

**In the matter of Snatchfield Farm
Application Reference 26/00328/OUT**

NOTE

- 1 We have been instructed by the Church Stretton Housing Plans Group (“our client”) who comprise residents in surrounding streets to the application site and wish to **object** to the application. Our client has asked us to review the application in terms (only) of highways, biodiversity net gain & ecology, design and conservation issues, landscape and visual impact. This Note should be read alongside the Church Stretton Town Council’s objection March 2026, with which our client concurs fully.

Background

- 2 The site is known as Snatchfield Farm and is a steep sloping pastured site outside the settlement boundary of Church Stretton and within the Shropshire Hills National Landscape in open countryside, allocated as Local Green Space in the draft Neighbourhood Plan. It is adjacent to the Church Stretton Conservation Area.
- 3 The current application is for:

“Residential development of up to 75 dwellings (all matters reserved except access), including 33% affordable housing, landscape and biodiversity enhancements (including off-site provision), drainage works, and means of access (including demolition of 23 Chelmick Drive).”

Highways

- 8 Paragraph 116 of the NPPF states that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

Paragraph 117 requires developments to:

- (a) *“give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- (b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- (c) *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- (d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*

(e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

Shropshire Local Transport Plan 2011-16 Policy E11 states:

“We will ensure that new developments are located, designed and served by transport in ways that enhance accessibility and reduce car dependency”

- 9 Tellingly, the applicant’s own Transport Assessment¹ noted the Personal Injury Accident (PIA) data for the highway network adjacent to the site - 8 accidents² within a four-year period to 2023.
- 10 Illustrative site drawings submitted set out an access 5.5m wide³ and a narrower estate road. However, a pedestrian footway is shown only along one part, and the estate roads appear to fall below the width required for sharing with cyclists. The drawings do not show a “footway 2m throughout the site” as claimed,⁴ and therefore that the site is accessible to pedestrians as well as motorists. Moreover, crossing the bridleway over a two-way vehicular access in two places raises serious safety questions.
- 11 The feasibility of *safely* accommodating pavements, bridleway and cycleway along a constrained access route should be satisfied now. As matters stand, the applicant cannot show that Policy E11 or NPPF paras 116 or 117 can be satisfied.
- 12 We refer to the Transport Technical Note of Martin Andrews Consulting⁵ that reviews this in detail and from a technical standpoint.

Biodiversity Net Gain & Ecology

- 13 NPPF paragraph 187(d) states developments should ensure they are

“minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs”

And when determining planning applications, the Council should apply the following principles (NPPF para 193):

“a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
c) 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 and a suitable compensation strategy exists; and
d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around

¹ Curtins

² Curtins

³ Planning Design & Access Statement p10

⁴ Para 3.2.3 but see drawing D/T/05001/PO1 where it is shown only along part

⁵ MAC dated Feb 2026

developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

Local Plan Policy CS17 states decisions will ensure that:

“all development Protects and enhances the diversity, high quality and local character of Shropshire’s natural, built and historic environment, and does not adversely affect the visual, ecological, geological, heritage or recreational values and functions of these assets, their immediate surroundings or their connecting corridors”

- 14 The Strettons Area Community Wildlife Group identified⁶ six species of bats present on the site: badgers, brown hares and hedgehogs. In addition, a Preliminary Ecological Assessment was undertaken by The Environment Partnership⁷ in August 2019, with further studies on the site in 2025. These studies found:

“S41 habitats within the site include semi-natural broadleaved woodland, rush pasture and hedgerows.”

“The semi-natural broadleaved woodland qualifies as S41 habitat of principal importance. Loss of woodland will significantly reduce the ecological value of the site.”

“The species-poor hedgerows within the site qualify as S41 habitat of principal importance. The hedgerows provide potential to support foraging bats, nesting and foraging birds, habitat for amphibians, reptiles, dormouse and hedgehog, and opportunities for badger sett creation. Any loss of hedgerow will have a negative impact on the ecological value of the site.”

“The grassland fields, scrub, hedgerows, shrub and woodland provide suitable habitat for foraging, ranging and hibernating amphibians.”

“Sections of flowing water are present within the stream, and suitable food plants for water vole are present along the length of the watercourse.”

“The site provides good suitable habitat for reptiles and invertebrates, including S41 invertebrates.”

“There is potential for indirect impacts on Ragleth Wood and Ragleth Hill Local Wildlife Sites, located 9m and 230m from the site.”

- 15 In 2025 The Environment Partnership identified at least eleven species of bat to be active at Snatchfield. Of particular note is the recording of two Annex II species (Lesser Horseshoe and Barbastelle) out of the four listed in the EU Habitats Directive. Both species are highly sensitive to disturbance and habitat loss, and the Lesser Horseshoe Bat has a particular aversion to artificial light at night. The extensive watercourses at Snatchfield attract the insects on which these bats feed; The Environment Partnership report the application site to be of National Importance for bat conservation.
- 16 The site therefore contains “irreplaceable habitat” and provides for a variety of bat species including two Annex II species, yet the applicant has failed to show how

⁶ Report August 2024

⁷ On behalf of Northern Trust

adverse impact will be avoided or effectively mitigated. Accordingly, the requirement in para 193 has not been met.

- 17 The site is required to deliver 10% BNG⁸. However, the BNG Metric shows a total net gain of 10.6%, although as the site will lose habitat (-0.21% overall) this can only be achieved off site⁹ on an adjacent 0.5ha. The biodiversity gain hierarchy and the mitigation hierarchy set out in NPPF 193(a) are similar in stressing the need to provide improvements on site. The rationale for not providing BNG on-site with this development is unclear, but likely to be the consequent impact on the number of houses that could be delivered. That (if true) is not an acceptable justification. Moreover, the applicant seems confused as to whether the biodiversity enhancement will be provided on or off site¹⁰.
- 18 Accordingly, neither national nor local policy requirements are met.

Design Context & Conservation Area Impact

- 19 The Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area¹¹. The site is on the boundary of the Church Stretton Conservation Area (see FIG.1 below) and will affect both the setting of the conservation area and view from it across the site.
- 20 Shropshire Local Plan Policy CS17 requires all that development
- “protects and enhances the diversity, high quality and local character of Shropshire’s natural, built and historic environment”.*
- 21 The proposals are out of scale with the built surroundings. The Planning Design & Access Statement¹² identifies the built environment as mostly single storey buildings but then¹³ states the development will be “mostly detached 2-storey”.
- 22 The Heritage Impact Assessment states¹⁴ that “There is no visual or historical connection between the Site and the historic core of Church Stretton” but accepts it will be visible from Hazler Drive and Hazler Road but provides no sightlines in the report to resolve this. As the application currently stands, the proposals will not fit in with the existing built environment nor enhance the adjacent conservation area.

⁸ Environment Act 2021

⁹ BNG Feasibility Report para 4.9

¹⁰ see PD&AS para 4.7

¹¹ S72 Planning (Listed Buildings and Conservation Areas) Act 1990

¹² Eden Building Design

¹³ At p10

¹⁴ Wessex Archaeology Ltd para 6.3.5



FIG. 1
SAMDev 2015 Policies Map
Local Green Space Analysis Feb 2026: Brown shows the settlement boundary
Green dotted line shows the Conservation Area boundary

Landscape & Visual Impact

23 The site is within the Shropshire Hills National Landscape:

“Panoramic views can be had across the Shropshire Hills, and both wide open spaces and intimate corners are found. There are contrasts from relatively wild hills and valleys to softer, settled landscapes, as well as between varying seasonal colours of heather, grass, bracken and broadleaved trees”¹⁵.

24 Shropshire Historic Landscape Character Assessment¹⁶ described the site as ‘reorganised piecemeal enclosure’, defined as:

“Small -large irregular or rectilinear fields where at least two field boundaries exhibit ‘scurve’ or ‘dog-leg’ morphology (suggesting the former presence of medieval open fields), but which also demonstrate evidence for significant change since their initial enclosure.”

The LVIA includes the analysis by Gillespie of the site as it forms part of a larger plot¹⁷ which:

“provides distinctive visual value with extensive views across the valley and the sloping plateau towards Long Mynd... Visual receptors including PRow users and residents are considered to be of high sensitivity, nevertheless, views are partly obstructed and localised due to a level of enclosure from existing woodland. This resulted in a medium-high visual sensitivity for new development.”

25 The site is visible from several PRowS where the baseline value for 9 out of 15 viewpoints in the LVIA¹⁸ was noted as “very high”. The important role the site plays as a green lung is recognised in the Reg 14 draft Church Stretton Neighbourhood Plan, which seeks to designate it as Local Green Space, also in the Local Green Space

¹⁵ SHNL website character description “Special Qualities”

¹⁶ Wigley, 2007

¹⁷ Referred to as Parcel C

¹⁸ Table 3 at para 3.41

Analysis February 2026, shown clearly outside the Church Stretton settlement boundary in FIG.1 above.

26 Section 85 CROW Act 2000¹⁹ as amended in 2023 now requires public bodies to seek to further the purposes of National Landscapes whenever they make decisions which affect land in these areas. This means they must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. The **proactive** nature of this duty has recently been accepted by the Secretary of State.²⁰

27 NPPF Para189 states:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas... The scale and extent of development within all these designated areas should be limited [...].”

NPPF Paragraph 187 applies to the natural environment and states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

28 Local Plan Policy CS6 focuses on the positive benefits that natural open spaces bring, limiting development to that which:

“Contributes to the health and wellbeing of communities, including safeguarding residential and local amenity and the achievement of local standards for the provision and quality of open space, sport and recreational facilities”

and further Policy CS5:

“New development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt.”

29 The applicant’s LVIA is contradictory on the effects and impact of the development on the near and further landscape views from and into the site. At one point it concludes²¹:

“it is considered that the proposed development would initially give rise to a medium magnitude of change on the localised setting.....By Year 10, it is considered that the overall magnitude of change would reduce slightly to medium – low and that the overall effect on this receptor would be no greater than Moderate / Minor” and that the effect on the wider landscape setting would

¹⁹ Section 245 of the Levelling Up and Regeneration Act 2023

²⁰ See the consent to judgment in R (The Dedham Vale Society) v SoS HCLG & ors, February 2025

²¹ LVIA Aspect Landscape Planning Para 5.11

be “negligible or neutral”²² But then goes on to say²³: “On balance, effects would remain adverse owing to the permanent loss of pasture land associated with the Site itself” and that the site would have “high potential visibility” from the LDR along Long Mynd above Church Stretton, and also “the wider landscape setting to the site typically displays very high landscape value”²⁴

30 We also refer to the review by Make Space Landscape Architecture Limited, commissioned by our client, who make the following observations many of which reflect our concerns above:

“1. The Zone of Theoretical Visibility (ZTV) which is a fundamental drawing when considering the visual effects of a development deviates from the guidance set out in Guidelines for Landscape Visual Assessment 3 (GVLIA3). This should be based on a bare ground assessment of visibility, best practice would be using 'OS terrain 5' data. Instead the drawing is based upon Lidar data, which will present a much smaller visual envelope (where the drawing implies the development would be visible from) than the bare ground analysis. A bare ground analysis presents a more conservative approach to potential visibility which is then verified by the photo viewpoints. The way this is currently presented favours the development.

2. We have serious concerns over the viewpoint selection. These have all been taken from standard Public Rights of Way, and do not take into account the fact that large areas both sides of the A49 are designated as open Access Land. This provides unrestricted public access (and not marked as footpaths!) to some of the areas most iconic and best loved landmarks, notably Caer Caradoc (hilltop & scheduled ancient monument), Burway Hill, Stanyeld and Bodbury Ring (hilltop & scheduled ancient monument), all of which being an integral part of the draw of the Shropshire Hills National Landscape. We note that all of these locations fall within the ZTV - which as stated previously is showing the best case scenario (ie more screened), rather than a more cautious worst case scenario (ie less screened) with regard to visibility. These views will be of high visual value and high susceptibility to change - resulting in high overall sensitivity. In addition to the above - It is good practice for the viewpoint location plan to also show the ZTV information so that the relationship between viewpoint locations and zones where the development can theoretically be seen from can clearly be understood. At present this is not the case in the information provided. The viewpoint location plan should also be shown overlaid onto the 1:25,000 OS plan to give the full detail of Public Rights of Way and Open Access Land.

3. All viewpoints have been taken in June when the trees and hedges are in full leaf - this again presents a best case scenario in terms of the visual impact of the development - it will be more visible during the winter months which is not assessed.

4. Church Stretton town design statement 2.41 – ‘development on hillside shall only be permitted where... there is no harm to visual amenity’ - obviously this is not the case.

²² Para 5.14

²³ Ibid para 5.12

²⁴ LVIA para 3.34

5. *Shropshire Hills National LMP 2.37 iii. Tranquillity should be protected in all aspects – peace, quiet, views, visual harmony and absence of intrusive visual influences. The report suggests that there is limited tranquillity due to housing on three sides, however this is contradicted by the close range images of the site which clearly demonstrate a green & tranquil site.*

6. *No assessment table has been provided to show how medium-high landscape sensitivity has been reached. Important to note the individual value and susceptibility to change for each key landscape receptor.*

7. *No analysis provided for how overall significance of landscape effects has been reached – should provide a table with sensitivity and magnitude ratings for each landscape receptor. Only two overall ratings provided for ‘the site itself’ as moderate adverse and ‘wider site context’ as negligible neutral.”*

31 Accordingly, the LVIA submitted by the applicant cannot be relied upon to establish that the development will not have a significant effect on the local and national landscape character.

Conclusion

32 As we have set out above, Local Plan policies are consistent with current national policy, all of which show that the development cannot be supported at this site.



RICHARD BUXTON SOLICITORS
17 March 2026