



“SILENCE IS NO LONGER GOLDEN”

A NEW CHARTER FOR PRO-ACTIVITY IN SUPPORT OF UK CIRCUITS AS A VALUED PUBLIC FACILITY?

INTRODUCTION

The primary purpose of this document is to stimulate fresh debate (and let's be clear, this should not be one that takes place only within the walls of motorsport) that will work towards reversing the apparently unsuccessful methods of capitulation, subservience and unswerving compliance exhibited by UK motorsport in the face of aggressively applied noise legislation and the mis-use of statutory nuisance laws. Against a background of increasing litigation, restriction and expense that is little short of oppression, it is suggested that this downward spiral will lead inexorably to our eventual extinction. The only viable alternative therefore is to consider attack as the best form of defence by mounting a pro-active campaign to change the perception of motorsport from something 'perhaps to be tolerated' to one of appreciation, being an activity that makes significant positive contributions to mankind — socially, economically and environmentally.

It is hoped that the following pages may serve to illustrate the size and speed of the threat and to form the basis for an action plan, through which this list of discussion topics may lead to a consensus of opinion regarding a way forward. A way forward that may then be led by a core group, one more politically powerful because of its dis-association from the direct vested interest of financial benefit from motorsport and one that gains strength from a membership made up of public individuals.

The second purpose of this document, driven by recent negative developments at Croft circuit in North Yorkshire, is to summarise the thoughts, opinions and ideas gathered in recent days since the formation of the 'Save Croft Circuit' group on Facebook (already exceeding 16000 members), and since the unfortunate appeal court decision in January which granted damages

and an injunction based upon noise as a statutory nuisance. Matters specific to the Croft situation may be found in the latter part of this dossier.

It is this group's opinion that the current situation as recently experienced by Croft circuit is the blunt end of a very long wedge. We are reminded —

"All that is necessary for the triumph of evil is that good men do nothing."

In the circuit-starved north-east, with Croft as our focal point, we refuse to be impassive, not only because we have lost amenity locally, but also because the restriction of liberty is an epidemic in the wider sense. This debate and a campaign to reverse the damaging trends of nimbyism and the compensation culture in the UK must be expanded and taken to the highest authority to embrace not only motorsport fans, participants and professionals, but everyone who desires to make use of the great outdoors as a resource common to us all and one that should be shared equally by us all.

THE BIGGER PICTURE

ALL IN THE SAME BOAT, SOME SINKING, SOME FLOATING, ALL TREADING WATER?

Simple searches on noise related court actions quickly reveal a country-wide (indeed world-wide) epidemic in relation not only to race circuits but also aimed at bell-ringing, children's playgrounds, sports fields and at other community facilities such as public houses and music venues. While this illustrates a disturbing general malaise from which no-one is immune, it also indicates the potentially huge volume of allies we may be able to harness, as in almost every case it is a minority of individuals that seek to significantly prevent the participational activity of many (largely without any adjustment or compromise being necessary on the plaintiff's part).

Returning to our field, even the world's most famous motorsport heritage sites suffer:

(i) **Monza** - In November 2005 a Milan court approved an order prohibiting the circuit's use unless noise levels were reduced but a meeting between Michele Faglia, the mayor of Monza, and a number of residents of the town Biassono, which lies adjacent to the circuit reached an out of court settlement. (An out of court settlement? Perhaps money inhabits a scale that talks louder than the decibel range?)

(ii) **Assen** – August 2007 – “Residents living nearby the track have joined forces with the owners of the Witterzomer holiday park which surrounds the facility and three Dutch environmental organisations, to protest at the noise pollution that will be caused by the event.”

(iii) **Penske** facility, North Carolina – September 2007 - “Penske Racing proposed to build 1/4- and 1/2-mile ovals within the 3/4-mile oval track, and a 1.8-mile road course on a 54 acre site close by its racing headquarters in Mooresville but the objections of 200 opponents of the project on the grounds of noise pollution at the Iredell County Planning Board meeting, led to a 9-0 vote against the track.”

Internationally, the Association Internationale des Circuits Permanents (AICP), the worldwide governing body of permanent race circuits, states - "Because of the increasing amount of attention being given to the environment, circuits are obliged to revise their operations with regard to the environment. By introducing environmental management, circuits will simultaneously fulfil their obligations to the public and governmental regulations and lay a firm foundation for future developments. Environmental issues such as noise and alternative energies have become more and more important in recent years. To meet this challenge, A.C.I.P. takes this responsibility with great enthusiasm to a global level, motivated to implement operational standards throughout its member circuits."

Here in the UK:

(iv) **Donington Park**, despite being one of the UK's premier facilities and adjacent to the noise-producing M1, East Midlands Airport and within an industrial area including a huge DHL distribution depot, has suffered from unreasonable and disproportionate restrictions meaning that motorcycle track days for example are limited mostly to road-legal decibel levels. Racing and official pre-race practice at Donington are restricted to 40 days a year.

(v) **Lydden Hill** is not allowed to operate on Sunday mornings until church services finish and is known to have fought long local battles on the noise front resulting in restricted use.

(vi) **Romford Speedway** was closed down due to an individual noise complaint and the **Curborough** sprint venue is suffering similarly.

(vii) **Elvington's** local council served a noise abatement order on the airfield in 2005 and in November 2006 a district judge imposed restrictions.

(viii) **Goodwood's** potential to stage further events is limited by strict local environmental restrictions (i.e. noise limits). Corporate entertainment, race tuition, experience days and track days are offered at the circuit by third party companies, and these account for around 220 non-event days of activity a year, however noise restrictions mean that only five noisy vehicles, or ten well-silenced vehicles, are allowed on the track at any time.

(ix) **Thruxton** tends not to operate track days because of severe local noise restrictions.

(x) **Castle Combe** noise restrictions limit the potential for motorbike track days. Due to noise restrictions self-owned karts cannot be used at this track. The circuit has been stopped from running Formula 3 and GT meetings, its biggest form of income. 2005 – "The future of motorsport at the Castle Combe circuit in Chippenham, Wiltshire is under threat after villagers in nearby Yatton Keynell, complained to the district council that the noise from Formula Three meetings at the circuit was too loud. North Wiltshire Council noise experts agreed and served an order on the circuit." Later in 2005 – "A Magistrates Court in Chippenham, Wiltshire dismissed an appeal by the owner of the Castle Combe circuit against a statutory notice regarding noise control. In a hearing that lasted for three days; the Court did not vary the Notice and awarded costs to the local North Wiltshire District Council."

(xi) **Snetterton** – "In February 2007, Breckland Council began legal proceedings against MSV following a number of complaints about loud and intrusive noise causing a nuisance to nearby villagers. However it has now scrapped the noise abatement notice agreeing to a range of measures". July 2008 – "A £10 million scheme to redevelop the Snetterton race circuit in

Norfolk has been postponed to allow more discussion over the noise impact of a planned extension of the track. Residents have lived side by side with the track for 30 years with few issues, but over the last few years there has been tension, disharmony, and patience is running thin.”

What caused the ‘disharmony’? Is it unreasonable evolution in circuit use or more likely, is it subsequent adjacent development allowed by the same local authorities who then use their powers against circuits? Though since ‘re-approved’, how were prior agreements at Snetterton simply pushed to one side allowing the emotive debate spiral to re-commence? Who suffered the cost of the delays?

(xii) **Brands Hatch** – May 2008 – “MotorSport Vision which owns the UK’s Brands Hatch in Kent, has signed a signed an agreement to reduce noise and disturbances at its race events.”

(xiii) **Oulton Park** – January 2007 – “A series of detailed noise studies conducted on behalf of the circuit’s liaison group, by environmental consultants engaged by the Vale Royal Borough Council, has prompted MSV to agree to noise restrictions being put in place.”

(xiv) **Wildtracks** – November 2005 – “The owners of the Wildtracks off-road activity park near Newmarket face legal action to stop noise from motorcycle racing. East Cambridgeshire District Council officials are to start enforcement action against the owners”

(xv) **Ty Croes** – October 2007 – “The circuit’s owners said, “One of the principal drivers with regards to the re-configuration of the circuit was the need to deliver noise reduction. The new track configuration was designed to ensure the noisiest parts were taken out and that the new configuration guarantees delivery of agreed noise limits.”

This is only a sample. Is there a single circuit that has not suffered from noise restrictions?

In living memory, around 128 UK circuits have closed down altogether. To what extent was noise a factor in this (and was the obvious consequence of concentrating a greater degree of naturally noise-producing activities in to a much lesser number of facilities ever strategically considered)? We doubt it. No longer with us are:

Alexandra Palace (1935), Biggin Hill (1959), Boreham (1950-52), Brooklands (1908-39), Crystal Palace (1927-72), Grandsden Lodge (1946), Long Marston (1970s), North Weald (1946), Paddington (1962), Sculthorpe (1990s), Stapleford Tawney (1947), Thorney Island (1977), Waterbeach (1970s), Welwyn Garden City (1962), West Raynham (1970s), Blandford (1948 -60), Bryanston Park (1947), Chivenor (2000), Colerne (1970-80), Goram Fair (1959), Ibsley (1951-53), Imber Road (1948-53), Keevil (1970 – 80), Little Rissington (1964-66), Morton Valence (1960s), Pendennis Castle (1930s), Plymouth (1938), Staverton (1969-78), St Eval (1966-67), Sutton Veney (1950), Weston-Super-Mare (1949), Wroughton (1970s), Wymering Park (1930s), Alton Towers (1953-58), Ansty (1946-51), Chirk Castle (1948), Church Lawford (1960s), Gamston (1951), Gaydon (1970s), Haddenham (1949), Hanley Park (1934), Long Marston (1980s), Osmaston Manor (1952-57), Park Hall (1928-39), Perton (1960s), Prees Heath (1960s), Retford Project (1949), Syston (1929-35), Wellesbourne (1968-78), Barkston Heath (1990s), Beadnell (1956), Brough (1947-56), Carnaby Raceway (1970 – 88), Carnaby Two (2001-04), Catterick Airfield (1959-60), Catterick Camp (1962-63), Dunholme (1947-48), Esholt (1931-55), Everthorpe Park (1947), Ormesby Hall (1936), Ouston (1960-88), Rufforth (1970s), Thornaby (1959-61), Tranwell (1950), West Park (1935), Altcar

(1947-55), Belle Vue (1927-28), Flookburgh (1980s), Greeves Hall (1930s), Longridge (1974-78), New Brighton (1960-80), Parbold (1930s), Silloth (1964-83), Alford (1990), Ballado (1950s), Beveridge Park (1948-88), Charterhall (1953-62), Crail (1952-93), Crimond (1951-72), Edzell (1959-04), Errol (1951-59), Gask (1960s), Ingliston (1960-79), Kennell (1950), Turnbury (1950s), Winfield (1950s), Eppynt (1948-53), Fairwood (1952), Kinmel Park (1970s), Llandow (1960s), Mona (1970s), Rhydymwyn (1949-63), St Athan (1963), Andreas (1951-70), Aghadowey (1975-07), Aldergrove (1946-47), Ballydrain (1922), Ballynahinch (1921-29), Banbridge (1921-30), Bangor Castle (1945-66), Carrowdore (1925-00), Clandboye (1922), Coleraine (1923), Comber (1937-38), Desertmartin (1921), Dungannon (1924-27), Enniskillen (1929-52), Greengraves (1922), Killinchy (1956-91), Killough (1921), Lisburn (1946), Long Kesh (1945), Lurgan Park (1950s), Maghaberry (1962-71), Mid Antrim (1950s), Newtownards (1949-52), North Down (1925), Nutts Corner (1984-05), St Angelo (1960-05), Temple (1921-99), Davidstow (1952-55), Debden (1962-65), Fersfield (1950-52), Full Sutton (1958), Linton on Ouse (1960-61), Lulsgate (1949-50), Pebsham (1956-57).

We are now left with 35 UK circuits in total and little prospect of this number increasing. Removing those from this list where use is only occasional or kart-specific or public roads based (such as Scarborough, the Isle of Man and various Irish circuits), we are left with barely 19 in semi-regular use and perhaps only 9 or 10 that can be described as top class facilities:

Brands Hatch, Goodwood, Lydden Hill, Snetterton, Castle Combe, Thruxton, Darley Moor, Donington Park, Mallory Park, Silverstone, Cadwell Park, Croft, Elvington, Aintree, Oulton Park, East Fortune, Knockhill, Anglesey and Pembrey.



Considerations such as — ‘Is this level of provision a sufficient public resource?’ have never been undertaken by the politicians or been identified on the radar of judicial review. It is time that this was changed.

Other groups associated with outdoor noise-producing activities are equally concerned, the world over. For example, the medium of music is even less able to be silenced where its sole purpose is to reach the ears of humans, however even this fundamental form suffers:

Musicgroup.org are a membership of music lovers in Australia who are concerned about recent severe restriction of their preferred pastime. (If they haven’t enough space on that under-populated continent to enable all to live in harmony, then just where is this possible?).

Another Facebook group named ‘Live-With-It’ recently gathered 3639 members before submitting an electronic petition to No.10 Downing Street proposing; “There are increasing cases of new residents moving into a location, only to complain and campaign against activities that have taken place for many years, especially when such noise would or should have been obvious before choosing to live in the locality”. A familiar story if you operate a race circuit. An analysis of the intriguing formal Government response follows.

The subsequent petition attracted 13,326 signatures and can be seen at:

<http://petitions.number10.gov.uk/livewithit/#detail> .

Government position:

“When reaching a decision as to whether the noise is a statutory nuisance, a variety of factors are taken into consideration, such as, the type of the noise, the frequency and duration of the noise, the loudness of the noise, the general character of the area, sensitivity of the complainant and reasonableness of the activity causing the noise. The determination of each of these issues is carried out by reference to established case law”.

It is notable that the value of the venue and activity to the public and the value to the local economy is not considered worthy of mention, mirroring the trend identified in relevant court transcripts and local authority minutes studied so far. The sensitivity of an individual complainant is weighted, though one wonders why the significance of such a minor factor (in terms of the overall number of people affected) be given such prominent consideration? Perhaps this is because the significance of the amenity to thousands of users is apparently totally ignored.

And why is the final determination decided predominantly by reference to established case law? Is each case not sufficiently meritorious and distinct in its own right and does each case not have a range of parameters that may mean its complexity is outwith previous cases? Are the judiciary so lazy that they can sanction the expenditure of (in Croft’s case) around £1m in legal costs to establish the history of the general topic, yet not allow due process in terms of live, on-site assessments carried out by a ‘jury’ of average citizens free from vested interests or preconceptions, advised by experts, not in the field of law, but in the field of noise? It is clear that such cases are 99% legal but only 1% the practical application of science and common sense.

Furthermore, though the general character of the 'area' as mentioned (an undefined variable and apparently one which extends beyond the boundaries of travel of the noise in question) is considered an important facet, in Croft's case it seems that 60 years of motorsport activity is not sufficient to contribute to, or indeed to define, the area's character.

The Government response continues:

"Were the changes proposed (in the petition) made to the legislation, a statutory nuisance causing activity, such as a factory or a noisy neighbour, could be allowed to continue to blight an area as they happened to be resident before the complainant".

As alluded to elsewhere in this document, the words 'noisy' and 'blight' are used in such a way that pre-decides such status. Such emotive terms should not be allowed in courts of law or in Government comment.

Nowhere in the governmental reply or generally in court transcripts reviewed is the option for the few disturbed residents to take personal steps (such as moving away, installing triple glazing, wearing ear defenders or utilising sound masking techniques) considered.

Finally, the response states:

"In relation to the noise sources specifically mentioned however, it seems unlikely that an Environmental Health Department would consider church bells or children playing in a playground to be considered a statutory nuisance as they very well may be considered reasonable for the area".

Here we have a scenario whereby an officer of a local authority makes a decision as to what 'reasonableness' is for an area (an area still probably undefined in size etc). On the strength of this opinion, a judge largely decides the question of damages or injunctions. Is 'reasonableness' really a definable matter? Some would argue that for it to be so, a complex and all-encompassing matrix of interlinked variables would have to support such an important calculation, taking into account the views and merits of both sides and all significant circumstances. We suspect that far from this, the question of reasonableness is quickly decided through gut feelings, preconceptions and local political pressures, all of them insufficiently considered.

Another UK group, concerned about plans to force music venues to install sound attenuation equipment at huge cost have acted thus — "We the undersigned petition the Prime Minister to not introduce sound control devices as a legal requirement in entertainment venues." This attracted 86,452 signatures and can be viewed at:

<http://petitions.number10.gov.uk/NoNoiseControl/>

The licensed trade industry is also concerned — "The recently introduced changes in licensing law have produced an environment where music and dance, activities which should be valued and promoted in a civilised society, are instead damaged by inappropriate regulation. We call on the Prime Minister to recognise this situation and take steps to correct it.

This attracted 79,928 signatures and can be viewed at:

<http://petitions.number10.gov.uk/licensing/#detail>

The above examples are just the tip of a titanic iceberg. Though the concentration of public dissatisfaction is often diluted by there being so many separate opportunities for comment, the extent of the wider issue is clear. Most campaigns on Facebook and the Downing Street petitions facility attract up to a few hundred signatures. The above are much better supported and probably indicate the current strength of feeling.

Frighteningly, there are an even larger number (numerically, but not in supporter membership) of petitions in evidence that recommend increased noise restrictions of one form or another! These however tend to concern minor (often quirky) or local issues and attract much smaller participation. This is though, an indication of the increased stress felt by householders as this small island becomes ever more crowded, reducing noise tolerance as a by-product of modern life.

Finally on this related topic, The BBC's 'Inside Out' programme of February 18th reported that Newcastle City Council's specialist noise control team were called out 7000 times in 2008 compared to 250 times in 1998.

So why the exponential increase? We doubt it's due to more loud music being played because 10 years ago most hi-fi speakers were large, now a lot of listeners use earphones or smaller speakers. Dare we suggest the reasons are:

Lower tolerance thresholds due to underlying stress levels.

More people crammed more closely together.

People tend liaise with each other directly less often and go to a third party to complain more readily.

The noise officers effectively encourage complaints (thereby justifying their existence).

It seems even teenagers can no longer do what teenagers do without risking the confiscatory powers of the latest buzzword - 'enforcement'.

The motorsports community is also an easy target and should not bear the brunt of society's ills.

BETTER NEWS!

A small number of examples are available where businesses have succeeded in defending their operations:

Pembrey – “An appeal hearing in a magistrates court in Llanelli has resulted in the overturning of a noise abatement order that was imposed on the Welsh race circuit at Pembrey and Carmarthenshire Council was ordered to pay the circuit's costs in the case, which total more than £60,000. The magistrates decided the circuit had not, as alleged, created a statutory nuisance and overturned the order imposed after receiving complaints from two nearby residents who said the noise from the races, and from testing events, was making their lives a misery.”

This was a similar situation to Croft's, but with polar results (and significantly lower costs) compared to the Croft outcome.

We need to gather a UK-wide assessment of noise nuisance claims, initially against motorsports circuits but preferably also for other threatened activities to indicate the size of the problem nationally and the trends therein. Case histories should be shared and lessons learned, not least from the few successful defences.

Nigel Mansell's kart circuit at **Dunkeswell**, East Devon, successfully defended an injunction attempt recently. Included in the court transcript was the conclusion:

"It is of course very tempting to bow to the subjective assertions of local residents. But the law of statutory nuisance is an onerous one for the Council to satisfy and rightly so given its consequences. This is why subjective questions of detriment to residential amenity are dealt with by the planning system and why the threshold for statutory nuisance is so much higher. The use of land cannot be improperly sterilized".

In the above case, the Judge appears to have properly considered the planning process as a useful indicator. In Croft's case, not only was this in-depth process ignored, but the public enquiry also brushed aside.

In other areas:

A 2008 case involving the Mokoko public house in St Albans can be summarised as follows and appears to be identical in many ways to the Croft scenario in that:

- The facility was there first long before the complaint was made.
- The plaintiff was notably a 'jonny-cum-lately'.
- The judge (Mr Justice Forbes) said the courts were entitled to take into account that residents should be aware of an establishment's existence before they moved into an area.
- The judge found that it was in "the nature of things" that the style of operation of particular premises changed over time.
- Earlier, the magistrates decided that the defendant had used the "best practicable means" to alleviate the noise problems and the judge said they had tried hard to help the claimant and to reduce the problem.

Why then did Mr Justice Forbes make a decision in this case so different to that made by Mr Justice Simon and again by the appeal court Judge in Croft's case? Why did this case law not apply whereas other opposing precedents did?

MOTORSPORT AND 'GREEN' ISSUES

The US Society of Automotive Engineers (SAE) called for papers to be presented at its 2008 Motorsports Engineering Conference and Exhibition (MSEC), including an invitation to submit papers on green motorsport topics. The SAE sought abstracts for papers and oral presentations on motorsports technologies and engineering related topics including safety, vehicle/chassis testing/Simulation, aerodynamics, powertrain and materials. Green motorsport

abstracts were welcomed on future emissions and carbon regulations, **noise regulations** and muffler design, catalysts in motorsports, hybrid and electric vehicles, safety with hybrid and electric vehicles, bio-fuels, regenerative braking, kinetic energy recovery systems and similar topics. (Are noise studies etc available from this conference? – possible contact – Tim Holland, Lotus Engineering).

While it is reasonable to say that motorsport is leading the way with multiple developments that will significantly benefit the environment (and excellent that it should seek to do so), if noise is the single greatest threat to our existence, can the other substantial benefits not be used as a negotiating point to obtain a moratorium on further noise reductions? Why should the benefits of alternative fuels research, greater fuel efficiencies, lower emissions, improved components and safer vehicles be welcomed while the perceived drawback of noise (at its lowest engineered level ever) be so vilified? Why do we only negotiate away our specific allowances when others seek to further restrict, to take away or to prevent? Why do we not negotiate with our general contributions in order to gain ground elsewhere?

The following results are taken from the recent Motorsport 100 survey:

“Which would be the one area that the motorsport industry should focus on to try and improve the environmental image of the industry without removing the excitement or attraction to the industry?”

a. Fuel consumption / CO2 emissions from racing	61%
b. Other	20%
c. Noise pollution	6%
d. Waste management / recycling	5%
e. Fuel consumption / CO2 emissions from transporting race teams	5%
f. Excessive use of materials e.g. tyres, metals, raw materials etc.	3%
g. Damage to land / natural environment	1%

Do we really believe that noise is likely to do us less damage than the drop in the ocean that motorsport in total represents in terms of fuel consumed? What made up the ‘other’ 20% that was more of a threat than the emotive subject of noise?

From the same survey:

Do you think attitudes to and concerns about environmental impact act as a threat or an opportunity:

	Motorsport Industry	Your Organisation
Significant Threat	3%	3%
Threat	26%	21%
Neither	6%	11%
Opportunity	43%	46%
Significant Opportunity	7%	7%
Both	17%	11%
Balance *	21%	29%

* The balance is the difference between the proportion of respondents indicating an opportunity / significant opportunity and those indicating a threat / significant threat.

Do we really think that environmental concerns offer more of an opportunity than a threat? If we do, do we include noise in that opinion? Surely noise will never be 'an opportunity', but represents the single greatest menace to motorsport venues.

We should of course be building a case for the environmental benefits of local venues. There is a strong case for regional facilities. In the case of Croft, trackday enthusiasts will have to find alternative locations within the 330 mile stretch of eastern Britain from Knockhill in Scotland to Cadwell Park in Lincolnshire. So, instead of consuming minor quantities of fuel to get to a local track, they will have to make 3-400 mile round trips. Multiply this by the estimated 4000 enthusiasts that attended motorcycle and car track days at Croft alone last year and we are straightaway looking at a potential extra 1.4 million unnecessary milesand that's before calculating what the racing fraternity consume. There are additional environmental concerns unsuited for this platform (and of course significant time and expense considerations important to most).

There is little doubt that environmentally, we need to keep things regional.

FUNDAMENTALS

At the highest political levels, we need to seek (meaning to outsmart, to establish undeniable supporting evidence for our case and to bludgeon where necessary) agreement as follows, in order to build a logical case for the usefulness of circuit-based activities as sports, pastimes and economic contributors (in all guises from scooter to truck racing, from track days to GPs).

Here follows an attempt at a logical step-by-step progression of our general case:

- (i) The acceptance of motorsport as a legitimate activity. This to include acknowledgement of its part in establishing the United Kingdom as a valued producer of sporting champions, a source of engineering excellence leading to road safety and environmental improvement and in making a significant contribution to the economy through tourism and manufacturing, reliably repeated over many decades.
- (ii) When politically agreed as legitimate, it naturally follows that such activities must then have sufficient venues at which such sports, hobbies, public services and pastimes may be undertaken for leisure, practice, self-improvement, skills development, re-adjustment of offenders and competition purposes. Other public service facilities are subject to calculation regarding their reasonable demographic provision, so why not motorsport amenity? There needs to be proper assessment of the level of demand for such activities and only then can their location, density and available hours of access be sensibly decided upon. This is much less a local issue and more of a national resource issue just as the third runway at Heathrow is claimed to be. In this way, as a public right and an obvious benefit, minor obstructions such as the environmental considerations sidestepped by Government sponsored projects (or in our case, noise concerns) may be apportioned reduced gravitas.
- (iii) Once the reasonable need for the provision of such a national public service is established, then the existing facilities (or a greater number as research indicates

must be built) should receive immunity from attack for an agreed (extended) period to allow their proper operation as self-supporting businesses and important service providers. In this way, encroachment upon the boundaries of race circuits may be discouraged and 'grandfather rights' reinforced.

- (iv) It has become obvious that there is and always will be (if the status quo remains) a real conflict between circuits and others within earshot (accompanied by a fabricated conflict with those that need to be seen to be defending the rights of locals and those that seek to profit from so doing). Is this not therefore a predictable situation (with much evident case history), the main aspects of which should be broadly considered in advance to avoid unnecessary repetition of court action and associated costs? Do legislators, politicians and planners not have a duty of care to predict and protect against such obvious circumstances? Is their due diligence reasonably being carried out? Has this direct question ever been asked of them?
- (v) Simply because a plaintiff has an address in the vicinity of a circuit, why should the resource they can access (in terms of assistance from statutory authorities) apparently be far greater and more easily obtained than that which a distantly-dwelling facility user (track day fan or competitor) or the facility operator themselves is able to? Indeed, should the cumulative value of an amenity that is used by thousands not be considered and weighted in comparison to the perceived loss of amenity of an individual or a few individuals? This is a check and balance that appears to be absent from courts of law or local politics in most noise complaint cases.
- (vi) We know only too well what are the rights of individuals and local authorities. What then are the rights of circuit owners and circuit users? Why have these not been enshrined in case law? We are after all; businesses, employers, employees and equal citizens. If some of the more favourable case histories above do enshrine such case law, why is this not being applied?
- (vii) With rights come responsibilities. Politicians, planners, environmental health officers and householders and their legal representatives all have responsibilities. The responsibility to foresee certain conflicting circumstances and to avoid them directly while embracing a spirit of compromise and fair play applies on their part too. Circuits have gone out of their way to compromise and to appease. It is our belief that those responsibilities 'on the other side' are being almost completely ignored and that bias towards the complainant is inherent and entrenched. The burden of proof required to 'prove' nuisance is minimal while it is almost impossible to disprove.
- (viii) There is a degree of noise associated with every physical activity. The internal combustion engine (and every other recreational activity that is or may subsequently come under threat) is no different, nor is the frictional effect of rubber on tarmac. This should be acknowledged and allowed for as inevitable as it is widely accepted in connection with public transportation. In this way, the fact that zero noise emissions are impossible should inform the legislators and those charged with applying the laws of the land that limitations exist and therefore continual, inexorable and downward pressure in terms of noise is unrealistic and unreasonable.

- (ix) Noise levels at circuits should not be forced to drop below those experienced adjacent to public highways. This thinking should reasonably apply to both peak level and time-weighted considerations. We should develop the idea that any activities involving road-legal vehicles or giving rise to noise similar in nature to the effects of highways be immune from further scrutiny or restriction where this just happens to occur on race circuits.

In summary, we must strongly suggest that the entire subject matter of noise requires a strategic review and a reduction in its potency and leverage in courts of law. This based upon the undoubted subjectivity of the topic, its disproportionate emotive power (where terms like blight and noisy are commonplace), its complex and little-understood technicalities and the wide range of personal opinions as to what is pleasantly musical, what is beneficial and what may be disturbing to the average listener, rather than to the hyper-sensitive one. In other words to encourage such disputes to be considered less within courtrooms and more 'in the field', judged by those without vested interests or extreme views.

Furthermore, are the laws of statutory nuisance safe? Does the fact that in Croft's case a senior judge had his decision overturned on appeal (regarding the injunction) illustrate that the laws of statutory nuisance are immature? Surely this is confirmed by the completely different outcomes for almost identical case scenarios as outlined above? There is too much variation and case law is being selectively referred to.

NOISE – AN EMOTIVE SUBJECT

(i) Noise is a wholly subjective matter. There are many types and levels of noise, with intensity, frequency, duration, mood and occupation (of the recipient) at the time all having a bearing. That which is music to one man's ears may be anathema to another. Opera singing is painful to some rap music fans (who may experience enjoyment at 100 -120dB levels through headphones) while the sound of a strimmer or lawnmower (up to 100dB) may annoy the man that loves the sound of a Porsche or Ducati on full song. Teenagers often claim to need music to study, older people may prefer total silence. Can decisions regarding this sort of topic really be decided within the walls of a court of law particularly where in that arena the finite (such as the mathematics of decibels and distances) is normally considered to be omnipotent, but where this subject actually encompasses emotions, opinions and many other intangibles? Can the imponderable of 'nuisance' even be quantified, let alone proven, or is the legal requirement ostensibly that the claim for damages simply has to be made to have effect (attaining an automatic status of reality) which is then largely indefensible? It seems that the claimant, whatever their motive, has a considerably easier task in establishing their case.

(ii) Efforts made in noise attenuation such as reducing the vehicle numbers on a track at any one time or silencing those vehicles (even to the point of restricting performance), building noise deflecting walls, tree planting and reducing operating hours, seem to be little appreciated by complainants and given little weighting by judges even when costing individual participants and circuit operating businesses hugely. It seems unfair by comparison that plaintiffs should not apparently have to make compromises too. Having established (almost for the simple want of asking) a life-altering level of perceived nuisance, the plaintiff can relax, his job done. In court transcripts we do not see adjacent dwellers being asked to spend more time indoors, or to advise circuits of their holiday plans, or to wear ear defenders, or to mask

unwanted sounds with ones more pleasant to themselves, or to accept triple glazing in compensation or to restrict their barbecue occasions, or to spend less time outdoors.

(iii) Following decisions in law applying further restrictions, there appears to be no period of grace where 'enough is enough' over a significant subsequent time whereby businesses (and individuals who have invested in modifications to personal vehicles) become immune from further or copycat actions enabling them to pay for any mitigation measures, thereby slowly recovering from them over a reasonable period. It seems that case law (particularly selectively referred to) encourages copycat actions and discourages proper consideration of the individual merits of a case. Furthermore, the tendency is inexorably towards lower noise levels, less frequent use and ever greater effort by the circuits or activity participants. This trend should naturally be limited on the common-sense basis that the eventual outcome is the extinction of all activities that create noise. Total silence is an impossibility. Accordingly, the point beyond which restriction becomes unreasonable should be established long before repeated claims for statutory nuisance are allowed. We know though, that this spiral will continue unless altogether halted.

(iv) Furthermore, why are the laws of statutory nuisance able to overturn the longer, more thorough and more wide-ranging consultations and investigations associated with planning laws and public enquiries?

(v) Does the layman really understand the science of noise? For example racing motorcycles have seen reductions from 110dB to 105dB in recent years and 'normal' track days from 105dB to 100dB at Croft and to 98dB at other locations such as Donington Park. Surely finite levels and limits themselves are misleading where actual circumstances vary widely? Does the judiciary understand that such reductions in measured noise levels are in fact quantum leaps on a logarithmic scale? How have we arrived at a point where even vehicles silenced to road-legal standards are capable of eliciting claims for noise nuisance?

(vi) In the Croft case for instance, what was the extent of the Judge's diligence in attending a representative range of activities at the circuit? Was there any attempt to gather opinion from a body of independent witnesses without vested interests or indeed from a selection of local people who hold views opposite to the claimants? Such people exist in this group. Surely, the collective opinion of a gathering of well-balanced individuals from all walks of life at the site of the complaint would have been far more relevant (and considerably less expensive) than the remote deliberations of the comparatively uninformed?

(vii) Why is the emotive term 'noisy' allowed in a court of law at all? Should the descriptions of various noise levels not have been given numerical ratings based upon decibels at particular distances and compared to pro-rata noise levels (from everyday activities) reproducible in the court? In any case, the degree of arbitrariness of noise limitation demands as applied by the judiciary is far from scientific.

(viii) Despite noise levels from motorsport in general being far lower than in earlier decades (110dB was acceptable for rallying events in the 1990s), noise complaints are increasing sharply in number. Could there be a reason for this that is altogether disconnected from the noise produced by any particular activity? If so (perhaps lower thresholds of tolerance precipitated by other stress-inducing lifestyle changes), is it unfair to penalise certain individual pastimes? Of course it is!

COMPARISONS – ARE THEY ENTIRELY ODIUS?

In the subject area of 'rights associated with public access to land', it is possible to claim a right of way using common law. Common law is an unwritten body of law (i.e. it is not written down in an Act of Parliament), instead it derives its authority from usage and customs as well as previous judgments in case law. Dedication of a route may be implied from a long period of public use 'as of right' (i.e. without secrecy, force or permission), and the toleration of the landowner in that use.

Do we see parallels in the 'grandfather rights' of race circuits? Is Croft's 60 year evolution comparable?

The 2007 Barker Review of Land Use recently considered the inevitable tensions between rapidly changing economic (and to some extent environmental) circumstances, and the development of plans within a 15-20 year time horizon. The recommendations in that highly respected report aim to ensure that regional and local plan documents are as timely as possible, and that they take full account (through the updating of planning policy) of the requirements of economic growth alongside social and environmental needs. In other words, planners are to be charged with the responsibility of being predictive and forward-looking.

They are to be charged with "clarifying the need to take full account of economic benefits from development applications" and to provide "a policy framework which encourages, within the context of the plan-led system, a more positive attitude to development setting out the case for local planning authorities to have better financial incentives and flexibility to promote economic development more effectively." Are circuits to be immune from this approach?

We need to establish our own high level review.

CONCLUSION

The time is right to form a new body specifically charged with the purpose of turning the tables of restriction of liberty in motorsport as sought by some through the overly-convenient medium of noise as a statutory nuisance.

A groundswell of support exists for such action within motorsport and more widely and subtle aggression is recommended as a replacement for the recent unsuccessful strategy of capitulation.

A think-tank for ideas and actions needs to be created, pursuing radical ideas such as:

- The formation of a common resource and pro-active action plan involving direct action to reverse the trend and halt the downward spiral (including a single website focal point).
- The establishment of a fighting fund.

- Liaison with other sporting and entertainment industries in order that the burden may be shared and support pooled (including via a wider petition at no10.gov.uk targeted to exceed 100,000 signatures).
- A best-practice study to ascertain why some defences of litigation succeed while most fail.
- Production of a widely distributable DVD (or You Tube film) that illustrates the wide-ranging benefits of motorsports and demonstrates that the noise it produces is 'worthwhile', already well-policed, already close to its lower limits, wholly subjective and in real terms no more intrusive than other accepted aspects of everyday life.
- The development of the Save Croft Group into an 'independent', arms-length lobby organisation to maintain third party status between the industry and the Government / judiciary. This body to benefit from zero vested financial interests in motorsport and from a make-up of individual members of the public.
- Lobby an MP to sponsor an Early Day Motion to review the laws of statutory nuisance (See list of political contacts below within Croft pages).
- Pursue developments of the Croft scenario as a test case.
- Establishing that reductions in public track day availability are a threat to road safety.

The time is right. Is it going to be now or never?



THE CROFT SCENARIO

Members of the group wish in the first instance to express (and ultimately action) support for Croft circuit and the belief that this much-loved and much-needed facility of long standing should not only be allowed to return to former activity levels, but that its natural evolution should be encouraged at the highest level as a public facility for the legitimate and worthwhile pursuits of many. As the only facility of its kind in a 330 mile stretch of eastern Britain, Croft is of regional importance, serving many counties and a catchment area of several millions of people. As well as being a motorsport venue, the circuit provides significant public services and contributions to social improvement and charity support. As such it represents a significant asset and should be valued, not persecuted.

THE FACTS? — KNOWN, ASSUMED AND AWAITED ...

It is not yet precisely clear how the effects of the injunction and award of damages will take effect upon Croft's operation. The circuit has been busy re-structuring its operations since the appeal failure and though no official statement has been made, several event losses have been reported and track day activities decimated according to various operators and participants.

Although the injunction was applied immediately (disabling Croft even from carrying out experiments as to how best to utilise its allowances) the precise terms remain unclear at this stage. It is assumed that Croft has had its 'noisy' days (everything except very low-key driving skills days using a very small number of road-legal vehicles) reduced from potentially around 200 per annum to just 40. The 5 (known so far) remaining track days (compared to some 40 in 2008) will be at significantly increased cost for individuals – for example rising from around £120 in 2008 to £169 for motorcycles (representing a doubling of costs for motorcycle trackdays in only 5 or 6 years, much of it attributable to earlier noise reduction measures, now apparently all wasted effort).

It is unknown whether the injunction is solely in favour of the 3 claimants or a general one against Croft as an operation. In other words, if the claimants were to move away for example, could the circuit return to former activity levels within the limitations of its planning consent or has the injunction gone beyond the demands of the plaintiffs?

Clearly, the terms of the injunction and its effects need to be known accurately and this group will seek further information to that effect as soon as possible and a continuing lead from Croft circuit as to what action they intend and that which they would prefer the group to take. It is known that Croft are looking at whether any further appeal is possible and that lobbying at high political levels is planned.

We emphasize that CROFT HASN'T DONE ANYTHING ILLEGAL despite punitive effects. It has operated at all times within the terms and conditions of its planning application, approved at a Public Enquiry held by Richmondshire District Council in 1998. They have not flouted engine starting restrictions, curfews etc and this circuit is well known to users as one of the most stringent circuits in the UK in respect of enforcing noise restrictions. It has also transpired that the circuit have issued 400 free passes to local residents and offered 3-monthly meetings with local councillors in an attempt to liaise with concerned parties.

Regarding the question of established historic precedent or 'grandfather rights', Croft has seen active motorsport every year (admittedly, sometimes infrequently) between 1965 and 2009. Its motorsport heritage spans almost 60 years in total.

It is ironic that during the 2nd World War many brave young airmen flew out of Croft Aerodrome in their Halifax and Lancaster aircraft, never to return. They paid a high price to earn our liberty, a freedom of choice that is now impotent as our ability to pursue pastimes of our choosing has been compromised.

FURTHER LEGAL QUESTIONS

Without wishing to unduly criticise Croft's legal team (and the defence transcript has not yet been made available), the following questions arise:

- (i) Were the 'grandfather provisions', an accepted legal consideration where an existing facility or habit may establish historical rights and precedents, sufficiently stated and properly weighted? It seems that other tranches of law place much more store in un-challenged or 'tolerated' history.
- (ii) As comparable case histories (shown above) with opposing outcomes have now been demonstrated, can these cases not yet be offered in evidence?
- (iii) Can the case still be taken higher to a European Court (subject to funds being available)?
- (iv) Are there any opportunities for motorsport professionals to counter-sue the claimants for loss of earnings or for circuit users to sue them for loss of amenity?
- (v) Can a case be built demonstrating a lack of diligence exhibited by the Judges (such as through www.judicialcomplaints.gov.uk) in terms of insufficient practical on-site assessment, poor reference to case law and the fact that courts allowed an appeal court Judge that may have been influenced by preconceptions (Mr Justice Morritt) considering his residence in the local area (Barnard Castle).

Furthermore, most spectators are astounded that both Judges accepted the plaintiff's claim: "the Claimants did not acquire their interests in the properties with a knowledge of the

nuisance." Bearing in mind the claimants' former involvement with the circuit (one as a shareholder, two as former attempted developers of a hotel on the complex), the whole of the Judge's opinions in this area of the case are clearly a total nonsense.

Should calculations of the plaintiffs' loss of amenity not include factual records of complainant residence time, even detailed to the extent of estimating the split between periods spent outdoors or indoors? It seems that 'nuisance' does not need to be quantified.

Can Croft circuit and its users, should they choose to do so, now remove the various noise attenuation features installed at great expense prior to the court ruling and return to former levels where still within the letter of planning consent? (Could this option be used as a bargaining tool?).

There is a question mark whether Mr Justice Simon misinterpreted case law or comment attributed to Lord Hoffman. Lord Hoffman of Huntley actually stated, "The planning system is, I think, a far more appropriate form of control, from both the point of view of the developer and the public, than enlarging the right to bring actions in nuisance at common law." He went on, "It gives the developer the advantage of certainty as to what he is entitled to build." A certainty resulting from a public enquiry that was swiftly overturned by 3 individuals.

There is hearsay that the Watson's premises have been used as a point for spectating at Croft events in the past.

There is concern that the various noise levels designated as N1 – N5 are un-scientifically arbitrary and may have been over-relied upon in court.

There exists an opinion that that the claimants were allowed effectively to decide what Croft's 'core' activities are and to aim their injunction demands at these. Surely Croft Promosport should be able to state what their core activities are, without interference from a claimant seeking to reduce the total number of days rather than upper (race event) noise levels only.

Why was Croft's legal team not able to demonstrate that the claimants 'came to the nuisance' with full knowledge of its nature and consequences? Potential nuisance was blindingly obvious as was the 'inside' knowledge of the claimants. Why should the claimants not have to clearly demonstrate their claimed lack of knowledge? This would have been impossible in the case of Mrs Wilson who was a former shareholder.

If increases in circuit use since 1998 planning approvals were cited in the Watson's case, why were they comfortable in buying property for their daughter in around 2000? Have the content of conveyancing solicitor's searches been investigated?

Was the influence of former domestic disagreements established?

Surely all of these areas should be examined further?

THE LOCAL SITUATION

It is clear that of the three dwellings closest to the circuit, the occupants of two are happy to be near to the activities there, even positively encouraging them. At least two further Facebook

group members living nearby have expressed their love of the circuit. This adds to the subjectivity discussion that surround matters of noise as discussed above.

Councillor Ms Jane Parlour of Richmondshire District Council is a vocal opponent of circuit activities. Several carefully crafted and reasonable communications with her have resulted in brief and almost flippant responses. All offers of meetings with this group have been rejected. Accordingly, the proposal to take up her intransigent and biased attitude with senior personnel in Richmondshire District Council may be pursued following a consensus of opinion on this course of action. At the very least she should be disallowed from future involvement in discussions regarding the circuit and her stated compliance with The Local Authorities (Model Code of Conduct) Order 2007 called into question. With local councillor re-elections due in June, the timing of this is important.

The question of whether Ms Parlour has benefited from or tried to benefit from the offering of parking and/or camping facilities to Croft event visitors is presently under subtle investigation.

The rumour that one of the plaintiffs' (Mr and Mrs Watson - Pond House or Ms Wilson's - The Granary) properties had been sold and the sale then cancelled due to perceived threats from unruly motorsport (so-called) fans has proven to be untrue. Neither property is known to be on the market.

Rather than days of circuit use, would the mathematics of allowable use not better revolve around hours of use (avoiding whole days lost due to weather cancellations etc) or even be calculated in terms of decibel hours (combining two aspects of a perceived burden)?

Talking point - It has been suggested that the purchase of two key properties adjacent to the circuit is one potential way of limiting future claims (and, if the injunction is related only to the plaintiffs in question, of potentially removing the injunction). To put some scale on this, every £1m mortgaged over 25 years would cost approximately £5846/month at an interest rate of 5%. If it were possible, should a group the size of the current Save Croft Circuit group take out such a mortgage, it would cost each of us just 40 pence per month. Is this such a crazy idea? Are there benefactors in motorsport who would consider such an investment (especially considering current depressed property values and future development opportunities)?

THE VALUE OF CROFT CIRCUIT TO THE AREA

The income to the area from the main annual events has been estimated at some £3m without including circuit income. This could easily grow to £5m or even £10m with local motorsport-related industry turnover and the full benefits from tourism. This is significant and should be more widely broadcast locally (and multiplied up nationally).

The value of the facility is not monetary alone. Disabled arrangements are good (this has been specifically mentioned by such group users) and a public service is provided through the development of driving skills at multiple levels. For example the Police force had planned a programme to educate 'boy racers' and to convert their energies to track-based, rather than public road-based, activities. This initiative may now be threatened. Drivers of pre-licence age are also able to develop their skills here.

The Great North Air Ambulance relies heavily upon open-space facilities such as Croft for landing and exhibiting their helicopters and gains much publicity and charitable collection opportunities from this and directly from event collections. Croft has made the GNAA their official charity alongside St Theresa's Hospice (for whom £400 has already been raised at the first event) this year. GNAA have raised as much as £2500 from attendance at single Croft events and had budgeted for £10–20000 over the course of 2009. This is now likely to be much reduced.

Croft circuit provides real road safety benefits through track days. Certain activities otherwise practiced on public roads are better confined to controlled circumstances. Who will take responsibility for related increases in road casualty statistics? The Government's road safety 'Think' campaign actually recommends track days as the correct arena for today's higher performance vehicles and acknowledges the contribution to skills enhancement.

THE LOCAL CAMPAIGN

As alluded to, the Save Croft Circuit group has only been running for less than a month, but has already attracted over 16000 members. Though few may be able to make significant contributions in terms of technical or legal expertise, this represents an excellent and accessible network of like-minded and supportive individuals. 99% of the support has been sensible and revolves around the perfectly reasonable suggestion, 'if you don't like motorsport noises, then don't move towards them'. Early instances of unsavoury comments have now diminished to virtually zero.

Additionally, 'Save Our Circuit' is a newly set up petition running until April 2009 and is currently carrying over 4500 signatures at the time of writing. This can be viewed at:

<http://petitions.number10.gov.uk/saveCroft/>

WHERE DO WE GO FROM HERE?

A meeting with Croft and BARC personnel to clarify the circuit's position and needs and how this group may assist is requested.

The issuing of this dossier to national stakeholders will widen our circle. A concerted and focused effort nationally will no doubt aid Croft's circumstances.

In the absence of national activity, is the level of support sufficient to establish a local fighting fund? If so, should this be spent on direct support for Croft or on pursuit of the wider issues? How would this be administered and what targets should usefully be established?

We need expertise in legal matters. Are there any local volunteers of basic services and advice within the group's network?

We need scientific expertise in matters of noise science. (One contact has offered some assistance in the form of case studies of successful defences (Ray Smith, Licensing Engineer of Tamworth Borough Council's Environmental Health Department).

We need further local and political supporters:

As active, well-informed and well-connected as the above good folk of the active contact list (see below) are, we need some really 'big guns' to get involved, or at least to listen in the first instance.

Politicians

Which MPs have responded positively to contact so far other than Mark Oaten and Dari Taylor (who has written to The Secretary of State for Environment, Food and Rural Affairs)? William Hague has been initially contacted in writing. Robert Goodwill, MP for Whitby & Scarborough is said to be a potential ally as may be Baroness Billingham who has supported sports facilities in defending noise damage claims and also Lord (Paul) Drayson - Minister of State for Science and part time American Le Mans Series racer.

Who are the other politicians with a soft spot for motorsport and vehicles or known to be against the restriction of healthy public outdoor activities? Some pointers:

Peter Hain MP (register of MPs' interests: "Training and provision of RACMSA Competition Licence, and entry in the House of Commons versus the House of Lords Motor Race at Donington Park".

Jack Jowell MP, Angela Smith MP, Jane Kennedy MP - entry in the House of Commons versus the House of Lords Motor Race at Donington Park".

Richard Burden MP - main leisure pursuits are: Motor racing and he holds a competition licence and is a former winner of the House of Commons v House of Lords motor race. He is also Chairman of the AI Party Motor Group:

<http://www.the-mia.com/All-Party-Motor-Group> ...

Which includes:

Lord Corbett of Castle Vale
The Rt Hon Michael Jack MP
Lord Astor of Hever
Fabian Hamilton MP

This group's stated intentions include "In order to increase the Group's awareness and knowledge of the industry, several visits to events as well as companies, are organised. The MIA, SMMT and RAC act as official organisers and liaise between the guests and the Host Company on their chosen visits. The concept behind the Motorsport event visits is to demonstrate to Government Ministers, MPs and Lords the strength of the organisation and industry behind a Motorsport event.

Motorsport Competitors / Managers

We have an initial list of celebrity competitor supporters within the 15000 group members including James Toseland, Kevin Mawdsley, Jimmy Storrar, Luis Raza, Tom Chilton, Scott

Redding, Matt Neal and Cal Crutchlow, all top flight national names but how can we add to this with international celebrities? Just how do we attract the endorsement of the Lewis Hamiltons and the Valentino Rossis?

Motorsport Officials and Celebrities

We also have Charlie Boorman (friend of Ewan McGregor and Long Way Round star) amongst us, but how do we attract the endorsement of Bernie Ecclestone, Richard Hammond and Jeremy Clarkson etc?

Local Resident Supporters Etc

We already have some links with local people (within earshot) such as Andrew Constantine (rally co driver who lives in Dalton), John Hutchinson (listed as a friend of this group), Brendan Suffell (who owns the garage at Entercommon, motorcycle trials rider), the Coates family from Scorton (rallycross & kart racers), Wayne Longstaff, race mechanic (lives next to Croft Spa Hotel), Phil Lockey (Hurworth plumber whose son races minimotos). This list could of course be usefully grown through direct contact with local accommodation and engineering businesses. Clow Beck House Hotel have already posted a supportive link on the Facebook website.

FRIENDS OF CROFT

An early list of stakeholders and interested parties has been created, all of whom have expressed a desire to be kept informed or have asked to be directly involved and many have contributed ideas and information to this dossier. Further recipients are asked to please circulate to as many potentially useful contributors as possible and to express their willingness as appropriate to have their information added to the list of members for circulation.

Doug Harris
March 1st 2009
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