

# **Bovingdon Action Group (BAG)**

Planning Reference: 4/03082/16/ROC

## **Response to Planning Reference: 4/03082/16/ROC**

Bovingdon Action Group – 1<sup>st</sup> March 2017

### **Location:**

LAND AT RUNWAYS FARM, BOVINGDON AIRFIELD, UPPER BOURNE END LANE, HEMEL HEMPSTEAD, HP1 2RR

### **Proposal:**

REMOVAL OF CONDITION 1 (TWO-YEAR TEMPORARY PLANNING PERMISSION) OF PLANNING INSPECTORATE DECISION (APP/A1910/C/14/223612) APPEAL OF PLANNING APPLICATION 4/00435/14/ENA

### **Recommendation:**

The Planning Inspector's decision was very clear: If the motorsport noise nuisance on Runways Farm could not be eliminated within the two-year trial period then the activities should cease.

The motorsport noise nuisance continues to negatively impact residents whose homes border the runway, despite the fact that Runways Farm was given 2 years (until 14 January 2017) by the Inspector to resolve the problem.

In line with the Inspector's decision, The Bovingdon Action Group strongly objects to this application.

# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

## Introduction:

This document responds to the additional information provided by Gerald Eve on behalf of the applicant dated 7<sup>th</sup> February ref: RJLD/CKE/J7803, which should be read in conjunction with this document. The sections and responses correlate.

## Summary:

This additional information provided confirms residents' fears that the Inspector's decision is not being properly implemented and highlights the applicant's hesitancy to accept or address the issues which is causing ongoing and unacceptable noise nuisance to residents.

Gerald Eve's response to the Clarke Saunders recommendations to help solve the noise nuisance clearly highlights that the applicant has neither a clear grasp nor an understanding of the points that the Inspector made very clear in his decision, particularly in respect of the noise nuisance residents are experiencing:

*"it is not just the loudness of the noise that makes it annoying to the residents but the characteristics and repetitive nature and even low sound levels could become annoying".*

As demonstrated by the noise complaints still being submitted by local residents, the noise nuisance that the Inspector witnessed during his site visit is still occurring, six weeks after the 2-year trial period has ended:

*"In the afternoon, I was aware of the accelerating car with what seemed to me to be a 'distant' fairly high pitched noise followed by an equally distinguishable distant 'hollow' reverberating noise from the exhaust as the car was throttled back. This was sometimes accompanied by squealing tyres. While not necessarily recording as a loud noise, it attracted attention. In my view the noise report while not doubting its veracity, does not seem to place enough weight on these important noise characteristics and the effect they have on listeners. This is important as it is these which are noticeable and if repeated could become annoying even at the low sound levels I perceived on my visit, as demonstrated by the residents' complaints. The same effect was not experienced by the revving, accelerating and decelerating police cars which seemed to be much more effectively silenced".*

In his decision, the Inspector makes it very clear that during the 2-year trial the operations should be modified to prevent the noise nuisance to neighbouring occupiers. The Gerald Eve document makes it very clear that the applicant has grasped a theoretical, computer generated noise threshold with the aim of preventing noise nuisance exceedances. While the Inspector agreed that in principle this is a good approach he raised the concern:

*"but in practice I have concerns that any reliance on the theoretical impact prediction is unlikely to be satisfactory, bearing in mind the predictions of impact in the acoustic study. This is a situation where what is occurring on the track has to be related to what is being experienced by neighbours and the impact of the noise with the current annoying characteristics eliminated at the receptors".*

The applicant is offering nothing of significance to address the noise nuisance especially with regards to drifting, falsely claiming that watering is always taking place, denying there is any noise generated on the concrete and describing the noise as a squeak which, with respect, is laughable. After the 2-year trial period the latest proposal is to paint the curbs, which will make no material difference. It is time to face up to reality; Drift Limits have no response and cannot address the noise nuisance created by drifting.

As clearly instructed by the Planning Inspector:

*"if it is not possible for the activities at the site to be conducted with acceptable noise characteristics in relation to engine revving and tyre squeal these should not be allowed to continue".*

# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

**Clarke Saunders Acoustics (CSA):** Concerned that noise nuisance continues despite the fact that the Runways Farm Noise Management Plan had been operational for more than a year, in July 2016 local residents engaged the services of Clarke Saunders Acoustics. CSA is a firm of specialist acoustical consultants which provides expert consultancy advice to many UK motorsport circuit and off-road venue operators, including Silverstone, Brands Hatch, Oulton Park and Bugatti Owners Club. The company has also been involved in the planning stages of new and modified motorsport facilities, such as the Circuit of Wales, Snetterton and smaller corporate and club facilities and provided assistance to Local Planning Authorities and neighbours of such venues.

## 1. Amount / Positions / Quality of Noise Monitors

CSA has considerable experience in establishing trackside drive-by noise monitoring systems at motorsport venues, having worked with the leading circuit operators and equipment suppliers in establishing optimum system and installation details. The most important factor is the location of the monitor, in terms of both position on the circuit and lateral set-back distance from the track. The location needs to capture pass-by noise when the vehicle is under full acceleration at relatively high revs to capture the loudest and most consistent noise emissions. It needs to be close enough to identify noise emissions from a single vehicle, but not so close that the lateral location of the vehicle on the circuit makes an appreciable difference to the repeatability of noise readings due to taking different lines through and between corners.

However, as observed by CSA during the site inspection at Runways Farm, it is apparent that the drifting instruction and experience drive activities are entirely different. With laps being untimed, and uncompetitive and with the emphasis on fun and handling skills, there are no consistent track behaviour patterns. As a result, whether deliberately or sub-consciously, it is almost inevitable that drivers who are aware of the monitoring microphone location will moderate their behaviour in its vicinity. As a result, any single microphone location for each track will inevitably underestimate the noise emissions from vehicles engaged in these types of activity. While the noise monitoring system has the potential to deliver suitably accurate and reliable monitoring data, the implementation and scale isn't sufficiently deployed to effectively monitor the activity it is required to 'police'. It is recommended that Dacorum Borough Council require the applicant to utilise multiple simultaneous noise monitoring locations (at least 3 per track) to reduce the under-reading effect of driver moderation.

### Justification for lack of noise monitoring adjacent to affected properties:

Contrary to the Sharps Redmore noise predictions, when noise nuisance is occurring on the circuit and the Runway it can often be heard over the noise levels of road traffic. In line with the Inspector's decision and based on the noise nuisance at affected properties, local residents expect ***that the activity causing the problem will be modified until the noise nuisance they are experiencing in their homes and gardens is eliminated*** (i.e. reduce noise thresholds, if modification is ineffective offending vehicle/s and or activity will be eliminated, etc.). Despite continuing noise nuisance from motorsport activity on the runway the noise thresholds **have not** been adjusted and it has taken months to remove offending vehicles from the track. To effectively monitor and eliminate noise nuisance it is critical that the existing noise monitoring system is expanded as recommended.

If a new and more progressive noise nuisance management program as outlined above fails then noise monitoring adjacent to affected properties may be the last resort.

### Justification for not allowing the Council and local resident's real-time noise data:

Gerald Eve has obviously not been made aware of the fact that a large percentage of the motorsport noise nuisance that residents hear does not trigger a noise alert, and the noise alerts that are reported dramatically understate the noise nuisance impacting residents. This is especially the case with the excessive amount of very loud tyre screeching caused by drifting on the runway.

It is unfortunate that it is cost prohibitive for Runways Farm to provide residents direct access to noise data. Experience has shown that web-based systems of this type can be of greater direct benefit to neighbouring communities if direct open access is provided, enabling residents to access the information directly. To the benefit of all parties the availability of such tools helps reduce the number of complaints received, when potential complainants are able to access the system and better understand levels of activity and variability occurring on site.

# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

## 2. Noise Thresholds

Nowhere in the Gerald Eve document is it mentioned that throughout the 2-year trial and since its conclusion on 14 January 2017 the 2 noise monitors deployed are not detecting a significant number of the noise nuisance complaints reported by residents. As a result, the exceedances reported by the applicant are vastly understated. Conveniently, and to the applicant's benefit, no investigation has been undertaken by the applicant to determine the cause of this under reporting. Instead the applicant claims that local residents don't know the difference between high performance motor vehicles and day-to-day road noise or aeroplanes flying overhead.

In his decision, the Inspector clearly stated:

- **It is not just about loudness of the noise that makes it annoying to the residents but the characteristics and repetitive nature and even low sound levels could become annoying.**
- **That during the two-year trial period the operations can be modified to prevent such noise nuisance to neighbouring occupiers.**

The 2-year trial was not and should not have been about setting noise thresholds at the start and then spending the rest of the trial explaining away the exceedances, but about utilising the trial period to demonstrate that the nuisance can be eliminated by continually refining the noise management plan including reducing noise threshold levels as required.

### Justification of Thresholds:

Noise thresholds or no thresholds, the key for a successful trial is to understand the nuisance from a resident's point of view and for the applicant to modify the motorsport operations in order to prevent residents from experiencing continuing noise nuisance. Unfortunately, this has not happened. While Dacorum Borough Council were involved in helping to establish the initial noise thresholds as a starting point, the applicant (not DBC) was responsible for modifying the operations as necessary to prevent the nuisance continuing. This has not occurred and the applicant remains focused on justifying the initially agreed thresholds which were only meant to be a starting point to help eliminate noise nuisance.

## 3. Exhaust Standards

At section 6 (k) of the Management Plan, operating restrictions are described including vehicle exhaust noise emissions control by means of the 'standard' static noise test, and reference is made to MSA passport approval. The test regime described, however, is subtly different from the MSA static sound test, which requires noise levels to be measured at 0.5m rather than the 1m shown in the Management Plan, or with an option to test at 2m against a more stringent limit.

**This doubling of measurement distance can be expected to make up to a 6dB difference to the resultant noise reading, making the 110dB(A) limit in the management plan the equivalent of 116dB(A) tested to the correct MSA methodology.** With reference to the table below from the MSA regulations it is clear that this constitutes a very high comparative level of output in comparison with high performance competitive racing formulae.

In comparison, most track day operators apply a static test limit in the region of 105dB(A) at 0.5m

It is essential that the MSA exhaust standards are implemented as soon as possible.

## 4. Transparency of Noise Monitoring Data

As noted by the applicant the information provided is just a restatement of the noise management plan that was developed in 2015 offering nothing new to assist in eliminating ongoing noise nuisance. On first glance it looks impressive but when further analysed it appears to be more of a data collection exercise lacking firm commitment to action the problems that have been identified in a timely fashion:

- **The site owners are required to contact users who cause an exceedance 'as soon as possible'. Similarly, operators are required to notify the site owner of any noise complaints 'as soon as practicable'.**
- **As you will note there is no defined time to respond to an infraction, all very vague and noncommittal, with today's technology it should be immediate.**
- **The corrective action has a similar theme. Once the nuisance has eventually been communicated, "the operators must consider what action they should take in order to comply in the future" – a resolution timeframe is not mandated resulting in continuing noise nuisance.**
- **The document continues with a similar theme stating "This may include the removal of the vehicle until servicing and or modification can be carried out".**

# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

## 4. Data Transparency **Continued**

If the applicant is truly committed to eliminating noise nuisance then you would expect any breach to be diagnosed within a few hours and cars removed immediately from the tracks until a solution has been implemented. Instead the applicant's noise nuisance resolution policy is just words with little to no substance which has prolonged the noise nuisance residents are experiencing. This can be clearly seen in the Noise Violation Log where the same violations occur time and time again. Another fundamental flaw is there has been no program has been implemented to research residents' noise nuisance complaints that were submitted to Environmental Health but did not generate a noise nuisance alert.

## 5. Details of the Operational Log Diary

As noted in other sections this is a restatement of the noise management program that was put in place in 2015 as required by the Inspector's decision. It brings nothing new but it is good to read that the operational logs are being produced and available (assuming their accuracy) but the fact remains that noise nuisance continues.

## 6. Breakdown of noise exceedances and their cause, and the evidence that the exceedances have dropped

The inconsistencies between noise exceedances captured by the monitors as compared to noise complaints submitted by local residents has never been rectified. The last noise exceedance report that was shared with local residents was the Q3 2015 results which was provided by Tony Cawthorne. Tony's report correlated residents' noise nuisance complaints with noise monitor alerts. Throughout this period there is a significant variance between the noise alerts recorded by the 2 monitors and noise complaints submitted by local residents which could not be reconciled as the monitors do not appear to be capturing the noise nuisance residents report. Tony acknowledged the inconsistencies and that the monitors experienced significant down time but said he simply did not have enough time in his already too busy schedule to resolve these differences.

The reporting that has been provided by the applicant does not include the number of complaints received from local residents or the noise monitor downtime. No effort has been made to research why noise complaints submitted by local residents who live a significant distance from RWF are not being captured by the noise monitors.

As stated the Q3 2015 report was the last noise nuisance report that was provided to local residents. To date the underreporting of noise nuisances experienced by local residents has never been resolved. It appears that the underreporting has increased significantly since the drifting cars were moved to the runway. The very loud screeching and at times loud engine roar that is highlighted on the **youtube** videos provided is simply not being captured by the noise monitors. It is shocking that the far less intrusive noise of the Met Police training exercises where there are no more than 2 cars on the runway at any one time is being captured by the noise monitors while the horrendous noise nuisance from nonstop drifting is not. This is especially true given it is now documented that the applicant rarely waters the track when drifting activities are being conducted

Until such inconsistencies are rectified and the underreporting is corrected the reports provided by the applicant are meaningless. This is one of the reasons residents engaged the services of CSA and whose findings now need to be acted upon.

# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

## 7. Catalogue of measures that demonstrate the efforts that have been made to reduce noise nuisance and the effect of these measures in practice, including the effect of wind direction and inconsistency of track wetting.

Credit must be given to the applicant for providing such a creative and detailed set of mitigation measures though what is missing is any substantiated evidence that these changes have made any material difference. Throughout the document no quantifiable evidence has been provided to substantiate the claims of any reduction in noise nuisance.

**A. Mitigation:** Slick soft race compound tyres fitted to all super cars / experience cars on the circuit in dry conditions.

**Observation:** This may help to a degree with the experience / supercars but periodic tyre screeching can still be heard as they run around the circuit.

**B. Mitigation:** Installing larger back boxes /additional exhausts /more restrictive wadding / additional bungs to tailpipes / catalytic converters / different exhaust manifolds / repair exhaust leaks.

**Observation:** Engine noise emitted from a number of cars is still an issue / noise nuisance. These are primarily the high-power cars on the circuit and the higher power drift cars on the runway.

Again, as the Inspector said it is not just about the noise levels.

**C. Mitigation:** Installing more restrictive air filters or additional ducting and filters.

**Observation:** It has to be questioned how much of a noise reduction this makes if any. Again, no documentation or data has been provided to substantiate this claim.

**D. Mitigation:** Removing gear sets from Formula Renault gearboxes – only 3rd gear remained.

**Observation:** Obviously, this did not reduce the noise nuisance sufficiently as Drift Limits ended up eliminating the Formula Renaults. It must be remembered that residents had to endure the unacceptably loud engine for approximately 18 months of the 24-month trial period while Drift Limit endeavoured unsuccessfully to eliminate the noise nuisance the car generated.

**E. Mitigation:** Tightening up torque setting on Formula Renault rear limited slip differential.

**Observation:** Please see Mitigation 'D' above.

**F. Mitigation:** Installing sound deadening acoustic foam to Formula Renault hood and side pod cowlings.

**Observation:** Please see Mitigation 'D' above.

**G. Mitigation:** Planned, methodical upkeep of the cars maintained professionally by *'Drift Limits Performance Ltd'*

**Observation:** It is nice that Drift Limits moved their garage and renamed their team of mechanics. As you will remember when the Planning Inspector made his site visit to Runways Farm as part of the public hearing (approximately 8 months before the management plan was implemented) Drift Limits' chief mechanic proudly told the Inspector about all the efforts to minimise and reduce noise nuisance most of which are listed above. Obviously, the cars were maintained previously. Raising issues like this demonstrates how deep the applicant needs to dig to find examples of actions taken to reduce the noise.

**H. Mitigation:** Ensuring staff driver training is carried out by a senior instructor.

**Observation:** Weren't Drift Limits' instructors trained in the past by a qualified instructor? Whilst instructors are tasked with minimising the noise, aren't they also in fact regularly expected to showcase their abilities (with the associated noise nuisance) doing hot laps that customers pay extra for and expect a thrill

<https://www.youtube.com/watch?v=d5GhazooOgs>

**I. Mitigation:** Clear and concise safety briefing made by a senior member of staff.

**Observation:** Is the applicant suggesting that there was no safety briefing in the more than 2 years operated prior to the trial? Is it realistic to expect someone who has just paid hundreds of pounds for a high-power car driving experience to think "I better not drive very fast or rev the car very high in third as it might be too loud"? Again, no quantifiable evidence has been provided to substantiate the claims of any reduction in noise nuisance.





# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

**J. Mitigation:** Removal of event vehicles from site if they do not adhere to noise limits as per the management plan.

**Observation:** The data provided highlights the fact that the applicant is in no hurry to remove any vehicles from the site. The noise violation log highlights exceedances occurring all day with no prompt action being taken and allowed to continue day on day. The same goes for 'guest' operators where they operate for a day with numerous exceedances only to be allowed to do the same days later. Yes, the Renaults were removed from the site. Whilst the applicant is keen to highlight this point throughout the document it has to be questioned why the Renaults were allowed to run for more than 18 months of the 2-year trial when the cars had been identified to be a major contributor of the noise nuisance while they were operated on RWF.

It should also be highlighted that just about all the cars cause a noise nuisance in one way or the other, be it engine noise, tyres screech or both. If the applicant is seriously committed to reducing the noise nuisance it has to be questioned why Drift Limits has introduced high power drift cars which has resulted in almost continuous tyre screech and engine noise.

Nissan S15 V8	BMW E46 M3	Toyota AE86 Turbo	Nissan S14 V8
<b>Engine</b> 5.7L V8 <b>BHP</b> 450 <b>0-6</b> 3.9s <b>Top Speed</b> 170mph <b>Weight</b> 1200kg	<b>Engine</b> 3.2L <b>BHP</b> 350 <b>0-6</b> 4.7s <b>Top Speed</b> 155mph <b>Weight</b> 1275kg	<b>Engine</b> 2L Turbo <b>BHP</b> 300 <b>0-6</b> 4.3s <b>Top Speed</b> 159mph <b>Weight</b> 960kg	<b>Engine</b> 4.0L V8 <b>BHP</b> 320 <b>0-6</b> 4.6s <b>Top Speed</b> 160mph <b>Weight</b> 1220kg
<b>Experiences</b> <a href="#">Drift Bronze Experience</a> / <a href="#">Drift Silver Experience</a> / <a href="#">Drift Gold Experience</a> / <a href="#">Drift Collection</a>	<b>Experiences</b> <a href="#">Drift Bronze Experience</a> / <a href="#">Drift Silver Experience</a> / <a href="#">Drift Gold Experience</a> / <a href="#">Drift Collection</a>	<b>Experiences</b> <a href="#">Drift Bronze Experience</a> / <a href="#">Drift Silver Experience</a> / <a href="#">Drift Gold Experience</a> / <a href="#">Drift Collection</a>	<b>Experiences</b> <a href="#">Drift Bronze Experience</a> / <a href="#">Drift Silver Experience</a> / <a href="#">Drift Gold Experience</a> / <a href="#">Drift Collection</a>
			

**K. Mitigation:** Relocating specific driving experiences to the most appropriate track.

**Observation:** We agree that the high-powered, high-pitched Formula Renaults triggered noise alerts as they ran the length of the runway and past the monitor at full throttle. However, the moving of drift cars to the runway has created a new noise nuisance for residents due to the horrendous tyre screeching and engine roar as the cars drift over the concrete runway that has not been resurfaced like the Circuit. DBC and Cathy Leahy are well aware that drifting on the concrete runway does cause horrendous noise nuisance as was demonstrated by 'Learn to Drift' back in 2012/13 which resulted in DBC issuing a Stop Order which resulted in subsequent appeal and then the 2-year trial which just ended.

It appears, however, that the applicant has learned from the Formula Renault experience as the drifting on the runway is kept well away from the lone noise monitor to help avoid detection of the noise nuisance. The only activity that is conducted near the monitor is Met Police Driver Training which, not surprisingly, has resulted in a dramatic increase in police generated noise nuisance alerts.

**M. Mitigation:** Designing a track with noise consideration in mind.

**Observation:** The redesigning of the runway and circuit was indeed done with noise consideration in mind. The new runway design ensures that the tyre screeching and engine roar of the high-powered drifting is kept as far away as possible from the noise monitor installed towards the centre of the runway.

The circuit has also been redesigned to move the noise generating activity away from the track's lone noise monitor.



# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

**N. Mitigation:** Installing water lines onto the drifting areas.

**Observation:** This indeed sounds impressive but in simple terms anybody running a hose pipe from a normal domestic tap could make the same claim. Installing water lines / pipes is meaningless unless the water is turned on and the runway properly and consistently maintained in the required wet condition. Contrary to the applicant's claims and as documented by residents and now **youtube** videos, the runway is rarely maintained in the required wet condition to minimise the noise nuisance caused by drifting.

The applicant is claiming they have run a water line (hose pipe) to two different points of the runway to provide an effective way of reducing tyre squeal. It is not being questioned that the hose pipes exist in some shape or form, but it is questionable if indeed these hose pipes are always used and are at all effective.

We need to be clear, on tarmac or concrete the tyre screech/noise nuisance exists, and whilst the applicant is keen to suggest this is the reason for moving the drifting on to the runway (along with other points) it should be noted again that the noise nuisance and complaints started originally with drifting on the runway / concrete surface when the Circuit was still being used by Bovingdon Market. Nothing has changed.

The following points need to be highlighted:

- The water lines in operation have not been witnessed on the runway by residents.
- The various online videos/ pictures (examples below) show no evidence of any watering.
- The noise nuisance / tyre screech noise indicates no watering is taking place.
- The tyre smoke witnessed indicates no watering is taking place.
- The size of the runway / drifting areas is in the region of four football pitches would require a major irrigation system and water source that is not believed to exist.
- Water supply could be impacted by restrictions imposed by the water board particular in the summer when vast amount volumes of water would be required.

Whilst it has been continually highlighted that wetting the track minimises tyre screech noise nuisance, as has been documented the actual watering of the track has been extremely rare during the 2-year trial. It is only when there is continuous heavy rain that the tyre screech changes to a less annoying tone but it still exists and can be heard.

The screen shots from RWF **youtube** videos clearly indicate that the track is rarely being watered during drifting:



MX-5 Drifting – 13 Nov 2016



S14 V8 powered BMW Drifting – 31 Dec

The photos below provide examples from other venues of how the runway should be watered during drifting events





# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

**O. Mitigation:** Installing rougher anti-skid – apex curbs on the drift runway track.

**Observation:** Firstly to describe the noise nuisance generated by drifting as a ‘squeak’ that is emitted occasionally and say it is not deemed to be an issue clearly highlights the applicant’s dismissive attitude towards residents.

In early October of last year residents met with Dacorum Planning and Environmental Health Officers to discuss the continuing and unacceptable RWF motorsport noise nuisance (including the horrible screech produced by the drifting) and provide potential solutions (please see Clarke Saunders Report AS9100.16913.R2.0). DBC subsequently shared this information with the applicant later in October.

In response to residents’ concerns about the horrendous drifting noise nuisance in the 7 February 2017 Gerald Eve ‘Additional Information’ submission, the apex curve ‘problem’ was raised for the first time. Reactively and after the 2-year trial period has ended the applicant is now proposing to apply anti-skid coating to the curbs - which based on video evidence the drifting cars rarely touch - to eliminate the noise nuisance residents are hearing.

The numerous **youtube** videos provided demonstrate that a vast majority of the screeching is being caused by the tyres running over the un-watered concrete runway. As the videos show, instead of painting curbs the applicant should be watering the track as mandated in the agreed management plan. This is clearly a desperate measure to try and offer an explanation for increasing drifting related complaints by residents, knowing the tyre screech is extremely difficult to manage / control which is why so many motorsport venues do not allow drifting.

## The Impact of Wind on Noise Nuisance

Wind is also mentioned in the mitigation section. As reported by Clarke Saunders “The influence of weather conditions cannot be overstated in considering day to day and even hour to hour variability in the level of noise disturbance caused. Although the prevailing wind on Runways Farm is from the west, it changes frequently at this hilltop location, encouraging noise propagation towards Bovingdon, Whelpley Hill and the homes on the Hempstead Road in turn. Downwind propagation typically increases noise levels by 5dB, whereas the reduction for an equivalent upwind vector is 15dB. This total ‘swing’ of 20dB difference between upwind and downwind conditions equates to a four-fold change in the subjective level of disturbance and does not appear to have been taken into consideration in the Sharps Redmore calculation of the level of noise nuisance residents will experience”.

The applicant acknowledges that **“wind travel makes a big difference as to when a motor activity can be heard and when it cannot”**. Despite Sharps Redmore sound expertise, the applicant admits that “wind monitoring has not been included in the approved management plan, nor has it been previously requested by the Council”.

The applicant then falsely claims that **“Nonetheless, operators have managed to reduce the noise output of their experiences enough so that they operate within the margin to cater for strong winds blowing in any direction”**. *Once again, no evidence or analysis has been provided by the applicant to back this laughable claim.* Contrary to this claim the noise nuisance residents experience is dramatically impacted by the speed and direction of the wind. There is a clearly demonstrable correlation between the direction the wind is blowing and the homes that submit noise nuisance complaints.

Even more disturbing and contrary to the photographic evidence on page 8 of this report and in the **youtube** videos that have been supplied to the Council, the applicant claims that **“track wetting it undertaken when the drift track or skid pan area is dry and there is no inconsistency in application”**.

The **youtube** video links below graphically demonstrate that the runway is rarely watered when drifting is occurring:

- 31 Dec 16: <https://www.youtube.com/watch?v=RjpVLGO--mc>
- 13 Nov 16: <https://www.youtube.com/watch?v=QrkGe5kx7Vw>
- 12 Nov 16: <https://www.youtube.com/watch?v=xv-cxjcykkg>
- 25 Sep 16: <https://www.youtube.com/watch?v=uKwMFzx97wA>
- 06 Sep 16-A: [https://www.youtube.com/watch?v=v3v7Os\\_N7oQ](https://www.youtube.com/watch?v=v3v7Os_N7oQ)
- 06 Sep 16-B: <https://www.youtube.com/watch?v=2rReazk-dBo&t=26s>

# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

## 8. Explanation of why drifting should be allowed to continue, despite large number of complaints being made against this activity

As highlighted in Section 6 above, until the underreporting of noise nuisance complaints from residents is resolved it is impossible to get an accurate understanding of noise nuisance trends.

It is important to emphasise that there are such a large number of drifting related complaints because the noise nuisance generated is so horrendous and which, too often, don't trigger noise alerts. Whilst cleverly positioning drifting on the runway the applicant appears to be able to hide the activity from the noise monitor it is impossible to hide this level of noise nuisance from the homes neighbouring the runway.

The applicant is not helping her case by not ensuring that the runway is kept in the required wet condition as demonstrated in the photos above. Now that the water pipes have been installed it is hard to understand why the track is not being kept in the mandated wet condition unless there is not sufficient water pressure or that to water the runway as required would be cost prohibitive.

The drifting noise nuisance (both tyre screech and engine roar) on the runway has escalated dramatically with the introduction of competition drift cars (M3 / S14 / Skyline / AE86) boasting powerful V8 450BHP engines. Now that they have this new generation of drift car and to quote its website Drift Limits now encourages guests to *"jump in the passenger seat for insane hot laps..."* as Drift Limits offers *"full blown sideways"* action with long transitions *"at 70mph smoking up the tyres at the UK's fastest drifting experience"*.

Based on the manner in which drifting on the runway is now being conducted it is questionable how seriously the applicant has taken the 2-year trial period.

The applicant continues to try and make a case that drifting as it is currently being conducted on the runway is suitable, based on the fact that drifting activities are similar to that carried out by the Metropolitan Police claiming that Drift Limits have achieved a quieter operation. The [youtube](#) videos clearly demonstrate that is not the case.

Taking a closer look at how the Police training and Drift Limits compare, the driving intensity and activity is completely different and there is simply no comparison between 'experience drifting' and the police training that is being conducted:

- The 2 police training vehicles cars drive up and down, following each other conducting evasive manoeuvres and turns which can make short intense tyre screeches as the cars slam on the brakes. The actual running time is minimal, as the police dedicate a significant amount of time to briefings and feedback between activities and the police typically only run for half a day.
- The same cannot be said for Drift Limits, the cars do continuous laps drifting / screeching at speed on the special drift tracks at either end of the runway (and as far as possible from the noise monitor). For those that purchase the Drift Limits Gold package you get 48 laps, then multiply this by 4 or 5 cars running which could run all day. Then add in the high-power drift cars and instructor showcasing 'hot laps'.

The Drift Limit Gold Experience website promotion and the Planning Inspector observations on the police training session provide an eye-opening comparison:

### GOLD DRIFT EXPERIENCE

£265.00 inc VAT

The Drift Limits Gold drift experience offers 48 laps of full-blown sideways action on one of our most intensive learning courses. Everyone is allowed to progress at their own pace, but with this much practice, drivers will be using the handbrake, holding high speed drifts at aggressive angles, and linking corners together confidently. Our Drift Limits instructors will accompany you to help you learn as quickly as possible stretching your ability to the limit.

Towards the end of the session you will put one of our drift prepared Competition Cars (M3/S14/Skyline/AE86) to the test by drifting sideways on full lock around our track practicing 3rd gear entries with a long transition at 70mph smoking up the tyres at the UK's fastest drifting experience.

Optionally during this experience, trade some circuit laps to learn donuts - some drivers will find this throttle control exercise useful for their laps on the circuit. As a further optional extra on the day (charges apply), you can upgrade to drive one of our competition Drift Cars (M3/S14/Skyline/AE86) for your experience and jump in the passenger seat for insane drift hotlaps with a professional driver.

Following registration, the experience starts with a welcome and theory based briefing, covering performance track driving & track day etiquette. You will then head out in one of our track prepared sports cars for 3 passenger laps including hot lap in a drift car followed by 47 drift laps 5 of which are in a competition drift car with 1:1 instruction.

Vehicle upgrades:

Nissan S14 V8  
Nissan Skyline R33  
Nissan Skyline R34  
Nissan 350Z  
Toyota AE86  
BMW M3

Please note without this upgrade your standard vehicle will be an MX-5.

Please take a look at our [Photo Gallery](#) or [Video Channel](#) to see our experiences in action!

# Bovingdon Action Group (BAG)

Planning Reference: 4/03082/16/ROC

## **Extracts from the Planning Inspector's Decision reviewing the police driver training sessions**

23. At the site visit I saw police operating on the main runway and other operators on the circuit. The police officer in charge of the day's training identified that what we were observing was typical of what occurs, and that the 'J' and 'Y' turns being undertaken would produce the most noise generated. Sometimes horns (not sirens) were blown in assessments to indicate a bollard was hit. The engines for the cars produced very little noise, even of fast acceleration and the skids that were generated were over very quickly.

### **Overall Conclusion on Ground (a).**

39. It is plain that the site can be used for motor based recreation and instruction as shown by the police and other past use of the site. While the police use is limited to 60 days per year, if it were causing harm for the days the use was in operation I am sure there would be complaint. From my own observations, the police use would be barely perceptible for the residential areas, apart from the odd short squeal of tyres.

The Metropolitan Police training that is conducted on the runway is utilised throughout the Gerald Eve document to suggest that if the Police can have permission and sometimes exceed the noise levels so can Drift Limits. This document fails to mention, whether intentionally or unintentionally, that the Police operation does not create nearly the same level of nuisance as Drift Limits which again was made clear in the Inspector's report in paragraphs 23 /39. The police have been somewhat a victim of the noise monitor installed in the centre of the track. They are not conscious of its presence and as they conduct a majority of their training exercises towards the centre of the runway, they often trigger it.

## **Meetings with Bovingdon Action Group and the Applicant**

Bovingdon Action Group (BAG), ever hopeful that solutions can be found to end the ongoing motorsport noise nuisance, instigated meetings with Catherine Leahy and Drift Limits. In total 5 meetings were conducted between September 2015 and March 2016. In an effort to help maximise the effectiveness of the meeting BAG invited the Environmental Health Officer responsible for the motorsport noise nuisance who was able to attend a majority of the meetings.

### **While good progress was made on safety related issues efforts to reduce noise-nuisance were not as productive.**

BAG's key focus was on improving safety on the public footpaths, working with Drift Limits to eliminate (or at least significantly reduce) the excessive noise nuisance that was being caused by Formula Renaults and to set up a hotline that residents could call to report noise nuisance as it was happening so that it could be actioned immediately.

Our combined efforts to improve footpath safety were very successful but progress on eliminating the Formula Renault noise nuisance was painfully slow as Drift Limits implemented a whole host of potential noise reduction initiatives on a car by car basis. While improvements were made, it was not at a scale that reduced the noise nuisance the vehicles were generating to an acceptable level. As documented in the Gerald Eve submission the Formula Renaults ultimately had to be eliminated.

The Noise Nuisance Hotline that was put in place was not a success. When residents called the hotline to report noise nuisance to Drift Limits as it happened, no action was taken and the noise nuisance was allowed to continue. Before long residents learned their calls to the hotline were a waste of time and they stopped calling.

**With the failure of the Noise Nuisance Hotline, the painfully slow progress with the Formula Renaults, and on learning that the Environmental Health Officer would no longer be attending, BAG broke off the meetings in March 2016. We then began to develop a new plan of action to help reduce the continuing noise nuisance which led to residents hiring Clarke Saunders in July 2016.**