

New Settlement Proposal at Colworth by Wrenbridge



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1: Summary

Santa Pod Raceway perceives the potential development of 4,500 new family homes in such close proximity to the race track as a serious threat to its business operations. Experience within the motorsport industry tells us that the power available to members of the public with modern legislation is formidable; this means that the opportunity for a single complainant or a group of complainants to curtail the business activities of a company like SPR is very real. Fortunately due to Santa Pod being present and active in running drag racing for over 50 years, the community in which we sit is largely accepting of what we do. The danger to the business and employment is that a new community would not be so understanding.

Santa Pod Raceway is synonymous with high speed and noise; these two elements are at the very heart of what we do at Santa Pod. When we receive complaints from the community we listen and react where possible, we actively engage with our neighbours because we understand how important they are in what we do. Motorsport noise is an issue that local people have a good deal of acceptance towards, many taking the view that SPR has been operating as a venue for drag racing for over 50 years, so for the vast majority of our neighbours the sound of racing engines has always been there on certain weekends. The prospect of around 10,000 extra people living in closer proximity to the venue than almost all of our current neighbours is gravely concerning. This amount of new people would certainly include a significant percentage of people who would not take this view.

The very distinctive noise that the raceway creates is received by its customers as a vital and immensely enjoyable part of the drag racing experience. The excitement that the sights and sounds of Santa Pod brings to tens of thousands of fans has enabled the company to build a loyal following that has grown over decades, we are held in high regard and with affection by a great many loyal spectators. The threat that a nearby housing development would pose to the continuation of events as we know them would likely cause consternation amongst our followers.

If the Colworth development were to go ahead the nearest residential houses would be approximately 200 metres away from the SPR startline. To some this would seem like madness, the sound generated by dragsters this close to a family home would be an unbearable burden and completely unavoidable, intrusive and impossible to ignore. We would certainly expect to be the subject of legal injunctions and at once be in conflict with new residents if houses were to be built this close to our venue. In what condition the business could expect to survive this conflict is impossible to predict.

Santa Pod Raceway makes a significant financial contribution to the local economy by providing employment in a rural area. Excluding directors salaries the SPR wage bill for 2016 was £1,315,459. The vast majority of SPR employees live within 15 miles of the venue. As a business SPR spends £1,633,215.76 on goods and services in the locality. The company also pays an annual rates bill of £50,000. Santa Pod is able to operate at this level because of the type of events that are run at the venue



2: Introduction

As a response to the Environmental Sound Survey Report and the Preliminary Noise Impact Assessment Report provided on behalf of Wrenbridge, Santa Pod Raceway intend to present its own representation of the noise impact that can be expected at the proposed Colworth development site as we understand it. It is accepted that noise is a sensitive subject in the surrounding area and as a consequence SPR have retained the services of MAS Environmental Ltd, acoustic experts who were asked to conduct a sound survey and model the results in 2013. A separate part of this response will contain data and presentations from MAS Environmental Ltd. We would also like to present a more accurate picture of the type and frequency of events that take place at the venue as well as the character of events and likely noise impact in the surrounds. Areas that we would like to specifically address include mitigation, live music, drifting and the number of events that will produce sound to a level that we feel will contravene planning guidelines and make the choice of Colworth as a site for a new settlement inappropriate.

2.1: Background

Santa Pod Raceway has been operating as a motorsport venue for over 50 years, it was the first dedicated drag racing venue in Europe. The facility is owned by Trakbak Racing Ltd and is the only FIA (Federation Internationale de l'Automobile) sanctioned drag racing facility in the UK and boasts numerous British, European and world records, we host 2 prestigious annual FIA European Drag Racing Championship rounds as well as 13 annual MSA (Motor Sport Association) National Championship rounds. Bedford Borough Council describes the raceway in their Planning Policy documents as a: "sporting facility which is of national significance" and also states that it will encourage and support the upgrading of the facility. The popularity of the venue and its reputation have grown to a level that it is known and respected worldwide. SPR employs 35 full time staff, 20 people working 3 days per week and around 150-part time workers to run its events. SPR attracts visitors from all over the country who take advantage of local hotels, restaurants and shopping facilities. Annually, SPR attracts in excess of 400,000 visitors to the venue. Industry allied specifically to drag racing is also a significant employer in the region and further afield. Santa Pod Raceway has consent to conduct motorsport activities on 365 days of the year between the hours of 09:00 to 21:00.

2.2: Site Layout

Santa Pod Raceway is located on the site of an old World War 2 American Airforce base that occupies an area of flat land on a plateau between the villages of Podington (1.3 miles away), Souldrop (1.5 miles away) and Sharnbrook (2 miles away). The venue itself amounts to around 70 acres (approx. 28 hectares) and includes the race track, which is 0.75 of a mile long (approx. 1.2 km) and runs in a straight line from northeast to southwest. The venue includes a large tarmacked area and grassed areas for car parking and sometimes weekend camping. Located within the venue are customer facilities such as toilet blocks, licenced bar, 2 shops, restaurant and catering outlets, storage facilities and the raceway control gantry. We have a well-equipped FIA standard medical



centre which can and has provided emergency services to the local community. SPR also leases approx. 80 acres (approx. 32 hectares) of neighbouring land which is also used for camping and parking. Offices for staff that operate the venue are located on site.

3: Events

Events at SPR can be broadly separated into three categories; drag racing events, festival style events and car enthusiast events. The drag racing events are split into European Championship and National Championship rounds, these drag racing events are spread throughout the racing season which runs from March to September. There are two main festival style events held in the summer; Bug Jam and U.S.C. (Ultimate Street Car) which can produce a significant music and associated crowd noise sound profile into the evening. SPR also host numerous popular car enthusiast events. SPR operates from February to November, during this period the race track itself operates on approximately 80 days (excluding private track hires). SPR also operate Drift Days, these are held on 14 days during the year. See appendix B for a full list of events for the 2017 season.

3.1: Drag Racing Events

Contrary to the claim that *"Drag racing events typically occur 2-3 times a year"*, which can be found in in paragraph 3.2.8 in the Wrenbridge Noise Impact Assessment Report, SPR typically hold 10 large drag racing events throughout the season. We would like to draw a distinction between proper drag racing events and other events where drag racing features, most of which produce similar levels of noise. The governing bodies that run the sport and issue rules pertaining to the sport of drag racing in the UK must issue an official race permit to allow competition to take place under the auspices of the governing body. Currently the FIA, MSA, (governing body for car classes) and or the FIM, ACU (governing body for motorcycle classes) issue race permits upon request for 29 days of competitive racing that currently take place at SPR annually. The FIA championship rounds attract more than 250 race team entries and typically run from 09:30 until 20:00. There are also six additional practice days that are associated with the race permits, there are a further five of these days which takes the total number of days annually where loud drag racing takes place to 40 (Please see appendix C). There may also be a number of "track hire" days for private testing purposes. All of these days involve cars and motorcycles running under power with racing style open exhausts.



FIA European Finals 2016

3.2: RWYB Events

Run What Ya Brung or RWYB, these days are essentially public track days. The track is available to anyone who wishes to attend, show their dirvers licence, sign a consent form and pay a small fee.



Provided their vehicle passes a safety check they are allowed to make unlimited runs. Due to this format we cannot predict the type of vehicle that will attend therefore noise levels are unpredictable. There are 24 RWYB dates in 2017.

3.3: 2017 RWYB Dates

5th February 26th February 5th March 19th March 25th March 1st April 8th April 30th April 6th May 13th & 14th May 3rd June 10th June 17th June 1st July 8th July 12th August 19th & 20th August 16th September 7th October 14th October 22nd October 29th October

3.4: Non Race Permit Events

Part of the SPR events calendar comprises of non-race permit drag racing events. These events involve a full programme of racing on the track that would audibly be virtually indistinguishable from race permit events. The character of the noise produced at these events is very similar to the FIA European Championship events.

2017 Non Race Permit Events Dates

Dragstalgia	14 th 15 th 16 th July
Monster Truck Nationals	20 th August
Flame and Thunder	28 th October

3.5: Jet Car

One of the most popular attractions at SPR is the Santa Pod Jet Car. The car is powered, as the name suggests by a jet engine and produces a loud and spectacular show for our customers. The car runs



at 28 events during the season and at bigger events will be joined by other jet cars. The characteristic sound of a jet engine means that it is probably the most recognisable noise that Santa Pod emits, with multiple runs at most events the jet car will make around 100 runs over the season.

4: Live Music

Paragraph 3.2.5 in the Wrenbridge report states that there *"is only a single event per year that is of greatest concern"* with regards to music noise, SPR in fact hold 10 events per year that host live outdoor music on stages at various times and locations. Our own mobile outdoor stage is used at 8 events whilst we host 2 annual events with larger temporary stages. Santa Pod have consent to operate entertainment until 02:00 at events. Due to an initiative in 2013 SPR has voluntarily curtailed music on outdoor stages to finish at 23:00 as a courtesy to local residents.

SPR operates self-policing noise control management systems at all events that involve external music entertainment into the evening. This system involves staff posted to known locations where noise nuisance can occur to conduct listening tests and recording both background and music noise measurements. It can be noted that all the listening and potential noise nuisance locations currently monitored fall much further away from the site than the proposed development's location.

4.1: 2017 Music Dates

Fast Show	2 nd April	10:00 until 17:00
Big Bang	21 st 22 nd April	20:00 until 23:00
Retro Show	18 th June,	10:00 until 17:00
BMW Show	2 nd July,	10:00 until 17:00
Jap Show	9 th July,	10:00 until 17:00
Bug Jam	21 st 22 nd July	19:30 until 23:00
USC	4 th 5 th August,	19:30 until 23:00
Mini in the Park	13 th August,	20:00 until 23:00
VW Action	1 st 2 nd September	20:00 until 23:00
Flame and Thunder	28 th October	10:00 until 17:00

<u>4.2: USC</u>

Ultimate Street Car is an annual event that takes place in early August over three days. Entertainment includes a main stage which is positioned on a large tarmacked area at the side of the race track. This stage features live music from 7.30pm to 11.00pm, we position the stage so that the sound is not directed towards nearby residential areas this would not be possible if the proposed development goes ahead. Another feature of the event is a large big top marquee which contains DJ based music from 20.00 to 01.00, the sound in the mid and high frequency bands here is deadened due to the fact that the PA system is within the tent, however bass frequencies are not attenuated by the marquee and generally require active management later in the evening.





Images from USC 2016

4.3: Bug Jam

Bug Jam is Santa Pod Raceways' biggest event and is held annually towards the end of July. It is Europe's largest VW festival and features drag racing and night time entertainment during 3 days of the event. There is an outdoor main stage and 2 large big top marquees, music features heavily at this event. The main stage is located on the large tarmac area at the side of the race track, the stage runs from 7.30pm to 11.00pm. The big top marquees host dance music shows and run from 20:00 to 01:00.



Images from Bug Jam 30

4.4: Public Address System

Another significant factor related to entertainment and safe site operation is the Santa Pod Raceway PA system. Commentary on track activity takes place on more than 80 days throughout the season, due to the nature of a public address system the sound must be broadcasted to an open space. Depending on wind conditions the sound from the PA can travel and be audible to our nearest neighbours. The PA system is a necessary feature of SPR and provides instructions to race teams, commentary to the public, as well as being able to broadcast safety notices and instructions in the event of an emergency situation.

The PA system consists of 2 main 100V line arrays of re-entrant horn loudspeakers aiming to the right and left of the drag strip into both public viewing areas and team pit areas, as well as to other smaller areas such as catering areas and trade areas.

In addition to the min site PA system, smaller systems are deployed to provide commentary and public safety announcements to individual display and stunt arena areas as required by the management of individual events.

5: Drifting



Drift What Ya Brung. Drifting comprises of cars sliding sideways under power, this takes place on 14 midweek dates, mainly from January to April, then from October to December. Drifting takes place from 09:30 to 16:30 with half an hour break for lunch. During the active times noise is continuous and emanates from several different locations on site.

5.1: 2017 DWYB Dates:

11th January 25th January 8th February 22nd February 8th March 22nd March 26th April 10th May 4th October 18th October 8th November 29th November 6th December

5.2: Drifting Within Established Events:

Drifting also takes place within other established events. There are 11 event days where a small track is used for displays. These displays take place periodically throughout the day.

2nd April 7th May 18th June 2nd July 9th July 4th, 5th & 6th August 1st October 8th October 28th October



5.3: Drifting Sound Characteristics

The character of the noise produced by drifting involves a mixture of engine noise and tyre noise.



Images from Drift What Ya Brung

6: Mitigation

In paragraph 7.2.1 of the Wrenbridge report it is stated that there has been "*encouraging and positive discussions to date with commitments to ongoing and future dialogue between our client and Santa Pod*". SPR would like to make it clear that although we have had meetings with representatives of Wrenbridge, at no time have we agreed to any off site mitigation measures, nor would we wish to construct any such installations on the SPR site.

Paragraph 7.2.2 of the Wrenbridge report identifies certain measures that may be taken to mitigate noise. Below are the mitigation measures suggested in the report followed by our responses.

1) Relocation of the drift track:

There can be up to 7 drift tracks operating at the same time on a drift day, using all available tarmac space. Providing noise mitigation by "relocating the drift track" would not be possible due to the fact that there is nowhere to relocate to.

2) The use and location of stadium style raked seating:

Similarly, due to space constraints this would not be possible.

3) Rerouting of vehicular movements:

It is unclear what vehicular movements are being referred to but, the vehicular movements closest to the proposed development site would be behind the startline area, all vehicles that pass this area are normal road vehicles that must comply with the on-site speed limit of 10mph so noise generated in this area would be minimal.

4) Use of acoustic barriers close to sources of noise (e.g. start of drag runs):

Noise studies of our own show that sound is produced continuously from vehicles as they race down the ¼ mile track. Any attempt to mitigate noise at the startline would not diminish the overall effect of noise from the rest of the track.

Due to the racetrack being historically linked to the World War 2 air base, the main runway was designed to enable aircraft to take off into the prevailing wind, this is why the racetrack runs from



northeast to southwest (the wind most commonly being south-westerly), because of this it can be expected that the prevailing wind will come from the southwest for a significant number of days during the year. This of course means that sound carrying on the wind will often be towards the area of the proposed development which lies directly east and northeast of the racetrack. Attempts to mitigate noise in such a complex soundscape on this scale, given the wide variety of sounds and noise levels emanating from a wide variety of locations and activities would, we feel be entirely impractical and unachievable.

7: Problems in Wrenbridge Preliminary Noise Impact Assessment Report

7.1: Targets that depend on SPR Compliance

Paragraph 8.1.12 in the Wrenbridge Noise Impact Assessment Report states that: "*The reduction in noise impact is likely to require both on site (i.e. development site) and off site (i.e. on the Santa Pod site) mitigation measures.*" On site (SPR venue) sound mitigation would depend entirely on consent from SPR, which would not be forthcoming. We would not wish to comply with any requirement or request to build or install any barriers or infrastructure that would enable the developers to achieve compliance with noise limitations at the proposed development site.

7.2: Wrenbridge Sound Survey Period

Paragraph 4.1.1 in the Wrenbridge Noise Impact Assessment Report states that noise monitoring was undertaken from: "14:00 hours on Saturday 15 October 2016 to 12:00 hours on Friday 4 November 2016". This period late in the season includes only one day of what we would consider to be a loud event and therefore this does not reflect the true nature of the noise impact on the local surrounds.



Aerial View of Santa Pod Raceway



Appendices

Appendix A – Drift What Ya Brung Map



Appendix B – 2017 Calendar Dates

Date	Event	Noise Levels
	January	
11/01/2017	Drift What Ya Brung	
25/01/2017	Drift What Ya Brung	
	February	
05/02/2017	Run What Ya Brung	
08/02/2017	Drift What Ya Brung	
18/02/2017	Stunt Fest	
22/02/2017 Drift What Ya Brung		
26/02/2017 Run What Ya Brung		
	March	
04/03/2017	Dial In Day	
05/03/2017	Run What Ya Brung	
08/03/2017	08/03/2017 Drift What Ya Brung	
19/03/2017	Drift What Ya Brung	
22/03/2017	Run What Ya Brung	



25/03/2017	Straightliners						
26/03/2017	017 Straightliners						
	April						
01/04/2017	Run What Ya Brung						
02/04/2017	The Fast Show						
08/04/2017	08/04/2017 Run What Ya Brung						
09/04/2017	GTI Spring Festival						
13/04/2017	Pro Peak Performance						
14/04/2017	Festival of Power						
15/04/2017	Festival of Power						
16/04/2017	Festival of Power						
21/04/2017	Peak Performance Test & Tune Day						
21/04/2017	Big Bang Camper & Bus Show						
22/04/2017	Big Bang Camper & Bus Show						
23/04/2017	Big Bang Camper & Bus Show						
26/04/2017	Drift What Ya Brung						
29/04/2017	VHR Vintage Nationals						
30/04/2017	Run What Ya Brung						
	May						
07/05/2017	Run What Ya Brung						
10/05/2017	Drift What Ya Brung						
13/05/2017	Run What Ya Brung						
14/05/2017	Run What Ya Brung						
20/05/2017	Race, Rock 'N' Ride						
21/05/2017	Race, Rock 'N' Ride						
25/05/2017	Pro Peak Performance						
26/05/2017	FIA/FIM Main Event European Championships						
27/05/2017	FIA/FIM Main Event European Championships						
28/05/2017	FIA/FIM Main Event European Championships						
29/05/2017	FIA/FIM Main Event European Championships						
	June						
03/06/2017	Run What Ya Brung						
04/06/2017	Classic Ford Show						
10/06/2017	Run What Ya Brung						
11/06/2017	Performance Vauxhall Show						
17/06/2017	Run What Ya Brung						
18/06/2017	Retro Show						
23/06/2017	All Torque Test Day						
24/06/2017	National Drag Racing Championships						
25/06/2017	National Drag Racing Championships						
	July						



01/07/2017 Run What Ya Brung 02/07/2017 02/07/2017 BMW Show 04 08/07/2017 Run What Ya Brung 04 09/07/2017 JapShow 04 14/07/2017 Dragstalgia 04 15/07/2017 Dragstalgia 04 16/07/2017 Dragstalgia 04 16/07/2017 Bug Jam 31 04 22/07/2017 Bug Jam 31 04 23/07/2017 24th Mopar Euro Nationals 04 30/07/2017 24th Mopar Euro Nationals 04 30/07/2017 24th Mopar Euro Nationals 04 04/08/2017 Ultimate Street Car 05 04/08/2017 Ultimate Street Car 05 05/08/2017 Ultimate Street Car 06 08/2017 Run What Ya Brung 04 13/08/2017 Run What Ya Brung 04 20/08/2017 Run What Ya Brung 04 01/09/2017 Pro Paek Performance 04 03/09/2017 Pro Paek Performance 04			
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	07/10/2017	Run What Ya Brung	



08/10/2017	GTI Festival			
14/10/2017	Run What Ya Brung			
15/10/2017	/10/2017 Straightliners			
18/10/2017	18/10/2017 Drift What Ya Brung			
22/10/2017	Run What Ya Brung			
28/10/2017	Flame & Thunder			
29/10/2017	Run What Ya Brung			
November				
04/11/2017	Fireworks Frenzy			
08/11/2017	Drift What Ya Brung			
15/11/2017	Drift What Ya Brung			
29/11/2017	Drift What Ya Brung			
	December			
06/12/2017	Drift What Ya Brung			

High Level	Medium Level	Low Level	Music and	Jet Car Runs	
Noise	Noise	Noise	Racing	Kuns	

Appendix C – MSA Permit Race Dates



MOTOR SPORTS ASSOCIATION

Please find below a list of Permits held at Santa Pod Raceway for the 2016 calendar year:

Permit	Title	Permit Type	Start Date	End Date	Venue
92737	JAP SHOW FINALE	Speed-Drag Race- National 'B'	02/10/2016	02/10/2016	Santa Pod Raceway
92735	NATIONAL FINALS	Speed-Drag Race- National 'A'	24/09/2016	25/09/2016	Santa Pod Raceway
92881	NATIONAL FINALS	Speed-Drag Race- National 'B'	24/09/2016	25/09/2016	Santa Pod Raceway
92734	THE EUROPEAN FINALS	Speed-Drag Race- Int'l (4 Day)	08/09/2016	11/09/2016	Santa Pod Raceway
92880	THE EUROPEAN FINALS	Speed-Drag Race- National 'B'	08/09/2016	11/09/2016	Santa Pod Raceway
92733	ULTIMATE STREET CAR	Speed-Drag Race- National 'B'	06/08/2016	07/08/2016	Santa Pod Raceway
92732	MOPAR EURO NATIONALS	Speed-Drag Race- National 'A'	30/07/2016	31/07/2016	Santa Pod Raceway
92730	BUG JAM	Speed-Drag Race- National 'B'	23/07/2016	24/07/2016	Santa Pod Raceway
92729	JAP SHOW	Speed-Drag Race- National 'B'	10/07/2016	10/07/2016	Santa Pod Raceway
92728	SPRC SUMMER NATIONALS	Speed-Drag Race- National 'A'	25/06/2016	26/06/2016	Santa Pod Raceway
92879	SPRC SUMMER NATIONALS	Speed-Drag Race- National 'B'	25/06/2016	26/06/2016	Santa Pod Raceway
92727	THE MAIN EVENT	Speed-Drag Race- Int'l (4 Day)	27/05/2016	30/05/2016	Santa Pod Raceway
92878	THE MAIN EVENT	Speed-Drag Race- National 'B'	27/05/2016	30/05/2016	Santa Pod Raceway
92726	BIG BANG	Speed-Drag Race- National 'B'	23/04/2016	24/04/2016	Santa Pod Raceway
92725	FAST SHOW	Speed-Drag Race- National 'B'	10/04/2016	10/04/2016	Santa Pod Raceway
92397	Festival Of Power	Speed-Drag Race- National 'A'	25/03/2016	27/03/2016	Santa Pod Raceway
92877	Festival Of Power	Speed-Drag Race- National 'B'	25/03/2016	27/03/2016	Santa Pod Raceway

Yours sincerely,



Competitions and Clubs Administrator For and on behalf of the Motor Sports Association

THE ROYAL AUTOMOBILE CLUB MOTOR SPORTS ASSOCIATION

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