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Banbury,
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George Smith,
Senior Planning Officer
Cherwell District Council
Bodicote House
Bodicote
Banbury
Oxon OX15 4AA

Dear Mr Smith,

Re: PLANNING APPLICATION REFERENCE 21/00517/F :

“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)”

I'm writing to register my objection to the latest attempt to gain planning permission for a National/International Motocross track at the Wroxton Heath venue.

Personal experience

I would like to begin with my personal experience that has caused me to object to this retrospective planning application.

Firstly, I believe it is wholly wrong that the track expansion and increase in event days has occurred thus far with no planning permission. There should have already been penalties in place for this unlawful development. The track operators have knowingly contravened rules around the basic 28 (14+14) days allowed for operation under 'Permitted Development Rights'. This is unacceptable and I am concerned that CDC have not taken enforcement action immediately upon discovering this. Trust in our local authority is important to the members of this community.

Secondly, this is a tranquil village, which people have chosen to live in based on its fantastic community assets and rural, quiet location. Having grown up in Hornton, I remember how quiet the weekends used to be when I was younger and this allowed myself and my brother to enjoy the time we spent outside in our garden as children. In the last few years we have complained extensively about the impact of the increasing track noise on our concentration, disturbing our studies and ability to relax, both inside and outside the house. My family and I, and many others in the village, work long hours and are incredibly grateful for quiet weekends to recuperate from stressful weeks. It is essential for our health and wellbeing as a community that we can continue to do so. The noise is incredibly loud and constant on track days, making our garden unusable for relaxation and even permeating through our house walls. I found myself leaving the village on track days to escape the incessant noise. We should be allowed 'quiet enjoyment' of our surroundings; we can tolerate occasional weekends of track use but 65 days per year will be unacceptable to many who live here.

Thirdly, as a keen cyclist I use the Bell Street route in and out of the village regularly. I have been subject to a number of near misses as large caravans pull out of the entrance sited on a blind bend, with no regard to potential oncoming traffic – assuming it is a barely used, quiet road. This is scary and dangerous. I am also aware many of the site users leave on a Monday morning, when parents with young children are driving to the village school, giving potential for accidents to occur. The road surface is additionally very poor and has been made almost unusable on a road bike and even for cars in parts, additionally causing safety concerns regarding road traction. I believe the road is unsuitable for large scale use of caravans/heavy vehicles. Increased use of the track will lead to increased traffic on these routes which I believe would create more opportunity for accidents.

Professional view

As I am training to be a doctor, and I am currently undertaking a Masters of Science in Public Health (Management), I would like to note two issues I have with the track on a health basis.

1: Air pollution

Air pollution is the largest environmental public health concern in the UK. The Government Clean Air Strategy¹ indicates health can be affected by short-term, high pollution episodes as well as long-term lower level pollution.

The World Health Organisation suggests we progressively cut particulate matter pollution to improve health of our communities². The Department of Health and Social care indicates air pollution is particularly problematic for older people and young children³, of which there are many individuals in the village. Common conditions which may be exacerbated by high levels of air pollution include asthma, COPD and cardiovascular disease and it is problematic across the life course, with emerging evidence for association with development of dementia and low birth weights^{4,5}.

Motocross bikes release particulate matter from their exhausts in high concentrations, particularly during acceleration episodes. On windy days, not just noise but also particulate matter may blow into the area of the village.

I therefore believe the CDC should not be supporting further expansion of a sport which is potentially detrimental to the health of the participants and local people. These are not 'essential' emissions. It does not align with the Government Clean Air Strategy 2019 which has long-term aims to reduce people's potential exposure to particulate matter, to improve the health of the population. At the very least, the CDC should have an obligation under Health and Safety to measure the particulate matter generated on track days and assess the potential impact.

2: Noise pollution

The Department for Environment, Food and Rural Affairs published a Noise Policy in 2010, applicable to this planning application, where noise from the premises fall under 'neighbourhood noise'⁶.

The policy long term aims are as follows:

'Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- **Avoid significant adverse impacts on health and quality of life**
- **Mitigate and minimise adverse impacts on health and quality of life**

- Where possible, contribute to the improvement of health and quality of life⁶

WHO defines health as a state of complete physical, mental and social wellbeing⁷. Enjoyment of the highest attainable standard of health as one of the fundamental rights of every human being. Quality of life improvements are a contributor to maintaining a high standard of health.

‘The policy recognises that noise exposure can cause annoyance and sleep disturbance both of which impact on quality of life’⁶.

It is widely acknowledged that noise exposure can have adverse health effects on an individual through noise annoyance and sleep disturbance. The WHO has published a systematic review of these health effects, including increased risk of cardiovascular disease associated with noise annoyance⁸.

I believe that the noise levels produced by the track are unacceptable in what is otherwise an extremely quiet area and cause significant levels of annoyance, which may have direct adverse health effects on individuals living locally. A robust sound report representative of the actual noise on a busy track day (not during COVID times) would show these high sound levels. The nature of the noise is an additional problem, as it not one constant level but often variable, as the motorbikes create more noise as they accelerate, initiating the ‘fight or flight’ stress response⁸, exacerbating the impact on health. The noise from the track often begins early on a Sunday morning which impinges on what should be a ‘day of rest’ and may interrupt sleep.

The noise has additional social health implications for individuals, who may not socialise or invite over guests to gardens/houses as they would normally on weekends due to the difficulty of having a peaceful and relaxing conversation.

On these grounds, in line with the Noise Policy Statement for England, the CDC should not accept the planning application for expansion of the track.

Economics

Unless a robust economic evaluation of the proposition is undertaken I cannot be certain of the economic consequences however I would like to raise a few points:

The track provides little to no benefit to the local economy as it is self-contained and visitors stay in caravans on site. The local village community does not mix with those who use the track and do not benefit economically from their custom. In the spirit of seeking a fair society, the economic gains of the site owner can be juxtaposed to the loss of many others in this community. I have outlined a few of these below:

- This is increasingly becoming an area of tourism, where people venture to visit places of historic significance such as Upton House and Edge Hill. There are often many walkers, including DofE groups who have made day trips to the area.
 - o Walkers will be less likely to return to a footpath running directly next to an incredibly noisy track
 - o With the increasing availability of data on the internet, people may write comments regarding the disturbing noise of the track, resulting in fewer visitors to the area who might spend locally
- There is significant damage to the roads which will be expensive for CDC to repair and maintain if a large scale track is granted
- This is a particularly pertinent issue for the hospitality sector in the village
 - o Noise may prevent people from staying at Hornton Grounds Farm B&B

- Noise may prevent visitors including walkers visiting the pub on what should be a peaceful Saturday or Sunday afternoon
- Noise, if the 65 day limit is granted, may impact the uptake of hire of the Pavilion for events, the profits of which are spent on local community actions. This would hugely adversely affect the local community assets.

The noise is extremely detrimental to leisure activities and to the livelihoods of many members of this community.

Environment

The 25 Year Environment Plan, published by the Department of Environment, Food and Rural affairs states that current policy for the planning system should provide biodiversity net gains where possible⁹. The track is, counter to this, detrimental to the environment for the following reasons:

- There having already been breaches of the Land Drainage Act in the unauthorised works of damming and draining the watercourse. These actions will have significant downstream effects on wildlife habitats.
- The watercourse is a tributary of the Sor Brook. Any pollution from exhaust fumes, such as deposition of reactive forms of nitrogen, may enter the watercourse and prove detrimental to the health of wildlife and crops downstream of the track. The Clean Air Strategy 2019 indicated in Chapter 3 that the Government is committed to reducing damaging deposition of reactive forms of nitrogen and other particulate matter which may pollute watercourses¹. Additionally, fuel leaks and detergents used for cleaning bikes, as well as waste material from the people staying on site may all end up in the stream. The larger the scale of the operation, the more likely there will be significant detrimental impacts to the environment. There is absolutely no evidence the track owners have made any efforts to counteract these, and based on photographs and other evidence I am able to access, they are clearly not complying with the instructions set out by the AUC Motocross Governing Body on reducing environmental impacts and will continue to operate in this way unless they receive a penalty¹⁰.
 - Additionally, if International Championship Events have taken place at the track, it is a responsibility of the track to adhere to the AUC Environmental Code and this must be undertaken by an official in possession of a current FIM Environmental Officials Licence as specified in the FIM Sporting Code. I would recommend an investigation into whether this responsibility has been adhered to.
- It is just a few hundred metres from a Site of Special Scientific Interest, managed by the Banbury Ornithological Society¹¹, where many rare species of bird can be found including the curlew. The noise pollution from the track may prevent birds from staying in this area as they are sensitive to noise.
- From the ecological survey, there are two ponds which are deemed to be of high suitability for Great Crested Newts, which I personally have sighted in Hornton area. The presence of this endangered species would indicate upscaling of the track as unsuitable.

Hornton is sited just outside of the Cotswolds Area of Outstanding Natural Beauty and is within the Ironstone Downs. For the same reasons as the rejection of the fuel depot, a large scale motocross track is not appropriate for this area.

The CDC should consider the long-term consequences of this decision. The support of development of a sport which uses a fossil fuel is also counter to the long term aims of the Government Green Plan in huge reductions in fossil fuel usage, including their target of no new petrol or diesel powered cars by 2030¹².

Summary

In conclusion, I fully support the response of the Hornton Parish Council in deeming this application wholly unacceptable, on a health, economic and environmental level.

Yours sincerely,

Kate Matthews

References:

1. <https://www.gov.uk/government/publications/clean-air-strategy-2019/clean-air-strategy-2019-executive-summary#chapter-3-protecting-the-environment>
2. <https://www.who.int/news-room/fact-sheets/detail/ambient-%28outdoor%29-air-quality-and-health>
3. <https://www.gov.uk/government/publications/clean-air-strategy-2019/clean-air-strategy-2019-executive-summary#chapter-3-protecting-the-environment>
4. <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>
5. <https://www.gov.uk/government/publications/air-pollution-and-cardiovascular-disease-mechanistic-evidence>
6. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69533/pb13750-noise-policy.pdf
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