

## **“Diesel generators at Sizewell C”**

### **- written representation by Frances Crowe to the Planning Inspectorate in respect of the DCO for Sizewell C, June 2021.**

This paper is Paper 6 of 6, submitted as part of the written submission for Deadline 2 by Frances Crowe. A written representation summary of all my submissions for Deadline 2 will be separately submitted.

I am a resident of Sudbourne. I have lived here with my family since 2001 (20 years), previously holidaying frequently in the area. My written representation includes detailed papers on air pollution (*‘Air pollution [tropospheric ozone and particulates PM<sub>2.5</sub>]*’) and on coastal erosion (*“Coastal erosion at Thorpeness and lessons for the Sizewell C Project”*) and a more general paper covering a range of other concerns (*‘Transport, health and other matters’*). I am also submitting three very short papers on radioactive emissions, water discharges and diesel generators (this paper), which were also submitted to the Environment Agency in September 2020. All six papers will be submitted separately for Deadline 2.

All issues were referred to in my relevant representation.

A transcript of my oral representation (presented on 18<sup>th</sup> May, 2021) has been separately submitted.

#### **Diesel generators at Sizewell C**

- The UK government pledged this year to bring forward a ban on new diesel car sales from 2040 to 2035 in acknowledgement of diesel emissions’ significant contribution to global climate change and to the pollution of air, water, and soil, with consequent health impacts for humans (cancer; cardiovascular and respiratory) and ecosystems. In the light of this, it is unacceptable to give consent to diesel generation on this scale for a development that will not be operational until at earliest 2034 and for which the main selling point (mistakenly - see <https://stopsizewellc.org/the-times-sizewell-c-faces-six-year-emissions-lag/>) is its purported low carbon credentials.
- Diesel combustion would fuel regional tropospheric ozone pollution levels, already exacerbated by SZC construction. Ozone pollution already consistently exceed governments objectives locally, with this region being often the the worst in the UK. To propose to emit more ozone precursor pollutants without evaluation of their impact is totally unacceptable. Despite this, EDF inexplicably - and I believe *negligently* - make no acknowledgment of diesel’s role in their generation or, indeed, mention ozone pollution at all.
- Evaluation of the impact of emissions on air pollution of all types (nitrous oxides and particulates (especially PM<sub>2.5</sub>), in particular) and, specifically, of ozone precursors

must be undertaken, taking into account seasonal, meteorological and climate change factors and their cumulative impact in conjunction with all other emissions generated by SZC, as well as those of other major infrastructure projects in the region, over the period of construction, operation and decommissioning.

- Diesel emissions do not just affect human health but are also be very damaging to the sensitive ecosystems, which surround the SZC site. The cumulative effect of all the adverse impacts of SZC construction and operation must be taken into account in reviewing this one element. Whilst individually, the impacts may appear relatively small, looked at holistically (habitat destruction and dislocation, hydrology disruption, noise, light and air pollution, to name just a few), the cumulative effects are likely to be catastrophic.
- EDF do not clarify what alternatives to diesel generation have been considered and what the grounds were for their dismissal. We have seen with EDF's transport strategy for SZC construction a preference for cheap/quick options regardless of their impact on local people and ecosystems. This is totally unacceptable.
- EDF acknowledge significant impacts on habitats in the vicinity in respect of nitrogen and acid deposition but consider it insignificant because of 'the background rates of high chronic deposition' (Non-technical summary, p4). This neat piece of Catch-22 logic is totally unacceptable (and could - wrongly and absurdly - be used to justify an escalation of pollution and harm in any context), especially as the background deposition rates are undoubtedly impacted adversely by EDF's own activities.
- Given the sensitivity of the surrounding location and its numerous protected designations, there can be no scientific (or legal) basis for increasing the consented limits for emissions that were agreed when permissions were granted for Sizewell B. Without this scientific basis, any increase in consented levels, beyond those agreed by the Secretary of State for SZB, might be regarded as a spurious calculation proportionate to the degree of industrial activity proposed rather than based on the science of what is necessary to protect the surrounding environment, and, as such, may be open to legal challenge and potential judicial review.

Frances Crowe  
2/6/21