

## Objections to 23/01085/F

**Grounds for objection – Significant Noise pollution and resultant potential impact and harm on health, negative impact and harm on environment and wildlife in the local conservation areas and SSI at Stratton Audley Quarries which forms part of the land. Huge potential negative impact on air pollution and quality of life which could harm ecology and health. Not in accordance with WHO guidelines on noise pollution and not in accordance numerous planning guidelines. This is not regularisation of ongoing activity – this is increasing noise levels from what they have been doing without planning permission, increasing hours of operation each day, significantly increasing very large external events across the year and increasing the days they exercise vehicles to every single day of the year.....and of course generally having a huge negative adverse effect on the character and appearance of the Conservation area and heritage assets as well as affecting the character of the conservation area in Stratton Audley from the potential pollution and harming our peaceful enjoyment for all the local residents affected including Glory Farm, Southwold, Caversfield, Stratton Audley and Launton.**

### Summary of proposal

Unlimited use of track 100dB (3 vehicles on track) every day of the year increasing hours from 5pm to 6.30pm class A

50 days a year 100dB (5 vehicles on track) class B

12 days a year for 90 minutes each day 108dB (unspecified numbers of vehicles on track) class C

A = no more than 6dB (doubling the volume and **a significant and noticeable increase in loudness**) – impact Who guide defines as moderate noise impact. Action is to **mitigate and reduce to minimum**

B= no more than 12dB increases the sound intensity by 15.85 – impact Who guide is that **noise impact is significant** - action is **avoid**

C= more than 12dB – impact Who guide **unacceptable** – action is **prevent**.

**Conclusion** – B and C class testing is to absolutely ‘avoid and prevent’ under the World health organisation guidelines on noise and its affect on health and should not be agreed. Otherwise it will seriously affect the character of the Bicester Motion conservation area and heritage assets and the Stratton Audley conservation area.

A is mitigate and reduce to a minimum (ie not 365 days a year) and reduce from 100dB which is hugely excessive – no car is allowed on the public road over 80dB (some HGVs and motorcycles up to 89dB but interestingly I can find no exemption for classic cars to these rules) and even Full racing circuits like Brands Hatch are only 92dB. Many circuits are only 87.5dB and Croft is only 70dB (averaged over the month). New cars from 2016 are restricted to 72dB and from 2026 this noise limit falls to 68dB. 100dB and 108dB is hugely excessive and totally unrealistic, especially in light of such close proximity to such a large number of residential properties. In the event this planning is approved then I would recommend a limit of 89db max to mirror the absolute maximum legal limit for any vehicle on the road (unless trailered in, they will arrive using public roads).

### **Listed Buildings, schedule monuments, Conservation area, SSI etc**

Is it appropriate to have cars racing around when there are listed buildings and schedule monuments actually in harms way close to the track? Surely we all have an obligation to minimise the risk and maintain the character and appearance of the Conservation area and appearance of the Conservation area and heritage assets - what happens when a car loses control and damages our Heritage? Why has the Council taken no action since they started racing cars around the track in 2015/16 onwards and why is there no planning permission in place and enforcement not taken place to date despite a number of complaints from local residents about the noise?

This retrospective planning is not regularising what is currently happening – it is completely changing the parameters and risks

causing extensive harm to the character and appearance of the Conservation area and heritage assets within.

The track has not been used for the last 10 years so the planning rule doesn't apply and presumably wouldn't anyway as it's in the curtilage of listed buildings and schedule monuments.

### **Noise pollution**

So to put into context – BH are requesting driving by noise of **100dB** and **108dB** – for their 'experience and demonstration' track.

Brands Hatch is a full motor racing circuit and only 92dB drive by limit and Bedford Autodrome and Bruntingthorpe are only 87.5dB and Croft only **70dB** (average over an hour). A drive by limit of **100bD** plus is therefore hugely excessive and will massively impact the local community...and on a site which states, it won't be racing cars, just testing and experience.

The 100 db drive by noise level is measured at 20 meters away so the actual noise is significantly greater. Every 3db and the noise doubles.

Any noise above 70db over a prolonged period may start to damage your hearing, sounds over 85db can damage your hearing faster. The noise levels in the noise report are in excess of 70dB for say Hundar Court – this has the potential to damage hearing and is completely against the World health organisation guidelines for the effects of noise on health.

### **Saturday 13<sup>th</sup> May 2023**

I heard significant noise from cars racing at Bicester motion and counted 7 cars racing around the track – I sent a copy of the video to Stratton Audley Parish Council as it seems Bicester Heritage are ignoring their own rules and are already 'counting their chickens' and moving to C category racing already in advance of any decision on this retrospective planning application – increased numbers of cars racing around increase the noise and dB very significantly so there is

a dramatic increase in the noise pollution. Bicester Motion set their own rules of no overtaking except on the straight, no tyre squeal, not more than 1 car on the track and all these rules (on their website) are being blatantly ignored (check out the Flywheel promotional video with wheel spin and tyre smoke and squealing tyres) with again a total disregard and causing noise pollution and potential harm to hearing for those surrounding residential properties/homes.

### **Respite days/weekends**

Most racing circuits also have respite days and weekends to take into account noise pollution and give the local residents time off without a constant barrage of noise pollution every day of the year – This feels absolutely right and is fair and neighbourly.. Nothing is suggested or offered.

So to allow testing all day every day of the year is totally unbalanced and fundamentally wrong and shows BM are putting financial gain ahead of any needs of all the local residents.

Two weekends a month for example as proper quiet time and days off like Sundays and bank holidays – and only A class cars with restricted times and days so we can get some peace and quiet to enjoy our gardens and fresh air without cars racing around in the background.

A balance needs to be drawn between this commercial enterprise (which may bring in some tourism and employment) against the needs of the existing local residents to have peace and enjoyment of their properties and not have to queue in traffic for hours to get into Bicester each weekend. It is very saddening to learn that this retrospective planning is completely stretching all the boundaries of what they already do without any formal planning permission currently with no regard again for the local residential properties and nursing homes in such close proximity.

### **Wind speed and direction.**

I can see no allowances in the noise modelling for any factoring for wind speed or direction which can add a very significant impact to the dB level and noise pollution and disturbance. An example is

Bovington track where locals have been severely impacted with noise pollution from cars racing – they have recorded a difference in dB of 20dB swing between upwind and downwind – this equates to a four fold change in the subjective level of disturbance. If you factor in an increase of 20dB, the increase in noise pollution would heavily exceed healthy levels indicated in the World Health Organisation guide on the impact of noise on health and make this retrospective planning application completely unrealistic.

The prevailing wind is SW which will carry the noise and air pollution in the direction of Stratton Audley.

### **Backfiring**

No allowances have been made for any car backfiring which produces 120dB to 140dB and would make all modelling of potential noise pollution totally unacceptable.

Many hyper cars, race cars and historic cars are designed to backfire (former) or prone to backfire (latter). Indeed the upcoming Father's day event at Bicester Heritage talks about cars lapping the experience and demonstration track, from fire breathers to modern machines, Le Mans stars and hero cars – What will the dB noise levels be? Again, all planned and tickets sold with no planning permission in place.

### **Tyre Squeal**

Bicester Heritage claims no tyre squeal – but when you view their promotional video for Flywheel they show a number of vehicles producing tyre squeal on the test track including a rally version of the Ford Escort in full wheel spin with smoke billowing off the back tyres.

## **Electric car racing and electric go karts**

Objection to Electric cars and electric go karts any time day or night– this doesn't feel appropriate or balanced with the local community and it's wrong to just assume electric vehicles don't emit any noise.

Indeed, many electric cars have significantly higher performance so tyre squeal and noise needs to be factored into any agreed operating hours and not just carte blanche to carry on day and night.

A recent study has shown that the weight of electric cars is significantly heavier than a normal fuel powered car, this additional weight creates much greater tyre wear and this can add micro particles into the air causing significant airborne pollution which has potential to cause significant health issues.

Noise and light impact potential to be significant. – high pitched whine and tyre squeal plus headlights impacting the environment and conservation area producing a significant potential tyre noise and light pollution if they decide to flood light the tracks which hasn't been factored at all.

## **Operating hours**

Track currently used only to 5pm not 6.30pm and then an extra ½ hour at the start and end of the day for engine noise prior to and post testing. It is realistic or even sensible to allow these extra hours – what next, evening testing til dusk? That could be 10pm in the summer for example or later and what happens in the winter when it's dark at 4pm?– do we then have 2.5 hours with flood lighted testing of cars or headlights causing significant light pollution?

No mention of avoiding weekends or bank holidays when residents enjoying their gardens. Also no impact mitigation on daytime noise for those who work nights and sleep in the day or those who work from home.

## **Additional race tracks and drift track 21/01224/OUT**

This planning application needs to be reviewed in conjunction with 21/01224/OUT as the noise modelling is only on the one current test

track and the data is 4 years old and wind direction does not appear to have been factored. Indeed, on the days of the noise recordings, wind was away from the noise monitors and no monitors at all were set up to the NE in the direction of Stratton Audley (which doesn't even get a mention despite being directly in the path of the prevailing wind from Bicester Motion).

The prevailing wind is SW in the direction of Stratton Audley. There are three more tracks to follow and the drift track as Bicester Heritage and Bicester Motion own both so impact will be hugely greater than indicated in this current planning application and any approval of 23/01085/F could potentially set a precedent for the future works planned under 21/01224/OUT.

The noise modelling used for both applications was taken when the wind direction was unusually NE hence blowing sound away from the noise capture devices set up on Caversfield side of the site. No Noise capture devices were located to the NE which is the direction of the prevailing wind and Stratton Audley only 0.5 miles away across open fields.

### **Noise Complaint 20<sup>th</sup> Oct 2021**

Following my formal complaint about noise to CDC from racing cars and back firing constantly over and over for the 20 mins I heard it That is 120dB plus I was told by BM ' I'm surprised you only heard it for 20 mins and we've been doing it for the last 5 plus years anyway'. The truth is I only heard it for 20 mins as I had to stop working from home that day and head into the office because the noise was so bad.

Interestingly when I then met BM to address my noise complaint with a Parish Councillor – BM confirmed that the sound monitoring equipment recorded the cars at over 120 dB that day (despite being told the car was fitted with an external silencer) – The cars were hitting their rev limiters over and over again and backfiring constantly for those 20 mins so it's not surprising I heard it so clearly in my house with the windows closed. The BH noise pollution modelling for this retrospective planning is all calculated at much lower dB so it's not giving a true picture of the reality and what actually happens, if modelling was redone at the levels of what actually happens on the

ground and factoring prevailing wind and average wind speed, it's likely to be totally unacceptable and well in excess of World Health guidelines.

### **Extra Events/festivals (in addition to all the other BH events)**

I note Bicester Heritage are advertising a **4 day live music camp out festival** this summer 28<sup>th</sup> to 31<sup>st</sup> July 2023 (another Glastonbury?) and tickets are actively being sold with over 10,000 sold already. Do they actually have planning permission for this type of event? Do they have a licence?

I dread to think of the noise and disruption for locals will be like – will it be until 3am? I object to their retrospective planning for events on the grounds of noise pollution and hugely increased traffic and risk of serious overloading of the road networks which are not designed to cater for this level of vehicles and will continue to impact locals as it does currently on any of the current car event days. Will they have public address tanoys and lighting?

The retrospective planning is for an extra 25 very large external events on top of all the normal Bicester Heritage events and is this for use of the entire airfield site **which is a protected area of NERC ACT S41 habitat** including the Calcareous grassland (for quite camping area perhaps?) and the abuting SSI– The wider airfield is largely surrounded by a local wildlife site -to suggest that prior to events the grasslands will be searched for ground nesting birds and the area sectioned off is quite frankly unrealistic. Will the sectioned off areas be lit or will people camping out simply walk into the fencing in the dark? Attendance will be 12,000 people and they suggest a very large% is by car so that could be over 7000 plus cars attending big events most weekends of the year.

The hotel planning requires improvements to the local roads to cater for the increase in traffic and yet nothing seems in place for the roads to be improved before massive events like this camp out festival should be allowed and no planning or licences should be approved until such time as the road networks are improved to cater for this massive increase in traffic which will harm the character and setting of this conservation area and site of schedule monuments.



Adding these events to the calendar will mean large events pretty much most weekends of the year with ensuing traffic disruption and noise pollution and no respite for the locals. 12,000 attendees is likely to bring 7000 plus cars with additional exhaust pollution affecting air quality and huge potential disruption for all the local residents. The roads are already a grid lock when the Scramble events and flywheel type events are on and these events are planned to be even larger– it took me over a hour to get from Stratton Audley to Southwold and back one Sunday (a journey that normally takes 5 mins max). The road networks in the area are just not geared up for such volumes of traffic and there is potential for a severe impact on road safety and function with so many vehicles attending these very large events.

The national planning policy framework sets out in paragraph 111 that development should be refused where it results in severe impacts on road safety and function.

With these larger events – like the live music camp out in July there is no detail about the orientation of the stage and loud speakers – plus no detail on plans for the stage lighting and how noise and light pollution will be properly addressed and mitigated, or indeed what time the noise and light pollution will end each night? If the stage for example is facing North east, the noise will travel on the prevailing wind straight over to Stratton Audley. What will be in place for loo facilities for the 12,000 campers and where will they be located to minimise the risk of attendees not wanting to traipse across the airfield in the night and any potential ensuing damage and potential harm to the protected area, grassland and SSI. Events should be limited to any existing area and not the entire site as proposed in this planning application. Where will the quiet camping area be that's advertised on the festival website?

Badminton Estate hit the press this week – they had applied to the council for a licence for a festival in July too and after a huge push by 39 local residents the council amended the licence to insist on no overnight camping and a close at 10.30pm. This was for a Who and Rod Stewart festival taking place at a similar time to this proposed huge Vegan camp out live music festival at Bicester Motion. It should be heavily restricted or it will simply set a precedent for ongoing misery for all the many local residents.

## **Perimeter road**

It's imperative this has heavily restricted use and not as a test track due to it's proximity to SSI and protected grasslands.

## **Radio Controlled aircraft**

This needs to be properly regulated and controlled – both with noise pollution in mind but also sensible and realistic operating times.

The noise is very intrusive and has been since its inception a couple of years ago.

An example, I was sitting in the garden on Sunday 14<sup>th</sup> May 2023 and there were radio controlled aircraft being flown from noon for about an hour between the main airfield activities– These model aircraft are high powered petrol and jet engined and I can only liken the noise to a cross between a world war 2 German Stukka (in its dive) and a petrol grass trimmer. The jet powered aircraft which I have heard on other days sounds more like a very high powered whooshing noise. The aircraft dive and climb and the pitch of the noise constantly changes so it's highly audible and is very intrusive. Is it reasonable to be making this level of noise on a Sunday lunchtime and with no regulation at all? Do you not need planning for this activity and why is this activity being allowed when there is no planning in place and no management or control of the operations?

My understanding from the Gov't code of practise on noise from model aircraft 1982 which in some circumstances requires specific planning permission for a site to fly these type of model aeroplanes (presumably one like BM where there is residential property on at least 3 sides – with weight and noise limits on the model aircraft and the local authority imposing conditions designed to reduce the risk of disturbance by noise and any such conditions should be observed at all times. This can include controlling number of model aircraft in operation simultaneously, times of operation etc. Sunday lunchtime on a sunny day and it's a blatant disregard for the local residents.

I have lived in Stratton Audley for 11 years and the radio controlled aircraft has only started in the last few years – at first I thought it was a neighbour cutting the grass but now I can see the model aircraft rising into the sky before diving etc. It certainly hasn't been happening for the

last 10 years and it seems in odds with the protected area, the character of both conservation areas at Bicetsre Motion and Stratton Audley and general common sense.

### **Stratton Audley Quarries SSI**

The SSI at Stratton Audley Quarries and the local conservation area of Stratton Audley with all its listed buildings will be potentially and irrevocably affected by the noise and air pollution if this planning is approved.

The Thames Valley environmental records 2018 states regarding Stratton Audley quarries - The site has previous records for a range of birds (including little ringed plover, snipe and skylark), great crested newt and many invertebrates (including nationally notable species of bees and beetles). The Red List species - White-footed Furrow Bee and Southern Bronze Furrow Bee have also been recorded here. The site provides habitat for butterflies with Dingy and Grizzled Skipper recorded in 2018. The site has good potential value for a range of other invertebrates such as soldierflies, dragonflies and damselflies

#### **Noise Impact on ecology**

Excessive noise causes the birds and the bees to alter their behaviour in many significant ways: it interrupts mating, reduces the number of birds and insects in the vicinity, causes them to stop moving (a “shock” reaction), and prevents birds from hearing fellow birdsong that's important to their day-to-day life.

#### **Bees**

It should be noted that there are numerous active bees hives in the field directly abutting the North perimeter of BM (known locally as 7 springs) as well as bee hives to NE of BM site on the cross bucks way by Stratton Audley which could be severely impacted and potentially harmed by the noise and air pollution – bees are a protected species.

#### **Bicester and Whadden Hunt Kennels**

The area referred to as R3 commercial in the noise report from Bicester Heritage is in fact a cluster of residential properties and the main hunt kennels housing some 120 hounds. The noise impact on the hounds is likely to be considerable and disruptive as the prevailing wind is in this direction from Bicester Heritage. Disruption of the hounds many cause excessive barking which may well impact the village with a domino effect of noise pollution. The Hunt Kennels are immediately North of the main Bicester Motion site and have been there long before Bicester Motion. Has anything been factored for potential harm and distress to all these animals?

## **Research on Noise pollution**

### **Direct and indirect effects of noise pollution alter biological communities in and near noise-exposed environments**

[Masayuki Senzaki](#),<sup>1,2</sup> [Taku Kadoya](#),<sup>1</sup> and [Clinton D. Francis](#)<sup>3</sup>

Here, we experimentally applied a field-placed noise playback manipulation and quantified the influence of noise exposure on three taxonomic groups (birds, grasshoppers and odonates) from different trophic levels and varying mobility and dependence on the acoustic realm. Birds generally rely on the acoustic environment throughout their life for communication, foraging and habitat selection [26–28]. Grasshoppers also rely upon acoustic signals and cues for mating and predator detection [29,30]. Odonates have no auditory receptors [31,32]. Among these, birds have a higher trophic position and mobility than the other two taxa. Grasshoppers and odonates are preyed upon by many birds and other predators such as small mammals, and their behaviour can change with predation risk [33,34]. Because animal movement speed is generally higher in birds than arthropods and in flying animals than non-volant, ground-dwelling animals [35], we assumed mobility of our focal taxa declines from birds to odonates to grasshoppers. Thus based on their relationships to the acoustic environment, we might expect noise to have direct negative effects on bird and grasshopper distributions and abundance by interfering with their ability to interact with their environments acoustically, but odonates would be unaffected. Furthermore, we would expect that grasshoppers would respond less strongly than birds owing to their lower mobility and potential release from

predation from birds owing to noise exposure ([figure 1](#)). Thus, with both direct and indirect pathways by which noise can influence grasshoppers, we could potentially determine which pathway is stronger. Odonates might also increase in noise-exposed areas avoided by birds and other predators owing to benefit from predation release and movement of individuals from areas with higher predation risk ([figure 1](#)). Such responses in odonates, if detected, would provide strong evidence of indirect effects of noise. Furthermore, if noise displaces acoustically oriented taxa, such as birds, to nearby areas with lower noise exposure, we might expect that grasshopper and odonate abundance decrease relative to comparable quiet areas owing to heightened predation ([figure 1](#)).

## **Not in accordance with NPPF or Noise policy statement for england**

**NPPF 185.** Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- (a) mitigate and reduce to a minimum potential adverse impacts resulting from noise and avoid noise giving rise to significant adverse impacts on health and the quality of life <sup>65</sup>;
- (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and

(c) **limit the impact of light pollution** from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

**186.** Planning policies and decisions should sustain and contribute towards **compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.** Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. **Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.**

NPPF

15. Conserving and enhancing the natural environment 174. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; e) preventing new and existing development from contributing to, being put at **unacceptable risk from, or being adversely affected by,** unacceptable levels of soil, **air,** water or **noise pollution** or land instability. Development should, wherever possible, **help to improve local environmental conditions such as air** and water **quality,** taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

## Noise policy statement for England

Noise Policy Aims 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; and • where possible, contribute to the improvement of health and quality of life.

“Significant adverse” and “adverse” 2.20 There are two established concepts from toxicology that are currently being applied to noise impacts, for example, by the World Health Organisation. They are: NOEL – No Observed Effect Level This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise. LOAEL – Lowest Observed Adverse Effect Level This is the level above which adverse effects on health and quality of life can be detected.

SOAEL – Significant Observed Adverse Effect Level This is the level above which significant adverse effects on health and quality of life occur. 2.22 It is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times. It is acknowledged that further research is required to increase our understanding of what may constitute a significant adverse impact on health and quality of life from noise. However, not having specific SOAEL values in the NPSE provides the necessary policy flexibility until further evidence and suitable guidance is available. The first aim of the Noise Policy Statement for England Avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development

This site is a former historic airfield – located in a heavily built up residential area on the North side of Bicester and by Caversfield village and close to Launton and Stratton Audley. It's an airfield and this should be the overriding activity, not racing and testing cars without any regard for the local residents and the potential effect that the noise and air pollution with have as well as the huge increase in traffic levels for which the current road infrastructure is not geared up for in any way. How Bicester Motion have been allowed to carry on regardless for some many years with seemingly no planning permission needs to be properly addressed and not by granting them retrospective planning for even greater negative impact on the local residents and potential harm to the character and appearance of this Conservation area and site of schedule monuments and Stratton Audley Conservation area.

I therefore, not unsurprisingly object to the retrospective planning proposed. [REDACTED] The Bradburys, SA