

Ref: DC/22/1290/HYB

COPART Stanton

26<sup>th</sup> February 2023

Green Ixworth has been expressing concerns over this development since it was first announced. At this stage we are minded to object unless our concerns are satisfactorily addressed. Our views were also expressed in our reply to the consultation on the 2nd stage of the West Suffolk Plan concerning the A143 corridor. For details see page 5. [https://greenixworth.org.uk/?page\\_id=613](https://greenixworth.org.uk/?page_id=613)

Green Ixworth represents those concerned with the built and natural environment in the eastern part of West Suffolk and are **objecting** to the Copart Development at Shepherds Grove, Stanton.

We are mindful of the needs to reduce traffic for reasons of Climate Change and replace fossil fuelled vehicles and that entails providing more local employment for local people and scrapping older vehicles. We therefore understand the need to support developments where this principle applies, **providing our concerns are met**. However, the details provided in the application lead us to be unable to support it and therefore object to the development as it stands.

## **Background**

### **The Site**

The site is already zoned for development, in the West Suffolk Council/St Edmundsbury Vision for 2031 so the site's development is not for debate, however the nature and impact of the development is.

The site proposed for Copart is part of a wartime US bomber base. Post war it was used for USAF Super Sabre fighter aircraft and after that from 1969 to 1963 was the home to nuclear armed, Thor ballistic missiles with their 1.3 megaton warheads stored on site. War time and emergency conditions are likely to have enabled and accepted a lax attitude to safely containing materials, like fuel, which are dealt with daily and in large quantities.

Fuels used and probably contaminating the area were aviation petrol, containing tetraethyl lead, and kerosene (paraffin). Piston aircraft were refuelled from bowsers or jerry cans so there would have been many spills, jets from bowsers. Other chemicals used in quantity included degreasing agents - trichlorethylene, carbon tetrachloride and fluorocarbons. Fire-fighting foaming agents, were a major problem with the USAF who have identified over 700 significant spills at their bases, including in the UK. In NW Suffolk large spills reached the local aquifer limiting further water extraction. Carbon tetrachloride in extinguishers for electrical fires will also have been used in training. All the above are toxic and most carcinogenic. Rain will have carried these materials from concrete into the nearby soil or into drains.

Recent research published in February 2023, concludes that contamination by PFAS, which include the foaming agent for fire-fighting, is more widespread and at higher levels than previously understood. Further the permitted levels in the UK are now significantly higher and thus more hazardous, than elsewhere in the developed world.

Subsequent soil disturbance when concrete was removed some 20 years ago was likely to have released these dangerous pollutants present from previous military use.

### **The company – Copart**

The company itself has a history of frequently breaching environmental standards even when repeatedly told not to do so by regulatory authorities, thus an \$800,000 fine in California for breaches in environmental protection. Userve Ltd, trading as Copart UK, have been found in breach of their permit by the Environment Agency with three permit violations in 2018, at a Kent site. Copart themselves have suggested the new Stanton site will be much larger than any of their existing 15 locations.

We acknowledge the benefits of:

90 new jobs providing local employment with potentially a positive impact on local traffic concerns.

Attracting smaller businesses to the employment area.

A new A143 Roundabout improving safe access to Shepherds Grove West, Hepworth and Walsham le Willows.

Remove heavy traffic from Stanton village.

The Disadvantages are numerous and can be very damaging to the natural and human environment.

### **The issues**

Cars and vans, especially older ones, contain materials which would not be permitted today such as asbestos brake pads and clutch plates. Asbestos use is now banned, not having been widely used since the late 80's but exposure to which, in the UK, is still killing over 5,000 people each year who have been exposed to its fibres, by no means all were employees of asbestos manufacturers or users.

Car breaking is a messy and noisy job with a great deal of contaminated material left over, some of which, will be potentially damaging to employees and the populace at large, if they were not to be contained on site and disposed of properly.

### **Extra traffic**

The development further increases traffic by about 1,800 movements per day on the A143, with approximately 1,500 from and towards BSE. The results of the Suffolk Police Safety Camera Partnership show 95,000 a week. Housing development would create a similar number of traffic movements but without the HGVs. The proposals by Copart to deal with the rise in traffic, the length of the A143 to BSE, are inadequate.

Furthermore, the approximate calculated traffic flow at the Orttwell Roundabout with all development likely to be in the WSC Plan, would be an additional 110%, a more than doubling of present levels. See Addendum.

The volume of traffic quoted by Copart is largely an unqualified estimate. At the Dedham Copart facility local people suggest that the car transporters are a minor part of the traffic. AA and RAC lorries bring and private individuals or repair shops, bring or take away vehicles in large numbers. Seeking to load or unload at the earliest opportunity, vehicles often arrive before the yard opens and park all over the village. The approach roads to the Stanton site are not capable of safely coping with large vehicles parked on the roadside especially in seasons when farm machinery is on the move, potentially over a 24hr. period.

Great Barton is the most congested village on the route, in addition to having air quality issues due to existing excessive road traffic.

*1) Great Barton desperately needs a bypass.*

Ixworth is the most dangerous village as an interrupted public footpath crosses the three lane A143 with a 60mph speed limit. The foot-bridge promised within the WSC/St Edmundsbury Vision 31 was to be funded by developers because their developments make the road even busier and therefore more dangerous. Human access to a bridge would be welcomed but increased traffic will further add to the regular slaughter of large mammals and birds by heavy, fast traffic which could be reduced by creating a Green Bridge. Such a bridge would make possible a potential safe cycle route between Stanton and Ixworth and beyond.

*2) Complete the anticipated bridge as a Green Bridge*

The large increase in traffic from this development adds to the massive anticipated increase in excess of 2,200 new homes proposed along the A143 corridor from Stanton to Orttwell Road and is inadequately mitigated in this application. Although proposing to reduce road traffic by employees being encouraged and assisted to use foot or cycle access or public transport, improved cycle and foot paths would only ameliorate the problem if safe routes were created across the A143 making walking and cycling safer. These footpaths and cycle-routes should be specified and extend far enough from the site to allow new employees from local villages, eg Hepworth, Pakenham and Ixworth to travel to the development by foot or cycle.

*3) Cycles paths should link to the Bury St Edmunds' network of cycle paths via Ixworth.*

- 4) *Hepworth requires connecting via a safe crossing for pedestrians and cyclists.*
- 5) *Active measures to promote public transport should be linked to matching working hours with bus timetables or vice versa.*

(National Highways have sought a delay for permission to give full consideration to the application, unless agreed earlier.)

A noisy and dirty industry will create a major nuisance for residents in several close villages, with, currently, very rural aspects.

### **Noise and Light pollution**

Although lighting units, of which many are proposed, are designed to avoid light pollution, the height of some, at 12m, is concerning. Reflections from stored vehicles and walls will recreate the light pollution of the past where sodium lights were visible from several miles away and illuminated clouds above. Lighting also badly disturbs wild life.

- 6) *A dark sky policy should be adopted for lights on the site from 6pm to 5am when the site should be unoccupied.*
- 7) *If lighting is intended to deter crime, then infrared lights and CCTV would be preferable.*

The proposal for passing trade outlets on the roundabout would create noise, light and disturbance issues into Hepworth, beyond the declared opening hours of the Copart site.

- 8) *Lighting on or near the roundabout should be also subject to dark sky conditions.*

Recycling of body work for scrap with dismantling and compaction is a very noisy process.

- 9) *Better sound attenuation should be provided across the A143 end of the development to protect Hepworth residents*

### **Hazardous substances**

Car breaking is a messy and noisy job with a great deal of contaminated material left over, some of which, will be potentially hazardous to employees and the populace at large, if they were not to be contained on site and disposed of properly. Cars and vans, especially older ones, contain materials which would not be permitted today such as asbestos brake pads and clutch plates. Asbestos use is now banned, not having been widely used since the late 80's but exposure to which, in the UK, is still killing over 5,000 people each year who have been exposed to its fibres. By no means all were employees of asbestos manufacturers or users.

Therefore, breaking old vehicles will inevitably release many pollutants, oil, hydraulic fluids, refrigerant gasses, asbestos. Tyres, brake pads and clutches are a source of hard contaminants.

Any leakage from the site would pollute the aquifer and nearby danger zone for the Ixworth Water Works as well as surface water which enters the Black Bourn, a rare and delicate Chalk Stream. Surface water pollution is the most immediate risk but access to the aquifer is also worrying. The Ixworth Water Resource Zone is close by and surface water can travel through or across the existing semi-permeable clay over the aquifer.

We should expect comprehensive soil testing to ensure any polluted areas are not disturbed or better still, removed and safely processed. Soil should be checked for asbestos, which may well have been used for pipe, building and aircraft insulation from 1942 to 1966 when the RAF closed the site, PFAS, and other hazardous chemicals such as carbon tetrachloride.

*10) Comprehensive soil testing for pollutants including asbestos.*

“Advice to the Applicant from WSC Environment Team:

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas - final classification). Across East Anglia we are also concerned that the rivers and groundwater (including chalk streams) are vulnerable to deterioration under Water Framework Directive, from groundwater abstraction. Therefore, we recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM ‘excellent’ standards for water consumption. This is supported by Policy Policy CS2 (Sustainable Development) of the St Edmundsbury Borough Council Core Strategy 2010.”

The present BREEAM environmental standards are only provided for the construction stage. There is no reason why new buildings should not be of the highest environmental standards. The Office building should have solar water heating using a heat store to provide hot air heating and photovoltaics with storage to supplement heating and provide electricity. PVs should also equip the workshop. With such a site a ground source heat pump is a realistic option. Rain water storage should also be fully utilised.

Heating of workshop and office.

*11) Use ground source heat pump.*

*12) Use roofs for photovoltaic panels for electricity generation and battery and/or heat storage*

A condition should be attached concerning oil, hydraulic fluids and other contaminants including cleaning agents beyond that already specified. All should be captured and removed for safe disposal. Petrol/oil interceptors may not be sufficient unless all surface water is so treated but that removes the beneficial purpose of a permeable surface to return water to the aquifer or streams. Cars being stored before repair or breaking could leak fluids in the hard standing areas.

*13) How is the applicant ensuring that leaking fluids are removed from the permeable storage surface?*

There is evidence in the application that there is a secondary aquifer above the primary. A qualitative classification of estimated rates of vertical movement of water from the ground surface through the unsaturated zone of any superficial deposits (the zone between the land surface and the water table) suggests that the maximum permeability is moderate, minimum permeability is low.

*14) The proposed stone soil cover should be retained to recharge the aquifer.*

*15) Stored vehicles should be prevented from discharging liquid or solid material onto the ground surface unless it is adequately drained with petrol/oil interceptors.*

*16) Vehicles should only be broken on properly drained concrete with appropriate interceptors.*

#### “Environmental Works Summary

A moderate risk was considered to be presented by soil and groundwater contamination to the identified sensitive receptors, whilst the risks presented from ground gases were concluded to be high.”

Environment agency response to consultation.

#### “Groundwater & Contaminated Land

Ordinarily we would wish to review the submitted contamination assessment. However, we have significant resource pressures and do not currently have the capacity to technically review the submissions. We would encourage your Authority in discussion with your Environmental Health Team to ensure the developer has addressed risks to controlled waters from contamination at the site through relevant planning conditions having full considered the guidance below. We hope to be in a position in the future, to review the discharge of conditions with respect to controlled waters, that your Authority appends to your Decision.”

This statement is extremely worrying. It means that should there be a serious spill the regulatory authorities would have difficulty dealing with it promptly. This poses a serious threat to the aquifer (especially the secondary aquifer) and water courses both of which feed into the sensitive catchment of the Black Bourn and the Little Ouse, which should be protected by the designations of Special Area of Conservation (SAC), underpinned by several Sites of Special Scientific Interest (SSSI), plus Lopham Fens National Nature Reserve.

The existing flood risk to Hepworth would be exacerbated by just relying on local ditches and streams to disperse surface water.

*17) The proposed SuDs system seems inadequate and offers no significant benefits to Biodiversity.*

## Summary

The site has already been zoned for development. However, concerns remain:

*The site is unsuitable for car breaking on a very large scale in a very rural and generally quiet area*

*There is evidence of not being a good neighbour and ignoring statutory regulators*

*A large increase in heavy traffic on an already heavily congested A143.*

*Potential damage to the aquifer and local water bodies.*

Unless these matters are fully addressed the benefits of the development; local jobs, access to the A143 from Shepherds Grove West and reducing heavy traffic in Stanton, all of which we welcome, would be lost.

<https://www.greenixworth.org.uk>

## **Addendum**

### **Traffic and the A143**

Recent investigation by the Suffolk Police Safety Camera Partnership showed that approx. 95,000 vehicles a week used the A143 at Stanton. Copart say they expect an additional 1,800 vehicle movements a day, (12,600 per week) to be generated. That would increase traffic by approx. 13%.

Using the figure of 6 vehicle movements per house per day for calculating road needs, the SPSCP figures and taking ball park figures already mooted for development between Stanton and Orttwell Road roundabout, when completed we could expect traffic at the Orttwell roundabout to be some 110% of present levels. This is therefore the figure which needs mitigation, any piecemeal improvements development by development is not sustainable

In addition to Copart, there is the prospect of new development in:

Stanton - Bloor homes with 220 houses:- 1,320 – 9,240 per week

Ixworth - Persimmon and Pigeon approx. 370 houses:- 2,220 - 15,500 per week

Including Copart the total additional traffic between Ixworth and Great Barton would therefore be approx:- 37,500 or 40% of today's level.

The approximate number of additional properties being proposed for Great Barton is 1,600 :- 9,600 - 67,200 per week

The total using the road between Great Barton and Orttwell Road roundabout would therefore be an additional 104,700 per week.

The total at the Orttwell Road roundabout would therefore be an increase of 110%, more than doubling current traffic use.

Note:

- 1) The numbers of houses are approximate as permission has not yet been given.
- 2) The construction of the new properties may be spread over 15 years or so
- 3) There are likely to be more areas for housing development in Stanton and nearby villages in the West Suffolk Plan
- 4) This takes no account of smaller developments along the route nor traffic using the A143 from Thurston. A significant number of vehicles also come on and off the Fornham Road at Great Barton. From observation these numbers probably balance.