

Arena Essex Planning Application 25/00573/OUT

Objections of Thurrock Hammers Limited

Loss of the Speedway Facility

28 August 2026



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Purpose. This note sets out the objections of Thurrock Hammers Limited to the above application on the ground that it would result in the loss of the Speedway facility at Arena Essex. It is a standalone objection and is additional to the Company's objections on asbestos, land contamination and waste.

It draws on the applicant's own Sport and Active Recreation Needs and Benefits Assessment and Planning Supporting Statement; on the Needs Assessment and Feasibility Study prepared by White Young Green in 2018, which the applicant relies on and appends; on the consultation responses of Sport England; on the National Planning Policy Framework published in August 2026; on the adopted Thurrock development plan; on the appeal decision at Coventry Stadium dated 19 January 2024; and on the Council's own resolution of 25 January 2023.

Each objection notes the document it draws on so that the points can be checked and used directly in a written representation.

Documents already filed by the Company. The Company has already made the following representations on this application, each of which is on the Council's file and is relied on in support of this objection:

- Initial Objections dated 6 August 2025, published on the portal on 28 August 2025 (25_00573_OUT-THURROCK_HAMMERS-1144264);
- Objections of Thurrock Hammers Limited dated 27 August 2025, published on 27 August 2025 (25_00573_OUT-NEIGHBOUR_COMMENT-1154088);
- the Appendix to those Objections dated 27 August 2025, published on 2 October 2025 (25_00573_OUT-THURROCK_HAMMERS-1154087), which reproduces the 1982 planning permission, NPPF paragraph 104, the Council's resolution of 25 January 2023, policies CSSP4, CSSP5, PMD1, PMD5, PMD6, PMD7, PMD16, CSTP9, CSTP10, CSTP20 and CSTP23, the Aveley Sports and Social Club decisions, the Aveley Football Club permission 13/01021/OUT and the Coventry Stadium appeal decision;
- Environmental Objections - Ecology and Biodiversity, with its companion Authorities and Policy Relied On, filed 20 August 2026; and
- Objections - Asbestos, Land Contamination and Waste, filed 28 August 2026.

This objection does not repeat those documents and should be read with them.

1. Overarching objection

- 1.1 The application would extinguish a Speedway stadium and would build a data centre campus over it. The applicant's case is that the Speedway use is "demonstrably surplus to requirements" and that the test at paragraph 104(a) of the December 2024 Framework is met (Planning Supporting Statement paragraphs 9.2 and 9.4; Consult QRD assessment paragraph 4.4.6).
- 1.2 That case is addressed to a Framework that no longer governs the decision. The Framework published in August 2026 replaced paragraph 104 with policy HC7. Its national decision making policies are material considerations from the day of publication and the policies in it apply from 17 August 2026 (Annex A, paragraphs 1 and 7). This application falls to be determined against HC7. No document on the file assesses it against HC7.
- 1.3 Under HC7 only two of the four gateways are capable of applying to this development. Gateway (c) is confined to development for public service infrastructure, which the Framework defines as education and healthcare facilities of all types and facilities for blue light, social care, library and criminal justice uses. A data centre is none of those. Gateway (d) requires the development itself to be for alternative open space, sports and recreational buildings and land. This development is for up to 130,500 sqm of Use Class B8 data centre floorspace and a separate 4,000 sqm office building.
- 1.4 The applicant must therefore succeed on gateway (a), that the land has been clearly shown to be surplus to requirements, or on gateway (b), replacement by equivalent or better provision. It offers no replacement of any kind. Its surplus case rests on a needs assessment prepared in 2018 for a different applicant, in support of a different scheme, against a different Framework, before the landowner took the decision to close the track - and expressly premised on the replacement of the Speedway facilities by a lido, a country park and cycling facilities that this application does not provide.
- 1.5 The only Appeal Decision on the loss of a Speedway stadium, at Coventry Stadium on 19 January 2024, decided against the applicant's position on every point on which this application depends. The applicant's own consultant records that it disagrees with the Inspector.
- 1.6 The development plan is more demanding than national policy, not less. Policies PMD5 and CSTP9 contain no surplus to requirements gateway at all. Both require alternative provision and PMD5 requires it to be available for use before the existing facility is lost.
- 1.7 The Council resolved on 25 January 2023, by 42 votes, to use the Local Plan process to support the retention of Speedway in Thurrock. Granting this permission would put that objective beyond reach on the only land in the borough where it is presently deliverable.
- 1.8 **On the file:**
 - Sport and Active Recreation Needs and Benefits Assessment (Consult QRD, 2025);
 - Appendix 1 to that assessment, the Arena Essex Motorsport and Lakeside Sport and Active Recreation Needs Assessment and Feasibility Study (White Young Green, October 2018);
 - Planning Supporting Statement (April 2025), section 9;
 - Site Assessment (Mallory Land, July 2026);
 - Sport England consultation responses of 9 July 2025, 22 July 2026 and 24 July 2026;
 - Statement of Community Involvement;
 - National Planning Policy Framework (August 2026), policy HC7 and Annexes A and B;
 - Appeal Decision APP/E3715/W/23/3322013, Coventry Stadium, 19 January 2024.

2. What would be lost- and its planning status

- 2.1** The eastern part of the Site is the former Arena Essex Raceway. The stadium opened in 1978 for stock car and banger racing. Speedway was introduced in 1984, as the Arena Essex Hammers by the man who built the stadium. The team was renamed the Lakeside Hammers in 2007 and competed at the highest level of British Speedway from 2007 until 2016, winning the Knockout Cup in 2009 (White Young Green report, page 1; Consult QRD assessment paragraph 4.3.3 and footnote 4).
- 2.2** The Speedway use is authorised by an extant planning permission. Thurrock permission 77/00170A/FUL, "Use of land for stock car, banger and Speedway racing with ancillary car parking, access roads etc.", was approved and the decision issued on 25 January 1982. It was implemented and remains extant on the Council's own register.
- 2.3** That matters, because the loss the Council is being asked to authorise is the loss of a lawful use that could be resumed. In the Coventry decision the Inspector recorded that "The sporting use of the site is an extant use which in principle could be recommenced at any time, subject to the necessary physical improvement works" (paragraph 80).
- 2.4** What is offered in return, on the western part of the Site, is a mountain bike track, pedestrian and cycle links to the Mar Dyke Local Wildlife Site and Lakeside and informal access to retained habitat (description of development; Consult QRD assessment section 5).
- 2.5** The scale of the use that has been lost is recorded in the applicant's own appendix. Total attendance at the stadium across all events fell from over 100,000 in 2008 to about 48,000 in 2017 (White Young Green report, page 11). These are not the figures of a facility of no consequence.

3. The policy that now applies: NPPF policy HC7

- 3.1** The Framework published in August 2026 replaced the numbered paragraphs of earlier versions with lettered policy references by chapter. Old paragraph 104 is now policy HC7, in chapter 16, Promoting healthy communities. Policy HC7 provides:
- 3.2** “1. Development proposals should not result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other formal and informal play space and allotments, unless:
- a. An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, in a location which offers comparable or improved accessibility for the community it serves; or
 - c. The development is for public service infrastructure, and the resulting loss would be replaced by equivalent or better provision in terms of quantity and/or quality; or
 - d. The development is for alternative open space, sports and recreational buildings and land, the benefits of which clearly outweigh the loss of the current or former use.”
- 3.3** The status of that policy is not in doubt. Paragraph 3 of the Framework provides that the national decision making policies are a material consideration in the determination of planning applications and should be read alongside the development plan. Annex A, paragraph 1 provides that the policies are material considerations which must be taken into account in decision making from the day of publication. Annex A, paragraph 7 provides that the policies in this version apply from 17 August 2026. Paragraph 9 provides that the annexes are themselves national planning policy.
- 3.4** The application material addresses paragraph 104 of the December 2024 Framework and nothing else (Planning Supporting Statement paragraphs 9.1 to 9.9; Consult QRD assessment paragraphs 2.2.6, 2.5.1 and 6.1.3). Nothing on the file has been updated to address HC7 and the Council cannot determine the application on an assessment directed at superseded policy.
- 3.5** The differences are material to this case. Gateway (b) is now stricter: replacement must be “in a location which offers comparable or improved accessibility for the community it serves”, where paragraph 104(b) required only “a suitable location”. A new gateway (c) has been added for public service infrastructure, which Annex B defines as “Education and healthcare facilities of all types, and facilities for blue light, social care, library and criminal justice uses”. A data centre falls outside that definition.
- 3.6** Paragraph 11 of the Framework provides that where a policy sets out a list of sub-paragraphs, all of them apply unless the text indicates otherwise, such as by the use of “or”. HC7 uses “or”, so the applicant needs to satisfy one gateway. It satisfies none.
- 3.7** The policy applies to this Site notwithstanding the closure of the Speedway stadium. HC7 protects “existing” recreational land and gateway (d) refers in terms to “the current or former use”. The policy therefore contemplates facilities that are no longer in operation. The applicant’s argument that the loss is “arguably already permanent” because almost seven years have elapsed (Consult QRD assessment paragraph 6.1.3) is not an answer to the policy. At Coventry the stadium had been closed since 2016 and the appeal was determined in January 2024; the protective policy applied without difficulty and the appeal was dismissed.

4. The development plan: PMD5, CSTP9 and CSSP4

- 4.1** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the application to be determined in accordance with the development plan unless material considerations indicate otherwise. The adopted plan is the Core Strategy and Policies for the Management of Development.
- 4.2** Policy PMD5 provides: “The Council will safeguard all existing open spaces, outdoor sports and recreational facilities. Development proposals that would result in their complete or partial loss or cause or worsen a deficiency in the area served by the space or facility will not be permitted unless:
- (i) conveniently located and accessible alternative facilities of an equivalent or improved standard will be provided to serve current and potential new users; or improvements to remaining spaces or facilities can be provided to a level sufficient to outweigh the loss;
 - (ii) proposals would not negatively affect the character of the area and/or the Greengrid.”
- It adds: “Any alternative and improved facilities should be available for use before an existing open space or facility is lost.”
- 4.3** Policy CSTP9 provides that the Council will “Safeguard existing and future provision of leisure, sports and open space facilities. The Council will only allow the loss of a particular facility where appropriate alternative provision can be made elsewhere.”
- 4.4** Neither policy contains a surplus to requirements gateway. Under the development plan the question is not whether the facility is needed. It is whether appropriate alternative provision is made. None is made, none is offered and none is secured.
- 4.5** The applicant’s answer is that policies CSTP9 and CSTP10 “have not been applied” to the former Speedway stadium on the Core Strategy Policy Map, so the Site “appears to be afforded no protection” under them (Consult QRD assessment paragraphs 2.4.2, 2.5.3 and 6.1.5). That is not how these policies operate. PMD5 applies to “all existing open spaces, outdoor sports and recreational facilities” and CSTP9 to “existing and future provision of leisure, sports and open space facilities”. They are criteria-based development management policies of general application. Neither is expressed to depend on a Proposals Map notation and the applicant identifies no provision that makes it so.
- 4.6** Policy CSSP4 records that “the constructive and positive use of the Green Belt for sports and leisure purposes is an essential component of the Thurrock Spatial Strategy that will underpin the sustainable development and regeneration of Thurrock to the long-term benefit of local people”. The Site is in the Green Belt. Replacing a Green Belt sports and leisure use with a 130,500 sqm data centre campus is the reverse of that strategy.
- 4.7** If it is said that PMD5 or CSTP9 should carry reduced weight under Annex A, paragraph 2 of the August 2026 Framework. The answer is that neither policy is materially inconsistent with HC7. Both pursue the same objective of protecting recreational land and facilities and HC7 sets a national minimum below which protection should not fall. In any event the point does not arise, because the Site has not been shown to be surplus.

5. HC7(1)(a): the land has not been shown to be surplus to requirements

- 5.1** Gateway (a) requires “an assessment” which “has clearly shown” the land to be surplus to requirements. The burden lies on the applicant and the standard set by the policy is clarity.
- 5.2 Need and viability are distinct questions.** The applicant’s assessment runs them together: because the applicant suggests that venue was unviable in 2018 and because no funded proposal has since emerged, it concludes that the use is “demonstrably surplus to requirements” (Consult QRD assessment paragraphs 4.2.20, 4.4.5 and 4.4.6). The Inspector at Coventry considered and rejected precisely that argument: “The appellant argues that the need for a facility cannot be separated from the issue of viability. I disagree. Whilst they are related, they are in my view distinct matters. Whilst there may be a need for a particular facility, it does not mean that it is viable” (paragraph 28).
- 5.3** The applicant’s consultant is aware of this and disagrees with it: “Our view is that the appellant in the Coventry case was correct in their interpretation of need and viability for spectator sports facilities” (Consult QRD assessment paragraph 4.2.20). The Council is being asked to prefer a consultant’s disagreement with an Inspector to the Inspector’s reasoning in the only appeal decision directly in point. It should decline to do so.
- 5.4 The methodology is not the recognised one.** The 2025 assessment does not use Sport England’s Assessing Needs and Opportunities Guide (an ANOG assessment) and does not claim to be one. The applicant’s own Appendix 1, the 2018 White Young Green report, suggests that it used the principles of ANOG (page 29). The applicant has therefore moved away from the recognised methodology in the very document it relies on.
- 5.5 National decline is not the test.** The applicant’s case is largely a national one: the suggestion of falling attendances, fewer clubs, reduced television coverage. The Inspector at Coventry considered the same national picture and drew the opposite conclusion: “Whilst eight clubs have folded since 2006, only three clubs have gone into administration. 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” (paragraph 33).
- 5.6 Low participant numbers do not establish surplus.** The applicant relies on there being 209 registered riders nationally and describes the contribution to health and wellbeing as “negligible” (Consult QRD assessment paragraphs 4.1.2 and 4.4.2). At Coventry the Inspector accepted that Speedway racing is mainly a spectator sport with low participant numbers and held nonetheless that “Spectator sports provide social benefits to those that attend and contribute to health and wellbeing” (paragraph 74).
- 5.7 Quality.** Quality is one of the four ANOG headings and it is the one the applicant does not address. On quality, Arena Essex hosted the highest level of sport played anywhere in Thurrock. The Lakeside Hammers competed in the top tier of British Speedway from 2007 until 2016, as the applicant’s own consultant records (Consult QRD assessment footnote 4). The three Thurrock football clubs that the same report uses for comparison play at level 6 and level 7 of the football pyramid: Aveley FC at level 6, Grays Athletic FC and Tilbury FC at level 7 (Consult QRD assessment paragraph 4.3.6). No other sports club in this borough has competed in the top division of its national sport. The facility this application would extinguish is, on the applicant’s own evidence, the venue for the highest quality sport Thurrock has had.
- 5.8** At Coventry the Inspector approached quality in the same way, finding that the track was fit for purpose when the stadium closed, that it was “clearly more than just a local or regional track” and that “There were no qualitative issues to support its closure” (paragraph 37). Nothing in the material filed suggests any qualitative deficiency at Arena Essex either. The stadium was sold and closed as part of the owner’s development scheme.
- 5.9 The honours of the riders who rode for this club are a matter of record.** They are set out in the Company’s Local Plan submission of 31 July 2023 and in its Regulation 18 response of 17 February 2024, both already before the Council. Riders who rode for Arena Essex Hammers and Lakeside Hammers have between them won:
- the individual world speedway championship 8 times, with 3 further runner up placings
 - 22 Speedway Grand Prix
 - the world team cup 9 times
 - the world best pairs championship once
 - the world long track championship 7 times
 - the under 21 world speedway championship 3 times
 - the British Championship 8 times

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- the British under 21 championship 5 times
- the Swedish Championship 17 times
- the Polish Championship 4 times, 29 national championships in all.

5.10 The club itself won the Knock Out Cup in 1991 and in 2009, reached the Elite League play off final in 2008 and raced regularly on live Sky Sports broadcasts.

5.11 FIM licensing and world championship events. The FIM, the Fédération Internationale de Motocyclisme, is the international governing body for motorcycle sport and the body which sanctions world championship motorcycle competition. The Arena Essex track was licensed by the FIM to hold World Championship events. It hosted the world under 21 team cup semi-final in June 2012, and the British under 21 Championship in 2009, 2011 and 2012. It also hosted the two best attended speedway meetings held in the United Kingdom outside Grand Prix events in the last thirty years: Lakeside against Poole in 2008, and the Lee Richardson Memorial in 2012.

5.12 A track licensed by the international governing body of its sport to stage world championship competition, which has staged world and national championship events and the two largest non-Grand Prix events in the country is not a facility of just local significance. There is no comparable venue anywhere in Essex. That is the quality assessment the applicant was required to carry out and did not.

5.13 The alternatives relied on in 2018 have themselves gone. The 2018 report justified the closure of Arena Essex on the basis that there was “significant capacity at other local tracks including; Rye House, Mildenhall” and others, and recorded that the Lakeside Hammers had relocated to Rye House. Neither of the two venues the applicant now relies on has in fact absorbed anything.

5.14 Peterborough. The applicant states that the Peterborough Panthers site “received planning permission for mixed use development in October 2024” and that the club “has since folded” (Consult QRD assessment paragraph 4.2.16). That is not the position. The application to develop the East of England Showground, including the Speedway track, was refused by Peterborough City Council’s Planning and Environmental Protection Committee on 21 October 2025. Before that application was determined the landowner had already evicted the Speedway club from the Showground, notwithstanding that the club had raced there in every season since 1970 apart from 2020, when racing did not take place because of covid restrictions. The end of Speedway at Peterborough was therefore brought about by the landowner and not by any planning decision and when the planning decision came it went the other way.

5.15 Rye House. The applicant states only that the Rye House stadium “was redeveloped from 2020 onwards”. The position is that the Speedway track was removed without planning permission; East Herts District Council issued an Enforcement Notice, reference E/20/0423/ENF; and the current occupier has applied for retrospective planning permission for the development that removed the track. Those proceedings are live and undetermined, the enforcement appeals APP/J1915/C/24/3343929 and APP/J1915/C/24/3343930 not yet having been decided. Rye House cannot be counted as capacity that has lawfully replaced Arena Essex while the lawfulness of the works that removed its track is the very matter before the Planning Inspectorate.

5.16 The capacity said in 2018 to absorb the loss of Arena Essex has therefore been removed by the same process this application would continue, and in each case the removal has been resisted, refused or is still contested. That is not a surplus. It is a cumulative deficit and this application would deepen it.

5.17 Unavailability is not surplus. The applicant says the Site has changed hands twice since closure without a motorsport purchaser emerging and that as owner it “will not be developing a motorsports offer on site” (Consult QRD assessment paragraphs 4.4.4 and 4.4.5). At Coventry the campaign group had tried and failed to buy the stadium- and the Inspector dealt with the point in this way: “It could therefore be argued that the site is not available. However, the situation could change in the future” (paragraph 39). An owner’s unwillingness to sell or to operate is not an assessment that the land is surplus to requirements.

5.18 That account of the ownership history is wrong. The Site has changed hands once since Speedway was evicted, not twice. London Strategic Land acquired Arena Essex in 2017 and evicted Speedway in 2018. There has been one change of ownership since, the sale to the applicant, which the applicant’s own consultant places in 2023: “As the Applicant purchased the site in 2023, some 5 years after the site ceased to be used for speedway” (Consult QRD assessment paragraph 2.3.10). The precise date is 31 July 2023, on which the applicant acquired the freehold title to the Site, registered at HM Land Registry under title number EX567505, being the land lying to the north of the A1306 Arterial Road, West Thurrock, Grays.

5.19 The distinction matters because the applicant uses the number of transactions to suggest that Speedway had its opportunities and did not take them. A Speedway led consortium negotiated to acquire Arena

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Essex in 2017. There has been a single sale since the eviction, and it followed a soft not public marketing exercise, to a purchaser which has never engaged with the sport at all.

5.20 The suggestion that there was no Speedway interest in acquiring the Site is false and misleading.

In 2017 a Speedway led consortium, which included the Homes and Communities Agency, now Homes England, was in negotiation to buy Arena Essex. As part of those arrangements the then landowner's agent attended Government offices in Cambridge to discuss and negotiate sale terms. While the Site was being valued as part of the Agency's due diligence and, without warning, the landowner entered into an exclusivity agreement with London Strategic Land, which went on to complete the acquisition.

5.21 After that acquisition Thurrock Hammers attended the offices of London Strategic Land. London Strategic Land refused any arrangement under which Speedway could continue to run at Arena Essex. The club was ready, able and willing to continue racing. It was evicted.

5.22 The applicant has been no more willing to engage. Notwithstanding the efforts of Thurrock Hammers, the applicant has not engaged with the Company at all.

5.23 The proper reading of the last nine years is therefore not that no one wanted this Site for Speedway. Speedway interest was present, was funded and was backed by a Government agency but was displaced by a landowner which preferred a development value and then by a purchaser which would not accommodate the sport. That is precisely the circumstance the Inspector identified at Coventry, where clubs had closed because "the owners have seen an opportunity to realise their asset through redevelopment proposals" and where the Inspector held that this "does not indicate a sport in severe decline, rather it reinforces the need for existing stadiums to be retained" (paragraph 33). An owner who will not sell to Speedway, and a purchaser who will not let Speedway run, cannot between them manufacture a finding that the land is surplus to requirements.

5.24 Nor is lapse of time. Oxford Stadium was closed for some 15 years before it reopened and the Inspector recorded that it had "achieved higher numbers of spectators than anticipated in its first season" (paragraphs 55 and 59). Arena Essex has been closed for less than eight years and retains its extant permission.

5.25 The consultation responses are read the wrong way round. The applicant notes that only 17 per cent of the responses to its own consultation came from Thurrock postcodes and concludes that "the significance or value of Arena Essex to the local population is fairly limited" (Consult QRD assessment paragraphs 4.3.11 to 4.3.13). The correct inference is the opposite. Interest from across the country is evidence that the venue is of more than local significance- and at Coventry that was a decisive consideration: "Coventry Stadium was not just a local facility but was a stadium hosting local, regional, national, and international events" (paragraph 75).

5.26 There is no assessment of need for Speedway in Thurrock at all. The applicant records that it "have not been able to identify any Council documents that consider the need for Speedway venues, or motorsport facilities in general" (Consult QRD assessment paragraph 3.1.4). The absence of an assessment is not a finding of surplus. It is the absence of the very evidence that HC7(1)(a) requires.

5.27 Thurrock Hammers is still racing. The clearest answer to a case built on surplus is that the club displaced from this Site has gone on competing without a home track ever since. Since 2019 the Hammers have raced Tunnel Trophy fixtures against the Kent Kings at Central Park, Sittingbourne, and KenEx Trophy fixtures against the Kent Royals in 2022, the Kent Kings in 2024 and the Kent Eagles in 2025 all at Iwade in Kent, together with challenge matches against the Crayford Kestrels at Lydd and the Mildenhall Fen Tigers in Suffolk, the Isle of Wight, and against Eastbourne Eagles at Iwade in October 2024.

5.28 The team fielded against Eastbourne was almost entirely Essex born - Jason Edwards, Alfie Bowtell, Jack Kingston, Rhys Naylor, Ben Morley and Jacob Clouting - and every one of them had ridden for the Lakeside Hammers at Arena Essex before it closed. The riders and the following did not disappear when the track did. They were displaced, which is precisely what the Council recognised on 25 January 2023.



Thurrock Hammers at Kent Kings, 2019 (photograph © Tiffani Graveling), and racing at Iwade, Kent, 2024.

5.29 The club has also maintained a youth pathway, giving locally born riders such as Cooper Rushen, Jamie Etherington, Harrison Rogers and Kenzie Cossey a route into the sport and the chance to progress. That is participation, not spectating, and it is the very benefit the applicant's assessment says Speedway cannot deliver.

5.30 Cooper Rushen shows what that pathway produces. He is from Maldon in Essex. He is a fifteen times British Youth Champion across Speedway, Grass Track and Dirt Track. At 16 he is the current British Under 21 Champion and the youngest rider ever to hold that title and he finished fourth in this year's senior British Championship. He rides for King's Lynn in the Premiership, for Poole in the Championship, for Unia Leszno in the junior Ekstraliga in Poland and is a member of the Team GB under 24 squad and of the senior squad.

5.31 Because Speedway was evicted from Arena Essex, the outstanding young rider of his generation in this sport cannot ride in Essex at all. That is not the profile of a facility that is surplus to requirements. It is the profile of a county that has lost its only venue.



Cooper Rushen of Maldon, Essex, winning the British Under 21 Championship - the youngest rider ever to hold the title.



The Thurrock Hammers team and riders, from the club's own published material at thurrockhammers.com.

- 5.32 Public support.** Support for the return of Speedway to Thurrock is documented and current. The petition run by the Company has attracted 5,421 signatures as at 16 February 2024. The campaign's social media reach is current and it continues to grow. As at 27 August 2026 the campaign had 6,370 followers on Facebook and 1,091 on Instagram, and 8,936 followers on X across the Thurrock Hammers and Lakeside Hammers accounts combined. The Facebook and Instagram followings have grown over the year from 5,901 and 1,062 respectively as at 27 August 2025. The campaign also had 190 connections on LinkedIn as at 16 February 2024.
- 5.33** The reach extends well beyond followers. Since January 2017 over 144,000 people, from the United Kingdom, the United States, France, Spain, Australia, Poland, Germany, Italy and Sweden among others have visited the campaign website, generating more than 965,000 page views. Since August 2018 there have been over 1.783 million views on X. The Company's post about this application on 1 July 2025 was viewed more than 39,000 times; its post about the Council's resolution of 25 January 2023 had over 41,000 impressions; and its post about the Initial Proposals had 24,076 impressions.
- 5.34 The current year is no different.** Between 1 January and 27 August 2026 the campaign's Facebook posts were viewed 464,671 times, and its most recent post on this application has been viewed around 1,200 times on X. That is a level of continuing public engagement with a single sporting facility which the applicant's assessment does not acknowledge at all.
- 5.35** Those figures were filed with the Company's Local Plan submission of 31 July 2023, its Regulation 18 response of 17 February 2024 and its Objections of 27 August 2025, and the 2026 figures are taken from the campaign's own platform analytics as at 27 August 2026. They are the measure of the public interest in this facility, and they sit awkwardly beside the applicant's reliance on its own consultation exercise as evidence that the value of Arena Essex is "fairly limited".
- 5.36** A facility whose displaced club is still racing, still bringing local riders through and still supported at that level has not been clearly shown to be surplus to requirements. On the applicant's own reasoning it is the absence of demand that makes land surplus. The demand here is demonstrable, it is continuing, and much of the evidence of it is already on the Council's file.

6. The applicant's evidence base- and what it was prepared for

- 6.1 The surplus case rests on the White Young Green Needs Assessment and Feasibility Study, appended to the applicant's 2025 assessment as Appendix 1. The applicant is candid that it relies on it because the track has been closed for seven years and ownership has changed twice (Consult QRD assessment paragraphs 4.3.1 and 4.3.2). That report cannot bear the weight placed on it, for five reasons.
- 6.2 It was prepared for a different party. The client was London Strategic Land, not Global Infrastructure UK Ltd.
- 6.3 It was prepared in support of a different scheme, the residential development of about 2,500 homes the subject of application 18/01671/FUL, not a data centre campus.
- 6.4 It was prepared against a different Framework. It cites paragraph 97 of the Framework published in July 2018 (White Young Green report, page 2).
- 6.5 It was prepared while the stadium was still open. It is dated October 2018, revised December 2018 and records that "the decision has now been taken to close the track from November 2018" (page 1).
- 6.6 **Most importantly, it was expressly premised on replacement.** Its own brief was to demonstrate that the existing Speedway facilities were "either surplus to requirements and no longer required and / or will be replaced by more 'fit for purpose' better quality facilities as proposed in the Arena Lakeside development" (page 2). The facilities proposed were a country park, a cycling velopark including a small velodrome and mountain biking tracks, a public lido on the lake served by changing rooms and a café, trim trails and informal play (page 1; Consult QRD assessment paragraph 1.2.8).
- 6.7 The Sport England comment on which the applicant relies is a comment on that replacement package. Sport England said the study was a "Comprehensive needs assessment and feasibility study which makes a robust case based on the evidence available for replacing the existing motor sports facilities with the proposed Lakeside Sport and Active Recreation project" (page 2). That is about replacing a Speedway facility with a sports and active recreation project. It is not and cannot be read as, a view that a Speedway facility may be replaced by a data centre.
- 6.8 None of the replacement facilities is now proposed. There is no lido, no velopark, no velodrome, no country park, no changing rooms and no café. What is offered instead is a mountain bike track and trails within retained habitat on land which the applicant itself says is priority habitat requiring "careful consideration" of the uses that could take place on it (Consult QRD assessment paragraph 1.2.6).
- 6.9 An 8 year old assessment, prepared for another party, in support of another scheme, under a superseded Framework, while the facility was still open and expressly conditioned on a replacement package that has since been abandoned, cannot clearly show that this land is surplus to requirements in 2026.

7. What Sport England has- and has not, said

- 7.1 Sport England has responded to consultation on this application on 9 July 2025, on 22 July 2026 and on 24 July 2026. Its advice is the same on each occasion.
- 7.2 It states that the proposed development does not fall within its statutory remit under Statutory Instrument 2015/595 and that it has therefore not provided a detailed response and then advises: “If the proposal involves the loss of any sports facility, then full consideration should be given to whether the proposal meets Paragraph 104 of the National Planning Policy Framework (NPPF), is in accordance with local plan policies to protect sport and recreation facilities and whether it meets any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.”
- 7.3 That is a direction to the Council to apply the protective policy. It is not an indication that the loss is acceptable. Sport England has expressed no view on the merits of this loss, because it has not been asked to do so as a statutory consultee.
- 7.4 The applicant nonetheless presents Sport England as supportive, stating that “This view was supported by Sport England, which, while not a statutory consultee in this case, acknowledged that the venue could not feasibly be sustained in the long term” (Planning Supporting Statement paragraph 9.3). The support relied on is a non-statutory comment made in 2018 and 2019 on the residential scheme - and, as set out above, it was a comment on a package of replacement sports provision.
- 7.5 The absence of a statutory duty to consult does not disapply HC7. The statutory consultation requirement in SI 2015/595 is confined to playing fields. HC7 is not. It applies to the loss of “existing open space, sports and recreational buildings and land” and is not switched off by the scope of a consultation direction.
- 7.6 The planning practice guidance advises consultation with Sport England where development would lead to the “loss of, or loss of use for sport, of any major sports facility”. The applicant argues that it would be “wholly inaccurate” to describe Arena Essex as a major sports facility (Consult QRD assessment paragraph 2.3.8). A stadium which hosted a team competing at the highest level of its sport from 2007 until 2016 and was the venue for the highest quality sport Thurrock has had, is a major sports facility on any ordinary reading of those words.

8. HC7(1)(b) and (c): no replacement- and no public service infrastructure

- 8.1** Gateway (b) requires that the loss “would be replaced by equivalent or better provision in terms of quantity and quality, in a location which offers comparable or improved accessibility for the community it serves”.
- 8.2** No replacement Speedway facility is proposed, on this Site or anywhere else, by the applicant or by anyone else. The applicant does not contend otherwise. It relies solely on gateway (a), stating that “Only one of these criteria needs to be met. In this case, the Proposed Development clearly satisfies criterion (a)” (Planning Supporting Statement paragraph 9.2).
- 8.3** A mountain bike track, footpaths and cycle links are not equivalent or better provision for a Speedway stadium in terms of either quantity or quality. They are a different kind of facility serving a different activity and a different public.
- 8.4** Gateway (c) is not available to this development. It applies where “the development is for public service infrastructure”. Annex B of the Framework defines that term as “Education and healthcare facilities of all types, and facilities for blue light, social care, library and criminal justice uses”. A data centre campus in Use Class B8 is not within that definition.
- 8.5** It should be noted that the Framework does refer to data centres elsewhere, including in the flood risk vulnerability classification at Table 2, where they are listed as essential infrastructure. That is a separate classification serving a different purpose and it does not bring a data centre within the Annex B definition of public service infrastructure or within gateway (c).
- 8.6** The development plan requires more than the Framework does. PMD5 provides that “Any alternative and improved facilities should be available for use before an existing open space or facility is lost.” Nothing is proposed to be provided before the loss and nothing of an equivalent character is proposed to be provided after it.

9. HC7(1)(d): the benefits do not clearly outweigh the loss

- 9.1** Gateway (d) applies where “the development is for alternative open space, sports and recreational buildings and land, the benefits of which clearly outweigh the loss of the current or former use”. At Coventry the Inspector held that the equivalent wording “does not exclude a mixed-use scheme” (paragraph 62). Even on that approach the gateway fails here, for two reasons.
- 9.2** First, this development is not for alternative recreational provision in any meaningful sense. At Coventry the alternative provision was a full size 3G pitch with a clubhouse and pavilion and a 70 space car park, secured by a section 106 agreement containing a community use agreement and management and maintenance obligations. Here the recreational element is landscape treatment of land that is being retained because it is not being built on and the applicant's own case is that the proposals “will not, in and of themselves, generate additional demand for sport and leisure facilities” (Consult QRD assessment paragraph 6.1.1).
- 9.3** Second, the benefits do not clearly outweigh the loss. The Coventry comparison is instructive because the alternative provision there was considerably stronger than what is offered here - and it still failed. The Inspector found that the 3G pitch “could be used by up to 1200 people a week, this equates to 40-50,000 people a year” and that it “would be of significant local benefit” and concluded: “However, Coventry Stadium was not just a local facility but was a stadium hosting local, regional, national, and international events. The value of a 3G pitch, cannot compare to a facility, of which there are relatively few in the country, which can hold events generating such wide interest, with the social and wellbeing benefits for those that attend. I therefore conclude that the benefits of the alternative provision do not outweigh the loss of Coventry Stadium” (paragraphs 71 and 75).
- 9.4** Arena Essex falls into the same category. On the applicant's own evidence there are fewer than twenty operational Speedway tracks in the United Kingdom (Consult QRD assessment paragraph 4.2.14). According to the applicant total attendance at Arena Essex was over 100,000 in 2008 and about 48,000 in its final full year (White Young Green report, page 11). Those figures are of the same order as and in the earlier years well in excess of, the 40,000 to 50,000 annual users of the 3G pitch which the Inspector held could not outweigh the loss at Coventry.
- 9.5** The economic case for the data centre does not assist under this gateway. Gateway (d) is not a general planning balance. It asks whether the benefits of the alternative open space, sports and recreational provision clearly outweigh the loss of the sports use. The employment and investment benefits claimed for the data centre are not benefits of alternative sports and recreational provision and do not fall to be weighed under HC7 at all. They are matters for the Green Belt and overall planning balance, which are addressed separately.
- 9.6** The applicant's own Site Assessment of July 2026 concludes that “no other site within the defined search area has been identified as a suitable, available and deliverable alternative” for the data centre (paragraphs 7.1 to 7.4). Taken at face value, the applicant's position is that a nationally scarce sports facility must be extinguished because no other site could be found for a commercial development. That is not what HC7 permits.

10. The Council's resolution of 25 January 2023

- 10.1** On 25 January 2023 the Council considered Motion 3, proposed by Councillor J Kent and seconded by Councillor Kerin, in these terms: "Thurrock Council resolves to use the Local Plan process to support the retention of Speedway in Thurrock and identify a new home for Grays Athletic, in the Grays area." The Mayor called a vote and, "With 42 votes for, the Mayor announced the motion carried" (Minutes of the Meeting of the Council held on 25 January 2023, minute 111).
- 10.2** The debate records why the Council did this. Councillor Kent explained that a policy had been introduced under which "any sport club that had been displaced by a development would be found new land being identified in the borough", that "This had not happened for Lakeside Hammers who had been displaced by the potential development of Arena Essex"- and that the motion asked for the planning process and the Local Plan process to be used to identify suitable land. Councillor Coxshall said that as the Local Plan moved through the process "it was important to include sports provision with leisure, entertainment, and sports provisions as they were a critical part of the local plan". Councillor Jefferies spoke of "football and Speedway being at the heart of that local plan". In closing, Councillor Kent "noted the support of Lakeside Hammers was equally as important".
- 10.3** The resolution is a formal decision of the Council itself, carried by every member who voted. It is a material consideration in the determination of this application. It was taken after Arena Essex had closed and with the displacement of the Hammers expressly in mind and it states the Council's own position that the retention of Speedway in Thurrock is an objective it intends to support.
- 10.4** The applicant's answer is that the resolution has no policy effect: "Whilst we note the Thurrock Council Resolution of 25 January 2023 'to use the Local Plan process to support the retention of Speedway in Thurrock' there is currently no policy basis to secure the site of the proposed data centre for this use. Furthermore, we note that the draft Initial Proposals associated with the emerging New Local Plan for Thurrock, makes no provision for Speedway" (Consult QRD assessment paragraph 2.4.3).
- 10.5** That answer is circular. The resolution was a resolution to use the Local Plan process to secure the very thing the applicant says the Local Plan does not yet contain. That the process has not yet delivered it is not a reason to disregard the resolution; it is the reason the resolution was passed. The silence of the emerging plan is the deficiency the Council resolved to correct, not a justification for compounding it.
- 10.6** The resolution has three practical consequences for this decision.
- Arena Essex is the only land in Thurrock with an extant planning permission for Speedway. A permission to build a data centre campus over it would put the object of the resolution beyond reach on the only site where it is presently deliverable.
 - The resolution contemplated identifying a new home for a displaced club. No new home has been identified for the Hammers in the three and a half years since- and this application identifies none.
 - The Local Plan process has not concluded. A decision now which forecloses the outcome the Council resolved to pursue would prejudice that process and would deprive the resolution of any content.
- 10.7** The Council is entitled to have regard to its own resolution and if it is minded to grant permission it will need to explain, in the officer's report and in the decision, why it is departing from a decision it took unanimously less than four years ago.
- 10.8** Thurrock Hammers Limited was formed in 2019 with the object of returning Speedway to Thurrock and continues to operate as a club outside the league structure, a matter the applicant's own consultant records (Consult QRD assessment paragraph 4.2.5 and footnote 4). The Company remains ready to discuss the retention of a track on this Site, or the identification of an alternative site through the Local Plan process and without call on the Council's capital or revenue budgets.

11. The Thurrock precedent: Aveley

- 11.1** The Council has considered the loss of a sports facility before and the outcome shows how these policies work in Thurrock.
- 11.2** The former Aveley Sports and Social Club at Purfleet was the subject of application 12/01119/OUT for 501 dwellings with commercial, community and health floorspace, a replacement bowling green and local community facilities. The Secretary of State directed that the application be referred to him and refused it on 8 January 2015, agreeing with the Inspector, Mrs J A Vyse, that the development would significantly reduce the openness of the Green Belt and would cause harm to three of its purposes (APP/M1595/V/14/2214081).
- 11.3** On the sports issue the Secretary of State did not find that the facilities were surplus to requirements. He found that there would be no net loss: "The proposed development would result in the loss of the existing sports facilities on the application site. However, for the reasons at IR14.76 and having noted Sport England's letter of 25 July 2014 about recent changes in circumstances at Belhus Park, the Secretary of State agrees with the Inspector that the proposed development would not lead to any net loss of sports provision and therefore there would be no conflict with CSPMD policy CSTP9."
- 11.4** The relocation of Aveley Football Club, permitted under 13/01021/OUT on 17 March 2015, followed the same principle. Provision was made.
- 11.5 The Aveley comparison is exact and the applicant's own report makes it.** Aveley Football Club's former ground at Mill Field was redeveloped for up to 114 dwellings under permission 13/01021/OUT, granted on 17 March 2015. The club did not disappear. It moved to Parkside, a purpose-built replacement ground and the applicant's own assessment records that Aveley FC averaged 483 spectators in the 2024-25 season, the highest of the three Thurrock football clubs it lists (Consult QRD assessment paragraph 4.3.6). Before the replacement ground was provided the club's attendances were between 104 and 126 a season. The replacement ground is what produced the difference.



Parkside, the replacement ground provided for Aveley Football Club when its former ground at Mill Field was redeveloped for housing under permission 13/01021/OUT.

- 11.6 The numbers make the point better than argument does.** In the seasons before the replacement ground was provided, Aveley Football Club's average home attendance was 126 in 2010-11, 104 in 2011-12, 120 in 2012-13 and 123 in 2013-14, with estimated averages of 110, 115 and 125 in the three seasons to 2016-17. According to the applicant over the same years the Lakeside Hammers averaged between 983 per meeting in 2009 and 600 per meeting in 2016, and even in the final and much reduced 2017 season the average was 350 (White Young Green report, Table 2, Lakeside Hammers Attendances).
- 11.7** Speedway at Arena Essex therefore drew several times the crowd that Aveley Football Club drew in the years before a replacement ground was secured for it as a condition of redeveloping its old one: between five and nine times in the seasons when both were running, and still close to three times in Speedway's final and curtailed year. National and local policy were applied to the smaller facility and replacement was required. This application asks the Council to disapply the same policy to the larger one.

11. The Thurrock precedent: Aveley

- 11.8** That is what policies PMD5 and CSTP9 require and it is what Thurrock has done before for a football club on the applicant's own evidence. This application asks the Council to excuse a Speedway club from the same treatment.
- 11.9** The Thurrock precedent is therefore that the loss of a sports facility may be acceptable where replacement provision is made- and not otherwise. This application makes none. It asks the Council to accept, for the first time, that a sports facility in the Thurrock Green Belt may simply be extinguished.

12. Conclusion and what the Council should require

- 12.1** The proposal would result in the loss of existing sports and recreational land and buildings within the meaning of policy HC7, comprising a Speedway stadium with an extant planning permission.
- 12.2** The application does not satisfy any gateway in HC7. There is no assessment which clearly shows the land to be surplus to requirements; there is no replacement provision of any kind; the development is not for public service infrastructure as the Framework defines it; and the benefits of what is offered on the western part of the Site do not clearly outweigh the loss of a facility of more than local significance.
- 12.3** The proposal conflicts with policies PMD5, CSTP9 and CSSP4 of the adopted development plan, none of which permits the loss of a sports facility without alternative provision- and PMD5 of which requires that provision to be available before the loss occurs.
- 12.4** The proposal is contrary to the Council's own resolution of 25 January 2023 to use the Local Plan process to support the retention of Speedway in Thurrock- and would foreclose it on the only land in the borough where it is presently deliverable.
- 12.5** The Company invites the Council to refuse planning permission on this ground.
- 12.6** If the Council is not minded to refuse on this ground alone, it should not determine the application until the following have been provided:
- an assessment of the application against policy HC7 of the August 2026 Framework, rather than against paragraph 104 of the December 2024 Framework;
 - and, if any loss is to be contemplated, replacement provision of equivalent or better quantity and quality in a location of comparable or improved accessibility, secured by planning obligation and available for use before the existing facilities are lost, as policy PMD5 requires.
- 12.7** The Company would welcome the opportunity to discuss the retention of Speedway at this Site, or its provision elsewhere in the borough, with the Council and with the applicant.

Key documents relied on

- National Planning Policy Framework (MHCLG, August 2026), policy HC7, paragraphs 3, 9 and 11, Annex A paragraphs 1, 2 and 7, Annex B (Glossary) and Table 2.
- Appeal Decision APP/E3715/W/23/3322013, Coventry Stadium, Rugby Road, Coventry, Inspector Helen Hockenhull, 19 January 2024.
- Secretary of State decision APP/M1595/V/14/2214081, former Aveley Sports and Social Club, Purfleet, 8 January 2015- and Inspector's Report of 20 October 2014.
- Thurrock Council, Minutes of the Meeting of the Council held on 25 January 2023, minute 111 (Motion 3).
- Thurrock Core Strategy and Policies for the Management of Development, policies CSSP4, CSTP9, CSTP10 and PMD5.
- Thurrock planning permission 77/00170A/FUL, use of land for stock car, banger and Speedway racing, decision issued 25 January 1982.
- Sport and Active Recreation Needs and Benefits Assessment (Consult QRD, ref RG/1181/2025), submitted with application 25/00573/OUT.
- Arena Essex Motorsport and Lakeside Sport and Active Recreation Needs Assessment and Feasibility Study (White Young Green, October 2018), Appendix 1 to the above.
- Planning Supporting Statement (Mallory Land Ltd, April 2025), section 9.
- Site Assessment (Mallory Land Ltd, July 2026), section 7.
- Sport England consultation responses of 9 July 2025, 22 July 2026 and 24 July 2026.
- Statement of Community Involvement, submitted with application 25/00573/OUT.
- Sport England, Assessing Needs and Opportunities Guide for Indoor and Outdoor Sports Facilities.
- Planning Practice Guidance, Open space, sports and recreation facilities, public rights of way and local green space.

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