

Comment for planning application 21/00517/F

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| Application Number | 21/00517/F |
| Location | Land Used For Motorcross Stratford Road A422 Wroxton OX15 6HX |
| Proposal | Creation of a motocross track and soft landscaping scheme and the change of use of agricultural land to hold moto-cross events including set-up, take down and private practice sessions, with associated camping site, for up to 65 days per year and agricultural grazing (retrospective) |
| Case Officer | George Smith |
| Organisation | |
| Name | Steve Tilling |
| Address | The Barn, Millers Lane, Hornton, Banbury, OX15 6BS |
| Type of Comment | Objection |
| Type | neighbour |

Comments

I am writing to object to the application for an increase in size, intensity and frequency of use of the Wroxton BMX track. Many objections have already highlighted the obvious disruptions to neighbouring communities. I will focus on the negative impacts on biodiversity and wildlife. The map accompanying the applicant's ecological survey clearly shows that the track lies on a steep slope, immediately adjacent to - and draining directly into - Ragnell Bottom stream. This whole valley forms part of the Northern Valleys Conservation Target Area (NVCTA). The NVCTA is an important wildlife site which has been targeted specifically for biodiversity conservation. Cherwell District Council's (CDC) Local Plan 2040 states that CTAs will be the most important areas to target for biodiversity improvement. Locating a large BMX track capable of hosting international motocross events in this CTA is clearly contrary to that ambition. I have a PhD in ecology and question whether the Ecological Survey accompanying the application is reasonable and adequate for a project which is guaranteed to affect a regionally important conservation site. The surveyor admits that the fieldwork was 'conducted outside the optimal survey window'. That is a major understatement. The mid-January survey date falls outside any recommended window for most active animal surveys. Therefore, the report relies on a desk study which involves trawling for records in national databases which the author admits 'is not a comprehensive list of species data and therefore it is possible that protected species not identified in the search may be present in the vicinity of the site'. That, again, is a major understatement. A one-day field survey carried out in mid-January, accompanied by a desk study, will miss most of the notable wildlife, not least the annual flowering plants, the breeding birds (many of which are migrants which will still be in their wintering grounds in Africa and southern Europe), the invertebrates that are overwintering as eggs or larvae, the roosting and hibernating bats, amphibians, reptiles, mammals etc. The ecological appraisal is also very site specific. It does not extend beyond the boundaries of the Moto Cross site. As a result, it overlooks the importance of Ragland Bottom as a headstream which feeds into a series of linear streamside habitats connecting fens, swamps, flushes and meadows. Current conservation practice is to protect and enhance connections between wildlife sites - to provide corridors for animals and plants to move. Any disruption to the CTA corridor is likely to be damaging. Three potential impacts are particularly concerning: Siltation of the stream. The photographs show substantial erosion rills in the exposed soils caused by rainfall flowing down the steep slope. Siltation ponds will not capture the sediment during heavy rainfall or storm events. Fine particulates washed downstream are known to damage stream plants and animals, by smothering submerged leaves and gravel used for egg laying by fish and invertebrates. Therefore, the track will have impacts stretching well beyond its boundary. Noise. The Moto Cross site lies within the Ironstone Downs 'tranquil area' which is celebrated in CDC's 2040 Plan. The 65 days intended for events, when added to practice days, traffic entering/exiting, and the campsite being occupied before and after, will add up to a major disruption over the time of year when wildlife is at its most active. Noise is known to disrupt the behaviour of bats which will be foraging along the stream, and also the nesting success of breeding birds. These are just two examples listed in a recent DEFRA report 'The effects of noise on biodiversity'. Tranquility and a major Moto Cross track are discordant: CDC cannot have one with the other without major compromises being made. Light. The disruption of light pollution on wildlife is well known. It is not only the obvious groups such as nocturnal bats and birds that are affected. The list includes unlikely candidates such as frogs and toads. The ecological survey says that the track will not be illuminated at night. But the campsite and traffic surely will? The fully occupied campsite will have a population

larger than the two neighbouring villages. The International Dark Sky Association (IDSA) says 'the scientific evidence suggests that artificial light at night has a negative and deadly effect on many creatures'. Research is continuing to unearth more evidence. The neighbouring Cotswolds AONB is submitting a bid to the IDSA to become a Dark Sky reserve because the area suffers from very little light pollution. That makes it a nationally exceptional site. The threat to the dark sky, along with the negative impacts on wildlife, provide strong arguments against the proposed expansion of the track and its facilities.

Received Date

06/04/2021 17:41:59

Attachments