assessment has been undertaken having regard to the latest guidelines (Guidelines for Landscape and Visual Impact Assessment: 3rd edition), although for ease of comparison the 2nd Edition methodology has been retained such that differences / similarities between the 2008 and 2014 scheme proposals can be readily made.
- 5.51. In light of all of the long and close viewpoint assessments it is Landscape Matters conclusion that the proposed scheme will make a positive contribution to the Ancient Slope and Valley Farmlands LCA and have no impact on the nearby Peak District National Park. It should also be noted that although for purposes of the visualizations it is standard practice to select Year 1 and Year 15 as appropriate time periods in reality on the ground the maturing existing and proposed vegetation, under normal growing conditions and with standard on-going maintenance, is likely to move the scheme from 'slight beneficial' towards 'substantial beneficial' from Years 4 or 5 onwards.

## Ecology

- 5.52. SLR Consulting Limited was commissioned by Enhanced Developments Limited to update ecology surveys at Anzio Camp, Leek, Staffordshire. These took place throughout the summer of 2014.
- 5.53. The ecology of the site was originally assessed in 2006, with further work in 2008 and again in 2012 by SLR consulting.
- 5.54. The report's site context section notes it is surrounded by pasture land with large woodland blocks and mature hedgerows. The site is located 1.5 km to the east of Tittesworth Reservoir, north of Leek, and is located on the southern boundary of the Peak District National Park.
- 5.55. Desk study data from Staffordshire Ecological Record (the local environmental records centre for Staffordshire) was purchased for the site and 2 km radius around the site boundary, identifying all statutory and non statutory sites, and all protected and notable species, in 2012.
- 5.56. The habitat survey and mapping exercise was updated in 2014, following the standard Phase 1 Habitat survey methodology.



- 5.57. The assessment considered flora, the possible presence of badgers, bats, birds, reptiles, and great crested newts. The results of the surveys are summarised below.

#### ***Badger***

- 5.58. Badger tracks were located in the east of the site, within the SBI boundary; a badger snuffle hole was also observed in the north-west corner of the site. No evidence of badger latrines or setts was found on site.

#### ***Bats***

- 5.59. The buildings have continued to degrade, due to weather damage, but remain in a broadly comparable condition to the 2012 survey. Dusk & dawn activity surveys were undertaken in July 2014.
- 5.60. Bat activity surveys in 2014 identified one roost in Building B6, involving two common pipistrelle bats *Pipistrellus pipistrellus*. In addition common pipistrelle *Pipistrellus pipistrellus* were recorded foraging on the site, particularly in the vicinity of Buildings B4, B6, B7, B9, B11 and B12.

#### ***Birds***

- 5.61. Nesting swallow *Hirundo rustica* were recorded breeding in Building B12.

#### ***Great Crested Newt***

- 5.62. The south east corner of the site formerly supported a wet ditch surrounded by willow and alder trees, this has now dried up completely. As there is no standing water on or near the site, there does not appear to be any scope to impact upon great crested newt.

#### ***Reptiles***

- 5.63. Surveys were undertaken between June and August 2014. No reptiles were recorded during the seven visits; though a number of common toads *Bufo bufo* were recorded taking shelter beneath the refuges.
- 5.64. The updated assessment also considered relevant legislation and policy in connection with ecological matters.

#### ***Discussion and Recommendations***

- 5.65. The assessment concludes the habitats on site have not changed significantly since 2012; the continued lack of management has allowed a more diverse grassland sward to develop on the former amenity grassland in the western part of the site. It has also led to a significant increase in the amount of scrub on the site, as a whole. The area of marshy grassland in the north of the site has remained largely unchanged, while the area of grassland within the SBI in the east has become dominated by coarse grass species, which has reduced the species diversity since 2012.



- 5.66. It is recommended that a site management plan is formulated to promote the management of the Anzio Camp SBI and the site vegetation.
- 5.67. The buildings on site were found to support fewer roosts during 2014, than in 2012, most probably as a result of the natural degradation that the buildings have experienced since the last survey. Bat activity on the site indicates that it is still a valuable foraging resource for local bat populations, and as such, as much of the existing tree cover should be retained, and any that is lost, should be replaced elsewhere.

### ***Mitigation measures***

- 5.68. Although the number of bat roosts found in the 2014 update surveys has reduced to just one, it is recommended that the mitigation and enhancement measures proposed in 2012 are left unchanged. That is, the provision of a number of tree mounted bat boxes, hibernating boxes, exterior fascia boarding and interior roosting features (on new buildings).
- 5.69. For birds, the site offers a wide range of bird nesting opportunities, both within the buildings and in surrounding scrub and woodland. Nesting birds are protected, and if possible all demolition works and scrub clearance should be scheduled to avoid the main bird breeding season.
- 5.70. Additional kestrel and barn owl boxes are proposed as mitigation measures, as well as sparrow terraces, and other bird boxes.

## **Archaeology and Cultural Heritage**

- 5.71. A study of the archaeological and cultural heritage resource of the site has established that it does not lie within or adjacent to a Conservation Area and does not contain any Listed Buildings or Scheduled Monuments. This was undertaken in 2008 by RPS.
- 5.72. The closest statutorily protected feature is a cast iron milestone located on the A53 road immediately adjacent to the proposed development area. The proposed development would have little or no effect on this feature or its setting. No registered parks and gardens, historic battlefields or Conservation Areas, or their settings, will be affected by the proposed development. Similarly, no statutorily protected or registered feature or setting would be affected by the proposed development.

## Flood Risk and Drainage

- 5.73. The proposed redevelopment of the Anzio Camp site was assessed in 2008 in terms of its potential to flood or cause flooding of the surrounding area. Reference to the Environment Agency (EA) indicative floodplain maps indicates that the site is located outside of the floodplain of a main river and is as such unlikely to be at risk of direct fluvial flooding at the site. Since the proposed development site is greater than one hectare in area, there is also a requirement to assess its potential to increase the risk of flooding off-site through the addition of hard surfacing. The likelihood of the development causing a detrimental impact to the quality of watercourses in the vicinity of the site has also been considered.
- 5.74. It is considered that the majority of the potential detrimental impacts identified as a result of construction of the proposed development can be successfully mitigated against at the planning/design phase. Given the nature of the proposed development, there is limited potential for detrimental impacts on nearby surface watercourses during the operational phase. A range of mitigation measures would nevertheless be implemented to ensure their ongoing environmental protection.
- 5.75. It is anticipated that the surface water run-off from impermeably surfaced areas would be subject to more limited control than occurs on the site in its current state by the incorporation of Sustainable Urban Drainage Systems (SUDS), consequently redevelopment of the site would lead to an overall beneficial impact through reducing the likelihood of flooding within its vicinity.
- 5.76. Enquiries made in 2012 with EA confirm there have been no flooding incidences since 2008 and no developments in the vicinity that would impact on the 2008 calculations.
- 5.77. The footprint of the existing development areas contains non-permeable surfaces which will not increase as a result of the proposed development.

## Land Quality

- 5.78. An assessment has been carried out of how the development proposals may cause a detrimental impact through contamination. The site has previously been developed as an army training camp, which is likely to have left a legacy of contamination in the underlying ground. There is a potential that such contamination could be mobilised via the redevelopment operations, posing a risk to the health of future site users or the surrounding environment. Construction and operation of the

redeveloped site has also been considered in terms of its potential to cause new incremental contamination of the site.

- 5.79. Many of the short-term adverse construction effects arising from the redevelopment of the site can be effectively mitigated by the utilisation of good construction techniques and practices implemented by a Construction Environment Management Plan.
- 5.80. The proposed site end-use is unlikely to pose a significant contamination risk to its surroundings. Nevertheless, the storage of materials, particularly liquids, with a pollution potential would incorporate appropriate measures considered to be current best practice. The risks posed by existing contamination would be addressed by way of the implementation of a suitable remediation scheme to mitigate against the risks posed to a number of environmental receptors including human health and controlled waters, thus resulting in an overall beneficial effect.

## **Air Quality**

- 5.81. The potential for the proposed development to cause changes in local air quality has been assessed in relation to the potential for nuisance dust to be created during the construction phase, and changes in road traffic once the development is operational.
- 5.82. The site does not lie within an Air Quality Management Area as defined by Staffordshire Moorlands District Council. The air quality effects likely to be experienced during the construction phase are deemed to be localised and of minimal significance. Once the site becomes operational, air quality effects from changes in traffic flow characteristics on the local road network are deemed to be extremely small and consequently the effect on local air quality is deemed to be negligible.

## **Noise**

- 5.83. A noise assessment has been carried out by Sharps Redmore, (Acoustic Consultants) in 2014. The assessment considers environmental noise and mitigation measures, on the proposed development site in the context of a nearby shooting range used by the Leek and District Shooting Centre. Members of the Shooting Centre have given their full cooperation and assistance in this exercise, including allowing noise surveys and readings to be taken at shooting centre when the outdoor ranges have been in operation.
- 5.84. The proposed mitigation measures set in the report are intended to protect both the Shooting Centre and future occupiers of the proposed development.

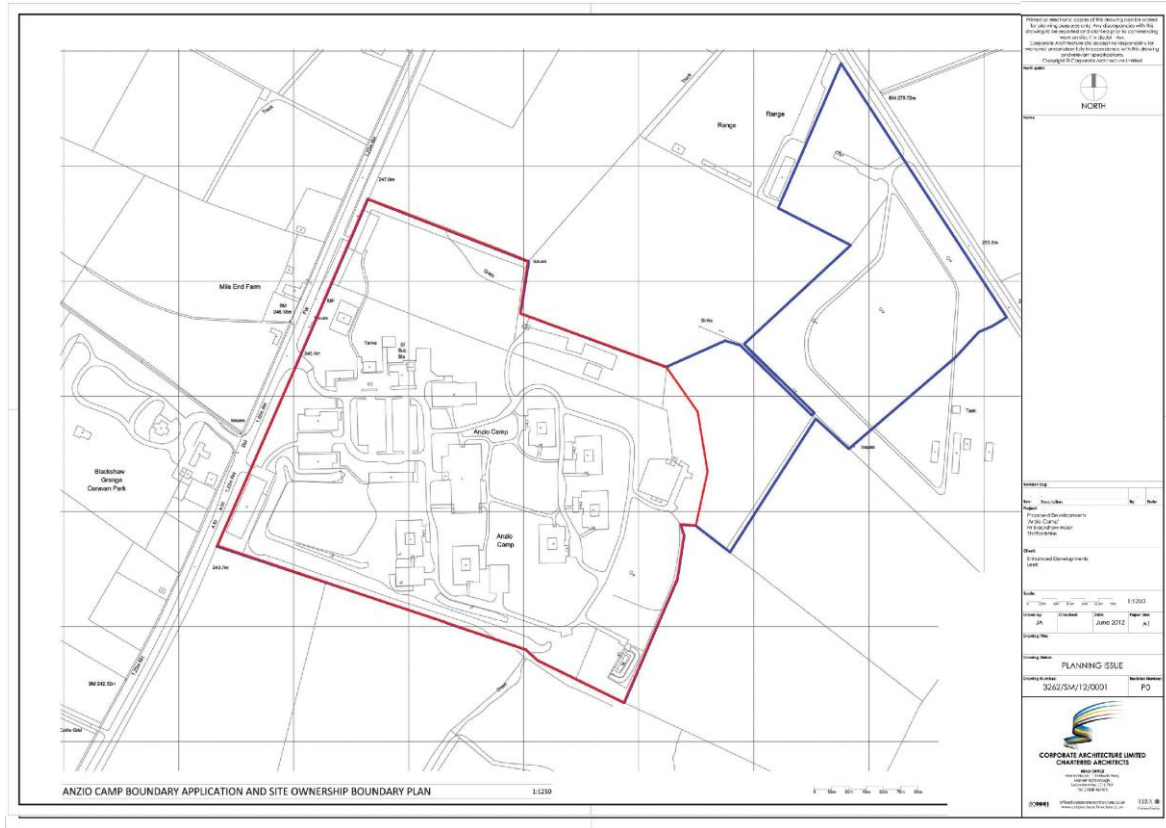
- 5.85. A review has been undertaken of existing national policy and guidance on noise from this type of operation and this has been used to derive suitable target offsite noise limit levels and possible mitigation.
- 5.86. The National Planning Policy Framework (NPPF) sets out the Government's economic, environmental and social planning policies for England. Paragraph 123 of the NPPF offers advice in respect of noise. Additionally, the Planning Practice Guidance (PPG) 2014 indicates it is not expected that noise is considered in isolation, separately from economic, social and other environmental dimensions of the proposed development.
- 5.87. There is no specific guidance to assess the level of noise arising from rifle shooting ranges in the UK. However, there is a code of practice for clay target shooting published by the Chartered Institute of Environmental Health in 2003, titled "Clay Target Shooting – Guidance on the Control of Noise". This guidance contains a statement on the limitation in scope of its use, as follows:
- "The scope of this guidance is limited to clay target (pigeon) shoots. It should not be taken as having any application to other outdoor shooting events or other gun club activities."*
- 5.88. In light of this limitation, it is not considered appropriate to adhere rigidly to the guidelines contained within the code. Nonetheless, the noise assessment has had regard to the information and guidelines within the code, and has adapted the methods used, to minimise intrusion and annoyance from shotgun noise, rather than relying on a rigid methodology not directly applicable to a less intensive use of a shooting range where clay target shooting does not take place.
- 5.89. These levels and methodology have been discussed and agreed with the local authority's environmental health officer for use at this site applicable to the variety and type of accommodation proposed.
- 5.90. In terms of factors to consider when selecting shooting noise level the assessment has taken into consideration a number local circumstances, and their influence/effect in relation to the development site. These include existing background noise, the days of the week the shooting occurs, the intensity of shooting (numbers of days per year), type of shoot, and rate of fire.
- 5.91. Based on all of relevant considerations, in particular the type of shoot and the frequency of firing, the report concludes it is reasonable that the relevant target level should be considered to be closer to the higher end of the range (i.e. a level below 63 dB).

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- 5.92. Initial modelling without mitigation for both 50m and 100m ranges established that noise levels on certain parts of the Anzio site from the shooting centre would be likely to result in noise levels at receptors in excess of the target level. These measurements of noise levels at the shooting club and the proposed development site have been taken at worst case scenario and used to create a number of 3D computer models of noise propagation in and around the proposed development site.
- 5.93. These models have been used to optimise sound mitigation design to ensure that levels will be acceptable at the development site.
- 5.94. The acoustic performance of the Shooting Centre's buildings could be improved through a simple upgrade as follows:
- The open access areas to the rear walls of the shooting areas of the ranges should be infilled to enable suitable acoustic performance access doors to be fitted.
  - All gaps between walls and roof should be made good and infilled.
  - The current corrugated metal roof is acoustically poor; improvements could be achieved through the internal installation of an acoustically insulated ceiling to fit flush with existing blockwork, effectively sealing the gaps between existing roof and walls.
  - The retention of the corrugated metal roof would maintain visual amenity.
  - Absorptive material should be applied to the walls and roof undersides.
- 5.95. A 5 metre high bund to the North East of the Anzio site will further mitigate noise levels to the site, and these levels are again shown in the form of noise mitigation contours.
- 5.96. These measures, following survey, calculation and prediction have addressed issues and recommendations raised by both the Planning Inspector's comments on a former appeal decision, and a separate noise survey undertaken by the Shooting Centre's acoustic consultants in May 2012.
- 5.97. With the proposed mitigation scheme the Shooting Centre and the proposed mixed use development could both exist with no significant adverse impact to the Shooting Centre or the permanent residents.

## 6. Summary

- 6.1. The proposals for the redevelopment of the Anzio Camp site near Leek, Staffordshire have been the subject of an Environmental Impact Assessment carried out having regard to with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (the '1999 EIA Regulations'). The relevant updated assessments undertaken in 2014 have had regard to the more recent 2011 EIA regulations. Specialist technical assessments have been undertaken for each of a number of key environmental topic areas.
- 6.2. Where potential adverse effects from the proposed development have been identified that cannot be eliminated by the design process, a range of mitigation measures have been highlighted to either eliminate such effects or reduce them to as low as practicably possible.
- 6.3. The remaining residual effects that are likely to occur following implementation of such mitigation measures are largely considered to be of negligible significance, or of minor significance albeit on a localised scale or for a short-term duration. A number of overall beneficial effects of the proposals have been identified, including long-term benefits in landscape and visual influence, enhanced ecological benefits on the site, remediation of existing on-site contamination, and travel plan.

## 7. Figures



**Figure 1: Site Location Plan (drawing no. 3262/SM/12/00001).**





**Figure 2: Proposed Site Masterplan (drawing no. 3262/SM/14/1000).**



# Appendix 1. List of ES documents

The ES undertaken in 2008 for a previous proposal has been updated as appropriate. This Appendix provides a list of relevant chapters of the 2008 ES and its various appendices, and documents and figures.

Where the text appears as strikethrough ~~thus~~, it has been replaced in its entirety as part of the assessment of the present proposal, which is referenced as either 2012 or 2014 update, as appropriate.

Document Name	Chapter heading or Figure heading /reference	Notes
<b>Non-Technical Summary (2014) (This document).</b>		Written by Tyler Parkes Partnership.
	Introduction	
	Planning Policy Context	
	Alternative Sites Assessment	This no longer applies.
	Transport Assessment	Summary of update 2014.
	Landscape and Visual Impact Assessment	Summary of update 2014.
	Ecology	Summary of update 2014.
	Archaeology and Cultural Heritage	Notes that this chapter has not been subject to 2014 update and the 2008 ES remains applicable.
	Flood Risk and Drainage	Notes that this chapter has not been subject to 2014 update and the 2008 ES remains applicable.
	Air Quality	Notes that this chapter has not been subject to 2014 update and the 2008 ES remains applicable.

	Noise	Summary of 2014 update.
<b>Transport Statement</b>  <b>29/06/2012</b>	<p>Figure 1.1 Site location Plan</p> <p>Figure 3.1 Highway Network</p> <p>Figure 3.2 Walking Isochrone</p> <p>Figure 3.3 Cycling Isochrone</p> <p>Figure 3.4 Public Transport Network</p> <p>Figure 3.5 PIA Area of interest</p> <p>Figure 3.6 PIA analysis</p> <p>Figure 6.1 Traffic Flows 2008 AM and PM Peak</p> <p>Figure 6.2 Traffic Flows 2012 AM and PM Peak</p> <p>Figure 6.3 Traffic Flows 2017 AM and PM Peak</p> <p>Figure 6.4 Development Trip Distribution AM and PM Peak</p> <p>Figure 6.5 Development Trip Assignment AM and PM Peak</p> <p>Appendix A Masterplan and Site Access</p> <ul style="list-style-type: none"> <li>- Proposed site access (Drawing no.GA 001 rev A)</li> </ul> <p>Appendix B Personal Injury Accident (PIA) Data</p> <p>Appendix C Traffic Flow Data</p> <p>Appendix D TRICS Outputs</p> <p>Appendix E PICADY Outputs</p>	<p>Written by WSP.</p> <p>It has been updated and accepted as still applicable by Savoy Consulting (2014).</p>

<b>Technical Review of Transport Statement and Travel Plan</b> (October 2014).		Written by Savoy Consulting.  To be read in conjunction with 2012 TA.
<b>Landscape &amp; Visual Impact</b>	<p>Viewpoint locations (map).</p> <p>Viewpoint 1. Cemetery. (site not visible)</p> <ul style="list-style-type: none"> <li>- Existing</li> </ul> <p>Viewpoint 2. Moorlands Walk</p> <ul style="list-style-type: none"> <li>- Existing</li> <li>- Proposed (Year 1)</li> <li>- Proposed (Year 15)</li> </ul> <p>Viewpoint 3. Gun Hill.</p> <ul style="list-style-type: none"> <li>- Existing</li> <li>- Proposed (Year 1)</li> <li>- Proposed (Year 15)</li> </ul> <p>Viewpoint 4. Birch Tree Farm (site not visible)</p> <ul style="list-style-type: none"> <li>- Existing</li> </ul> <p>Viewpoint 5. Thorncliffe Bank</p> <ul style="list-style-type: none"> <li>- Existing</li> <li>- Proposed (Year 1)</li> <li>- Proposed (Year 15)</li> </ul> <p>Viewpoint 6. Troutsdale Farm</p> <ul style="list-style-type: none"> <li>- Existing</li> <li>- Proposed (Year 1)</li> <li>- Proposed (Year 15)</li> </ul> <p>Viewpoint 7. Road A53</p>	<p>Use of 2008 assessment baseline information.</p> <p>Agreed viewpoints for the assessment the same.</p> <p>Updated visualisations and assessment undertaken by Landscape Matters 2014.</p>

	<p>Opposite Site Entrance</p> <ul style="list-style-type: none"> <li>- Existing</li> <li>- Proposed (Year 1)</li> <li>- Proposed (Year 15)</li> </ul> <p>Viewpoint 8. Hen Cloud</p> <ul style="list-style-type: none"> <li>- Existing</li> <li>- Proposed (Year 1)</li> <li>- Proposed (Year 15)</li> </ul> <p>Viewpoint 9. Ramshaw Rocks (site not visible)</p> <ul style="list-style-type: none"> <li>- Existing</li> </ul>	
<p>Ecological Assessment, Final Update Report SLR Ref: 421-04017-00001</p> <p>August 2014</p>		<p>Written by WSP.</p> <p>Entire report applicable.</p>
<p>Noise Assessment in respect of Shooting Club noise and the Mixed Use Development (Predicted Levels and Mitigation).</p> <p>Oct 2014.</p>		<p>Written by Sharps Redmore.</p> <p>Entire 2014 report applicable.</p>
<p><b>Environmental Statement (ES)(2008) (main folder)</b></p>		

ES Non-technical summary		Superseded by 2014 update.
ES Main report (RPS reference: 'Volume 1 Main text')	<u>Chapters:</u>	
	1. — Introduction	Superseded by 2014 update.
	2. — EIA Methodology	Superseded by 2014 update.
	3. — Factual background	Superseded by 2014 update.
	4. — Description of Proposed Development	Superseded by 2014 update.
	5. — Planning Policy Context	Superseded by 2014 update.
	6. — Highways and Transportation	Superseded by 2012 and 2014 update.
	7. Landscape & Visual Impact	To be read in conjunction with the updated assessment and visualizations 2014.
	8. — Ecology	Superseded by 2014 update.
	9. Archaeology & Cultural Heritage	Extant.
	10. Flood Risk & Drainage	Extant.
	11. Land Quality	Extant.
	12. Air Quality	Extant.
	13. Noise	Superseded by 2014 update.
ES 2008 Appendices (RPS reference: 'Volume 1- Appendices')	<del>2.1 EIA Regulations Extract</del> <del>2.2 Letter to SMDC (December 2007)</del> <del>2.3 Email from SMDC (January 2008)</del> <del>2.4 Letter to SMDC (February 2008)</del> <del>2.5 Email from SMDC (April 2008)</del> <del>2.6 February 2008 Workshop Design Issues</del> <del>6.1 Recorded Speeds on the A53 Buxton Road</del> <del>7.1 Landscape and Visual Impact Assessment Tables</del> <del>7.2 Photomontage Methodology</del> <del>8.1 Ecological Scoping Assessment and Bat Survey (Apex Ecology 2005)</del> <del>8.2 Copy of Desk Study Records</del>	

	<p><del>(2008)</del></p> <p><b>9.1 Desk based Archaeological Assessment</b></p> <p><b>11.1 Envirocheck Report</b></p> <p><b>12.1 Trends in NOx and NO2 Concentrations</b></p> <p><b>13.1 Noise Monitoring Results</b></p> <p><b>13.2 Calibration Certificates</b></p>	
List of Figures	<p><b>4.1 Site Location Plan</b></p> <p><b>4.1 Indicative Masterplan</b></p> <p><b>6.1 AM Peak Hour Base Traffic Flows</b></p> <p><b>6.2 PM Peak Hour Base Traffic Flows</b></p> <p><b>6.3 Development Peak Hour Base Traffic Flows</b></p> <p><b>6.4 2 km Walk Distance</b></p> <p><b>6.5 5 km Cycle Distance</b></p> <p><b>6.6 2009 AM Peak Hour Base plus Development Flows</b></p> <p><b>6.7 2009 PM Peak Hour Base plus Development Flows</b></p> <p><b>6.8 2009 Development Peak Hour Base plus Development Flows</b></p> <p><b>6.9 2014 AM Peak Hour Base plus Development Flows</b></p> <p><b>6.10 2014 PM Peak Hour Base plus Development Flows</b></p> <p><b>6.11 2014 AM Development Peak Hour Base plus Development Flows</b></p> <p><b>7.1 Location and Planning Context</b></p> <p><b>7.2 Topographical Context</b></p> <p><b>7.3 Landscape Features</b></p> <p><b>7.4 Landscape Character</b></p> <p><b>7.5 Viewpoint Locations</b></p> <p><b>7.6 Viewpoint 1 — Cemetery, North-East Look</b></p> <p><b>7.7 Viewpoint 2 — Staffordshire Moorland Walk</b></p> <p><b>7.8 Viewpoint 3 — Gun Hill</b></p> <p><b>7.9 Viewpoint 4 — Birch Tree Farm</b></p> <p><b>7.10 Viewpoint 5 — Thorncliffe Bank</b></p> <p><b>7.11 Viewpoint 6 — Footpath from Troutdale Farm</b></p> <p><b>7.12 Viewpoint 7 — A53, Opposite Site Entrance</b></p> <p><b>7.13 Viewpoint 8 — Hen Cloud, The Roaches</b></p> <p><b>7.14 Viewpoint 9 — Ramshaw Rocks</b></p> <p><b>8.1 Ecological Mitigation Plan</b></p> <p><b>9.1 Historic Environment Record Entries</b></p> <p><b>13.1 Noise Monitoring Location</b></p> <p><b>13.2 Grid Noise Map Based on Measured Levels — Day (PPG24 Bandings)</b></p> <p><b>13.3 Grid Noise Map Based on Measured Levels — Night (PPG24 Bandings)</b></p> <p><b>13.4 Façade Noise Map Showing Difference between Base and 2014 + Development</b></p>	Superseded by 2012/4 update (where it has been subject to strike-through), otherwise remains extant.