

The Lodge  
1 Armstrong Road  
Littlemore  
OXFORD  
OX4 4XT

19 October 2022

Sarah Greenall,  
Senior Planning Officer,  
Cherwell District Council

**By e-mail only**

Dear Sarah,

**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).**

We have the following comments on this application. As a wildlife conservation organisation, our comments refer specifically to potential impacts on wild species and habitats which may occur as a result of the proposal.

Thank you for your previous letter providing further details on the issues raised in our previous response. Thank you for clarifying that there would be no increase in the extent of the track or frequency of use without an additional planning application. We have reviewed the additional information supplied by the applicant in relation to biodiversity net gain. The remaining outstanding issues are addressed below.

Net gain in biodiversity

We welcome the submission of the revised net gain metric spreadsheet (dated 9/9/2022), the ecological enhancement measures (dated September 2022) and the document labelled Figure 4. Off-site Habitat Enhancement Map. **We ask that conditions are used to ensure that, in the event the authority are minded to approve the application, the measures set out in these documents are implemented and maintained.**

Potential impact on the biodiversity of the Sor Brook and on Horley Local Wildlife Site, which lies downstream on the Sor Brook

This is a matter of great concern. You have offered the use of a number of conditions to address the above. We consider that the conditions that you refer to as follows are of particular importance *“The FRA does outline maintenance, however, the Council is also minded to address this issue through the imposition of conditions to: (i) require regular management; and (ii) to secure an appropriate exit*

*strategy management plan for when the site ceases use as a motocross site.” We would ask that these conditions ensure that for the duration of the existence of the motocross that management to protect the Sor Brook is maintained and that measures can be taken by the planning authority to require action if the protection of the Sor Brook is not maintained.*

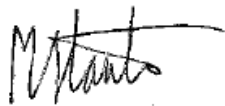
We note that paragraph 5.12 of the DAS states: *“5.12 The FRA report also considers surface water run-off and confirms that the drainage system across the track was designed to manage runoff and the high sediment loads within it. The upper or “silt” pond is cleaned out every three years and sediment is spread back on to the track. Additional structures have been recommended to manage sediment discharge in the western part of the track, associated with the starting grid. A series of short swales, aligned parallel with the contours are suggested to trap sediment.”*

and paragraph 5.13 states:

*“5.13 The Ecological Appraisal from Chris Seabridge and Associates Ltd and the Flood Risk Assessment (Lidar Logic 2021) both identify the potential for surface water runoff at the site. The Flood Risk Assessment has identified the measures that can be taken by the applicant to reduce this risk, to accord with both national and local plan policies. Please refer to the FRA, at Figure 31, ‘Recommended sediment control measures, along the track’s north eastern margin’ for details.”*

The measures described in these two paragraphs (and in the accompanying documents they refer to) are of great importance, however the use of phrases such as “have been recommended” and “has identified” (e.g. as opposed to “will take place” or similar) do not give sufficient surety to ensure that all these measures will be both put in place, and maintained for the duration of the existence of the motocross site. **We would ask that conditions or otherwise are used to ensure that all the above measures are put in place, and maintained for the duration.**

Yours sincerely,



**Matthew Stanton**  
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