

Comment for planning application 21/00517/F

Application Number	<input type="text" value="21/00517/F"/>
Location	<input type="text" value="Land Used For Motorcross Stratford Road A422 Wroxton OX15 6HX"/>
Proposal	<input type="text" value="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	<input type="text" value="George Smith"/>
Organisation Name	<input type="text" value="Fiona Donaldson"/>
Address	<input type="text" value="1 Pages Lane,Hornton,Banbury,OX15 6BX"/>
Type of Comment	<input type="text" value="Objection"/>
Type	<input type="text" value="neighbour"/>
Comments	<input type="text" value="See attached."/>
Received Date	<input type="text" value="10/06/2021 09:03:12"/>
Attachments	<p>The following files have been uploaded:</p> <ul style="list-style-type: none">• Mitigation Measures for Great Crested Newts HPC response 070621.pdf• Hornton Parish Council climate action framework objection Wroxton MX 070621.pdf

7 June 2020

Climate change and fossil fuel motorsport in a Cherwell protected rural area

By Hornton Parish Council

Cherwell District Council (CDC) has declared a climate emergency and believes itself 'well placed to lead on this agenda' via its excellent 2020 Climate Action Framework

The Council has said it will:

- ensure our own operations and activities are net zero by 2030
- do our part to achieve a net zero carbon district by 2030 and lead through example.

And the Council is up for facing the inevitable challenges this will bring:

"Technological, societal and economic conditions within the next decade will provide opportunities which we will need to realise and challenges we will need to overcome, whilst fully recognising that we have to do things differently and faster. ...

"We look forward to working with residents and businesses across the district to achieve these goals. COVID has underlined the critical importance of the environment and provided us with a unique opportunity to look afresh at how we would like to live in the future. It is our responsibility to take forward the environmental benefits we have seen during the pandemic and harness the collective will for building back better so that we can achieve real and meaningful change. We must do so not only for ourselves, but for future generations to come."

We applaud and wholly support this partnership approach. In the case of Wroxton MX Track and its recent activity and current application, Hornton Parish Council has been working with CDC in a bid to inject appropriate Planning restrictions and enforcement to prevent the threat to climate change that this facility brings. These harms have escalated in recent years due to the re-engineering of the circuit and the scale, duration and frequency of the larger commercial events held there.

So, as our final policy-led objection to this planning application, we are citing CDC's Climate Action Framework.

During the pandemic, the value of our rural open spaces has been highlighted like never before. So many local residents have objected to the scaling-up of this track – and its proposed further expansion – because of the dreadful impact it has had on the local environment in so many ways.

Here we have a case of a wealthy landowner and her team having unlawfully and stealthily built up a lucrative motorsport business at the expense of everyone and everything else. For them profit, not climate or community, is king. Forget sustainable triple bottom line thinking.

Hundreds of fossil-fuel-powered vehicles travelling many miles to burn more fossil fuel and horribly despoil a beautiful protected landscape – threatening both its wildlife and its human inhabitants – could not be more blatantly counter to the principles of the CDC Climate Action Framework and natural carbon management. Allowing this application to go ahead would be the polar opposite of low-carbon or zero-carbon provision of recreation. Nor would it bear any relation to the management of transport-related carbon emissions that CDC has so urgently targeted.

Moreover, this 'carbon-culprit' leisure venue is not for the local community who, for generations, before the latest MX onslaught, have been very happy enjoying the outdoor spaces of the Ironstone Downs in low- or no-carbon ways – on foot, bicycles or horses. Indeed, the Covid lockdown and temporary stop on MX racing has allowed more of them extra time and incentive to pursue these wonderful leisure pursuits in this area again. For some of them, it's also been a chance to see, up close, from the track boundary public footpath, the full scale of the souped-up circuit, both vacant and in full racing action, and its scarring of the landscape and to understand fully, for the first time, why they have been suffering such a noise nuisance in recent years, way beyond the low level occasional noise they used to tolerate.

During their current two-year climate action mobilisation phase, CDC is adapting business processes, culture and governance to systematically drive lower-carbon outcomes. You have promised to take 'comprehensive and direct action' to meet the Council's and the district's carbon goals. You have pledged to support policies that enable zero carbon developments within the Oxfordshire Plan 2050 and the Oxfordshire Local Connectivity and Transport Plan 5.

On this basis alone, this application must be refused. Please exert your Planning control, your influence and your leadership. Protect our future and draw a line right here.

Re. Wroxton MotoCross Circuit – Mitigation Measures for Great Crested Newts (posted on portal on 2 June 2021) – written by Chris Seabridge & Associates Limited

Comments from Hornton Parish Council – 7 June 2021

As we all know, great crested newts (GCN) are a European protected species. The animals and their eggs, breeding sites and resting places are protected by law.

GCN have been found in one of the ponds on the track site. This is somewhat ironic, as these are artificial ponds, dug and enlarged by the track team to offer places to discard water from the track, its maintenance and its underground drainage system. In January 2021, they described this TN6 pond, containing the GCN, as follows: "Pond with a water area of approximately 270m² which receives water through an inlet pipe that drains water to the south". Not exactly a good habitat for the GCN.

More worryingly, the track team *siphon off* water from several watercourses and ponds on or near the site (some of them not owned by the landowner but heavily tampered with and used nevertheless) to spray the circuit surface before racing. These water sources are very close to this TN6 pond – we are talking a few metres away. (See map in Appendix I of the Chris Seabridge Ecological Appraisal document of January 2021).

How will they prevent GCN from travelling from one pond or water source to another (as they do) and being polluted/poisoned/killed by water containing both fuel and other effluent, detritus and fumes (eg. from the camping site, the site-wide litter or from the incineration skips)? How will they prevent GCN in any pond water being sucked up into their pipes for bowser spraying on the circuit? How will they prevent the proposed new ponds from being equally at risk from the underground drainage scheme they have installed and the polluted water run-off?

Natural England's 'standing advice' on GCN is that it's an offence to deliberately capture, injure or kill or deliberately disturb them. Both the local authority and the developer must comply with the legal protections of GCN. Cherwell District Council are, of course, obliged to consider if the developer has taken appropriate measures to avoid, mitigate and, as a last resort, compensate for any negative effects on GCN. The developer may also need to apply for a mitigation licence.

For the reasons listed above and on the second page, below, we can't conceive that the measures suggested by the applicant's agent will 'avoid, mitigate or compensate' for any danger and harms done to GCN on this site, nor that a mitigation licence (a DLL) can possibly be granted.



We have brief further comments as follows, based on some extracts (in italics) from this report:

Introduction

Suitable terrestrial habitat within the development site is quite limited owing to the disturbed nature of the race circuit with extensive areas of bare ground, which is not considered attractive foraging and commuting habitat for GCN. The grassland at the southern end of the site which is used for car parking and camping is not considered to be good potential GCN terrestrial habitat as the sward is improved and regularly mown and grazed. There is potential to enhance terrestrial habitat for GCN and other wildlife on grassland at the north eastern side of the site which is described further below.

The 'bare ground', with dirt, fencing, huts and huge stone boulders, is so extensive it covers nearly all of the circuit area, all created by the massive engineering, construction and earthmoving that has taken place and which is permanent, despite this being a '14/28 day permitted use' location and designated agricultural land. The sward in the camping site is NOT 'regularly mown and grazed' – it is batted down and polluted by hundreds of heavy motor vehicles, people and bikes and its regular grazing is a fantasy.

Creation and management of aquatic habitat

The two ponds on site are to be retained and any maintenance works should only be conducted from November to late January when newts are most likely to be out of the water and on land.

This may be a well-meaning suggestion as regards pond remedial work but it is a smokescreen: already, unlawfully, the track and its ponds are used and worked on, with heavy machinery, all year-round and the track team are applying for a usage extension to 65 days' use per annum. The GCN will be disturbed, and potentially injured, on all of these occasions.

And, if recent history is anything to go by, the actual days – and nights – of people and vehicles being on site, with heavy and noisy machinery, will be far greater than any number of days for which they have permission.

We cannot imagine how GCN could survive this kind of disturbance from racing bikes, bulldozers, tractors towing water bowsers, earthmoving circuit layers and 'track rippers' and up to 600 camper vans and large bike-carrier vehicles, plus all the people driving, riding, spectating, camping, partying and walking over the site.

Furthermore, how the proposed wetland planting scheme will survive all of this is a mystery to us.

Creation and management of terrestrial habitat

The north eastern section of the circuit represents the most extensive area of semi improved grassland on site and this area should continue to be grazed by sheep to maintain the floristic value of the sward (TN3 on map). Over grazing should be avoided so as to maintain a varied sward structure with a mosaic of taller and shorter vegetation including occasional gorse scrub which is already naturally regenerating in places. The grassland at the foot of the slope which lies adjacent to the watercourse should be left ungrazed to allow taller vegetation and a litter layer to develop which will provide greater cover for newts as commuting and foraging habitat. This margin of tall vegetation will link to the northernmost pond (TN5). The planting of the new native hedgerow along the eastern boundary will provide both foraging habitat and commuting/migration routes for newts into the wider countryside.

Sadly, most of these comments are completely invalid. As we have stated – and many other eye witnesses and neighbours have stated – numerous times, sheep are NOT regularly grazed on this land and the structures there are permanent. It is not returned to agricultural use between MX events. The 'grassland at the foot of the slope', adjacent to the watercourse, is almost non-existent and covered with machinery, biker litter (like plastic throwaway visors) and debris, including skip incinerators sunk into the ground. Where there is any grass, or 'sward', on the site very little of it is suitable for grazing. The better quality sward, regularly grazed by both cattle and sheep, is on the neighbouring field owned by the neighbouring farmer, through which the public footpath currently runs. This area is visible on the aerial shots so it can be easily confused as being part of the track site.