A Review of the Ecological Assessments for

Planning Application 26/00328/OUT

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Executive Summary

- The UK is one of the most nature-depleted countries in the world. The UK government has set ambitious targets to halt the decline of nature by 2030 and restore wild species to healthy and resilient levels by 2050
- Northern Trust has submitted an outline planning application for major development of 75 houses on 4.21ha of land east of Chelmick Drive. The site is set within the Shropshire Hills National Landscape, designated for its varied landscape character and the wildlife associated with it
- The site for development was once a mediaeval meadow and it hosts three Annex II priority species, for which there is a particular responsibility to conserve
- Eleven species of bats are reported, a species assemblage of National Importance and included in the Shropshire Local Nature Recovery Strategy
- Breeding Great crested newt (an Annex II species) were found within 80m of the proposed development site. Their distribution range is typically 250m and their utilisation of the fields and surrounding habitats is highly likely
- Additional data from other sources include priority species: Otter, brown hare, dormice, badger, hedgehog and polecat
- A wide range of bird species, more than 50% of which are Red or Amber Listed in the Birds of Conservation Concern Review 5 have been reported by the ecological consultant and by other sources including the Shropshire Ornithological Society country recorder and casual observations
- Ecological Impact Assessment (EIA) and technical reports carried out by The Environment Partnership supporting the planning application are inadequate for the scale of damage that will be caused
- **The findings from this report show that development of this land for housing will have a significant and irreversible impact on nationally protected species and habitats of PRINCIPAL IMPORTANCE**
- **Development will also destroy a mediaeval meadow, and is contrary to a wide range of HM Government strategies committed to nature recovery**
- **The EIA carried out by The Environment Partnership is clear in that during construction there is a strong likelihood that important habitat and species will be damaged onsite and offsite. These habitats will be irrevocably destroyed**
- **Post construction impacts include:**
  - **Disturbance and interference through human habitation (including domestic pets)**
  - **Disturbance and pollution from artificial lighting**
  - **Disturbance from noise**
  - **Surface water pollution**
  - **Litter and tipping**
  - **Compaction and Erosion**
  - **Nutrient enrichment from dog and cat fouling**
  - **Loss of floral diversity**
  - **Loss of species diversity**
  - **Loss of habitat diversity**
  - **Introduction of non-native species**
  - **Deliberate and accidental damage.**
- **The EIA also acknowledges that increased recreation pressure will impact the ancient woodland**
- Delivery of the UK's commitment to the Global Biodiversity Framework is not for someone else to do. Shropshire Council should reject this planning application to fulfil its duties and to demonstrate it is as the forefront of conserving and enhancing this landscape for nature.

Contents

Introduction

An outline planning proposal 26/00328/OUT for the major development of 75 houses to be built on land east of Chelmick Drive (herewith referred to as Snatchfield) has been submitted to Shropshire Council. The proposal more than doubles the housing stock on the adjoining estate (Chelmick Close, Chelmick Drive, Poplar Drive and Ragleth Road) and seeks to destroy a valuable corridor of intact greenspace that provides migration corridors, food and shelter for a wide range of wildlife as well as a tranquil space for people. The site is in open country and set within the Shropshire Hills National Landscape, a designation that should ensure the protection of these special areas under the Levelling-up and Regeneration Act 2023, conserving and enhancing the landscape for wildlife and for the nation's benefit.

The State of Nature Report 2023 identifies the UK as one of the most nature-depleted countries on Earth. It recognises that centuries of habitat loss, development and persecution have been and remain significant reasons for this decline. The Global Biodiversity Framework (Convention on Biological Diversity, 2026) has led to the UK setting ambitious targets to address nature loss. Indeed, the Global community, including the UK government agreed to halt human-induced species extinction as well as reverse the decline of species abundance and distribution by 2030 and increase wild species to healthy and resilient levels by 2050.

Part of the framework for delivering nature recovery sits within the Shropshire Local Nature Recovery Strategy (LNRS) which recognises that large habitat areas are fragmented and have lost their connectivity. This means species are unable to move between and within habitats and this can lead to local decline and extinction. The Land Use Framework (2026) is clear in that National Landscapes will be working alongside LNRSs across England in making a strong contribution to nature recovery by 2030 as part of the 30by30 international commitment set within the Global Biodiversity Framework. The Government has pledged that by 2050 wildlife-rich habitats will be delivered across England and connected networks for nature will have increased. It also claims that by 2030 (just four years away) communities will have a greater say in the stewardship of the landscapes they love.

The aims of this report are to:

- Describe the ecological value of the site and its relationship with the wider landscape
- Conduct an independent ecological assessment of The Environmental Partnerships reporting, alongside county records and casual observations
- Assess the Biodiversity Net Gain component of the planning application
- Provide insight into the impacts of the construction and post construction phases of the development.

Site History and Description

Snatchfield is an important landscape feature of the eastern hills. It provides a unique linkage from lowland meadows through high level trees up onto Ragleth and Hazler Hills and this varied landscape, a special part of the Shropshire Hills National Landscape designation, hosts a wide range of species.

In the Middle Ages Church Stretton was surrounded by three open fields; Snatchfields (Figure 1) is now the only remaining open field with historical integrity, albeit much reduced in size (Dormer, 2020a). Most of the historical features of the site have been lost over the centuries due to agricultural operations. However, Dormer (2020b) presents LIDAR imagery (Figure 2) that shows a wet ditch, most likely a former trackway that is likely to be an ancient routeway (post medieval or earlier) connecting the town to Hope

Bowdler. Moreover, the Snatchfields lane (Jack Mytton Way) has the appearance of being an ancient Holloway (Dormer, 2020c).

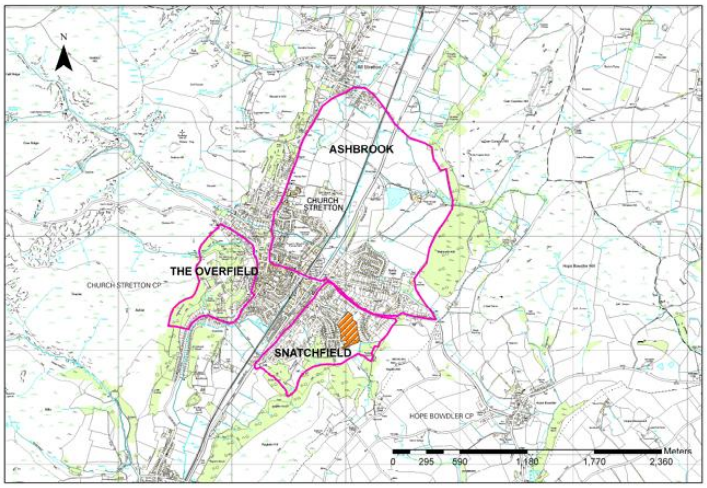

Figure 1. Area map depicting the three open fields within the Church Stretton parish.

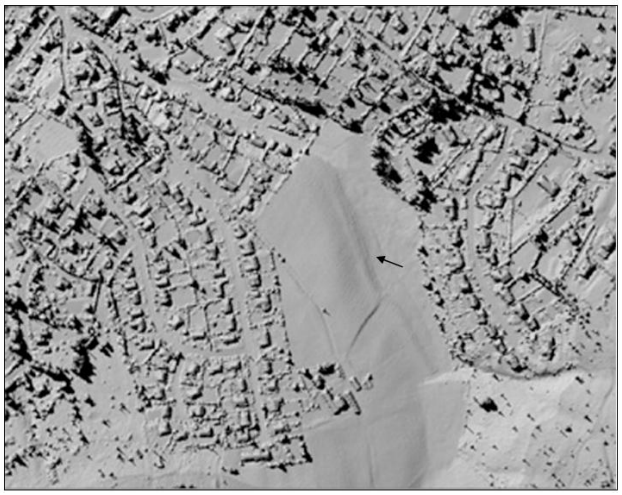

Figure 2. LIDAR imagery depicting a hollow that may be an ancient route.

Figure 3. 1834/1840 field name map.

In more modern times this linear wet flush acts as a wildlife corridor, enabling species such as otter and grass snake to move between landscapes. A 19th century field map (Figure 3) identifies the development site as Snatchfield, Plock, Lower Hollow Meadow and Upper Hollow Meadow. The names of the fields are of interest in so much as the use of the word Hollow, which indicates a route way. Gillespie (2018) states that this parcel of land possesses a strong sense of tranquillity which is vulnerable to loss or erosion due to visual or noise distribution from new development. Furthermore, there is an important connection with the settlement edge of Church Stretton.

Habitat description and context with the wider landscape

The site is set in a pastoral landscape of predominantly semi-natural pasture, fringed with mature woodland trees and relic hedgerow (Figure 4). An ancient ash tree is present on the site, as well as a mature oak that stands along the bridleway. The scrub area round the barns on the site and the barns themselves are ideal habitat for a variety of wildlife including insects, hedgehog, bat species, slow worm, grass snake, great crested newt, smooth and palmate newt, common frog and common toad and many bird species. The gentle decay of the barns and the impenetrable scrub that surrounds them provide refuge for the species mentioned above as well as foraging habitat. This is rare habitat, not considered of any importance because it

Figure 4. Aerial view of Snatchfield and adjacent habitats.

is deemed scruffy and untidy. Whilst it is not valued by humans it is a place of food and sanctuary for wildlife.

Semi-natural grassland

In the original report produced by The Environment Partnership (TEP) in 2019 their own assessment of the sward composition identified Section 41 habitat with a strong affinity with M23 and can be classified as rush pasture. This habitat is of principal importance in England and supports the suggestion that this field is indeed semi-natural grassland rather than semi-improved pasture (UK Parliament, 2026; JNCC, 2019a). Semi-natural grasslands (which Snatchfield is largely composed of), whilst mainly a product of human intervention, have the status of mostly ancient communities composed almost entirely of native species (JNCC, 2019b).

According to The Marches Ecosystem Assessment 2016 for Shropshire the annual baseline value as an ecosystem service of the two dominant habitats of grassland and woodland on or near to the site attribute the values shown in Table 1. The report continues that "The replacement of natural green spaces with concrete and impermeable pavements in urban areas reduces the effectiveness with which rainfall, snow melt and storm water are absorbed and returned to groundwater aquifers. This results in elevated levels of surface water run-off, which increases the likelihood of local flooding and sewers reaching overcapacity". Flood risk regulation benefits provided by these habitats contribute an estimated £40m towards reducing flood risk, and the author claims that the overall value that natural habitats provide is likely to be conservative.

Table 1. Annual baseline value of ecosystem services assessed in Shropshire.

Habitat type	Wild species diversity £	Flood regulation £	Aesthetic value and sense of place £
Grassland	23m	29m	11m
Woodland	5m	11m	7m

The relationship Snatchfield has within the wider landscape should not be underestimated as it plays an important role in connecting with the hillsides of Hazler and Ragleth Hills. The semi-natural grassland is contiguous with woodland fringe and within 100m of the site is the ancient woodland habitat of Ragleth Wood. The transition zone from this valuable and highly protected woodland also includes a wood meadow (Figure 5), an important habitat recognised by George Peterken (Uff, C. 2026, pers comm., 29 March), that should be valued and more widely recognised. The National Planning Policy Framework (NPPF) states that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland, and ancient or veteran trees) should be refused unless there are wholly exceptional reasons (paragraph 180 (c)", indicating how valuable this habitat is.

Figure 5. Wood pasture described by George Peterken.

The on-site scrub habitat adjoins a small hillside meadow where bluebells dominate under bracken (defined as wood pasture); ideal habitat for wrens and mammals. This connectivity provides a mosaic of habitats that roll over the hills into Apedale, enabling wildlife to migrate and move relatively undisturbed. For example, otters are well known to use the flush and move down into the Stretton valley floor via the

culverted/channelled stream. Brown hare have been reported sat in a shallow depression (known as a form which enables them to rest and avoid predators) and in the garden of Snatchfield Farm. Polecat are regular visitors to this area and like otter and brown hare they are secretive and difficult to spot. At least eleven species of bats forage and move between these habitats and great crested newt, recorded in a garden pond within 80m of Snatchfield will disperse typically within a 250m radius to these habitats once it has bred. Great crested newts generally spend most of their lives on land and therefore the surrounding landscape, which is ideal for their predominantly terrestrial lives, is vital for their survival. Further, the observation of great crested newt in the locality is a significant discovery in so much as they are a priority species and should be celebrated for their presence.

Wildlife

A wide range of wildlife species have been seen using Snatchfield or in habitat adjacent to Snatchfield which is well within their movement range. Table 2 presents a comprehensive but not exhaustive list of species observed in recent times, their conservation status, the legislation applicable to the species, and their relevance to the Shropshire LNRS. As Snatchfield is private land it is not possible to survey the site although where possible records have been submitted to Shropshire and Telford & Wrekin Environmental Records Centre database to provide more ecological data for referencing. It is also important to understand that recording the presence of protected species such as bats, otter, great crested newt, etc signifies that they are present. It is highly likely that utilisation of the site by these species is far greater than has so far been observed.

Given the proposal for major development in a sensitive and intact landscape it is surprising that there is a significant absence by TEP of ecological information regarding invertebrates (plus insects, earthworms, etc) on the site and in the wider landscape. The proposed development will destroy most of the habitats present and the “enhancement” proposal to remove soil in the adjacent field seems somewhat astounding. Quan *et al* (2025) found that conserving permanent grasslands supports insect herbivore populations and sustains ecological processes. Insects (and their near relatives) play an essential and critical role in the functioning of ecosystems, not least as a vital source of food (energy and nutrients) to a wide range of vertebrates such as fish, amphibians, reptiles, birds and mammals (Capinera, 2010; Scudder, G.G.E, 2017). Soil fauna such as earthworms, and ants are ecosystem engineers, modifying soil physical structure and influencing the rates of nutrient flows (Coleman *et al*, 2023). Furthermore, pollinating insects play an important role in food security which is clearly outlined in HM’s Government report on insect decline and UK food security: HM Government’s response (UK Parliament, 2025). It is clear that in this instance there appears to be a serious underestimation of the value of pasture and the role it plays in the ecosystem.

Table 2. Species list observed utilising the development site and within dispersal range.

Species	Protection	LNRS			
Great crested newt Red Listed	Annex II EU Habitat's Directive 1992; Habitats Regulations 2019; CRoW Act 2000; Wildlife & Countryside Act 1981; UK BAP species	No	Common pipistrelle	Annex IV EU Habitat's Directive (1992); Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Act 1996	Yes
Lesser Horseshoe bat Red Listed -	Annex II EU Habitat's Directive (1992); UK BAP species; Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammal Act 1996	Yes	Soprano pipistrelle Red Listed	Annex IV EU Habitat's Directive (1992); UK BAP species; Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Act 1996	Yes
Barbastelle bat Red Listed - Vulnerable	Annex II EU Habitat's Directive (1992); UK BAP species; Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Act 1996	Yes	Daubenton's bat Red Listed	Annex IV EU Habitat's Directive (1992); Habitats Regulations 2019 CRoW Act 2000; NERC Act 2006; Wild Mammals Act 1996	Yes
Brown long eared bat Red Listed	Annex IV EU Habitat's Directive (1992); UK BAP species; Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Act 1996	Yes	Natterer's bat Red Listed	Annex IV EU Habitat's Directive (1992); Habitats Regulations 2019 CRoW Act 2000; NERC Act 2006; Wild Mammals Protection Act 1996	Yes
Noctule bat Red Listed	Annex IV EU Habitat's Directive (1992); UK BAP species; Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Act 1996	Yes	Unidentified myotis species	CRoW Act 2000; NERC Act 2006; Wild Mammals Protection Act 1996	Yes
Brandt's bat	Annex IV EU Habitat's Directive (1992); Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Protection Act 1996	Yes	Hazel dormouse Red Listed - vulnerable	UK BAP species; Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Protection Act 1996	Yes
Whiskered bat	Annex IV EU Habitat's Directive (1992); Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Protection Act 1996	Yes	Otter Red Listed	Annex IV EU Habitat's Directive (1992); UK BAP species; Habitats Regulations 2019; CRoW Act 2000; NERC Act 2006; Wild Mammals Protection Act 1996	
Brown hare	UK BAP species; Habitats Regulations 2019; CRoW Act 2000 NERC Act 2006; Wild Mammals Protection Act 1996		Common frog	Wildlife & Countryside Act 1981	Yes
Badger Red Listed	Protection of Badgers Act 1992; Wildlife & Countryside Act 1981		Common toad	Wildlife & Countryside Act 1981	
Grass snake	Wildlife & Countryside Act 1981; Priority species: Post 2010 Biodiversity Framework		Palmate and smooth newt	Wildlife & Countryside Act 1981	
Hedgehog Red Listed - vulnerable	UK BAP species; Wildlife & Countryside Act 1981; NERC Act 2006 Wild Mammals Act 1996	Yes	Swallow	Wildlife & Countryside Act 1981	
Polecat	UK BAP species; Wildlife & Countryside Act 1981, Countryside Rights of Way Act 2000				

Bats

Results from the 2025 survey conducted by TEP have reported eleven species of bat, including two Annex II species; an assemblage of **national importance**. Foraging and commuting activity within the site and surrounding habitat was recorded throughout the survey period and prevalence is likely to be much higher than reported due to less than optimum conditions and limitations regarding the survey technique(s).

Daytime assessment of the barns for roosting potential resulted in just one night-time emergence survey carried out on one barn (two observation points). And yet TEP also state in the report that lack of evidence of potential bat roost presence such as urine stains, scratch marks, etc cannot be relied upon in isolation. The report continues that bats may not leave visible signs of their presence. The undertaking of one night survey to assess roost departure raises the question of whether this is considered adequate to discount the barns as roosting habitat not least because the UK Bat Mitigation Guidelines 2023 are clear in that roost loss should be avoided if at all possible. The guidelines provide an example: the conservation status and welfare of Natterer's bat, a species that roosts in buildings, can be affected if they are excluded from their roost site and even for more common species the cumulative effect of roost loss for long-term survival are unknown, and these are the species most effected by roost loss through development (Collins, 2023a). Common and soprano pipistrelle were recorded foraging around the buildings and it is reasonable to suggest that they may use the building(s) as roosts. There appears to be a complete disregard in this planning application for protection of the buildings as roost sites.

Furthermore, given that this is a proposal for major development with the intention to demolish these buildings, the mitigation hierarchy dictates that impacts should be avoided in the first instance. At the very least, when carrying out bat surveys for development there is a process that ecologists should go through (see Appendix,Figure 6 [Collins, 2023b]) and there appears to be little attempt in this planning application to mitigate for the harm caused to the bat populations.

It is evident that Snatchfield provides important foraging habitat; the pasture, flush area, hedgerow fringe habitat, woodland trees, mature oak and the buildings are all utilised by the bat species reported. In TEP's commuting and foraging assessment it states that "the wildlife corridors around the site provided by the woodland and scrub offer connectivity to habitats within the wider landscape. These include areas of semi-improved neutral grassland to the east with a large offsite wooded area to the east of the site. Residential areas to the north, east and west offer limited foraging and commuting habitat". Evidence indeed that a mosaic of habitats are present and that urban environments are not favoured.

Annex II species

The Bat Conservation Trust (2026b) reports that barbastelle bats (Annex II species) feed over open ground and will forage over a wide area, as well as water meadows where they usually hawk for micromoths. The spring and summer of 2025 was extremely dry and this might address the implication in the TEP report that utilisation is infrequent. Moreover, as they will feed over open ground once darkness has fallen the positioning of the static monitors along the site edges suggests that prevalence could be far greater than indicated. Of note is that the successive autumn and winter months have been wet. Bats will forage even in winter provided the temperature is warm enough and the mires are evidently important sources of food.

Lesser horseshoe bats (Annex II species) favour feeding amongst vegetation in sheltered lowland valleys, (Bat Conservation Trust, 2026) and Snatchfield provides such habitat. The species is also known to use temporary roosts and are sensitive to disturbance.

Development of this site will result in loss of feeding and roosting habitat, disturbance from noise, light pollution and disturbance from humans and domestic pets as well as becoming more contaminated land and thus reducing food availability. This vulnerable bat community will be significantly impacted and its occupancy of the area will be greatly reduced, if not entirely lost.

Table 3 (Appendix) provides a list of the bat species assemblage reported in the 2025 survey and their general feeding areas and relevant roost type. It is not comprehensive and targets the habitat features present on and adjacent to the site.

Birds

The TEP breeding bird survey reported that the site and 100m buffer surveyed in 2025 is of local significance with twenty-six species recorded. Indeed all of the twenty-six species listed were breeding, probably or possibly breeding within 100m of the site, indicating the site and the wider landscape provide important habitats for breeding birds. It is noteworthy that of the species identified TEP has omitted to record that Greenfinch are Red Listed in the Birds of Conservation Concern Review 5 (BOCC5).

The UK BOCC5 identifies an increasing number of bird species that are in decline and recognition of their status is important to guide conservation efforts to halt and indeed reverse the decline. Table 4 lists the species recorded within Snatchfield and the wider landscape (within the 100m buffer and Ragleth Wood) reported by TEP, Shropshire Ornithological Society (SOS) country recorder, SOS swift species champion and casual observations. Note the extensive list of species (forty-three) that utilise this area. For example, willow warbler (Amber Listed) has been recorded via Merlin (and ornithological knowledge) in the scrub area by the barns annually, and Common swift, house martin (both Red Listed) and swallow (Shropshire Red Listed) regularly forage over Snatchfield between May and October. Ravens are known to have nested in the pines in the adjacent field and swallows have previously nested in the barns.

The Breeding Bird Survey is just one tool to report environmental data concerning birds. Evidently Shropshire Council's own guidance for assessing bird populations related to development has not been adhered to as it requires six survey visits as a standard (Shropshire Council, 2024).

The habitats that are present in Snatchfield and the immediate area are varied and connected, shown by the number of species reported in Table 4; they are valuable places for the local populations to breed, feed and shelter.

Table 4. List of species observed in and around Snatchfield (including Ragleth Wood).

BIRD SPECIES	UK STATUS	RECORDED BY
Song thrush	Red Listed	TEP/casual observations
Dunnock	Amber Listed	TEP/casual observations
Bullfinch	Amber Listed	TEP/casual observations
Jackdaw		TEP/casual observations
Blackbird		TEP/casual observations
Blackcap		TEP/casual observations
Blue tit		TEP/casual observations
Magpie		TEP/casual observations
Cuckoo	Red Listed	SOS* country recorder/casual observations
Nuthatch		TEP/casual observations
Greenfinch	Red Listed	TEP /casual observations
Green woodpecker		TEP/casual observations
Greated spotted woodpecker		TEP/casual observations
Dunnock	Amber Listed	TEP/casual observations
Pied wagtail		TEP/casual observations
Raven		TEP/casual observations
Coal tit		TEP/casual observations
Greenfinch	Red Listed	TEP/casual observations
Goldfinch		TEP/casual observations
Great tit		TEP/casual observations
Goldcrest		TEP/casual observations
Rook	Amber Listed	TEP/casual observations
Tawny owl	Amber Listed	Casual observations
Sparrowhawk	Amber Listed	Casual observations
Robin		TEP/casual observations
Collared dove		TEP/casual observations
Feral pigeon		TEP/casual observations
Willow warbler	Amber Listed	Casual observations
Chiffchaff		TEP/casual observations
Chaffinch		TEP/casual observations
Siskin		Casual observations
Treecreeper		Casual observations
Pied Flycatcher	Amber Listed	SOS county recorder/casual observations
Tree pipit	Red Listed	SOS county recorder/casual observations
Common redstart	Amber Listed	SOS county recorder
Buzzard		TEP and casual observations
Red kite		TEP and casual observations
Wren	Amber Listed	Community
Wood pigeon	Amber Listed	TEP/casual observations
Starling*	Red Listed	Casual observations
House martin	Red Listed	SOS species champion/casual observations
Common swift**	Red Listed	Casual observations
Swallow	Red Listed (Shropshire)	Casual observations
Skylark**	Red Listed	Casual observations
Meadow pipit**	Amber Listed	Casual observations

*SOS = Shropshire Ornithological Society

*utilise the fields for feeding or winter migration

Great crested newt

Figure 7. Great crested newt 9 March 2026.

Great crested newt (GCN) are species of principal importance in England and an Annex II species. As the TEP ecological assessments did not find amphibians present it was decided that a survey of adjacent ponds should be undertaken by the Strettons Area Community Wildlife Group as it is known locally that common frog, common toad and newts are present within the immediate vicinity. A night-time pond survey was conducted on 9 March 2026 at a location within 80m of Snatchfield. Four GCN were observed (Figure 7) although vegetation in the pond limited visibility so it is likely that more were present. FrogLife (2000) state "Great crested newt probably stay within 250m of the breeding pond. However, newts may well travel further if there are areas of high quality foraging and refuge habitat extending beyond this range". The habitat within Snatchfield, which includes all of the primary requirements for GCN terrestrial habitats are present: rough grassland, scrub and woodland, underground crevices, tree root systems, mammal burrows, rubble piles and old walls. Relevant barriers to migration to and from the breeding pond and for terrestrial dispersal are roads with high traffic volume and built-up areas.

It is also noteworthy that common frog, common toad and palmate newt are routinely recorded within 100m of the site.

Other species of importance

Other species of principal importance in England that have been noted in or within the immediate locality of Snatchfield include: Otter, dormouse, brown hare, hedgehog and polecat. Including the bat species aforementioned (brown long eared bat, noctule bat, lesser horseshoe bat, soprano pipistrelle bat and barbastelle bat) there are nine species present that are most threatened and require conservation efforts to maintain biodiversity. Shropshire Council has a Biodiversity Duty to all these species as required under the Environment Act 2021 and the first consideration of what action to take for biodiversity should have been completed by 1 January 2024 (Gov.UK, 2026). Having accessed Shropshire Council's Ecology and Biodiversity webpages the Biodiversity Action Plans and Marches Nature Partnership documents appear to be the only available information indicating its commitment to nature conservation. However, the action plan for great crested newt has expired and the action plan for brown hare was last updated in 2010. The Shropshire Local Nature Recovery Strategy (LNRS) adopts a spatial approach to landscape recovery and is intended to enrich and connect areas of land to allow nature to be more resilient and diverse. The LNRS lists priority species and habitats however it is not intended to address the species of principal importance in their entirety and therefore it is unclear what policies Shropshire Council has in

Figure 8. Brown hare seen at Snatchfield Farm, October 2025.

place as part of its duty to conserve and enhance biodiversity, particularly species of principal importance. In light of this a Freedom of Information request has been submitted to Shropshire Council (2/4/2026).

Annex II species – should the site be further protected?

Combined surveys of Snatchfield and a buffer zone of 100m has produced three Annex II species that are utilising the habitat for feeding, roosting, and shelter: great crested newt, barbastelle and lesser horseshoe bats.

The European Union's Habitats Directive (Council Directive 92/43/EEC (a) on the Conservation of Natural Habitats and of Wild Fauna and Flora) requires that areas are designated as Special Areas of Conservation (SACs) for the great crested newt (as an Annex II listed species) and that the species is given strict protection (as it is listed on Annex IVa). The directive is implemented in England by the Conservation of Habitats and Species Regulations 2019 (also known as the Habitats Regulations). Paragraph 12 (3a) of the Habitats Regulations is clear: species listed in Annex II are required to have the area designated as a special area of conservation as a priority by the appropriate authority. Further, paragraph 13 (1) of the Habitats Regulations states that "the appropriate authority must, in accordance with paragraph (2a), establish priorities for designating as special areas of conservation such sites as it has determined to be sites of national importance", and continues in (2) "that priorities must be established in the light of species specified in Annex II of the Habitats Directive". It continues in 2(c) that priorities for the purpose of paragraph (1) must be established in the light of the threats of degradation or destruction to which the sites are exposed.

There is an utmost duty to protect the site from harm from development and secure it for these protected species in whatever way possible.

Shropshire Local Nature Recovery Strategy

The Shropshire Local Nature Recovery Strategy is required to describe local priority species and habitats for nature recovery and enhancement of species. Relevant species and habitats known to be at the site are listed below:

- Bat species assemblage (importance of the value of individual bat species)
- Hazel dormouse
- Deadwood species assemblage
- Woodland species assemblage
- Bog and wetland habitat (springs and flushes).

It is not clear how the development of this site can implement the recovery and enhancement of these species, assemblages or habitat. Rather, the possibility of recovery is highly unlikely should the planning application go ahead.

Disturbance and harm

Construction phase

It is well understood that the build phase will significantly impact wildlife and destroy the mediaeval meadow of Snatchfield (formerly Plock and Upper and Lower Hollow Meadows). Heavy vehicles, extensive earthworks, noise, chemical and light pollution during construction will be devastating for this part of the Shropshire Hills National Landscape and for the nature that lives and moves within it. The rush pasture

vegetation in Snatchfield is already classified of national importance (although not recognised in the more recent report by TEP). On site earthworks are likely to destroy this important habitat, destroy the existing ancient seedbank and mediaeval meadow, and any remaining vegetation will become contaminated land.

Post construction impact

The cumulative impacts of disturbance and mortality which will lead to a paucity of wildlife within this vital part of the Shropshire Hills NL is in total disregard of its designation objectives. The National Landscapes Associations purport that these landscapes are at the forefront of the climate and nature crisis and aims to protect what nature is remaining and restore what is lost (National Landscapes Association, 2026).

Figure 9. Loose dog on upper field.

The fields and woodlands adjacent to the proposed development will become amenity space, particularly for dog owners (Figure 9). Hughes and Macdonald (2023) show dogs negatively impact wildlife through predation and disease. The Wildlife Trust reports that survival of wildlife is impacted when it is repeatedly disturbed by dogs and people, and dog faeces are also harmful to soil and plant health (Wildlife Trust, 2026). Findings from a recent report commissioned by the Dogs Trust show between 30-40% of people own at least one dog (Dogs Trust, 2026). This indicates that there are likely to be a number of dogs permanently residing in the area. Intrusion into these special habitats by dogs and cats will have a catastrophic impact on the native wildlife that is currently present. The Bat Conservation Trust has identified cat predation as a threat to bat species. 86% of bats die if they are attacked by a cat (Bat Conservation Trust, 2026) and the mortality rate for birds is 78% (Baker *et al*, 2018). As 24% of households are reported to own a cat (Cats Protection, 2026) there is a high probability that at least fifteen cats will become resident on the Snatchfield site. This will be devastating to the local wildlife.

The UK government's guidance on light pollution recognises it is harmful to wildlife (UK government, 2026b). Pollution from light and noise causes fragmentation of the occupied habitats for animals, birds, insects and even plants, affecting their physiology or behaviour. Indeed, LED streetlights are considered even more harmful for insect populations (UK Centre for Ecology and Hydrology, 2024a; Buglife, 2026; Natural History Museum, 2026a). Man-made noise can also disturb animal's behaviour reducing their ability to feed, communicate or look for mates (UK Centre for Ecology & Hydrology, 2024b).

Figure 10. Litter at nearby site.

Findings from a recent report by the Keep Britain Tidy charity indicate that more than 90% of sites they surveyed contain litter (Keep Britain Tidy, 2026). Litter is hazardous to wildlife, causing entanglement, suffocation, choking, starvation, wounding and mortality (RSPCA, 2026; Circular, 2018; Science Direct, 2023; Academia, 2026). A densely populated housing estate such as is proposed will contaminate the environment and cause harm to wildlife and water quality (Figure 10). The augmentation pond will become contaminated with litter and other pollutants. Its performance as a freshwater aquatic environment will be

minimal. It will also require continued operational management which will destroy any wildlife that does occupy it.

This will be the aftermath of the proposed development and NO amount of mitigation can compensate for the loss of this valuable, quiet space within the landscape. The impacts on site and within the adjacent habitats including ancient woodland will be:

- Disturbance and interference through human habitation (including domestic pets)
- Disturbance and pollution from artificial lighting
- Disturbance from noise
- Surface water pollution
- Litter
- Tipping
- Compaction
- Erosion
- Nutrient enrichment from dog and cat fouling
- Loss of floral diversity
- Introduction of non-native species
- Deliberate and accidental damage.

Biodiversity net gain

A 10% Biodiversity Net Gain (BNG) is a mandatory requirement under the Environment Act 2021 and a review of the report produced by TEP highlights significant concerns regarding the capability of delivering BNG. TEP confirm that many assumptions have been made in the report regarding habitat impacts and the target habitat type and condition of created habitats. In fact, the assessment excludes some of the habitat features previously reported by TEP in 2019.

Furthermore, the summary of the Biodiversity Impact calculations is incorrect and there is a shortfall of 0.25ha of land unaccounted for. Of the 4.21ha site most of it will be permanently lost (all but 0.28ha), devaluing vital quality habitat including semi-natural grassland and bramble scrub for instance.

As BNG cannot be delivered on site TEP are recommending off site delivery. The proposal is to "improve 0.5ha of adjacent habitat to moderate condition". The BNG calculation used to measure the biodiversity metric describes four key factors (Figure 11). Three of these features:

- habitat condition
- habitat distinctiveness
- strategic significance

have been discussed in this report and are already met by the existing habitats.

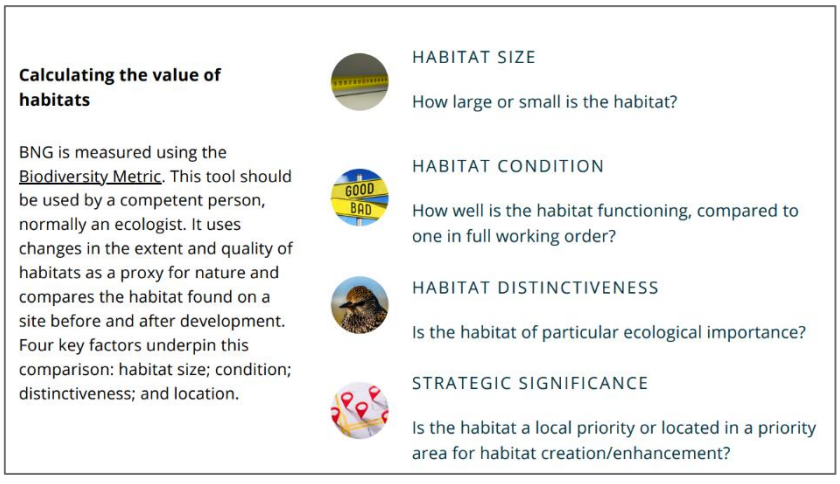

Figure 11. BNG guidance for the four key factors.

They have been shown to be fundamental to the functionality of the site, demonstrated by species utilisation and habitat continuity as described in the previous chapters. It is not possible to comment on the habitat condition and distinctiveness that TEP have used for the BNG metrics other than it has been

qualified as poor. However HM Government guidance states that the local authority should specify alternative documents for the strategic significance component whilst the LNRS is put in place (Shropshire's LNRS is currently draft). These include but is not exhaustive: draft LNRS, Neighbourhood Plans and National Landscape (AONB) management plans, river basin management plans, Biodiversity Action Plans, Species conservation and sites strategies (DEFRA, 2025). Given the history of the site and repeated attempts to develop it the expectation is that Shropshire Council has delivered on this requirement.

Moreover, on review of BNG guidance it is not clear how the suggestion to improve 0.5ha of the adjacent habitat to moderate condition by removing topsoil (and the consequential release of carbon) and seeding the site with meadow mix seed fits with habitat enhancement. In light of climate change and the nature crisis which includes insect and soil fauna decline this proposal is unjustified and incomprehensible.

Destroying habitat that is unique within the local landscape and is currently acting as a carbon sink as well as supporting a wide variety of wildlife (some of which is of national importance) is surely not the intended outcome of biodiversity net gain? The grassland supports mycorrhizal fungi, a varied sward, an unquantified invertebrate assemblage and carbon storage, all of which will be lost. There has been no assessment of this adjacent site and therefore to qualify it as poor is unreasonable. Further points are raised concerning the proposal of a 10-year management plan with a further 20 years to maintain the habitat 1) who will manage the site and 2) how will management be enforced? Finally, the development will deliver an increase in population size of humans and domestic pets who will use this land for amenity. There is a strong likelihood that introduction of meadow seeding will fail unless it is fenced from humans, dogs, rabbits, deer and sheep. This will make maintenance extremely difficult.

Finally, it is not clear where the offsite bramble scrub will be removed from and replaced with hawthorn, blackthorn, dog rose and hazel. The barn area has bramble scrub as well as elder, hawthorn (Figure 12) and ash however this appears to be part of the onsite destruction proposed and clarification is required as to whether this is part of the proposed offsite gain – take it away and then put it back again?

Figure 12. Hawthorn and scrub by barns.

Conclusion

The long-term consequences of development, and the recognised impacts human habitation has on local wildlife and habitats is evidenced widely.

As part of the criteria for sustainable development and in the absence of a definition from Shropshire Council of what constitutes sustainable development the UK government's description within the NPPF (and in agreement with the UN's 17 global goals for sustainable development) is that "the environmental objective is to protect and enhance our natural…environment, including improving biodiversity, mitigating and adapting to climate change and minimising waste and pollution" (NPPF, 2024). This review of the wildlife and habitats known to be present at the site and within the immediate area clearly shows that development of Snatchfield will be hugely and irreversibly damaging to nature and the environment in both the short and long term.

Some of these habitats and species are protected in law or identified in strategies, policies and guidelines to support recovery of our natural world:

- Levelling up and Regeneration Act 2023
- National Planning Policy Framework 2024
- Land Use Framework 2026
- The Habitats and Species Regulations 2019
- Biodiversity Action Plans
- Wildlife and Countryside Act 1981
- Natural Environment and Rural Communities 2006
- Wild Mammals Protection Act 1996
- Shropshire Local Nature Recovery Strategy
- Countryside Rights of Way Act 2000
- Environment Act 2021
- State of Nature Report 2023
- 25 Year Environment Plan 2023

Moreover, destruction of habitat and fragmentation cannot be replaced by Biodiversity Net Gain. Once destroyed it is gone forever and it will lead to the permanent loss locally (and contribute to the continuing global decline) of a wide range of species, including three Annex II species of principal importance that occupy this area. It will also destroy one habitat of principal importance and degrade a second habitat of principal importance. Indeed development will destroy a whole part of the landscape that is also of national importance, encompassed within the National Landscapes designation. Snatchfield cannot be compartmentalised, it is not isolated from the wider landscape; it is intact habitat that that is an integral part of it. The National Landscape designation recognises the importance of the Shropshire Hills and this vital parcel of land is an essential component of the landscape beauty. In the spirit of the designation there is a compelling case that it should be conserved and enhanced for wildlife conservation and protected for the nation's benefit and not irrevocably destroyed.

Delivery of the UK's commitment to the Global Biodiversity Framework is not for someone else to do. We ask Shropshire Council to fulfil its duties and to protect this unique landscape and the wildlife that make its home here. Once lost, this mediaeval nature-filled meadow is lost forever. At a time when nature needs our help more than ever we urge Shropshire Council to refuse this planning application and protect this sanctuary for wildlife.

Figure 13. A compilation of habitat continuity from Dryhill north west downhill along the Jack Mytton Way to Plock/Snatchfield.

Flush/mire at top of valley (nr Dryhill)

Gully (Jack Mytton Way)

Upper field looking down valley (Plock and Snatchfield)

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Appendix

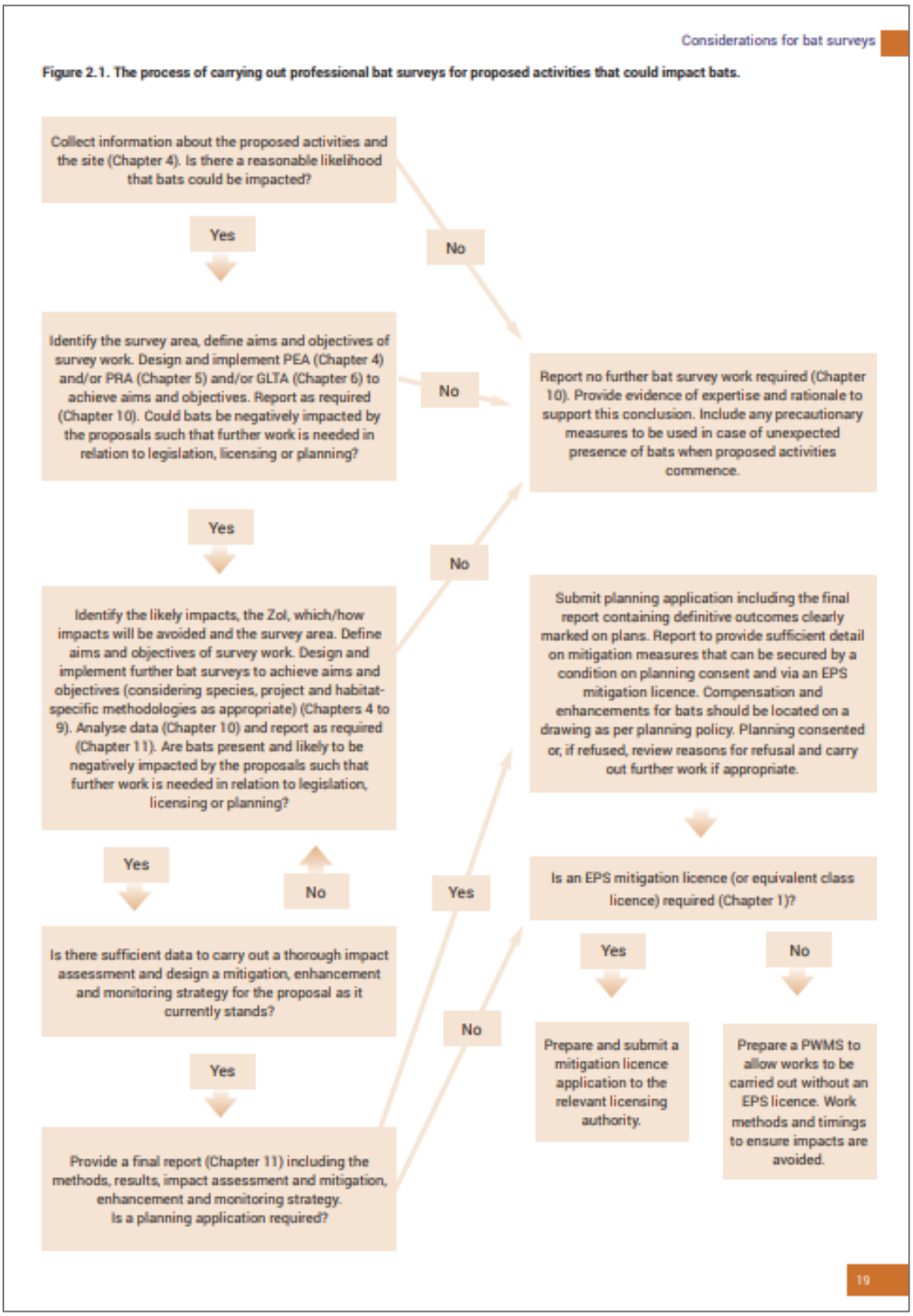

Figure 6. Bat survey process from the UK Bat Mitigation Guidelines 2023.

Table 3. Feeding and roosting habitat niches for bat species reported by TEP 2025.

BAT SPECIES	FEEDING AREAS	RELEVANT ROOST TYPE
Lesser Horseshoe bat	Sheltered lowland valleys and woodland 5m above ground Very sensitive to disturbance	Summer: Variety of buildings
Barbastelle bat	Preference for pastoral landscapes and open ground alongside deciduous woodlands. An extremely rare species	Summer: variety of building crevasses
Brown long eared bat	Close to foliage from ground level upwards (vulnerable to predation)	Summer: Variety of buildings and trees
Noctule bat	Fly high over open ground and tree canopy	Summer: Trees Winter: Variety of buildings
Common pipistrelle	Woodland, grassland, farmland, suburban and urban	Summer roost: Variety of buildings and trees
Soprano pipistrelle	Wetland areas and also tree and hedgerow lines, parks and gardens	Summer: Variety of buildings and trees
Daubenton's bat	Wetland areas: waterbodies	Summer: Trees
Brandt's bat	Woodland and near water	Summer:Variety of buildings
Whiskered bat	Hedgerows and woodland edge	Summer: Variety of buildings
Unidentified myotis species	?	
Natterer's bat	Tree canopy	Summer: Variety of buildings