My name is Arthur Stansfield.
Interested Party Reference Number: 20026225

I live in Wickham Market

Firstly I would like to make some general comments on the application and then some comments on mitigation of the traffic issues that will impact Wickham Market. My comments about traffic monitoring are probably reproduced in the Wickham Market Parish Council as I have been involved with that.

I frequently walk in the area between Aldeburgh and Walberswick, particularly Eastbridge, Dunwich Heath including bridleway 19 that will be lost and also along the beach from Sizewell to Dunwich Heath, so many of my walks will be severely impacted.

For the application to build Sizewell C to be approved the benefits of producing electricity from nuclear power over other forms of green electricity production have to outweigh the negative impacts on the population, landscape and environment of East Suffolk.
Where renewables and electricity storage are rapidly developing technologies with advances and cost reductions every year, the design for Sizewell C will be 30 years or more, old by the time it is complete. Nuclear fission reactors are fundamentally a moribund technology.
For example Southern Australia has moved from coal powered electricity production to predominantly renewable electricity production over the last 20 years and now has the cheapest electricity in Australia.

I find it difficult to understand how creating habitat in West Suffolk is mitigation for habitat loss in proximity to the Suffolk coast. I would like to endorse all the comments that FoE have made concerning habitat damage and inadequate mitigation on this front.

Damaging a Site of Special Scientific Interest has been shown to have devastating consequences, as evidenced by the SSSI at Menie losing its status last year due to the impact of Donald Trump's golf course. I fear that the damage to the SSSI at Sizewell will mirror this damage and effects. Pollution from the road over the SSSI will be ongoing and even after the construction of the road and those impacts.
One major problem with the Sizewell C plans is that the site is not large enough for the two reactors that EDF plan to build. A single reactor would result in massive damage to the AONB, but the intention to build 2 reactors results in a land grab of sensitive areas. This lack of care is replicated in their siting of the Southern Park and Ride where it is virtually impossible to make any real mitigation

The siting of the Southern Park and Ride just to the north of Wickham Market will cause additional daily car journeys of over 1000 by EDF's estimates. EDF did not seriously engage with Wickham Market to discuss mitigation until December 2019. I suspect that congestion will increase on the A12 at Woodbridge and additional local traffic will use the B1078 to travel to the west (A14) and to Ipswich via Tuddenham (when I worked in Ipswich I used that route).
EDF will have a policy for workers travelling to the Southern Park and Ride to use the A14 and A12, but no realistic means to monitor compliance.

So far in discussions with a Parish Council working group EDF have provided proposals to

slow traffic down and improve pedestrian safety. This will involve the loss of some street parking which is already in short supply. A speed limit of 20mph has been requested.
It is important to minimise the amount of traffic travelling through Wickham Market to the park and ride and a paper has been presented and discussed with EDF that would use Mobile phone and GPS and Geofences to monitor workers' journeys to work. The paper is included as an appendix.

It would also be possible to use smart cameras with ANPR to monitor whether EDF related traffic passes along a particular road. This technology is used in south Fulham to prevent rat-running in residential streets (see https://www.lbhf.gov.uk/transport-and-roads/south-fulham-traffic-congestion-and-pollution-reduction-scheme). This scheme uses the vehicle registration numbers of residents to determine if vehicles are allowed free access to the selected streets. Other vehicles are reported for non-permitted access. This technology could easily be adapted to monitor a vehicles that were not permitted to use a road, possibly by time of day. EDF could provide a list of all their associated vehicle registration numbers, this could include all HGVs, LGVs and workers' vehicles, that is all vehicles associted with Sizewell C construction. The cameras would be placed on roads that restricted access was required for EDF related vehicles. The cameras would only report on the EDF related vehicles. All other vehicles would be ignored. It would be possible to design the system so that EDF related vehicles were monitored only during the times for the EDF related journeys. Reports could be produced to show non-compliance with the traffic policy and EDF could sanction these drivers. EDF could publish reports on the compliance of vehicles to thier policies on a regular basis.

A way to reduce traffic along the B1078 would be to introduce a 40mph speed limit along its entire length from the A140 to the A12. A few strategically placed average speed cameras could ensure that it would be difficult to exceed the speed limit for through traffic. This would bias the A12/A14 route over the B1078. This approach could also be applied to Wickham Market if for instance a 20mph speed limit was introduced. It would make very difficult for through traffic to exceed the speed limit. Many cars already exceed the speed limit. For instance on the afternoon of 23 May when driving along the B1078 from the Five Ways roundabout while travelling at 30mph I was overtaken by another car that was probably travelling at about 40mph.

To ensure the minimum amount of traffic passes through Wickham Market it is important that the traffic is monitored. There are technical solutions that make this possible.

EDF have offered road furniture modifications to Wickham Market that will probably improve pedestrian safety and probably slow traffic down. In my opinion as a cyclist little if any account has been paid to the safety of cyclists in these proposals and may even make the roads less safe for them. The proposals combined with the extra traffic will also probably result in extra congestion and pollution that will affect the residents in the vicinity of the Hgh Street.

At the hearings EDF have commented after each session that they have been listening. This repeats their comments on the consultation, but I cannot give this statement much credibility as comments during the consultation process have been ignored, resulting for instance in EDF changing the DCO application after submission to try and address some concerns. Much of what was changed could have been included in the original application if EDF had heard the comments, not just listened without true attention. It was as if there was presumption by EDF that they could inflict whatever they liked and get the go-ahead.

Appendix

WICKHAM MARKET PARISH COUNCIL

Proposal (for discussion) for Using Mobile Phones to Monitor EDF workers Travel to Work

Introduction

Thousands of workers will travel to EDF sites during the construction of Sizewell C. WMPC consider that it will be desirable to limit the impact of this traffic on the villages and small towns of Suffolk. For instance EDF forecast that the Southern Park and Ride at Hacheston will add 1020 vehicle movements through Wickham Market village every day at the peak construction period. The objective should be to minimise the traffic (both private cars and LGVs) passing through the most sensitive areas e.g. B1078 in Wickham Market.

The Mobile Phone app proposed below would help workers choose the optimal and least sensitive defined routes. In the case of the Southern Park and Ride (for traffic arriving from the west) this would be A14/A12.It would be possible to define geofences (an area on a map such as a road, a circle surrounding a village or any required shape) that would define permitted roads and prohibited areas to be driven through on the journey to/from the work location. Using mobile phone GPS functionality, the geofence areas used by a driver could be monitored on the journey to/from the work location. Weekly reports could be produced to monitor compliance.

This represents a preliminary discussion of what is possible using mobile phone GPS capabilities to limit the impact of Sizewell workers' traffic on the villages and small towns of Suffolk.

Basic Architecture

This would consist of a server that would provide the following services:

tore geofence information

tore registered worker information

tore geofence entry and exit information

eporting functionality

The mobile phone app would supply the following functions:

tart journey to work

nd Journey to work as work location entered

tart journey home

xit Work vicinity geofence

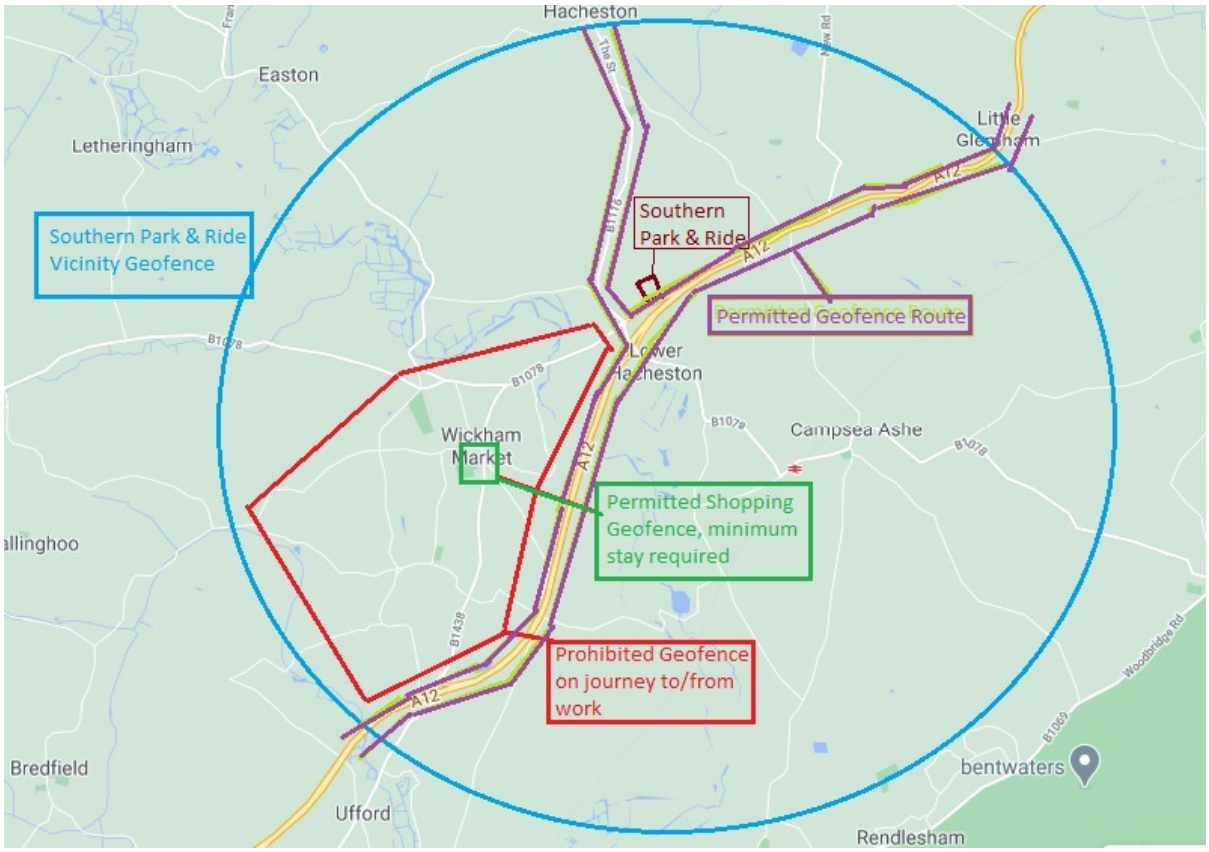
isplay geofences by type on a map to allow the worker to see permitted routes and prohibited areas

ecord entry and exit from each geofence on the journey to work

ommunication with the server

Defining Geofences

For simplicity only 5 geofences have been considered in this diagram.



On the map we see 5 geofences:

ight green - A12 – permitted geofence. This will define the preferred route.

rown Southern Park and Ride – work location geofence

ed Wickham Market – prohibited geofence. This will be used to limit EDF traffic through Wickham market

ark green - Shopping etc geofence. Travel through a prohibited geofence to the shopping geofence is permitted if the stay in the shopping geofence is of a minimum period.

lue work vicinity geofence. Monitoring reported when this geofence id entered.

Geofences could be time limited for each worker based on their shift pattern.

Register User

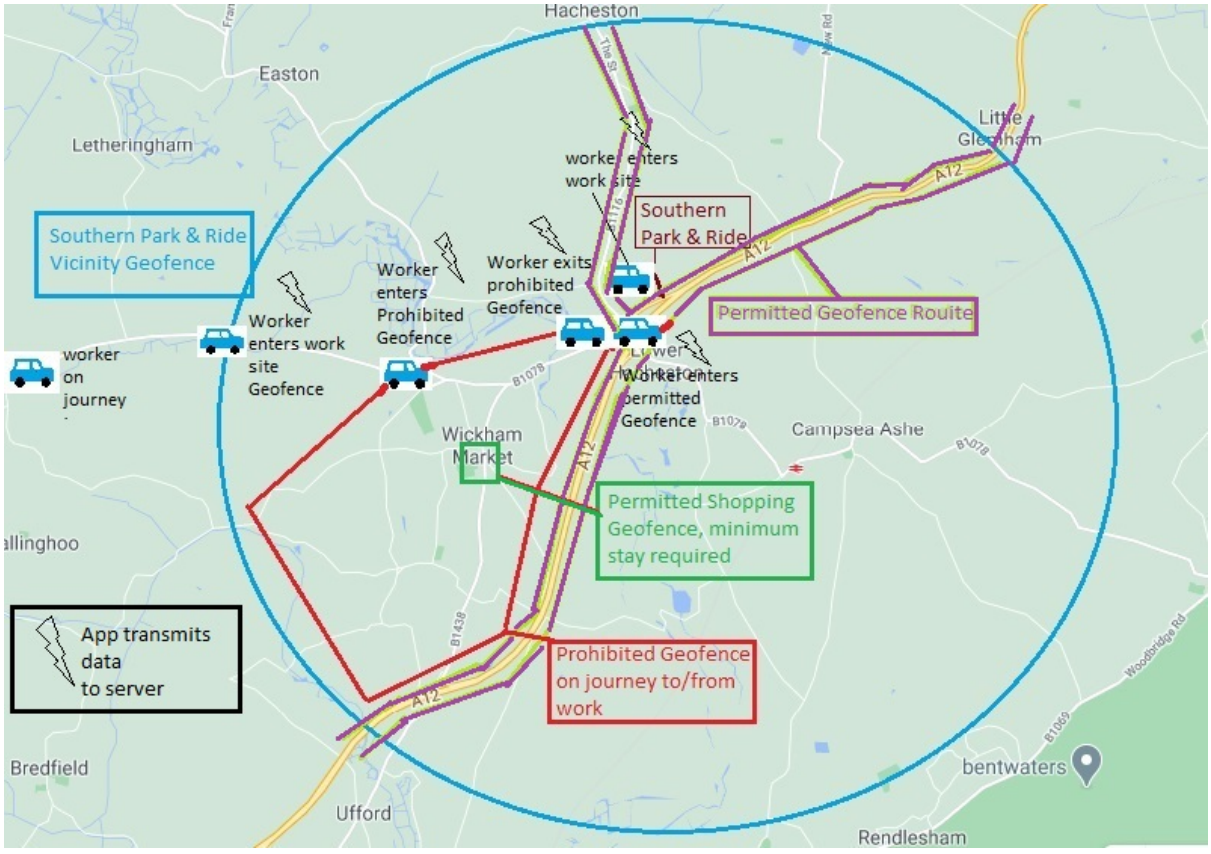
The EDF worker installs the EDF Work Journey app on their phone and registers. Registration will prompt the EDF server to download registration information for the user. This will include vehicle registration, work location, residence postcode, shift information.

Using the work location and the residence postcode the geofences that apply to the driver can be selected. For instance if the worker's residence is in Pettistree, then the Pettistree geofence would not be applied to this worker.

The Journey to the Work Location

The worker starts the application (if the worker wishes the worker could display the geofences that apply for the journey) and selects Journey to work. The time of setting off on the journey is recorded. The worker drives to his work location for example the SP&R site.

When the work location vicinity geofence is entered the geofence ID and the time of entry is reported. When the geofence is exited the geofence ID and the time is recorded. While within the work location geofence for any geofence that is traversed the entry and exit times are reported. When the work location is entered the work location ID and time of entry is recorded.



For example a worker drives along the B1078 towards the SP&R site from somewhere west of Wickham Market. This is shown in the above diagram and listed below. The following events will be reported:

1. The worker starts the application, the start time is reported 07:40 15-03-2023
2. Entry to SP&R Vicinity geofence 08:10 15-03-2023
3. Entry to Wickham Market geofence 08:12 15-03-2023
4. Exit Wickham Market geofence 08:20 15-03-2023
5. Entry SP&R geofence 08:21 15-03-2023
6. The App stops recording information

The Journey Home

The worker starts the app and selects journey home. The time of setting off is recorded. The worker drives to his home. As a geofence is entered the geofence ID and the time of entry is recorded. When the geofence is exited the geofence ID and the time is recorded. When the worker exits the work site vicinity geofence the data and time are reported and the app stops reporting.

For an example the worker drives home and stops in Wickham Market to do some shopping:

1. The worker starts the application, the start time is reported 16:40 15-03-2023
2. Exit SP&R Vicinity geofence 16:41 15-03-2023
3. Entry to Wickham Market geofence 16:42 15-03-2023
4. Entry to Wickham Market Shopping geofence 16:50 15-03-2023
5. Exit Wickham Market Shopping geofence 17:15 15-03-2023
6. Exit Wickham Market geofence 17:20 15-03-2023
7. The worker leaves the work vicinity geofence
8. The App stops recording information

Reporting

Reports could be produced to highlight the following:

List drivers that entered prohibited geofence areas.

Workers who failed to use the app for a journey to/from his workplace

Workers who had never used/installed the app

Summary reports of the number of breaches per work location

Summary reports of the number of breeches of each geofence

It would be possible to add targets for maximum number of breeches and report on whether the targets were being met

EDF could publish this information on their web site

Additional considerations

It may be desirable to define permitted geofence areas that lie within a prohibited geofence. For instance this could include an area that contained the local shops in Wickham Market. If a worker visited the shopping area in Wickham Market and remained there for a defined minimum amount of time then the reports could highlight this and the fact that the prohibited Wickham market geofence was entered could be discounted when inspecting the exception report.

It may be desirable to only consider exception reporting within a certain time (e.g. 30 minutes) of arriving/departing the work location.

Where the worker resides inside a geofence.

Automatic running of the app, this would require the app to be aware of shift patterns and to start monitoring in times that were relevant to journeys to/from work.

Use number plate recognition at a work site to gain additional confirmation of which cars/workers had travelled to a work site.

Arthur Stansfield

Sizewell Working Group

Wickham Market Parish Council

DRAFT for discussion

January 11th 2021