

To: Mr George Smith, Planning Department, Cherwell District Council.

From: Sara R Hall, Birchwood House, Pages Lane, Hornton. OX15 6BX

Date: 9th April 2021

**Re: Planning Application Ref. 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 wish to object strongly to the above planning application. I will make two points below drawing on my professional expertise and a further two points relating to my personal experience as a Hornton resident.

1) **As an experienced Biological Scientist I would like to make councillors aware of important data provided to me in a Biodiversity Report by Thames Valley Environmental Records Centre (TVERC) on 8th April 2021 (see attached report, which I have secured permission to attach to my planning application response).** The TVERC data search, **within a radius of 2km of Wroxton Motocross Track, (grid ref. SP3872 4377)** indicates that, since 1995, this area including Hornton, Shenington, Alkerton and Balscote Quarry Nature Reserve **has recorded sightings of an astonishing 39 out of a possible total of 67 bird species from the UK IUCN Red List of Threatened Species.** (This is especially surprising considering that this is not a coastal area, where the variety of bird species would be more likely to be high). Of these species, one is classified as vulnerable, 4 as near-extinct and 3 near-threatened. These species even include the scarce migrant, the Crane (2015) and the rare Osprey (2007/2013), plus the global red-list Red Kite (2016), as well as the Cuckoo, which I personally heard every spring since 2004, calling from the east of Hornton valley, but have not heard at all in the past 4 years. (Could this bird have been affected by the illegally up-scaled Wroxton Motocross Track?) Swifts (a species protected by UK law, which migrates from southern Africa to breed here every year and spends most of its life on the wing) are also recorded at Hornton Chapel and Shenington Church. I can confirm that in the spring and summer of 2020 (during the peace and quiet of the first covid-19 lockdown) I personally sighted large flocks of 30-40 swifts flying over Hornton and the fields to the east of the village (towards the Motocross Track) every day. I also witnessed their unusual 'screaming' behaviour (its purpose as yet unknown, possibly a type of group communication or alternatively an echo-location or 'herding' technique when hunting swarms of insects), which could well be affected by potentially competing loud noise from the Motocross Track. Many species of bats (also protected) have also been reported within the surrounding area, including at Hornton, Alkerton and Shenington, in addition to rare plants and insects. Finally, I would like to draw attention to the fact that **most of Hornton valley (to the west and east of the village, right up to the watercourse boundary with Wroxton Motocross Track) is a Government Conservation Target Area (CTA), total area 1395 hectares.** This area is **designated as including seven types of habitat covered by Section 41 of the Natural Environment and Rural Communities Act (2006).** This extends to an identified **Possible Priority Grassland Habitat of 72 hectares, which actually covers completely the area of Wroxton Motocross Track (see maps in TVERC Biodiversity Report, last page).** The area of the Motocross Track has obviously been extensively damaged through major earthworks carried out without planning permission. Oxfordshire Biodiversity Action Plan has multiple targets associated with this CTA, including 4 different types of grassland survey,

each with management and restoration plans. **In summary, the area around and including the Motocross Track is a very important area for biodiversity and merits conservation action. These data and much else in the Biodiversity Report provided to me indicate that a decision in favour of the Wroxton Motocross Track planning application by the planning committee of Cherwell District Council would be utterly indefensible. I urge the committee to reject these proposals outright.**

2) **As a BPS Chartered Clinical and Health Psychologist since 1993** (Health and Care Professions registered) **I would like to comment on the Noise Impact Assessment commissioned by the applicant, which I believe has significantly downplayed the possible health impact of the Motocross Track to residents of Hornton village and others who live locally.** Parker Jones Acoustics, the assessor, refers to BS 8233:2014 and quotes in the executive summary WHO guidelines regarding the peak noise emissions measured (up to 46dB according to this assessor's measurements at properties in Hornton and near the track). The report states that the WHO guidelines "imply that a level of 50 dB would be an acceptable level". This is an unscientific statement, as it is indicating the existence of a conclusion by suggestion rather than by explicit reference to (measured) evidence, such as that derived from the experiences of local people subjected to noise pollution. Aside from whether the assessor's "peak noise emissions" evidence is correct, it is becoming well-known that **the level of "noise nuisance" and the detrimental effects of noise on human health cannot simply be derived from a measurement of sound loudness or intensity** (whether actual or modelled). Noise has long been known to have various negative effects on the brain and nervous system (Basner et al., The Lancet, 2014;383:1325) ranging from interference with cognitive processing (memory and concentration) to damaging physical and mental health, including increased prevalence of cardiovascular disorders, anxiety and depression and neurodegenerative disorders (Stansfield and Matheson, British Medical Bulletin 2003; 68(1): 243; Noise pollution: non-auditory effects on health.) **Exposure to sustained noise can cause emotional distress and the importance of predictability and perceived control over the noise cannot be ignored in concluding whether it will be hazardous to health** (Smith, A. 2011; Psychological Bulletin: 138; 1262: An update on noise and performance.) The type of noise and other psychoacoustic parameters such as tonality, predominant noise pitch (e.g. treble/bass) and the effects and after-effects of extended exposure to noise may all influence the damaging impact of noise. Perception of noise is also related to characteristics of the individual, e.g. one member of my household has hearing so sensitive that they can frequently hear bats using (high-pitched) echolocation to navigate around the external corners of our house in Hornton and to detect insects. New scientific research using brain signal analysis by EEG and power spectral density analysis is showing how mental workload and visual/auditory attention can be significantly reduced when subjects are exposed to loud noise, (Jafari et al., Maced J. Med. Sci.; 2019;7:2924; The Effect of Noise Exposure on Cognitive Performance and Brain Activity Patterns). Due to the pandemic, **working from home has been required for most people who can do this and it is now widely reported in the media that this huge social change is set to continue for many.** I know of many Hornton residents who work from home from time to time, including those in my own household. Not everyone works on traditional weekdays, Monday to Friday only, and in any case, the Motocross practice and race days can, and do, occur midweek as well as at weekends. **The effects of noise exposure in occupational environments has been well-documented to cause a range of health problems and cognitive impairments** (Evans, GW and Johnson, D., Journal of Applied Psychology; 2000;85;779; Stress and open-office noise; Cohen, S., Psychological Bulletin; 1980;88:82: After-effects of stress on human

performance and social behavior: a review of research and theory). Smith, A. (ref. above) notes that noise research is increasingly concentrating on field studies of the effects of chronic noise exposure on children. I would point out that there is a state primary school in the centre of Hornton village and that the impact of the Motocross Track noise alone (aside from other factors) on the pupils' learning and environment is unknown. From the UK Government's own website, [www.gov.uk/noise-nuisances-how-councils-deal-with-complaints](http://www.gov.uk/noise-nuisances-how-councils-deal-with-complaints), permitted noise levels are stated as 34 dBA, (if the underlying noise level is no more than 24 dBA), and not the 50 dBA suggested in the applicant's report. This limit is within the experimental error of the applicant's sound measurements. In short, this Noise Impact Assessment provides insufficient evidence that the "noise pollution" will be "acceptable" to residents of Hornton and surrounding area, as it claims, and therefore should be rejected.

3a) **As a keen walker**, usually accompanied by other family members and my dog, **I regularly use the public footpath which borders the Motocross Track to the west.** On practice and race days, however, I am prevented from doing so because of the unpleasant environment created by the excessive noise, fumes and dust produced by the motorcycles. In addition, **I believe that walking along the adjacent public footpath on Motocross practice and race days would be extremely unsafe**, because the Motocross track, and especially what is apparently the race starting line (with metal tyre guides set into the ground - see my photographs 1 & 2 below, taken from the public footpath on 5th April 2021), is immediately adjacent to the public footpath, where the track then runs for an estimated 100 metres. Anyone who watches competitive multi-vehicle motor racing, such as the F1 Grand Prix, will know that the first few seconds of a race is the most likely time for a serious collision/incident. Despite this knowledge, there is only a simple barbed wire fence between the public footpath and the race track at this point (see photographs). **It is imperative that appropriate trackside barriers bordering the public footpath are constructed without delay to ensure public safety. No further racing should take place until Cherwell District Council have acted to protect the safety of the public, otherwise the officers may be held responsible for any serious incident which could occur.** NB Please do not 'solve' this problem by simply proposing to close or re-route the public footpath in question across this beautiful valley, which is a traditional route and a treasured local amenity.

Photograph 1



Photograph 2



3b) Furthermore, as a regular user of this public footpath, I take issue with the conclusions of the applicant's Flood Risk Assessment report . The report states "a small stream bounds the site's northern margin" but that, "the site is located within a broad valley" and "flood risk at the site is very low". My personal experience contrasts with this description: **Within the past two years, on more than one occasion, I have not been able to cross the footbridge over the stream for more than one day because it is inaccessible due to flooding in the steep-sided valley bottom.** The applicant's own Ecological Appraisal also contrasts with this finding, noting that a field survey "made surface water run-off very apparent, particularly at the north western side of the site, where soil erosion and run-off from the slope above the starting line of the circuit was evident". The report further notes, "there is potential for run-off and sedimentation of the watercourse", which "can carry.. chemicals causing environmental damage, (which) downstream can potentially damage spawning grounds of fish." Note, in my photograph 3 (taken 5/4/21) that there is a chemical toilet and several industrial-sized metal drums on the boundary of the motocross track with the watercourse. **I believe that the area surrounding the boundary watercourse requires a full survey to investigate flood risks throughout the year.**

Photograph 3



4) **I have lived in Hornton village for 17 years and my experience is that over the past 3-4 years the noise disturbance from the Motocross Track on most spring/summer/autumn weekends has become intolerable, both outside and INSIDE our house.** I believe that people deserve the right to feel safe and secure (i.e. not stressed) when they are spending time in their own home. I am not against motor sports: my late brother, Rob Hall, was twice British saloon car champion (Ford Fiestas) in the 1980s and I spent many days trackside supporting him. In recent years, however, attitudes have changed significantly and even conventional motorsport is beginning to highlight how human actions are damaging the planet, as shown by Lewis Hamilton's X44 Extreme E team's forthcoming events with electric vehicles to highlight globally significant locations for climate change (in partnership with Banbury's Prodrive, as reported in the Banbury Guardian, 8th April 2021). **In light of the direction of government policy**, (e.g. banning the sale of new fossil fuel-powered cars and vans by 2030), **I therefore propose that new planning applications for any motocross track should not be considered unless racing at the site is restricted to ELECTRIC motorcycles**, which I believe can be operated with much less noise than petrol bikes, as well as reducing other environmental impacts. The current application is wholly unsuitable, being out of step with future government plans regarding the environment. **Overall , however, I remain strongly opposed to the operation of a large-scale motocross track near Wroxton, as I believe this site is totally inappropriate for other significant reasons as described above. I urge Cherwell District Council to reject outright the Wroxton Motocross Track planning application, ref. 21/00517/F.**

Yours sincerely,

Sara R. Hall

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