

Issued via email to:
Jenny Fryer
Pinnacle Planning Ltd

RE: Wrotham Road, Meopham Site A - Addressing Kent County Council Commentary

BACKGROUND INFORMATION

RammSanderson Ecology were commissioned by Pinnacle Planning Ltd on behalf of Richborough to address comments raised by Kent County Council in relation to planning application 20250992 (Appendix 1), which details the outline application for the erection of up to 350 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved (Hereafter known as 'the Scheme').

The application concerns the area situated at Wrotham Road, Meopham, Gravesend, Kent, DA13 0AA, grid reference TQ 64580 66661 (hereafter referred to as 'the Site').

The Site was subject to a suite of ecological surveys conducted by RammSanderson in 2024 and 2025 which further informed an Ecological Impact Assessment (EcIA, RSE_8996_R3_V1_ECIA_SITE A). This was subsequently submitted to the local authority and reviewed in line with the proposed outline application.

Initially, site A was part of a wider scheme along with a further land parcel to the west (known as site B), which upon primary consultation with the client, was due to be submitted to the local authority as a single site. As such, the survey methodologies for each species were created in the view of a single site being submitted. However, later consultation June confirmed that the single site was to become site A and site B, with separate applications. At this point, surveys had already started being conducted which caused certain conflicts with the current survey effort guidance that had been published at the time. These are discussed herein.

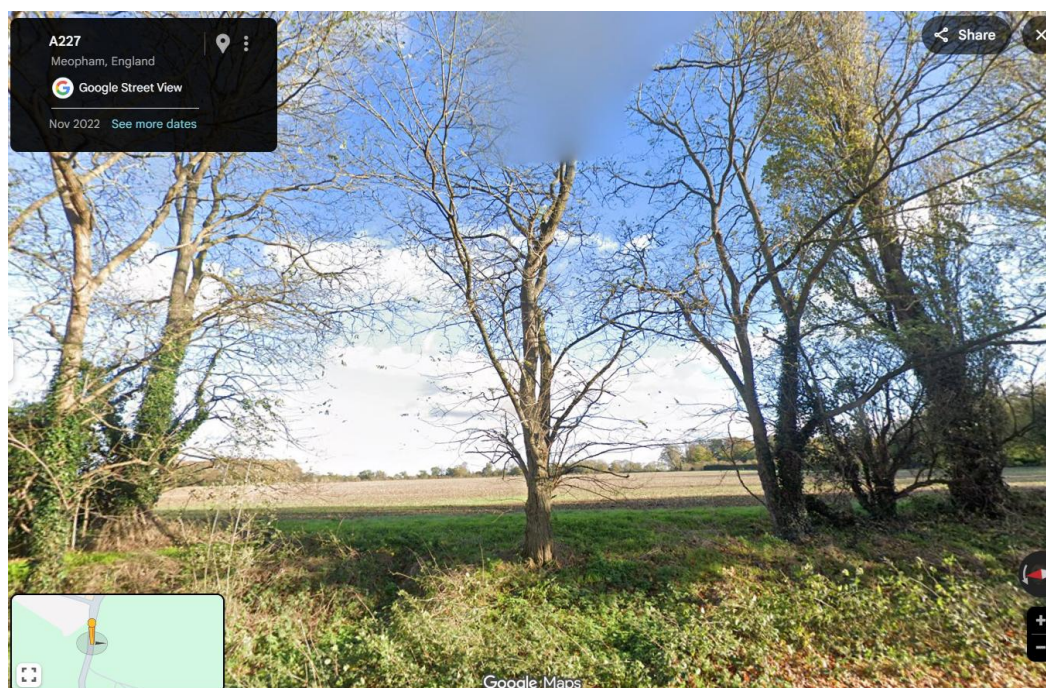
SITE LOCATION

The Site is located within the village of Meopham, Kent at Ordnance Survey national grid reference TQ 64606 66632 and is approximately 15.75ha in size. The Site comprises primarily cropland habitats, with modified grassland margins, bordered by hedgerows. The Site is bounded by areas of woodland, additional cropland and residential areas, and the wider area consists of further agricultural and residential areas.

Hazel Dormice

The assessment for hazel dormouse started in May following a change to the guidelines in March 2025. At the time, no PDF of the guidelines was available as had not been fully published yet. We had purchased a copy but were yet to receive. As such, we proceeded with old guidance. Furthermore, at the time of the survey commencement, the site was considered a single site, prior to it becoming site A and B. As such, the methodology for the assessment was correct with the correct density of tubes. It was only when the site was split into two separate sites that the methodology drifted away from guidelines. However, for Site A it was decided this was not a constraint due to the lack of suitable habitat within it. H1 had been included and sampled with nest tubes as a precaution. However, this was recently panted and gappy offering almost unsuitable habitat. The boundary tree lines along the western edge of the site were outside the redline for the most part with the exception of a small gappy section with immature trees to be removed to facilitate an emergency access point (Figure 1).

Figure 1: Emergency access point (©google.com)



The main access point on to the Site was through an area that was not suitable for dormice due to a gap in the vegetation (c.12m). Another access point through the northern boundary of the Site is proposed for a cycle route. This will be minor and at ground/scrub level – maintaining the tree canopy linkage. It was also commented that concerns as to why the woodland in the south and the hedgerow to the west were not surveyed. The woodland was private access and outside the boundary and such, we could not access to survey. Maisie Ryan was lead on these surveys and she has been an ecologist for 5 years', is a class licensed hazel dormouse surveyor (2024-12511-CL10A-DOR) who is competent at UK Habs assessments and is FISC level 4 certified.

Using Ukhabs data collected at the time the following dormouse habitats assessments have been conducted retrospectively:

- **Eastern Hedgerow (H1 - RSE_8996c_BIA Baseline Visualisation_V1R4_Site A_Optimized)** – The hedgerow recorded Hazel, Hawthorn, Blackthorn, Sycamore, Wayfaring Tree, Willow sp., Bramble. Gaps within the hedgerow were recorded at 10-25% of total length consists of gaps and/or some gaps large (>5 m), with a width of 2-3m. Dense growth to ground level along <25% hedge length with Dense outgrowths along 5-25% hedge length. Height was recorded at 2-3m with mature standards at >100m spacings. A <1m permanent herbaceous cover was also present. Following assessment, the hedgerow was confirmed as **High diversity (5)**. As such, in line with table 3.7 of the Hazel Dormouse Mitigation Guidelines, it is concluded that an estimated density of hazel dormouse in relation to habitat quality is **5**. Overall, in line with table 3.8b, the estimate population within this hedgerow is concluded to be **5 species per km**.

The majority of H1 is to be either retained or enhanced within the Scheme, with small sections of the hedgerow due to be removed to facilitate access to the wider eastern section. The eastern parcel of land beyond the hedgerow will also be enhanced to promote scrub, additional tree planting and grassland which will further provide good suitable habitat for hazel dormouse to utilise.

It is concluded following further assessment and analysis of data, including desktop data, that habitats within the Site were largely suboptimal for supporting hazel dormouse. The northern strip of woodland which is due to be impacted by the Scheme to create a cycle route/access point to the Site is the most suitable. Furthermore, adjacent habitats immediately outside the Site, also offered further suitability for hazel dormouse to be present. Since the EclA report was issued, desk records now indicate the presence of hazel dormouse 1.4km south of the Site, which was dated 27th November 2025 (NBN Gateway). In line with the guidance, it confirms that presence can be inferred if records of 5 years or less are returned within 3km of a Site and habitats within the Site have not significantly changed. However, due to the small area to be removed in the northern boundary and low suitability of impacted habitat elsewhere on site, a Precautionary Method of Works is deemed suitable to address residual risk at Reserved Matters with a licensed ecological clerk of works present to facilitate the clearance.

Breeding Birds

In UK, it is acceptable to carry out 4 breeding bird surveys instead of six in specific, well-defined circumstances. The key point is that six visits are the default for full breeding bird assemblage surveys¹, and anything less must be clearly justified, proportionate and defensible. Six surveys are required to provide:

- Full breeding bird assemblage surveys
- EclAs for large or complex sites
- Sites with potential for notable or Schedule 1 species

Four visits in this instance are justifiable as the site is clearly of low ornithological value:

- Intensively managed agricultural land
- Little scrub, woodland, hedgerow or wetland
- No historical records of notable breeding birds
- Not in proximity to wetland or Special Protection Areas with functional links
- Minimal vegetational structural diversity

In this case, four well-timed visits can adequately characterise the breeding assemblage and the risk of missing significant species is low.

Current best practice methodology was used following a method based on the British Trust for Ornithology's (BTO) Common Bird Census (CBC) methodology. On each visit the entirety of the Site was surveyed, with the surveyor coming within 50 metres of all points within the Site boundary. The location and activity of each bird detected (visually and/or aurally) was recorded. Birds were considered to be demonstrating breeding behaviour if they were singing, displaying, alarm calling, carrying food, and undertaking distraction displays or if eggs or chicks were found. All birds engaged in other forms of behaviour were considered to be feeding, passing through or loafing within the Site boundary and were not, therefore, considered to be breeding in the location of the observation. The location of each registration was mapped using standard two-letter BTO Codes, and bird activity was recorded using BTO behaviour codes. These were undertaken in suitable weather conditions and spread across the suitable time of year (30th April, 15th May, 29th May and 12th June 2025). Most surveys were lead by Dan McLaughlan who has been a birder for 25 years and is suitably experienced to undertake this type of survey. Joe Cole lead one survey and has been undertaking breeding bird surveys in consultancy for the last three years. He has been signed off inhouse by our ornithology team to undertake this type of survey. Survey effort was reduced as an impoverished assemblage was being recorded. Furthermore, as the majority of the Site was arable land, the main species of concern were skylark and other ground nesters. For these species four surveys April-June is deemed adequate to map territories.

Biodiversity Net Gain

We can confirm that from georeferencing the plans, the western boundary hedgerow is outside the redline and is exempt from the biodiversity calculations. To be included with these the woody stems would need to be within the redline. The arb report likely includes these to capture the canopy overhang. Therefore, no change is required.

Bats

It is acknowledged that the bat activity surveys were data deficient due to technology issues and would likely have underrepresented the number of passes along each suitable feature. However, as this is an outline application, further detailed surveys in line with finalised plans will be required to identify roosts on Site. In addition, it is recommended that the scheme design maintains a 15m buffer from boundary vegetation. This is shown to greatly reduce lighting impacts² and is the distance required to reduce impacts from 2 story buildings to <0.5 Lux on the vertical plan. At reserved matters a detailed sensitive lighting scheme should be provided. This will mitigate impacts along the boundary vegetation. Where woodland/hedgerows require removal, further detailed surveys are required along with a mitigation strategy to maintain flight lines along the existing corridors.

¹ [Survey methodology | Bird Survey Guidelines](#) accessed 15/04/2026

² https://www.linkedin.com/posts/lee-gunner-87b48418_bct-ecologicalimpact-sustainabledevelopment-activity-7292882190709710849-X34j accessed 15/04/2025

Figure 1 Example Distance required to Reduce Lux Levels

Sample House Type	Approx. distance until <0.5 Lux is received on the Vertical Plane
Single Storey Detached	5m
Single Storey Semi Detached	9m
Two Storey Detached	10m
Two Storey Semi Detached	13m
Multiple Two Storey Detached and Semi Detached	15m

At present, a small area of clearance within the woodland along the northern boundary is currently scheduled within the Scheme, to facilitate a potential footpath / cycleway access. It is anticipated that some tree removal will be required to facilitate this, including some PRF-I trees. However, precisely which trees will be determined at the detailed design phase as part of a reserved matters application. The surveys have confirmed a probable day roost for common pipistrelle in Tree 12-17. These trees represent mature landscape features and Important Ecological Features which can and should be retained. Whilst some facilitative clearance may be required for the new footpath connection, this should be restricted and avoid the mature trees. Where detailed design confirms any tree removal is needed, update assessments pursuant to a reserved matters application will be required to inform licences from Natural England and mitigation design.

Bat surveys we lead by Dan McLaughlan and Amy Spilsbury. Both are senior ecologists at RS and hold bat licences. They are therefore appropriately qualified and experienced to lead these types of surveys.

Surveyor Competency

All surveys were led by members of the team that had been signed off to lead that type of survey being suitably qualified with protected species licences where required. As a Registered Practice we are bound by the code of conduct to meet CIEEM guidelines in terms of capability. Survey leads for the species queries have been addressed specifically in previous sections.

In line with the comments raised, we feel that the concerns put forward by biodiversity officer have either now been addressed, or, we have provided clarity and/or commentary on additional surveys or requirements moving forward on the Scheme, if the application was to be approved.

Yours Sincerely

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Principal Ecologist

Appendix 1: KCC Response