

Sandford St Martin Parish Council

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Chadlington
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04 March 2023

Mr Phil Shaw
Planning and Strategic Housing
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
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OX28 1PB

Dear Mr Shaw

Re: Application no 22/03415/FUL

Proposal Construction of automotive museum building and museum exhibition building with associated corporate hospitality/club space, public food and beverage, retail, workshops, showroom and energy centre and formation of car exercise road. Construction of supporting holiday homes together with the formation of landscaped grounds, associated site services and other works

Sandford St Martin Parish Council objects to this planning application.

The Council believes the impacts of traffic, noise, the visual impact of the building, light pollution, ecology and environmental pollution have not been appropriately considered or addressed in the application, and their costs to the community, district and county are not mitigated by the relatively small potential economic benefits of the scheme.

Further, the Council believes some key documents supporting this application are incomplete in some areas and inaccurate in others. We understand that revised documents are being prepared and ask that once these are available, the Council be given a reasonable period to re-consult with parishioners and submit a revised assessment. Given the size and impact of this application it is important that we have a full and objective statement of the plans and time to review them. Within this letter we also offer a number of suggestions that would help mitigate the impacts listed below. We would welcome an opportunity to discuss these points in more detail.

Traffic

The Council believes that the Traffic Assessment submitted with the application is incomplete and inaccurate. For example, it does not provide an estimate of the increase in traffic on local roads. Based on other documents included with the application the increase could be as high as 2000 extra car journeys each day at weekends, approximately 60% more than today, using a figure of 3010 traffic movements on the B4022 included in application MW.0006/23. The cumulative impact of other developments close to Enstone Airfield means there could be 6000 daily traffic movements on local roads, an increase of some 4000 since 2014. The local roads are a combination of "B" roads, "C" roads and unclassified roads. Many are narrow and in poor condition.

The increase in traffic volume will increase the number of accidents, deter active travel, increase the number of potholes, and increase costs for local residents and the County Council who bear the costs of damaged wheels and more road repairs.

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Alongside these real costs are the impacts of increased noise and emissions. Traffic is one of the main challenges Oxfordshire has in reducing its level of emissions and this impacts rural communities as well as urban centres. For example, according to a model by Imperial College London, all parishes around Enstone Airfield exceed World Health Organisation guidelines for particulate matter emissions, and Steeple Barton suffers more particulate matter pollution than Chipping Norton. Clearly more traffic is going to make this worse. The only mitigant offered in this application is an electric bus to shuttle some visitors between Oxford and Enstone. This is unlikely to make a material impact and is disappointing from a development that is dedicated to transport and includes in its vision the intent to explore the future of transport. Is this project not an opportunity to propose a more ambitious and inclusive approach to the future of transport in a rural setting?

We believe the following WODC Local Plan 2031 policies are relevant in considering traffic, and that this application does not meet the spirit or intent of these.

- OS3 – Prudent use of natural resources, *“All development proposals ... will be required to show consideration to the efficient and prudent use and management of natural resources, including: delivering development that seeks to minimise the need to travel”*.
The Council believes that this development requires travel by car and the plans contain only a token effort to minimise this.
- Core objective CO1 – Enable new development, services and facilities of an appropriate scale and type in locations which will help improve the quality of life of local communities and where the need for travel, particularly by car, can be minimised
The Council believes the added traffic and related noise, pollution and accidents will clearly not improve the quality of life for local residents. Again, the plans contain only a token effort to mitigate these impacts.
- Core Objective CO11 – Maximise the opportunity for walking, cycling and use of public transport
The Council believes significantly increasing traffic volumes on rural roads, that are more dangerous than urban roads, is a disincentive to active travel.
- Core Objective CO15 – Contribute to reducing the causes and adverse impacts of climate change, especially flood risk
The Council believes that both the increase in traffic and use of the track will not help in reducing the impacts of climate change. Again, no material mitigants are offered here.
- Core Objective CO16 – Enable improvements in water and air quality
The Council believes that, as mentioned above, air quality in the area is already below WHO standards and will get worse as a result of this development.

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- T1 – Sustainable transport, *“Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport”. “All new development will be designed to maximise opportunities for walking, cycling, and the use of public transport, ensure the safe movement of vehicles and minimise the impact of parked and moving vehicles on local residents, business and the environment”.*

The Council asks that as this is a museum dedicated to the car and with a mission to explore the future of transport that the applicant be asked to demonstrate this with a more substantial plan to increase the use of sustainable transport, ideally in collaboration with Soho Farmhouse and Warner Hotels.

- T2 – Highway Improvement Schemes, *“Where necessary to mitigate the impact of development and support planned growth, contributions will be sought from new development towards new and/or enhanced highway infrastructure either directly as part of the development or in the form of an appropriate financial contribution.”*

The Council asks for a contribution to make the roads safer and reduce the risk of accidents.

- T3 – Public transport, walking and cycling, *“Where opportunities for walking, cycling, and using public transport are more limited, other measures will be sought to help reduce car use as appropriate...”.*

Again, the plans for this development make only a token effort to reduce car use and the impact of traffic.

Traffic in the area has grown significantly since 2015 when SoHo Farmhouse opened. If this application is approved there will be three major tourist attractions in close proximity that could attract approximately 600,000 visitors each year, all dependent on local rural roads. This will mean that traffic movements on local roads will triple from 2014 when there were less than 2000 daily traffic movements on the B4022.

The Council therefore asks that:

- A comprehensive traffic assessment is completed by the applicant before any approval is given. The current document does not provide a clear and objective assessment of existing traffic or a transparent assessment of future traffic volumes.
- The section 106 funds be used to undertake a broader assessment of the infrastructure needs of the local parishes, reflecting the current volumes and revised traffic assessment. This study should be done collaboratively with the local parishes and deliver a prioritised set of proposals to mitigate the impact of future traffic volumes and reduce the risk of accidents.
- The applicant be asked to submit a more robust traffic management plan that sets out a more ambitious plan to mitigate the impacts of traffic. Ideally this would be done collaboratively with SoHo Farmhouse and Warner Hotels as they will collectively be responsible for the majority of traffic on local roads.
- Section 278 monies be agreed with the applicant to fund road improvements before any approval to this application is given.
- During the operation of the museum a small levy is added to the ticket price to fund road maintenance in the future.

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Noise

The Council has two concerns about noise. One relates to the additional traffic, but the main concern is noise from the track that is part of the development. Residents and visitors value the quiet of a rural location, it is one of the key reasons people want to live in and visit the countryside. The EU Noise Directive, END, defines an area of relative quiet in the countryside as being one undisturbed by traffic, industry or recreational activities. This does not mean that there is no traffic. Rather, it is a soundscape where the benign natural sounds dominate over man-made and other unwanted noise.

This definition is reflected in section 4.7 of the Environment Noise Report, December 2022, included with the application. This states *“Existing noise levels were typical of a rural location with background levels during the day around 30dB and reducing to around 25dB during the night time period. During the date the existing sound levels were affected by localised road traffic.”*

The Council believes that this application will materially increase background noise levels both because of increased traffic, but mainly because of the track.

Paragraph 2.1 of the planning statement states, *“an automotive museum containing a number of automobiles of exceptional heritage value and interest with a demonstration circuit to allow the gentle exercising of the collection.”* What is not made clear in the application is that residents, members of the museum and potentially any guest, will be allowed to drive any road legal car, including loud high-performance cars, on the track any day of the week for 9 hours a day. Whilst the applicant may argue this will not exceed a limit of 83dB, it will introduce a material increase in the duration of noise, up to 9 hours a day, the frequency of noise, six days a week or possibly more, and the occurrence of noise, an unspecified number of cars on the track at any time. This will result in a persistent, man-made and unwanted noise into an otherwise rural soundscape. This must surely be considered a reduction in the quality of life for local residents and so be contrary to the Noise Policy Statement for England (NPSE), and WODC Local Plan 2031 policies EH2 and EN8.

A track side limit of 83dB (the sound level measured at 20m from the track) means that the sound level measured at 0.5m from the exhaust of the car (the static level) could be as high as 110dB. This is higher than almost every other track in the UK where the limit is generally between 100 and 105dB. This means that the Mullin Museum could become the noisiest track in the UK, when noise is considered as a factor of its level, duration, frequency and occurrence. Is this really the intent of WODC?

The Noise Assessment reports that noise in surrounding villages will increase from 30dB to 45dB. However, it concludes that this level of noise falls within permission granted to previous motorsport activities and therefore the noise will have no impact on surrounding villages. It reaches this conclusion only by ignoring all the dimensions of noise and UK planning guidance for noise that states, *“Although the word ‘level’ is used this does not mean that the effects can only be defined in terms of a single value of noise exposure. In some circumstances adverse effects are defined in terms of a combination of more than one factor such as noise exposure, the number of occurrences of the noise in a given time period, the duration of noise and the time of day the noise occurs.”*

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If the planning guidance on noise is appropriately reflected in the Noise Assessment report it should conclude that any village within three miles of the site will experience an increase in noise, especially at weekends when the Museum will be at its busiest and when residents and visitors would most like to enjoy peace and quiet in a rural location. This will have a negative effect on the quality of life for residents, and of visitors to the area who are not at the Museum. This is clearly contrary to WODC Local Plan 2031 policy EH8.

Further, the Council believes the noise limits included in application 18/03319/OUT are inconsistent with noise restrictions placed on similar venues and even some race tracks. For example, Goodwood Motorsports has limitations including 49 silent days, 71 days where the limit is 78dB and 130 days where the limit is 82dB. Given this application is for a museum and not a motorsports venue it seems incongruous that a museum should be granted a much higher limit on noise. The Council requests an explanation of why such a significant increase in noise was agreed under application 18/03319/OUT.

Given this lack of transparency around the use of the track it is not surprising that this is not fully evaluated in the Noise Assessment report, nor is any consideration made of the design of the buildings on noise. The steel and glass crescent shaped main building will concentrate and reflect sound from the track. No assessment has been made about how the prevailing winds will affect noise and no interviews were conducted with local residents. In summary, the Council does not believe the conclusions of the Noise Assessment report, and asks that a new one is prepared.

Within the WODC Local Plan 2031 there are specific objectives related to noise:

- EH2 – Landscape character, *“Proposed development should avoid causing pollution, especially noise and light, which has an adverse impact upon landscape character and should incorporate measures to maintain or improve the existing level of tranquillity and dark-sky quality, reversing existing pollution where possible.”*

The Council believes this proposed development will have a material adverse impact on noise, as set out above, and so it clearly contravenes this policy.

- EH8 – Environmental protection, *“Housing and other noise sensitive development should not take place in areas where the occupants would experience significant noise disturbance from existing or proposed development. New development should not take place in areas where it would cause unacceptable nuisance to the occupants of nearby land and buildings from noise or disturbance.”*

The Council believes it has demonstrated in the points above that this development will cause an unacceptable noise nuisance to residents within 3km of the site.

The Council therefore asks that:

- A clear and comprehensive statement is made about the proposed use of the track including details of the number of cars to be allowed on the track, who will be able to use the track and the hours of operation.
- A new Noise Assessment report is prepared that fully reflects the operation of the site, the design of the buildings, the prevailing winds, and interviews with local residents to document their previous experience of Vision Motor Sport.
- No permission is given until these reports have been assessed.

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- Sound barriers or banks are erected to attenuate noise more directly within the site and so reduce the impact on neighbouring villages.
- Appropriate noise restrictions are placed on the operation of the site, including quiet days and a lower limit on track side noise. We would suggest a 75dB track side limit, that is slightly above the legal noise limit for road legal cars.

Visual impacts

The proposed development sits in the Enstone Uplands that are defined in the West Oxfordshire Landscape Assessment as *“The Enstone Uplands have an attractive and unspoilt rural character”*. It is attractive and unspoilt because many local parishes include a conservation area, have many listed buildings and much of the land is held in private estates and is farmed.

The same report identified threat to the landscape as *“visual intrusion of large prominent buildings within visually exposed, elevated landscapes eg Enstone Airfield”* and *“ ‘suburbanisation’ of rural settlements and roads”*.

Despite its own definition of the local environment, identified risk and planning policies WODC seems ready to approve a building that:

- Is exceptionally large and prominent.
This building will become the most visible building from neighbouring parishes – bigger than the existing ABN buildings on Enstone airfield.
- Will have a much greater visual impact than the existing ABN building.
The ABN building is approximately 27m tall, sits at an elevation of 160m, is very visible from many directions and is a prime example of the visual intrusion of a large prominent building within a visually exposed, elevated landscape. In comparison, the main building of the Mullin Automotive Club will be 22m tall and sits at an elevation of 165m. It will effectively be as tall as the ABN building when seen from surrounding areas and be much bigger.
- Is so big that it can accommodate 36 holiday apartments, 42 bedrooms, events space and member facilities including a roof top lounge, gym, spa and catering facilities. The museum space represents less than 30% of the total floor space of the building. To facilitate this much room for residents and members, part of the museum space has been moved to another building. The main building, as proposed, is now effectively a combined residential and hotel space.
- Will be a material source of light pollution as the upper floors of the building will be heavily used at night. According to the CPRE Light Pollution and Dark Skies map, Enstone Airfield and SoHo Farmhouse are already the brightest developments within the area. This development will materially increase light pollution and will be brighter than any other building in the area, sitting at one of the highest elevations in the area. Like noise, in its current design it will have a permanent and negative impact on the local environment. The Light Design and Light Assessment report make no reference to the light from the buildings. This seems to be a material omission that must be addressed.

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- Is materially different from the original design and is more massive. The original design proposed a Foster + Partners design with a commitment to full BREEAM standards that would blend into the natural environment. Now we have a design that is more appropriate to a city landscape. For example, it is similar to the Blomberg headquarters in the City of London and as such represents an urbanisation of the local environment.

The following WODC Local Plan 2031 policies are relevant to the consideration of the visual impact of this proposal:

- Core objective CO1 – Enable new development, services and facilities of an appropriate scale and type in locations which will help improve the quality of life of local communities and where the need to travel, particularly by car, can be minimised.
- OS2 – Locating development in the right places, *“Development in the small villages, hamlets and open countryside will be limited to that which requires and is appropriate for a rural location and which respects the intrinsic character of the area”, “Proposals for non-residential development that is regarded as appropriate will include: re-uses of appropriate existing buildings which would lead to an enhancement of their immediate settings, with preference given to employment, tourism and community uses; proposals to support the effectiveness of existing businesses and sustainable tourism; development which will make a positive contribution to farm and country estate diversification.”*

The Council believes that the main crescent building is unnecessarily tall, bright and more appropriate in a city landscape or business park. Given WODC’s own characterisation of the Enstone Uplands the design does nothing to respect the intrinsic character of the area. It is also hard to argue that it will enhance the immediate setting. The building does not have to be so high or prominent to serve its function as a museum, dwelling and hotel. The current design choices will introduce, in the view of the Council, an unwelcome and unnecessary urban feature into a rural environment. Surely a more sympathetic design can be put forward that does not compromise the intrinsic character of the area or the commercial interests of the applicant.

As such, the Council believes the current design is contrary to CO1 and OS2. We ask that WODC reject the proposed design and request a more sympathetic one.

Economic Value

The previous application for the Mullin Museum, 18/03319/OUT, was approved in part because of the perceived economic and tourist benefits. The main benefits of the project are estimated to be 200 jobs on site, approximately 280 jobs in the county, added value of approximately £12m pa, and local jobs so reducing the need for commuting.

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The Council does not find the economic argument compelling because:

- The added value of the development is largely driven by the number of jobs. Yet it is hard to know exactly how many jobs there will be, as the estimate varies between different documents in the application. It could be as low as 40, based on the Traffic Assessment, or as high as 200 in the Economic Assessment, albeit this includes 30 volunteer roles, so the added value could be as low as £2m. If the added value is £12m, this is £1m lower than estimated in application 18/03319/OUT, estimated on a basis of 100 jobs on site. Given these inconsistencies the Council questions the veracity of the Economic Assessment and asks that the application be rejected because it offers lower value than the original proposal.
- Further, if the value added is approximately £12m this is a marginal benefit, approximately 0.05% to the £23bn in value added created across the county, based on data in the OxLEP strategy for Oxfordshire. A marginal benefit both in absolute terms, and small in comparison to other investment projects across the county that offer higher value jobs and higher value added. The benefits come at a high cost in terms of increased traffic, pollution, noise, visual impact and environmental impacts. The cost of these impacts are not reflected in the Economic Assessment, and most are contrary to WODC policies. In summary, if this project does not go ahead the local economy will not miss a beat.
- The Economic Assessment states that this project will help the recovery of tourism and visitor jobs. This is not true. In 2021 there was a 56% increase in both the number of visitors and related expenditure in Oxfordshire compared to 2020, rising from 14.5m to 23.3 m visitors and from £1 billion to £1.6 billion. This recovery was managed without the Mullin Museum. Adding another 200,000 visitors is less than 1% of the total numbers for Oxfordshire. Again, the economy will not miss a beat if the project does not go ahead.
- There are already around 1000 tourist related jobs in the area, the main employers being SoHo Farmhouse and Warner Hotel Heythrop. They, and other local businesses, are already constrained by a lack of staff. Adding more demand into the local environment is not necessarily a positive, as it could threaten local businesses more important to local residents. A perverse argument, but the reality of our current economic environment.
- One of the other proposed benefits is the creation of local jobs. There is already a shortage of people to fill local jobs in businesses important to local residents. The jobs created by this development are of marginal benefit to residents, either because they will not visit the site on a regular basis, or because very few of the new jobs will be taken up by local residents. The total population of the twelve surrounding parishes is approximately 4,300. Employment rates are already high, and the area has one of the highest proportions of retirees. So, like SoHo Farmhouse and Warner Hotel, most, if not all, the available jobs onsite will be filled by people from outside the area, increasing the "out-commuting", not reducing it as suggested and again increasing traffic movements. What would be more valuable to the local economy is people filling the existing vacancies in health, education, care and local jobs and businesses used by local communities.

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- The Council does not believe this development has embraced the concepts of sustainable tourism. Sustainable tourism can be defined as “an aspiration to acknowledge all impacts of tourism, both positive and negative. It aims to minimize the negative impacts and maximise the positive ones.” Many of the negative impacts of the development have been set out above, together with reasons the Council believes little has been done to mitigate the negative impacts.
- If for no other reason than emissions, this project cannot be considered a sustainable tourist development. As mentioned in the discussion around 18/03319/OUT, this development is intended to attract international high spend tourism. High spend tourists generally come with a high carbon footprint, for example a study by Oxfam identified from a sample of 125 billionaires that their annual carbon dioxide emissions total about 393 million metric tons, which is about the same annual carbon footprint of France, with its population of 67 million people. To put this into context of the Mullin Museum, if a high spend tourist from Switzerland buys a property on the site, visits twice a year using a private jet and spends two weeks exercising their collection of cars around the track, their tourist carbon footprint will be approximately 24 tonnes of carbon, driven largely by the use of a private jet that emits 2 tonnes of carbon an hour. The average home in the UK emits approximately 8 tonnes of carbon in a year according to the Committee on Climate Change. Extrapolating this, the carbon footprint for the 56 dwellings could be over 1000 tonnes, equivalent to 125 homes. This is more than the carbon footprint of Sandford St Martin or Great Tew, or Heythrop, or Kiddington or Swerford. And if the Museum seeks to increase its revenues it can only do this by increasing its carbon footprint. How can this be justified as sustainable tourism?
- The positive benefits seem to be primarily economic - more jobs and more revenue for local businesses. As mentioned above, the value of the additional jobs is marginal to the county and potentially a threat to other local businesses that are already struggling to recruit and retain staff. Further, the design of the development and its focus on members, hotel rooms and catering facilities suggest one of its financial objectives is to capture as much spend onsite as possible, rather than looking to spread this spend across existing local hotels, pubs and restaurants, that have the capacity to support 42 overnight guests a night. The Council believes a more modest development would create less negative impacts, create more local value and help sustain local businesses rather than threaten them.

In conclusion, the Council believes that the plans as presented are contrary to many planning policies, that there are too many important gaps and inconsistencies in the documents presented, that the economic benefits are marginal, and that the case for sustainable tourism has not been made. We ask that WODC either refuse application 22/03415/FUL or seek material changes to the plans presented, in line with the requests made in this letter.

Yours sincerely

Anne Ogilvie

Anne Ogilvie

Parish Clerk

On behalf of Sandford St Martin Parish Council