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Our reference EDFNDCT/020

BY EMAIL ONLY

Dear Mr. Campbell

Kent County Council Ecological Advice Service - response to comments regarding planning application reference 25/1388/FH for erection of a three storey administration building together with the installation of a bike and motorbike storage shed, external lighting and additional car park at Land to the west of Dungeness B Nuclear Power Station, Romney Marsh, Kent, TN29 9PX

A consultation response from Kent County Council Ecological Advice Service (KCC EAS) dated 17th September 2025, regarding the ecology reports supporting planning application reference 25/1388/FH has been reviewed. The KCC EAS letter requests clarification on points relating to BNG associated with the development and certain information and assumptions in the Habitats Regulations Assessment Stage 1 report. As detailed within the consultation response, this letter provides comments and clarification on behalf of the Applicant regarding the comments received from KCC EAS.

Specifically, the consultation response and this letter make reference to the following reports produced by AECOM Ltd of behalf of EDF that were submitted as part of the planning application:

- An Ecological Impact Assessment report (EclA), which concluded there would not be significant adverse effects on ecological receptors as a result of the proposed development;
- A Biodiversity Net Gain (BNG) assessment, which quantifies the value of the Site's habitat baseline using the Statutory Biodiversity Metric. This report concluded that there would be 100% loss of area habitat units and that appropriate off-site BNG compensation would be required; and
- A Habitats Regulations Assessment (HRA) Stage 1 Test of Likely Significant Effects report, which concluded no likely significant effects anticipated, and that a Stage 2 Appropriate Assessment (AA) would not be required for the Scheme.

Please find below a summary of the comments provided by KCC EAS and our responses to them for each of the ecological reports listed above in turn.

Ecological Impact Assessment

KCC EAS Comments

Within the response it is stated that:

'We advise that we are satisfied that sufficient ecological surveys have been provided to determine the planning application.'

Applicant Response

On this basis, we have no further response with regards to the Ecological Impact Assessment.

Biodiversity Net Gain

It is important to note that the majority of the land within the planning application boundary to be used for development of the proposed Administration Building comprises an existing tarmac surfaced car park, with no biodiversity. The proposed new car park to the north of the proposed Administration Building is based on an existing

temporary ad hoc laydown and parking area that has been used by the team at Dungeness B Power Station over many years to support large scale construction and outage projects at the power station. Although the site of the new car park is not surfaced with tarmac it has been surfaced with hardcore materials to make it suitable for use. The proposal for the new car park presented in the planning application seeks to formalise this use to support both the construction of the Administration Building development and to provide suitable car parking in an area close to the Administration Building. In accordance with Environment Act 2021 and the Town and Country Planning Act 1990 (as amended) the status of the proposed plot for the new car park has been assessed in biodiversity terms and the design of the car park has been considered to limit the removal of the best habitat and to make best use of existing infrastructure such as the existing accesses to the proposed new car park area. During the design process input from the project biodiversity team on the design and the biodiversity gain hierarchy has been used.

The design of the proposed car park has specifically

- Looked to minimise the hard surfacing, using a gravel grid and infill system in the parking spaces which would allow vegetation to colonise over time (refer to Drawing number 007395-LUC-DA-EX-DR-L-0201 – Proposed Car Park General Arrangement Landscape Plan and together with the Landscape Design Report included in the planning application),
- Looked to avoid impacts on the shingle bund and associated vegetation on the north western edge, which has specifically been excluded from the planning application boundary and will be retained (refer to Drawing number 007395-LUC-DA-EX-DR-L-0201 – Proposed Car Park General Arrangement Landscape Plan and together with the Landscape Design Report included in the planning application),
- Determination of the location of accesses into and out of the existing carpark have sought to minimise the encroachment of the features of high value habitats, such as vegetated coastal shingle, allowing the project to limit the removal of vegetated coastal shingle to a maximum of 0.03 biodiversity units.

KCC EAS Comments

Within the response from KCC EAS it is stated that:

Having reviewed submitted information, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development...

'... We have reviewed the submitted information and we are satisfied that sufficient information has been submitted to meet the requirements for mandatory net gain...

...We recommend that the applicant provides additional information indicating how they will be able to achieve a BNG for this site...

... We advise that FHDC must be satisfied that there is not another suitable area within the site to provide car parking for the power station.

We advise that while details of the off site habitat creation are not required prior to determination (as detailed above) if FHDC is sufficient information has been provided we advise that how the offsite habitat creation will be implemented must be agreed and registered on the biodiversity gain site register prior to the submission of the biodiversity gain register (if granted). Search the biodiversity gain sites register - GOV.UK.'

The response also provides direction to the Kent Biodiversity Net Gain Site Register, advising that due to the habitats to be lost to create the car park it may be difficult to find a suitable BNG provider.

Applicant Response

To align with legislation and best practice pertaining to biodiversity assessment and delivery of Biodiversity Net Gain, the following have been considered as part of the iterative design process:

- Consideration of alternative locations for siting the car park.
- Rearrangement of the layout of the parking area.
- Reduction of the number of parking spaces.

However, these options were deemed unfeasible due to the level of parking required for the development and the wider DNB Power Station site, compliance with other planning requirements, and the dominance of additional coastal vegetated shingle and designated habitats in surrounding areas, such that no suitable alternative locations were identified that would have resulted in lower or no biodiversity impact. We feel that the Biodiversity Gain

Hierarchy has been sufficiently considered and addressed by avoiding habitat losses and considering creation and enhancement opportunities onsite where possible.

As noted, detailed offsite provision of biodiversity units is not required at determination stage. However, given the specific habitat being lost, it is acknowledged that the Council requires a level of certainty regarding how Biodiversity Net Gain will be achieved. EDF has assessed options for habitat creation within its wider Dungeness landholding, however there are no areas suitable to provide the required biodiversity units, with the land either designated and already in good ecological condition, offering no opportunity for measurable uplift, or required for operational use.

It has been confirmed that no coastal vegetated shingle habitat is currently available from any registered habitat banks across the country; therefore, the appropriate 0.05 statutory biodiversity credits will be purchased (this is accounting for the Spatial Risk Multiplier) to address the unit losses for this habitat. The remaining unit losses will be addressed through the purchase of biodiversity units from an offsite registered habitat bank.

In accordance with the BNG Trading Rules, the replacement units must be of the same or higher distinctiveness than the habitat being lost. Therefore, to mitigate the loss of Other lowland acid grassland (a medium distinctiveness grassland habitat), units purchased will be of medium distinctiveness grassland or higher. The Kent Biodiversity Net Gain Site Register has been consulted to help identify potential suppliers in the first instance, all of whom have provided appropriate quotes. These include, but are not limited to:

- Adonis Blue Environmental (Kent Wildlife Trust)
- Enviroland
- Nature Impact
- Biodiversity and Habitat Solutions Ltd

Following review of the quotations received, it is confirmed that sufficient availability of Other lowland acid grassland (and other types of medium distinctiveness grassland) units exists to meet the BNG requirements for this development. A surplus of medium distinctiveness grassland units is available within Kent, .

All offsite biodiversity units, once purchased, will be allocated on the Biodiversity Gain Site Register by the unit provider, prior to the submission of the Biodiversity Gain Plan. Relevant details of the offsite unit purchase will be provided within the Biodiversity Gain Plan which will be submitted to discharge any BNG planning conditions, in accordance with national legislation and Government guidance.

Habitats Regulations Assessment

KCC EAS Comments

Within the response it is stated that:

'We have reviewed the HRA and disagree with the conclusion that impacts from the proposed development can be screened out and it is our view that a FHDC must produce a HRA for this application.

The submitted information has assessed the impacts the proposal will have due to construction and operational impact. We agree that, with the exception of lighting, the operational impact of the proposal is unlikely to impact the designated site as there will be no significant changes to the number of staff on site.

The submitted information has detailed that a construction management plan is required to managed impacts from the proposed development due to impacts from dust and surface water run off. Due to the requirement of this document to avoid an impact on the designated site we advise that it is our view that a HRA is required.

The submitted report details that no piling is proposed for the building and therefore we do agree that it is unlikely that the construction works will have a significant impact on the designated sites – however we advise that there will be a need for on going noise monitoring during the works to ensure that the noise level do not exceed what is detailed in the HRA.

The report has discounted the impact of nitrogen deposition as the proposal will not result in an increase in 200 Heavy Duty Vehicles however the submitted information does not detail the expected number of vehicles per day during construction. Concerns were raised during the HRA for the Kent Minerals and Waste Plan that small increases could have a negative impact on the Dungeness SAC due to Nitrogen Deposition. Therefore we advise that further context is given to this conclusion to demonstrate the construction works are unlikely to impact the SAC.

A lighting report has been submitted and it has detailed that a light survey has been carried out but we have been unable to identify a plan showing current light levels so we can compare them with anticipated light spill levels (shown on the plan on page 19). We understand that the lighting has been designed to minimise light spill but it is not clear if the proposal will result in an increase in light spill.'

Applicant Response

We acknowledge the concerns raised by KCC EAS and trust that the following addresses those raised. We also draw attention to the proposed works for the Administration building being located landward side and behind the existing and maintained 8m high shingle flood berm along the coastal frontage of the power station, which will remain in place throughout construction of the development.

We referenced a figure of up to 200 Heavy Duty Vehicles per day, as that is the threshold adopted in the Design Manual for Roads and Bridges below which air quality modelling is not required. We have received actual vehicle movements from EDF based on their experience at defueling and decommissioning power station sites at Hunterston B and Hinkley Point A. The forecast traffic figures for current and future site operations are:

1) Routine Operations (Pre-2021)

- Fuel deliveries (CO₂ coolant, maintenance materials): ~10–20 HGVs/year;
 - Waste removal (low-level waste, general refuse): ~50–100 HGVs/year; and
 - Maintenance and outage support: ~100–200 HGVs/year during major outages.
- ~ 160 to 320 HGVs per year or ~14 to 27 HGVs per month.

2) Defueling and Decommissioning Phase (Post-2021)

- Spent fuel transport (to Sellafield): ~50–100 HGVs/year depending on flask capacity and schedule;
 - Demolition prep and waste logistics: ~200–400 HGVs/year; and
 - Contractor and equipment deliveries: ~100–200 HGVs/year.
- ~350 to 700 HGVs per year or ~30 to 59 HGVs per month.

3) Total Estimated Annual HGVs

Combining categories, a reasonable forecast would be approximately 400–700 HGVs per year attending Dungeness B in support of defueling, waste handling and site maintenance. The cumulative effect would therefore be equivalent to approximately 4 HGV movements a day.

As a result the proposed construction of the Administration Building it is anticipated that over the life of the construction operations ~309 to 406 HGVs will visit the site. The makeup of the HGV numbers visiting site is estimated by the construction team as follows using information collected during the construction of a similar sized building at our site at Sizewell B in Suffolk in the past two years.

Overall HGV Traffic Estimate for Admin Building Construction

Phase	Estimated HGVs
Foundations (mass concrete + pads)	88
Steel Frame Delivery	15–20
Crane Delivery, Setup & Demob	13–18
Steel Erection Consumables	3–5
Envelope & Cladding	30–45
Internal Fit-Out & M&E	50–70
Site Logistics & Waste	70–100
General Site Deliveries	20–30
Contingency (weather delays, rework, phased deliveries)	20–30
Total Estimated HGVs	309–406

Over the life of the construction operations of approximately 22 months this equates to an average of 14 to 19 HGV per month with peak days reaching up to a maximum of 10 to 15 HGV per day. Hence the construction site with the existing operations at DNB Power station site are likely to generate up to approximately 20 HGVs per day on weekdays.

Our assessment is that this would not result in any measurable increase in the annual average nitrogen deposition rates at Dungeness SAC, or any Likely Significant Effects upon the Qualifying Interests of European Sites. If modelled, experience indicates that the nitrogen deposition would not be visible in the modelling and would therefore be effectively zero. This would therefore be imperceptible even in combination with other plans or projects. Accordingly, Appropriate Assessment is not required in respect of air quality.

With regard to dust and other pollutants, a Construction Environmental Management Plan (CEMP) has been prepared. It is our opinion that it is reasonable to take matters such as measures to control dust and potential water pollutants into consideration at Screening stage, with measures specified within the CEMP as embedded mitigation which would be undertaken irrespective of the presence of European sites, rather than specifically to protect them. For example, under the Environmental Damage (Prevention and Remediation) (England) Regulations 2015 and the Environmental Permitting (England and Wales) Regulations 2016 it is an offence to pollute the environment irrespective of whether there are European sites involved. Embedded mitigation can be taken into consideration at HRA Screening stage. With the embedded mitigation measures in place, we conclude that there would be no Likely Significant Effects upon the Qualifying Interests of European Sites. Accordingly, Appropriate Assessment is not required.

Regarding lighting, the proposed lighting strategy shows similar lighting to those currently used within the existing car park at Dungeness, with new 7.5m columns to match those existing. Construction of the new administration building will result in the establishment of a new area of car parking, and the loss of existing car parking. The overall lighting level will not materially change, although the specific areas to be lit will change. The areas subject to a low level of light overspill would be immediately adjacent to the car park. These areas do not contain any European Site Qualifying Interests which would be sensitive to the change in lighting at Dungeness. The lighting also has to be considered in the context of the existing lighting at both Dungeness A and Dungeness B. A supplementary report to show the existing lighting the stations is presented with this letter entitled Light Assessment – Supplementary Site Assessment completed 28 Apr 2025. Any impacts due to the change in areas lit will be minor and not result in any Likely Significant Effects upon the Qualifying Interests of European Sites. Accordingly, Appropriate Assessment is not required in respect of lighting.

With regards to noise, the HRA screening identified potential impact pathways of noise disturbance related to construction and operational use of the new building and car park. As stated in the Screening report, development schemes can result in the disturbance of qualifying SPA/ Ramsar bird species in Habitats Sites or functionally linked habitats through several mechanisms. Noise arising from construction activities may result in behavioural changes in birds (for example flight from the nest or cessation of foraging). Furthermore, post-construction disturbance from site usage and road traffic may also arise. Three of the most important factors determining the magnitude of disturbance appear to be species sensitivity, proximity of the disturbance source and timing/ duration of the disturbance. Generally, the most disturbing visual and auditory stimuli are likely to involve irregular, infrequent, unpredictable loud noise events, movements or vibrations. Birds are least likely to be disturbed by activities that involve regular, predictable and quiet patterns of sound or movement. The further any activity is from the birds, the less likely it is to result in disturbance.

An increasing amount of research on visual and noise disturbance of waterfowl from construction (and other activities) is now available. Noise is a complex disturbance parameter requiring the consideration of multiple factors, including the fact that it is not described on a linear scale, its non-additive effect and the source-receptor distance. A high level of noise disturbance constitutes a sudden noise event of over 60dB or prolonged noise of over 72dB. Bird responses to high noise levels include major flight or the cessation of feeding, both of which might affect the survival of birds if other stressors are present (such as cold weather, food scarcity).

Research has shown that above noise levels of 84dB waterfowl show a flight response, while at levels below 55dB there is no effect on their behaviour. These two thresholds are therefore considered useful as defining two extremes. Regular noise levels should be below 70dB at the bird, as birds will habituate to noise levels below this level. The Waterbird Disturbance Mitigation Toolkit published by the Institute of Estuarine & Coastal Studies in 2013, summarises the key evidence base relating to the noise disturbance impact pathway. Generally, noise is attenuated by 6dB with every doubling of distance from the source. For example, impact piling (which is not anticipated for the proposed Administration Building construction), is generally accepted to be the noisiest construction process

estimated at a maximum of 110dB at 0.67m from source, will therefore reduce to 67 to 68dB by 100m away from the source. This is below the level at which a flight response would be shown.

The coastal habitats covered by the Ramsar and the SPA designations offer potential breeding and foraging sites for terns. At the closest point to the Scheme, the SPA is marine only (designated for tern foraging habitat) with the closest area inclusive of shoreline broad enough for breeding being 1.6 km east of the Scheme and screened from the Scheme by the power station itself. The Ramsar is approximately 800 m away at this point with the closest inland sections also screened by the power station

The marine component of the SPA includes foraging habitat for terns; however, the SPA as a whole covers 4,000 ha, the majority of which is offshore. The area with the potential to be impacted by noise disturbance would be limited (worst case scenario) to approximately 8 ha and disturbance is likely to be temporary with no piling activities and therefore unlikely to have any significant impact. Other construction-related activities would result in noise levels below levels likely to result in disturbance. An important consideration in the determination of the risk of disturbance is the presence of an existing, maintained 8m tall and 20m wide shingle berm maintained to minimise coastal erosion associated with the power stations. The berm extends along the southern boundary of Dungeness B and Dungeness A power station and approximately 200m to the west hence provides substantial screening of the proposed construction site to the sea.

Traffic-related noise-made impacts are unlikely to occur given that the changes in vehicular movements at Dungeness B Power Station will be minimal.

Having taken the above factors into consideration, we conclude that there are no likely significant effects as a result of noise disturbance resulting from the Scheme on Dungeness SAC and the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar, either alone or in combination, and these can be screened out from Appropriate Assessment, and that noise monitoring is not required in respect of their Qualifying Interests.

Yours sincerely,



Emily Castel
Associate Director (Ecology)
AECOM Limited

cc L Cherry, Planning and Consents Lead, EDF
T McHardy, Land and Biodiversity Manager
Gemma Mantle, Biodiversity Support Officer, EDF

Enc A supplementary report to show the existing lighting the stations is presented with this letter entitled Light Assessment – Supplementary Site Assessment completed 28 Apr 2025

W780 NEW ADMIN BUILDING – LIGHT ASSESSMENT – SUPPLEMENTARY SITE ASSESSMENT COMPLETED 28 APR 2025

1. Background

This supplemental report has been provided to support the *250411 Dungeness Lighting Assessment* Report. The dark / night photographs provided in Table 1 were taken from the locations shown at Figure 1.



Figure 1. Site Map showing location of photograph

2. Supplemental Photographs (Table 1)



A. 50.916 , 0.959
(East)

Date / Time of Photograph: 28 Apr 2025 / 21.15



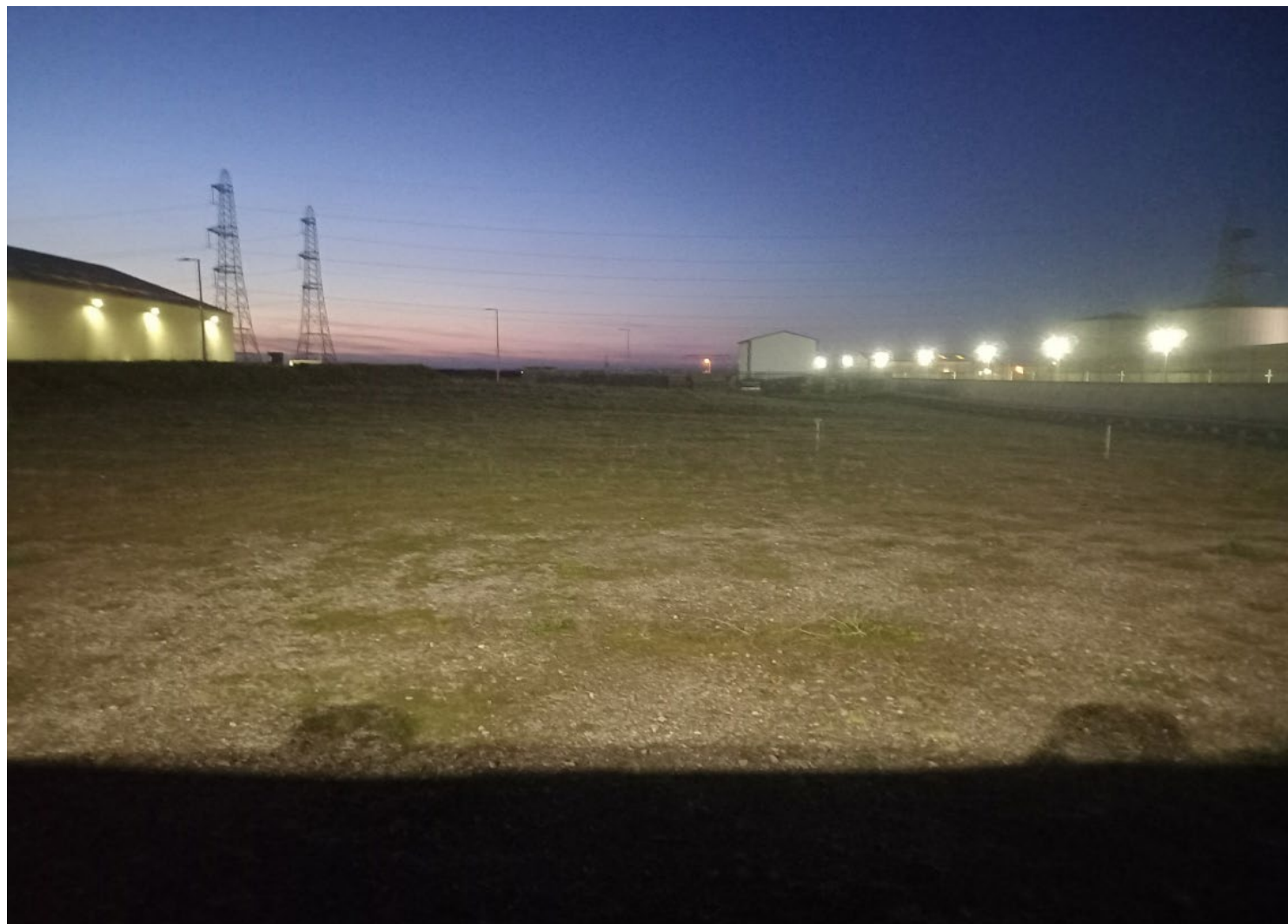
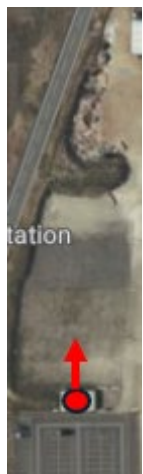
A. 50.916 , 0.959
(South)

Date / Time of Photograph: 28 Apr 2025 / 21.16



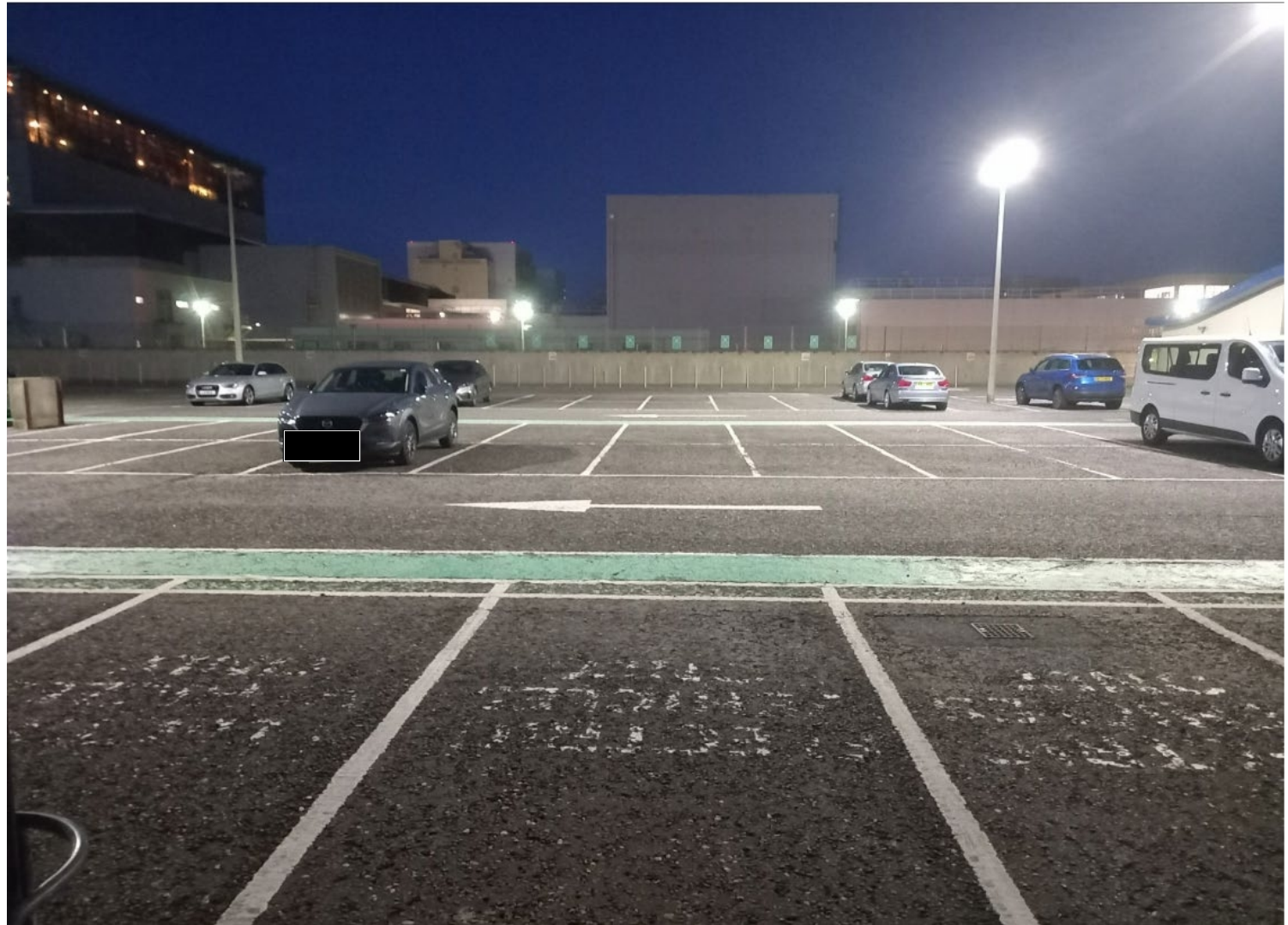
A. 50.916 , 0.959
(West)

Date / Time of Photograph: 28 Apr 2025 / 21.17



B. 50.914 , 0.957
(North)

Date / Time of Photograph: 28 Apr 2025 / 21.10



C. 50.912 , 0.956
(West)

Date / Time of Photograph: 28 Apr 2025 / 21.06



D. 50.912 , 0.956
(North)

Date / Time of Photograph: 28 Apr 2025 / 21.01