

## Planning Applications

23/00400/OUT | Outline permission for construction up to 850 dwellings, care village (up to 3.27 hec gross), up to 20,300 sq m of Class E [Class E (a), (b), (c), (d), (e),(g) (i) ] and F1 floorspace of which: 1. Not more than 1000 sq m of floor space being Class E (a); 2. Not more than 1000 sq m being Sui Generis drinking establishment / drinking establishment with expanded food provision; bed hotel (up to 250 bed), car parking / servicing, 2 FE primary school, associated open space & infrastructure. Demolition of all buildings except for Arena and barn. All matters reserved save for access. This application is accompanied by an Environmental Statement. | East Of England Showground, Oundle Road, Alwalton, Peterborough, PE2 6XE

23/00412/OUT | Outline permission for demolition of all buildings and construction of up to 650 dwellings with associated open space and infrastructure, with access secured and all other matters (appearance, landscaping, layout and scale) reserved. This application is accompanied by an Environmental Statement. | East Of England Showground, Oundle Road, Alwalton, Peterborough, PE2 6XE



BROADCAST PARTNER  
**★EUROSPORT**

This is the Objection of British Speedway's National Governing Body to the planning applications for the mixed-use development of the East of England Showground (23/00400/OUT & 23/00412/OUT).

1. I, Philip Morris, am the Chief Executive Officer of the British Speedway Premiership having been appointed by Speedway's National Governing Body, British Speedway Promoters Limited, which operates Speedway in the United Kingdom under the delegated authority of the Auto Cycle Union (ACU). I am also the Race Director of the highest level FIM (Fédération Internationale de Motocyclisme) international Speedway competitions including the Speedway Grand Prix series (the international Speedway World Championship event), the Speedway of Nations and the Speedway World Cup, the biggest international Speedway events.
2. I was born in Wales and was the Welsh Schoolboy Grasstrack champion at the age of nine and British Youth Grasstrack Champion from the age of 11 and which I won five times. I was signed as a professional Speedway rider by the Reading Speedway team just before on my 16<sup>th</sup> birthday and raced for a number of teams professionally from 1991 until my retirement from racing in 2008.
3. I was appointed Head Coach of the 2009 Great Britain under 21 team following which I was given responsibility for the management, development and co-ordination of activities of the under 21 and under 19 riders. I was also responsible for the running of the British under 16 Championship for riders from 8 – 16 years of age. In 2012 I was appointed Assistant Team Manager of the Senior Squad and led Team GB to a series victory over Australia in a series of meetings held on Premier League tracks.
4. I played a key role in the development of the Elite League Rider draft system, which saw young British riders fast tracked into the 2013 - 2014 Elite League teams. In December 2014, I was appointed the new Race Director for the Speedway Grand Prix World Championship series and the Speedway World Cup by the Swiss headquartered FIM.
5. In November 2023 the Planning Committee of the Rugby Borough Council unanimously refused the application for planning permission to develop the Coventry Speedway Stadium. The Applicant appealed and in 2024 I gave evidence to the Coventry Stadium Planning Appeal to rebut the false and misleading suggestions being made in support of attempts to develop the Coventry Speedway Stadium site. The Planning Inspector appointed by the Secretary of State heard evidence from 22 witnesses over 9 days in September and November 2023. The Appeal Decision of 19 January 2024 rejected all the arguments raised against Speedway and refused the applicant's appeal. The arguments about Speedway which were rejected by the Planning Inspector are repeated in the applications for planning permission to develop the Speedway track at the East of England Showground.
6. Speedway's National Governing Body is interested in these Planning Applications. We want Speedway to return to the East of England Showground, Alwalton, Peterborough and I make this Submission to oppose the Planning Applications. The facts to which I refer in this Submission are within my own knowledge unless otherwise stated in which case I believe them to be true.

#### UK Speedway

7. Speedway, which is now just over 100 years old, is a popular professional motorcycle sport introduced in the United Kingdom in 1928. The senior professional sport is competed by riders on 500cc motorcycles fuelled by methanol, the cleanest fuel used in Motorsport. Speedway tracks are loose surface oval tracks on which riders turn corners by a powerslide, a form of powered high speed-controlled skid. Part of Speedway's popularity is that, unlike for example Formula 1, Moto GP and the World

Rally Championship, it is one of very few motorsports where spectators can see all parts the racing from start to finish.

8. Following its introduction in 1928 many Speedway tracks were constructed at greyhound racing stadia following the introduction of greyhound racing from the United States a few years earlier.
9. At no time has trackside betting been permitted.
10. A league system has been in operation in the United Kingdom since 1929. Twenty two teams now compete in three leagues. Since its introduction UK Speedway has attracted riders from around the world. Three of the world's top six riders (according to the current Grand Prix standings) and the 2012, 2013, 2015, 2017, 2018 and 2021 World Champions ride for UK teams.
11. Speedway racing also includes individual events, the most significant being the World Championship which was competed every year at Wembley in London from its inception in 1936 until 1967 when it was staged in rotation with tracks in Sweden and Poland until 1981. From 1982 the World Championship Final (World Final) was held at other UK tracks in rotation with overseas venues. Since 1996 the World Championship has been competed on a Grand Prix basis with events held in the United Kingdom, Australia, Austria, Croatia, Czech Republic, Denmark, Finland, Germany, Italy, Latvia, New Zealand, Norway, Poland, Russia, Slovenia and Sweden. I am Race Director of the Grand Prix series.
12. Since 2000 the British Grand Prix has been held at the Principality Stadium (formerly the Millennium Stadium) in Cardiff where a temporary Speedway track is constructed. The Cardiff event is widely thought of as one of the pinnacles of the Grand Prix season. For the 2025 Grand Prix season an additional round will be held at the National Speedway Stadium in Manchester.
13. At the highest level Speedway Grand Prix riders earn in excess of one million Euros per annum.
14. A British rider has won the World Championship three times in the last 10 years. The British and former Peterborough Panthers rider Robert Lambert was runner up in the 2024 series.
15. The FIM also hold international team events. Since its opening in 2016 the National Speedway Stadium in Manchester has become one of the favoured venues for FIM international team events having held the Speedway World Cup in 2016 and the Speedway of Nations in 2021. These are the highest level international team championships.
16. The GB Team won the World Speedway of Nations event in 2021 and 2024, came runner up in the same event in 2022 and runner up in the Speedway World Cup in 2023.
17. Despite the loss of the full season of events of the UK's three Speedway leagues in 2021 due to Covid, as far as I am aware no British Government furlough funds were claimed or received by any Speedway team or promotion.
18. In 2022 after a 15 year interval Speedway was restored at Oxford Stadium following the local Council's resistance of the landowner's development attempts. During the 2024 season Oxford competed in all three national leagues (Premiership, Championship & National Development League). Speedway's return has been a huge

success with capacity crowds in attendance on many occasions.

### Broadcasting

19. In 2021 following a competitive bidding process and as part of its €100 million investment over 10 years in World Speedway Warner Brothers Discovery Channel was awarded the promotion and broadcast rights for the Speedway Grand Prix Series and the major international team events; Speedway of Nations, Speedway World Cup, SGP2, SGP3, SGP4 and SoN2. This will include 19 World Championship events per season.
20. Warner Brothers Discovery is one of the world's major media conglomerates, headquartered in New York with an annual turnover in excess of \$33 billion. With Olympics, Winter Olympics, Grand Slam Tennis and Grand Tour Cycling (Giro d'Italia, Tour de France and Vuelta a España) Grand Prix Speedway is one of Warner Brothers Discovery 'Gold Sports'.
21. British Premiership Speedway is broadcast live on Eurosport in the United Kingdom, Poland and Denmark. Warner Brothers Discovery / Discovery+ subscribers throughout the world have access to British Premiership Speedway and the Grand Prix Speedway broadcasts, live and streamed.
22. Eurosport and Discovery+ also broadcast 18 live UK Premiership League Speedway meetings in the United Kingdom, Denmark and Poland having bought the rights to do so as a result of a competitive tendering process. The bid is commercially confidential information. I am able to say that the investment in UK league Speedway by Warner Brothers Discovery is in excess of a seven figure sum per annum.
23. British Speedway Network is a new 'over the top (OTT)' live stream subscription broadcast service. In the 2024 season it will broadcast 58 live Speedway meetings on a commercially viable basis.
24. Many Speedway clubs also have their own commercially viable streaming service.
25. The result is that between Eurosport, Discovery+ and British Speedway Network 76 Speedway meetings will be broadcast live in 2024. It is usual for there to be three live meetings a week from these broadcasters.
26. It is right for me to say that there is a healthy level of broadcast coverage enabling Speedway to be enjoyed by many millions of people throughout the world.

### Team GB

27. British Speedway Promoters Limited has introduced a number of policies to develop the national team. As a result Team GB won the Speedway of Nations in 2021 and 2024 and came runner up in the Speedway World Cup in 2023.

### Youth Policy

28. The youth policy of the British Speedway Promoters runs throughout Speedway in the United Kingdom. Each Elite League team is required to have a junior GB rider. This is designed to ensure that young GB riders can develop their skills in a highly competitive league environment.
29. The Youth development programme has been a great success for many years with a host of current Professional Riders riding in Britain and Europe having come through the British Youth System.
30. Since 2018 the Great Britain Under 21 Team have achieved success on the World

stage claiming a World Championship medal each year from 2018 - 2022.

31. Since 2018 the Great Britain senior team have also had success on the World Stage having won a Silver Medal in 2018, 2022 and 2023 as well as being crowned World Champions in 2021 and 2024.
32. Since 2018 the Great Britain Speedway Team has increased its activities both on and off track, this includes the creation of our youth development pathway, the GB Academy for riders aged 12+. The GB Academy features the top 18 male and female riders from across the country who race 125, 250 and 500cc bikes who take part in a series of on track coached training and development sessions.
33. In addition to the GB Academy we have our 'Tracking Success' programme for elite riders aged 16+. The programme which is led by our Head of Performance, Chris Neville and Performance Psychologist, Jeremy Holt is a data driven development pathway with a four pillar structure of Physical, Technical, Mechanical and Mindset. In-depth mechanical, physical and medical data is collected at both on and off track events that enable us to build a picture of what elite level performance looks like in a Speedway competitor.
34. The policies have already borne fruit. For the final day of the competition the winning GB Speedway of Nations team in 2021 and 2024 was made up of 3 riders; Robert Lambert, Dan Bewley and Tom Brennan who had all won the British under 21 Championship; Lambert in 2017, 2018 & 2019, Bewley in 2020 and Brennan in 2021. I am also proud to say that Robert Lambert and Tom Brennan won the British Under 16 Championship, Lambert in 2010 and Brennan in 2015.
35. In 2017 Robert Lambert also won the European Individual Speedway Junior Championship and in 2020 he became the first British rider to win the Speedway European Championship. He finished 5<sup>th</sup> in the 2022 Speedway Grand Prix series, 6<sup>th</sup> in 2023 and 2<sup>nd</sup> in 2024.
36. The 2024 British Speedway Season has been another good year for Youth Development with 8 clubs hosting British Youth Championship Rounds involving up to 47 riders which included 4 female riders and all riders being under the age of 16, and depending on their age category riding 3 different class of motorcycles being either 500cc, 250cc or 125cc's.
37. For the first time in 2023 British Speedway also ran a Woman's Championship alongside the Youth Championship which included German Speedway Grand Prix Junior Rider Celina Liebmann as well as a number of British Women. This Championship was run over 3 rounds at 3 different venues during June and also took place in 2024.
38. Looking forward there is another batch of young British Riders who will be making their names on the World Stage within the next couple of seasons which includes 17-year old's Ashton Boughen, Luke Harrison, William Cairns who is just 15 and 14-year-old Cooper Rushen again just naming a few of what could be many.

#### Gender Equality / Women in Speedway

39. In line with the FIM initiatives to increase the participation of women in all areas of Speedway from officials down to Riders BSPL has held events for Women in Speedway. In 2023 the British open was held and was extended to additional race tracks more local to the participants in 2024. This is to support the FIM objective to establish international and world championship ranking events.

40. There was also a women's Speedway Academy held at the National Speedway Stadium in Manchester. I have attended in my role as Race Director offering a 360 degree approach to Speedway which included classroom sections as well as on track training.
41. A number of athletes were competitors from other motorcycle sports such as road racing, Motocross and Enduro. The event was so successful some of the athletes have decided to take up Speedway and are purchasing the equipment to do so.
42. This Academy also attracted big corporate companies such as Karcher to support this initiative because is aligned with their ethos of supporting, diversity in sports that are family welcoming environment such as Speedway and whose marketing director confirmed that she feels much safer as a women attending a Speedway event rather than a football event with its hooligan element. Hooliganism and crowd violence have never been a feature of Speedway.

### Environment

43. British Speedway Promoters Limited is working to reduce the sport's environmental impact.
44. The FIM is committed to caring for the environment and created its International Sustainability Commission (CID) to enforce this policy. The adoption of the first FIM Environmental Code dates back to 1994. This document, the latest version of which was adopted at the end of 2009, is updated every year by the CID and is an essential tool for the BSPL and national affiliated federations and other organisers of FIM events.
45. This Code prescribes regulations and recommendations to improve the relationship between motorcycling and the environment and promotes sustainable events. The regulations and recommendations refer in particular to:
  - (1) noise, fuel, protection of the ground and cleaning issues
  - (2) behaviour and activities of the spectators, organisers, circuit/track managers, race participants and road users
  - (3) duties for CID Delegates and Environmental Stewards.
46. BSPL follows the FIM International Sustainability Commission guidelines.
47. Several ideas are being looked into, such as Solar power panels to be fitted to pit roofs for a renewable energy source. Another current initiative is the use of e-bikes for practise to reduce the environmental impact in terms of emissions and noise.

### Land Tenure

48. In many cases since 1928 Speedway has operated on tracks at greyhound racing stadia which had been constructed following the introduction of greyhound racing from the United States a few years earlier. In some cases Speedway Clubs were licensees and did not have a 'stake in the ground'. They were unable to make decisions about land use so that in many cases land uses without Speedway were adopted without any ability to influence or control the decisions taken by landowners.
49. This continues to be a live issue. Wolverhampton Speedway is well supported having raced at the Speedway track in Wolverhampton since 1929. However, racing ceased at the end of the 2023 season, not because of any issues of popularity or viability but because the landowner wants to operate greyhound racing for international sports betting broadcasting on additional days with a view to the development of the Stadium site.



50. Birmingham Speedway is at risk for the same reason as a result of the decision of the same land owner. Peterborough Speedway ceased at the end of the 2023 season because of the current application for planning permission on the track site.

### Rebuttal

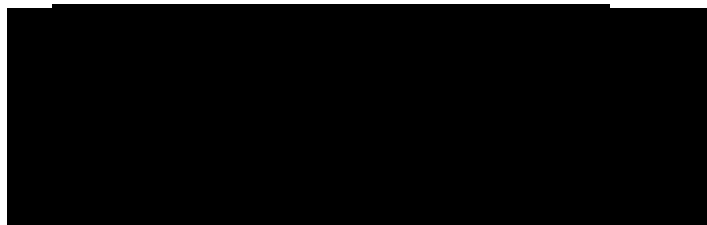
#### Collison & Associates Limited Leisure and Community Impact Assessment Report East of England Showground Speedway Assessment

51. I have read the suggestions made by Collison & Associates Limited in its East of England Showground Speedway Assessment dated variously December 2023 and February 2024. The suggestions made are false and misleading and are rejected. The identity of the author, their qualification and experience are not identified. The website of Collison and Associates Limited describes it as a '*rural, agri-food and agricultural consultancy on the Norfolk, Lincolnshire, Cambridgeshire border*'.
52. The nature of its business is recorded at Companies House as; '*01450 - Raising of sheep and goats, 70229 - Management consultancy activities other than financial management and 85600 - Educational support services*'.
53. The qualification, knowledge and expertise to produce an assessment of Speedway at the East of England Showground are unknown.
54. The Collinson & Associates Limited document suggests that the Planning Inquiry made a judgment on five main issues in deciding the Appeal;
- (1) Whether the proposed development forms inappropriate development in the Green Belt
  - (2) Whether the Stadium is surplus to requirements having regard to national and local planning policies
  - (3) Whether it is financially viable to reinstate the Speedway Stadium
  - (4) Whether there is an identified need for the alternative sports provision proposed
  - (5) Whether the benefits of the alternative sports provision outweigh the loss of the former Speedway use.
55. I gave evidence to the Coventry Stadium Appeal. Collinson & Associates Limited suggest that the Appeal Decision is not relevant, a suggestion I reject.
56. First, the Green Belt issue is not relevant to the Peterborough Planning Applications.
57. In relation to point (2) above the Appeal Decision held that the Coventry Stadium is not surplus to requirements having regard to the relevant policies. I believe that this applies to the Speedway track at the East of England Showground and refer to the following extract from paragraph 33 of the Appeal Decision;
- 'The number of motorsports facilities is declining nationally. A number of tracks are under threat. Swindon has closed, though there are efforts being made to replace it with a new facility. Speedway at Wolverhampton is set to end after the 2023 season as their tenancy is not being renewed, and I am advised that Birmingham Speedway may also close.... Four clubs have closed as the owners have seen an opportunity to realise their asset through redevelopment proposals. This does not indicate a sport in severe decline, rather it reinforces the need for existing stadiums to be retained.'*
58. In relation to point (3) above the viability of reinstatement of the Speedway Stadium related to a policy of the Neighbourhood Plan relevant to the Coventry Stadium site. I am not aware of any such policy being relevant in relation to these applications. No such reason or policy justification is advanced by Collinson & Associates Limited.

59. What Collinson & Associates Limited suggests about the viability of reinstatement at point 3 is fundamentally misconceived. First, Speedway did not enjoy unrestricted use of the East of England Showground. As a licensee Speedway was only able to use the East of England Showground for parts of about 20 days each year. Decisions about other uses were in the exclusive control of the freeholder and, more recently, the Applicant.
60. To attempt to suggest that Speedway should be the sole source of income from the East of England Showground where Speedway had access to the site on only 20 days each year is irrational and provides no basis to support these Planning Applications.
61. Secondly, the East of England Showground could be used for other purposes in addition to Speedway. As far as I am aware the infield is sufficiently large to be used for football, rugby, hockey or American football.
62. Thirdly, the Speedway track, safety fence, pits and racing facilities can be restored and the start – finish line and referee’s box repositioned at minimal cost. The Grandstand is not required and Speedway racing can be restored without the use of the Grandstand.
63. In relation to points (4) & (5) above it is accepted that the sports provision proposed is different to that proposed at the Coventry Stadium site. However the Coventry Appeal Decision sets a precedent for the protection of Speedway tracks when under the threat of land use for other sports.
64. Parts of the Coventry Stadium Appeal Decision are directly relevant and material to the East of England Showground Planning Applications. The Collinson & Associates Limited conclusion that *'none of the five material conditions for dismissal in Coventry being met at the East of England Showground, the decision to dismiss Brandon Estates appeal to re-develop the Coventry Stadium, is not believed to set a precedent for the development of the East of England Showground'* is at odds with the facts, the relevant planning policies and the Appeal Decision and is rejected.

AEPG Updated Statement : Speedway at the East of England Showground November 2023

65. This document does not support the Planning Applications with any relevant planning policy or reason and should be disregarded.
66. For the reasons outlined above it is submitted that the Planning Applications should be refused.



British Speedway Promoters Limited  
4 October 2024