

Thurrock Local Plan 2024 - 2044 Regulation 19 Publication Version (August 2026)

Representations to retain the Arena Essex site for Speedway and to secure the proper planning of Speedway in Thurrock

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Subject	Speedway at the Arena Essex stadium, Purfleet-on-Thames and Speedway venues (indoor and outdoor) across the Borough
Plan	Thurrock Local Plan 2024 - 2044, Regulation 19 Publication Version (August 2026) and Policies Map
Consultation	Wednesday 2 September to midnight on Wednesday 14 October 2026
Submitted to	reg19localplan@thurrock.gov.uk and the PlaceMaker consultation portal
Date	13 October 2026

1. Introduction and summary

These representations are made under Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on the Regulation 19 Publication Version of the Thurrock Local Plan 2024 - 2044 (the plan). They are made by Thurrock Hammers Limited, which was formed in 2019 with the object of returning Speedway to Thurrock and which has made submissions at every stage of the plan since 2023.

The Arena Essex stadium on the Arterial Road at Purfleet-on-Thames was the home of Speedway in Essex from 1984 until its displacement in 2018. It has an extant planning permission for Speedway (77/00170A/FUL, issued 25 January 1982). There is now no Speedway track anywhere in Essex, Hertfordshire or Greater London.

The plan allocates the site under Policy SS03 for a data centre campus. In 422 pages it does not use the words Speedway, motorsport, motor sport or raceway once. It contains no policy, allocation, safeguarding, criteria-based provision or supporting text for Speedway. It does not mention the Council's own resolution of 25 January 2023 "to use the Local Plan process to support the retention of Speedway in Thurrock".

This is so although around 320 of the 1,314 comments made at Regulation 18 (close to one in four) concerned Speedway, although Sport England asked the Council to carry out "an up to date and objective assessment of speedway needs" before allocating the site and although the Council told Sport England that "The recommendation to prepare an assessment of speedway needs is noted and appeal decision will be reviewed". No assessment has been produced. The new Playing Pitch and Outdoor Sport Strategy and Indoor Sports Assessment exclude motorsport by their own terms.

We support the plan's objectives for resilient healthy communities (Objective 1) and its stated intention to protect open space, sports and recreation provision (Policy DMP27). However, in the respects set out below the plan is not legally compliant and not sound. It has not been positively prepared, it is not justified by proportionate evidence, it will not be effective and it is not consistent with national policy.

Each point can be put right by the modifications we propose. Together they would retain the Arena Essex site for Speedway, require any loss to be replaced before it happens and allow a Speedway venue (including an indoor venue in a warehouse or industrial building) to be established on employment land without having to show that the land is surplus to requirements, no longer required or has been marketed.

The fifteen representations are summarised below and set out in full in section 7.

No.	Part of the plan	Soundness / legal compliance	Modification sought (in summary)
R1	Policy SS03 Former Arena Essex site and fishing lake	Not positively prepared; not justified; not effective; not consistent with national policy	Safeguard the stadium land for Speedway; data centre limited to land outside it or located elsewhere; any loss only with equivalent or better replacement secured and available first
R2	Policy SP03 The Economy and Skills (point 3) and paras 4.2.4 and 4.2.17	Not justified; not consistent with national policy	Consequential on R1; state whether the site leaves the Green Belt and why; add support for a Speedway venue on employment land
R3	New Policy DMP27A Speedway and Motorsport Venues	Not positively prepared; not effective	New positive policy (modelled on Rugby Policy W1B, supported by Sport England) for Arena Essex and for new indoor and outdoor venues
R4	Policy DMP27 part A	Not consistent with national policy; not effective	Protect all existing sports land, not only land designated on the Policies Map; replacement to be available before loss
R5	Policy DMP33 part B.1(b)	Not consistent with national policy	Remove sports facilities from the marketing and viability test, as Sport England sought at Rugby
R6	Policies DMP08 and DMP09 (employment land)	Not positively prepared; not effective	Support indoor and outdoor Speedway venues in Employment Areas and on employment allocations, including land not yet developed, with no surplus, marketing or viability test
R7	Policy SP04 part E, Policies DMP19 and DMP20	Not effective; not consistent with national policy	No sequential or impact test for a Speedway venue on employment land or in accordance with DMP27A
R8	Policy DMP30 part B.2 (agent of change)	Not effective	Name sports venues, including Speedway, as existing activities the agent of change principle protects
R9	Vision, Objective 1, section 5.1 and Policy PP02	Not positively prepared	Recognise Speedway, the 25 January 2023 resolution and the Core Strategy commitment to sports facilities at Lakeside
R10	Policy NS01 Blackshots Estate	Not justified; not consistent with national policy	Reinstate the Regulation 18 requirement that lost sports provision is re-provided
R11	Evidence base for sport and leisure	Not justified	Prepare a Speedway and motorsport needs assessment under Sport England's ANOG before submission; correct the gaps in the leisure evidence
R12	Integrated Impact Assessment (July 2026)	Not legally compliant; not justified	Re-appraise SS03 to record the loss of the sports facility and test reasonable alternatives
R13	Legal compliance: consultation, Regulation 8(5) and the duty to cooperate	Not legally compliant	Explain how the Regulation 18 Speedway representations were taken into account; identify superseded policies; engage Sport England and Basildon
R14	Policies Map	Not effective; not consistent with national policy	Show the Arena Essex stadium as sports and recreation land; keep the site in the Green Belt unless the tests are met; distinguish LP Open Spaces and Local Wildlife Sites in the key
R15	Policy SS03 deliverability, viability and waste; Policy SP10	Not justified; not effective	Establish the extent of landfill and asbestos contamination and the hazardous waste arising; test phasing and viability against them

2. Arena Essex and Speedway in Thurrock - why the plan must address it

The stadium and its permission

The Arena Essex stadium lies within the SS03 allocation, north of the A1306 Arterial Road, between Lakeside and the M25. Planning permission 77/00170A/FUL for "Use of land for stock car, banger and Speedway racing with ancillary car parking, access roads etc." was issued on 25 January 1982. It was implemented and remains extant on the Council's register. Speedway was introduced in 1984. The site is close to Chafford Hundred Lakeside station, bus routes and the A13, A1306 and M25 and some 3,494 people live within 1 km, 56,080 within 3 km and 106,587 within 5 km.

The Arena Essex (later Lakeside) Hammers raced in British Speedway from 1984 to 2018. Its teams included riders who between them won the world individual championship 8 times, the world long track championship 7 times and 29 national championships. The track was licensed by the FIM (Fédération Internationale de Motocyclisme) for world championship events, hosted the World Under 21 Team Cup semi-final in June 2012 and the British Under 21 Championship in 2009, 2011 and 2012. The stadium also hosted the two best attended Speedway meetings held in the United Kingdom outside Grand Prix events in the last thirty years.

How the sport was lost

In 2017 a Speedway led consortium including the Homes and Communities Agency (now Homes England) was negotiating to buy the site. While it was being valued in the Agency's due diligence the landowner signed an exclusivity agreement with London Strategic Land, which completed the purchase. London Strategic Land refused any arrangement for Speedway to continue although the club was ready, able and willing to operate. Its application for 2,500 homes (18/01671/FUL) was withdrawn on 5 September 2023. The site was sold in 2023 to Global Infrastructure UK Limited, whose data centre application 25/00573/OUT awaits decision. The stadium structures were demolished from 2020 and the Raceway Tavern was demolished in 2020 without planning permission.

The regional position

Every Speedway track in South Essex has now been lost: Rayleigh Weir (1948 - 1973) and Arena Essex (1984 - 2018). The pattern is national. Rye House, Hoddesdon lost its track without planning permission and the Speedway Stadium unlawful development is the subject of enforcement appeals APP/J1915/C/24/3343929 and 3343930. Peterborough's club was evicted from the East of England Showground and the redevelopment scheme was refused by Peterborough City Council on 21 October 2025. Coventry Stadium was saved only when an Inspector dismissed an appeal for housing (APP/E3715/W/23/3322013, 19 January 2024) and Rugby Borough Council's emerging plan now supports its restoration for Speedway (Policy W1B).

Essex riders cannot race in Essex. Cooper Rushen of Maldon, the current and at 16 the youngest ever British Under 21 Champion and a 15 times British Youth Champion, rides for King's Lynn, Poole and Leszno in Poland and for Great Britain, but has no home track in his own county. Basildon's Regulation 19 plan (July 2026) makes no provision for Speedway either. Without provision in this plan, there could be no Speedway in South Essex before 2044.

The Council's resolution

On 25 January 2023 full Council resolved, on Motion 3 proposed by Councillor J Kent and seconded by Councillor Kerin and carried with 42 votes for:

"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."

No vote against is recorded.

Councillor Kent explained the purpose by reference to this site: "This had not happened for Lakeside Hammers who had been displaced by the potential development of Arena Essex." He closed by saying "the support of Lakeside Hammers was equally as important". 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 said "the local plan was not just about building new homes it was about providing a community with sports, leisure and entertainment with football and speedway being at the heart of that local plan". The resolution is not mentioned in the plan or in the Cabinet report of 26 August 2026 that approved it for publication. It appears in the Regulation 18 Consultation Report only because objectors cited it. Neither limb has been taken forward: Grays Athletic is not mentioned in the plan either and no allocation in the Grays area provides for a football ground. In the same plan the Council has made exactly the provision the resolution called for, for Tilbury Football Club (NS21). A resolution of full Council carried without dissent is a material consideration in plan-making and calls, at the least, for a reasoned explanation where the plan departs from it. None has been given.

The issue has been raised at every stage

- Issues and Options Stage 2 (2018 - 2019): the Report of Consultation records calls for the plan to "support the future viability of the 'Hammers'", to upgrade "the amenities for motor sport as a planned development of the Arena Essex site" and to "find an alternative location so that speedway can continue in the borough".
- Thurrock Hammers Speedway Local Plan Submission (July 2023) and Regulation 18 Response

(17 February 2024).

- Regulation 18 Initial Proposals (December 2023 - February 2024): around 320 comments on Speedway and Sport England's request for a Speedway needs assessment (section 4).
- Objections to planning application 25/00573/OUT (2025 and August 2026).

A Speedway venue need not be an outdoor stadium. A track can be laid within a large building such as a warehouse or industrial unit, where noise, light and dust are contained and meetings can be held all year. Thurrock has the largest supply of employment land in South Essex (section 6). The plan runs to 2044. It is the opportunity to secure both the Arena Essex site and the flexibility for a new venue.

3. National and local policy

Which version of the NPPF applies

A new National Planning Policy Framework was published in August 2026. Annex A, paragraph 8 provides that plans other than those prepared under the new plan-making system "should be produced in accordance with the version of this Framework published in December 2024". None of the December 2024 transitional arrangements applies to a plan published at Regulation 19 in August 2026. These representations are therefore made against the December 2024 Framework. The August 2026 Framework is relevant because Annex A, paragraph 2 gives "very limited weight" to development plan policies that are materially inconsistent with its national decision-making policies unless they were examined and adopted against it. This plan will not have been, so any policy inconsistent with policy HC7 (formerly paragraph 104) will be discounted from adoption.

The August 2026 Framework bears on the plan in two further ways. HC7 now permits the loss of recreational land for "public service infrastructure" with equivalent or better replacement. That does not assist SS03: the Annex B glossary defines public service infrastructure 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, whatever its status as critical national infrastructure. And plan-making policy HC1(1)(d) requires plans to "set local standards for the provision of different types of recreational land and facilities, including for play, sport, informal recreation and allotments", with a footnote identifying "published Sport England Guidance (including Assessing Needs and Playing Pitch Strategy guidance)". That is the ANOG method the Coventry Inspector accepted and Sport England asked this Council to apply to Speedway.

For the avoidance of doubt, objections to planning application 25/00573/OUT on the same site have been made by reference to policy HC7. That is not inconsistent with these representations: Annex A, paragraph 1 makes the August 2026 policies material to planning applications from publication, while Annex A, paragraph 8 keeps this plan under the December 2024 Framework.

December 2024 Framework

- paragraph 20: strategic policies should make sufficient provision for community facilities;
- paragraph 32: policies should be underpinned by relevant, up-to-date, adequate and proportionate evidence;
- paragraph 36: a plan is sound if it is positively prepared, justified, effective and consistent with national policy;
- paragraphs 86(e) and 87: policies should be flexible enough to accommodate needs not anticipated in the plan and should recognise the specific locational requirements of different sectors;
- paragraphs 91 and 94: the sequential and impact tests apply to main town centre uses that are neither in an existing centre nor in accordance with an up-to-date plan;
- paragraph 96: policies should support healthy lifestyles, including through access to sports facilities;
- paragraph 98: policies should (a) plan positively for community facilities such as sports venues and (c) guard against the unnecessary loss of valued facilities;
- paragraph 103: access to open space and opportunities for sport and physical activity is important

for health and well-being; policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and opportunities for new provision and plans should then seek to accommodate the provision needed;

- paragraph 104: existing sports and recreational buildings and land should not be built on unless (a) an assessment has clearly shown them to be surplus to requirements, (b) the loss would be replaced by equivalent or better provision in quantity and quality in a suitable location or (c) the development is for alternative sports and recreational provision whose benefits clearly outweigh the loss of the current or former use;
- paragraph 154: facilities for outdoor sport and material changes of use for outdoor sport are not inappropriate in the Green Belt where they preserve openness; and
- paragraph 200: existing businesses and facilities, including sports clubs, should not have unreasonable restrictions placed on them as a result of development permitted after they were established (the agent of change principle).

The adopted Core Strategy

The adopted Core Strategy and Policies for the Management of Development (2011, amended 2015) protects existing provision. Policy CSTP9 commits the Council to "Safeguard existing and future provision of leisure, sports and open space facilities" and to "only allow the loss of a particular facility where appropriate alternative provision can be made elsewhere". At CSTP9 2.1.ii it records that "Leisure and sports facilities for Lakeside will be identified and set out in the relevant Development Plan Documents". Policy PMD5 safeguards "all existing open spaces, outdoor sports and recreational facilities" and requires that "Any alternative and improved facilities should be available for use before an existing open space or facility is lost." The plan is the Development Plan Document that CSTP9 anticipated. It identifies no sports facility for Lakeside and allocates the one that existed for a data centre.

The Coventry Stadium decision

The Coventry Stadium appeal decision (APP/E3715/W/23/3322013, Inspector Helen Hockenhull, 19 January 2024), made after a nine day inquiry at which 22 witnesses gave evidence, applies paragraph 104 (then paragraph 103) to a closed Speedway stadium. At paragraph 26 the Inspector applied the policy to a Speedway and stock car stadium without qualification, which disposes of any argument that a spectator motorsport venue is not protected because it is not a playing field. The Inspector held 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); that the closure of tracks because "Four clubs have closed as the owners have seen an opportunity to realise their asset through redevelopment proposals" "does not indicate a sport in severe decline, rather it reinforces the need for existing stadiums to be retained" (paragraph 33); and that Sport England's Assessing Needs and Opportunities Guide (ANOG) is a suitable method of assessing the need for spectator motorsport in the absence of any alternative (paragraph 31). She gave limited weight to public open space provided in place of the stadium (paragraph 86) and held that a 3G pitch did not outweigh the loss because "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." (paragraph 75). At paragraph 89 she found that the housing scheme would not be inappropriate development in the Green Belt and dismissed the appeal anyway, because the loss of the stadium conflicted with national and local policy. The protection of sports land is a freestanding objection that does not depend on the Green Belt and is not answered by it. Each finding applies to Arena Essex. If a 3G pitch could not outweigh the loss of Coventry, a data centre, which is not sports provision at all, cannot outweigh the loss of Arena Essex.

Sport England's position on the Rugby Local Plan

Sport England's representation 257 to the Rugby Proposed Submission Local Plan (March 2026) supported the restoration of Coventry Stadium for Speedway in a site-specific policy and objected to the use of marketing and viability tests for sports facilities:

"Sport England supports the objective of the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses."

"Sport England considers that a marketing exercise and viability assessment cannot demonstrate that a sports facility is surplus to requirements. A lack of commercial interest or viability does not equate to a lack of demand for the facility."

"The recent Coventry Stadium appeal decision (APP/E3715/W/23/3322013) confirms this principle, establishing that lack of use, disrepair, or viability considerations are not relevant factors when determining whether a sports facility is surplus to requirements under NPPF paragraph 104."

The same principles apply to Thurrock (R1, R3, R4 and R5).

4. The Regulation 18 consultation - what was said and how the Council responded

4.1 The Initial Proposals (December 2023)

The Initial Proposals said of the site only that "A new employment site is proposed at Arena Essex which would be classed as a Tier 1 employment site providing a range of unit sizes and suitable for all employment uses", with a note about the Local Wildlife Site. They did not say that it was a Speedway stadium with an extant permission. The Initial Proposals Integrated Impact Assessment (November 2023) refers to the "new employment site at Arena Essex" but does not mention Speedway or the stadium. On the same page, the Initial Proposals required that "Any sports provision and open space that is lost through the redevelopment of Blackshots Estate must be re-provided".

4.2 The Speedway representations

The Regulation 18 Consultation Report (2026) records 1,314 comments from 1,034 respondents between 18 December 2023 and 19 February 2024. On our analysis of the response tables, around 315 to 320 comment rows concern Speedway, the Hammers or the raceway. Their substance is recorded in the Report's own summary of individual responses (section 6.12):

"Speedway / Arena Essex: A large number of representations were received relating to the Speedway site. Individuals were concerned with any loss of Speedway and supported the preservation or reinstatement of the Speedway and related motorsport activities in the new Local Plan in accordance national and local policies. The Arena Essex Speedway should be included in future plans for Speedway purposes. Objects to any further development of the Speedway, request for Arena Essex Raceway stadium to remain as a speedway track. Concerned with any loss of the Speedway."

The infrastructure summary adds: "A very significant number of respondents supported the protection and return of Speedway facilities at Arena Essex, viewing Speedway as an important sporting, cultural and community asset."

The Council's responses to those comments, on our analysis, were as follows:

Council response	Number	Examples
"Comment noted and council to give consideration" (or "further consideration")	308 (about 98%)	Including our own submission at IP1170, which relied on NPPF paragraph 103, Core Strategy policies CSSP4, PMD5, PMD6, PMD16, CSTP9, CSTP22 and CSTP23, the 25 January 2023 resolution and the Coventry decision
"Comment noted. The Council acknowledge motion passed in January 2023, council to give further consideration."	6	IP0289, IP0290, IP0294, IP0295, IP0298 and IP0299. Comments citing the same resolution in the same words (for example IP0465, IP0467 and IP0479) received only the standard reply
"The recommendation to prepare an assessment of speedway needs is noted and appeal decision will be reviewed."	1	Sport England, IP0279

None of these responses changes the plan, answers any argument or commits to any piece of work other than the Sport England undertaking, which has not been honoured. The section of the Report describing how the infrastructure comments "informed the next stage of the local plan" lists the Infrastructure Delivery Plan, the Open Space Assessment, the Playing Pitch and Outdoor Sports Assessment and Strategy and the Indoor Sports Assessment and Strategy.

None of those documents considers Speedway.

4.3 Sport England's representations and the Council's responses

Sport England, which the Report classes as a Duty to Cooperate Body, made seven representations (IP0277 to IP0283). Its wording as summarised in the Report and the Council's responses are set out in full at Appendix A.

The representation on Arena Essex reads:

"Considers that the proposed allocation of the Arena Essex for a tier 1 employment area must be informed by an up to date and objective assessment of speedway needs, given the site's historic use - the study should consider if the speedway facilities are surplus to requirements and the council should engage with the British Speedway Promoters Limited / Speedway Control Bureau on the preparation of the needs assessment. Advises that the appeal decision at Coventry Speedway Stadium is worth reviewing. Notes that the consultation document does not state that the site is a former speedway stadium. Welcomes the requirements for the replacement of any sports provision lost through the redevelopment of the Blackshots Estate." (IP0279)

The Council replied: "The recommendation to prepare an assessment of speedway needs is noted and appeal decision will be reviewed." What has happened since:

- no Speedway needs assessment has been published and none is listed in the technical evidence;
- there is no evidence of engagement with the British Speedway Promoters Limited / Speedway Control Bureau;
- the Coventry decision is not mentioned anywhere in the plan or its evidence;
- the plan still does not say that the site is a Speedway or a former Speedway stadium; and
- the Blackshots re-provision requirement that Sport England welcomed has been deleted from Policy NS01 (R10).

Sport England also said that the evidence base for community sports facilities "is not robust and is out of date" (IP0277), asked for a policy "to protect, enhance and provide for sport and physical activity" (IP0278) and objected to the loss of playing fields at Gable Hall School (IP0280) and of golf facilities at Mardyke Valley (IP0281) and St Clere's Hall (IP0282) unless "a robust and objective assessment of golf facility needs" showed them to be surplus. The Council answered each with a promise of a Playing Pitch Strategy and an Indoor Sports and Leisure Facility Assessment. The Playing Pitch and Outdoor Sport Strategy (October 2025) covers football, cricket, rugby union, hockey, tennis, bowls, athletics and netball only. It assesses neither motorsport nor golf. The two types of facility on which Sport England asked for specific needs assessments are the two that were left out.

4.4 How other comments on the same site were treated

Comments on the same site that did not mention Speedway received substantive answers. British Land was told that a detailed Green Belt assessment would be prepared. Buglife, the Essex Field Club and Natural England were told that the Council would apply Biodiversity Net Gain guidance, prepare a Local Nature Recovery Strategy and test the allocation against the 2022 Local Wildlife Sites Review. SS03 now carries requirements on each of those matters. It carries none on Speedway.

4.5 What changed between Regulation 18 and Regulation 19

Matter	Regulation 18 (December 2023)	Regulation 19 (August 2026)
Arena Essex	Single sentence: Tier 1 employment site for all employment uses	Strategic allocation SS03: data centre campus, 135,000 sqm B8 on about 27 ha, all in 2029/34
Speedway	Not mentioned	Not mentioned
Speedway stadium	Not stated (noted by Sport England)	Not stated
25 January 2023 resolution	Not mentioned	Not mentioned
Blackshots sports re-provision	"must be re-provided"	Deleted (NS01)
Sports evidence	Out of date (Sport England)	PPOSS and Indoor Sports Assessment (October 2025) exclude motorsport and golf
Speedway needs assessment	Requested by Sport England; Council "noted"	Not produced
Coventry decision	Council to review	Not referred to
Protection of sports land	Core Strategy PMD5 (all existing facilities)	DMP27 protects only land designated on the Policies Map; the SS03 data centre footprint carries no designation

5. Leisure and sport in the plan, evaluated against the methodologies for assessing need

5.1 What the plan provides

Sport and leisure appear in the plan in the following places:

- Policy SP02 commits the Council to "supporting opportunities to enhance existing centres and other key public facilities and spaces including sports and open space provision" and expects schemes to "make provision for high quality green spaces, public realm, play, wider recreation and leisure". These are aspirations for new development; neither contains a protective test;
- Objective 1 seeks access to "the social, cultural and recreational facilities and services" communities need;
- Policy SP04 part E directs commercial leisure to centres first and Policy PP02 makes Lakeside "the principal focus for retail and leisure provision";
- Policy DMP27 protects designated open space, sports and recreation land and requires new sports provision "in accordance with the Council's Sports Facilities and Playing Pitch Strategies";
- Policy DMP32 deals with cultural space and Policy DMP33 with community, health, leisure and cultural facilities, including their loss;
- site allocations require playing pitches, 3G pitches, MUGAs, play space and open space in the new neighbourhoods and new settlements (for example SS17 West Horndon) and NS21 (Tilbury Football Club) and NS42 (The Springhouse) require replacement sports facilities to be delivered before the existing ones are lost; and
- Policy DMP39 part 4 accepts facilities for outdoor sport in the Green Belt.

There is no provision of any kind for spectator sport, for motorsport or for any sports facility of more than local catchment. The only sports venue of regional, national and international significance the Borough had is allocated for a data centre. The silence is specific to Speedway: the plan names Stanford Rugby Club, Orsett Recreation Ground, East Tilbury Memorial Park and Tilbury Football Club and makes detailed provision for the last of these. The only uses of the word "stadium" relate to Tilbury Football Club.

5.2 The methodologies

The recognised methodologies are:

- **Sport** - NPPF paragraph 103 and Planning Practice Guidance on open space, sports and recreation facilities, which point to Sport England's guidance; Sport England's Assessing Needs and Opportunities Guide (ANOG), which applies to all sports facilities other than playing pitches, in three stages: (A) prepare and tailor the approach, including the scope of facilities and the

geographical scale; (B) gather information on supply and demand under the headings of quantity, quality, accessibility and availability; and (C) bring the information together to identify needs and opportunities to protect, enhance and provide; Sport England's Playing Pitch Strategy Guidance (stages A to E) for pitch sports; and Sport England's Planning for Sport Guidance (2019), with its objectives to protect, enhance and provide. ANOG expects specialist and regional facilities to be assessed at the appropriate scale and across administrative boundaries, with the relevant governing bodies involved. The Coventry Inspector accepted ANOG as the method for assessing Speedway.

- **Leisure** - for commercial leisure, which is a main town centre use, the approach in Planning Practice Guidance on town centres and retail: an assessment of the scale and type of leisure development likely to be needed, based on expenditure capacity, an audit of provision and gaps and household survey evidence of participation and preference, so that sites can be allocated (NPPF paragraph 90(d)) and the sequential and impact tests applied (paragraphs 91 and 94). Where a leisure use cannot by its nature be accommodated in a centre, the plan should identify where it can go (paragraphs 86(e), 87 and 98(a)).

5.3 Sport - evaluation and deficiencies

Method requirement	What the evidence does	Deficiency
ANOG Stage A: scope tailored to local circumstances and informed by consultation	PPOSS scope fixed at eight pitch and outdoor sports; Indoor Sports Assessment covers sports halls, pools, fitness, squash, gymnastics, indoor bowls, indoor tennis, village halls and cycling	Motorsport, Speedway and golf excluded although around 320 Regulation 18 comments and Sport England (IP0279, IP0281, IP0282) raised them. The PPOSS itself says ANOG applies to non-pitch sports but did not apply it to them
ANOG Stage A: geographical scale appropriate to the facility	Four analysis areas within Thurrock; cross-boundary references to Basildon, Brentwood, Castle Point and Havering for pitch sports only	No sub-regional or regional assessment for a facility type whose catchment is regional and of which there is now none in Essex, Hertfordshire or London
ANOG Stage B: quantity, quality, accessibility and availability of supply	No audit of motorsport supply	The loss of Arena Essex and the regional losses (Rye House, Peterborough) are not recorded
ANOG Stage B: demand, including displaced and latent demand and governing body views	No engagement with the British Speedway Promoters Limited / Speedway Control Bureau or the sport	Displaced demand from Arena Essex and riders such as Cooper Rushen not considered
ANOG Stage C: protect, enhance, provide	No conclusion on motorsport	No basis for any finding that the Arena Essex facility is surplus (paragraph 104(a))
Open Space Assessment (February 2026)	Records site 126 Arena Essex as semi-natural greenspace "found to have no public access"	Removes the site from the audit without considering its lawful sporting use
Site Selection Methodology (July 2026), Stage 5	PPOSS, Indoor Sports Assessment and Open Space Assessment applied to housing sites	No sports evidence applied to employment sites, so the loss of a sports facility to the SS03 employment allocation was never tested
Infrastructure Delivery Plan (July 2026)	Sports infrastructure drawn from the PPOSS and Indoor Sports Assessment	No Speedway or motorsport requirement, so none can be funded or secured
Integrated Impact Assessment (July 2026)	Scores SS03 positive for health and double positive for access to facilities	Does not record the loss of a sports facility; no alternative retaining Speedway appraised (R12)

5.4 Leisure - evaluation and deficiencies

The plan does not itself evaluate leisure against these methodologies. Its only statement of leisure need is paragraph 4.2.22: "The Centres, Retail and Commercial-Leisure Needs assessment identified capacity for some limited growth in cinema screens and gyms during the Plan period. Any other growth in leisure/entertainment will be subject to demand." The underlying study quantified need for two uses only: up to three or four cinema screens and up to five premium or four budget gyms by 2044/45. Every other form of leisure, including spectator sport, family entertainment and events, is left to unassessed demand. Paragraph 4.2.22 records that residents want better family leisure and entertainment, "with an ice rink, crazy golf and more leisure and activities for families suggested", but no policy or site responds. The evidence and the plan compare with the methodology as follows:

Method requirement	What the evidence does	Deficiency
Scope of the commercial leisure assessment	The Centres, Retail and Commercial Leisure Needs Assessment (December 2025) assesses the NPPF Annex 2 town	Spectator sport and motorsport events, which are major leisure attractions but cannot locate in a centre, are outside its scope

Method requirement	What the evidence does	Deficiency
	centre uses: food and drink, cinemas, gyms, bowling, bingo and cultural uses	
Expenditure capacity	Forecasts "Recreational & sporting services" spending in the study area rising from £412.5m (2025) to £505.3m (2044), an increase of £92.8m (22.5%)	Growth is not translated into any provision for sporting events or venues outside centres
Quantitative assessment of need by type of leisure	Quantifies need for cinema screens (up to three or four) and gyms (up to five premium or four budget gyms by 2044/45) only; plan paragraph 4.2.22 says any other growth "will be subject to demand"	No assessment of any other type of leisure, so the plan cannot show that it provides for the scale and type of leisure likely to be needed
Household survey of participation and preference	Leisure attractions asked about: restaurants, pubs, cinema, theatre, family entertainment, gyms, museums, bingo and "other"	No question on attending sporting events or motorsport, so demand for spectator sport was not measured
Market share and leakage	Family entertainment venues in the Borough achieve only a 22.7% market share; residents travel to Basildon (Festival Leisure Park), Romford, Bexleyheath and Central London and asked for an ice rink, crazy golf and more family leisure	Leisure spending leaks out of the Borough and no site or policy provides for family entertainment or events outside centres. A Speedway venue is family entertainment that would retain that spending
Audit of provision and gaps	Audit of centres and commercial leisure at Lakeside, Grays and elsewhere	The loss of the Borough's only stadium-scale leisure venue is not recorded as a gap
Allocation of sites (paragraph 90(d)) and flexibility (paragraphs 86(e) and 87)	SP04 part E directs commercial leisure to centres; PP02 makes Lakeside the focus for leisure	No site or policy for leisure uses that need large sites away from housing; no route for an indoor Speedway venue other than a sequential test it cannot pass
Core Strategy CSTP9 2.I.ii	Committed to identify "Leisure and sports facilities for Lakeside" in the Local Plan	None identified. The adjacent sports facility is allocated for a data centre
Visitor economy (Policy SP03 point 11)	The study records that "There is no contemporary hotel or tourism data available in relation to the Thurrock Council area"; the latest figures (2016) are 2.5m trips, £177.5m of tourism value and 3,897 tourism related jobs	SP03 supports the visitor economy without current evidence on visitor attractions; the loss of the Borough's only venue for international sporting events is not considered

5.5 Conclusion on need

Measured against ANOG, against Sport England's 2024 advice and against the leisure needs methodology, the evidence has not assessed the need for Speedway at all. There is therefore no assessment capable of showing the Arena Essex facility to be surplus. Paragraph 104(a) cannot be met, SS03 provides no replacement under paragraph 104(b) and informal open space is not alternative sports provision under paragraph 104(c). The plan is not justified (paragraphs 32 and 36(b)) and not consistent with paragraphs 103 and 104. Nor does the plan evaluate leisure against the leisure needs methodology: beyond cinema screens and gyms it leaves all growth in leisure "subject to demand" (paragraph 4.2.22), which is not an assessment of need.

6. Indoor Speedway and employment land

Speedway is a sui generis use whether indoor or outdoor: Use Class E(d) excludes indoor sport "involving motorised vehicles" and Class F2(c) excludes outdoor sport involving motorised vehicles. An indoor venue would occupy a large clear-span warehouse or industrial building, of the kind found in Thurrock's Employment Areas and planned on its employment allocations. It suits those locations: noise, light and dust are contained, it is separated from housing and meetings are held in the evenings and at weekends when demand on access and parking from neighbouring businesses is lowest. It generates employment (permanent, race-night and contractor staff) and visitor spending.

As drafted, the plan would make such a venue very hard to deliver:

- Policy DMP08(1) safeguards Employment Areas for E(g), B2, B8 and "sui generis related employment uses", without saying whether a sports venue qualifies;
- Policy DMP08(5) permits a non-employment use only where the site "is no longer required having been marketed for employment use for at least 12 months", cannot be redeveloped for

employment use "as justified by a viability assessment" and small business options "have been fully explored";

- Policy DMP09(2) protects employment sites outside the Employment Areas unless they are no longer suitable or, if vacant, have been "marketed over an appropriate period of time"; and
- Policies SP04(E), DMP19 and DMP20 require a sequential test and an impact assessment for leisure outside centres.

Few owners will leave a warehouse empty for a year to allow a sports use and no Speedway venue can be accommodated in a town centre. The tests would rule out the one type of location where a venue is most likely to be acceptable.

Removing them for Speedway would not harm the supply of employment land. On the Council's own figures at Policy SP03(2) the plan provides some 614 hectares (18.5 ha of underused land in Employment Areas, 312 ha at Thames Enterprise Park, 111 ha at London Gateway and a minimum of 172.5 ha of new allocations), plus 27 ha for the data centre, against an Economic Development Needs Assessment requirement of 245.65 ha under the higher growth scenario (paragraph 4.2.4). A Speedway venue needs a few hectares or a single large building. Locations such as Thames Enterprise Park, a former refinery away from the main residential areas where the plan already supports sui generis uses, show that suitable land exists.

National policy supports this. Paragraph 86(e) requires flexibility for needs not anticipated in the plan and paragraph 87 recognition of the locational requirements of different sectors. Once the plan itself supports a Speedway venue on employment land, such a proposal is "in accordance with an up-to-date plan" and the sequential and impact tests in paragraphs 91 and 94 do not apply. Our modifications at R3, R6 and R7 achieve this without disturbing the protection of employment land for other uses.

7. Representations

Each representation identifies the part of the plan concerned, whether it is legally compliant and sound, the reasons and the modification sought. Proposed new or amended wording is shown in the shaded boxes. New words are in normal type; we have not reproduced unchanged text.

R1 - Policy SS03 Former Arena Essex site and fishing lake, Lakeside (pages 77 to 80)

Legally compliant: no (see R12 and R13). **Sound:** no - not positively prepared; not justified; not effective; not consistent with national policy.

SS03 allocates about 52 hectares, including about 27 hectares in the east for "a data centre campus" of "Approximately 135,000 sqm of floorspace for B8 use". The allocation includes the Arena Essex stadium, which has an extant permission for Speedway. SS03 does not mention the stadium, its permission, Speedway or any requirement to replace the sports facility.

The stadium is "existing ... sports and recreational buildings and land" within paragraph 104. Closure does not take it outside the policy: paragraph 104(c) refers to "the current or former use" and the Coventry Inspector treated the closed stadium as an extant use that could be recommenced (paragraph 80). Policy DMP33 of the plan applies to facilities "currently or last used".

None of the paragraph 104 exceptions is met:

- (a) surplus: no assessment of Speedway need exists (section 5). The only assessment ever prepared, for the 2018 application, relied on capacity at Rye House and other stadia that has since been lost. That is not a surplus but a cumulative deficit;
- (b) replacement: SS03 requires none; and
- (c) alternative sports provision: SS03 offers only "a new publicly accessible open space" around the lake for "informal recreation". That is not sports provision. The Coventry Inspector gave limited weight to open space offered in place of a stadium (paragraph 86), although the appeal scheme there offered public open space some 370 per cent above the policy requirement on a site the public could previously enter only on race days. Arena Essex has no public access either: an offer of open space around the lake is worth no more.

The plan applies the paragraph 104(b) principle to other sports facilities. NS21 requires that Tilbury Football Club's replacement "must be equivalent or better in terms of quantity and quality and be delivered prior to the redevelopment of the existing football grounds". NS42 requires the Springhouse Sports Club's replacement facilities "to be completed and operational prior to the demolition of any of the existing sports and social club facilities". NS43 requires the loss of a sports facility to be addressed under DMP27. The Council applied the same principle when Aveley Football Club, with average crowds of 104 to 126, was relocated to Parkside (13/01021/OUT) and the Secretary of State applied CSTP9 to the former Aveley Sports and Social Club in APP/M1595/V/14/2214081 (8 January 2015), finding no net loss of sports provision. No reason is given for treating Arena Essex, whose crowds were several times larger, differently.

The allocation is not positively prepared. It disregards the 25 January 2023 resolution, the Regulation 18 representations and Sport England's advice and its own undertaking. It is not effective: the Council's Viability Assessment (June 2026) does not appraise SS03, tests a data centre only as a greenfield typology (EMP_GF_6) and finds that typology to be "The sole typology shown to be unviable" (paragraph 7.78), while warning that its data centre evidence is less reliable than for other uses (paragraph 7.79). A data centre does not need this site: the plan identifies far more employment land than the evidence requires (section 6). A Speedway stadium cannot readily be found elsewhere. The deliverability of SS03 is addressed further at R15.

A plan which allocates the site for a data centre also pre-empts the judgement that DMP33, which applies to facilities "currently or last used", would otherwise require. The Council should be asked to confirm whether any assessment of Speedway needs exists.

Modification sought. Our primary modification is to retain the stadium for Speedway, with the data centre (if retained) confined to land outside it:

Amend the Key Requirements of SS03 to read:

"The site includes the Arena Essex stadium, which has planning permission for stock car, banger and Speedway racing (77/00170A/FUL, 25 January 1982). The stadium and the land needed for its operation, access and parking, as shown on the Policies Map, are safeguarded for the restoration of Speedway and associated motorsport together with other community uses in accordance with Policy DMP27A. Development elsewhere on the site, including any data centre campus, must be laid out so that it does not prevent or prejudice the restoration and operation of Speedway on the safeguarded land and must incorporate the noise and amenity measures needed to ensure that the Speedway use is not subject to unreasonable restrictions (Policy DMP30)."

Reduce the floorspace and site area figures for the data centre campus accordingly and add to the Development & Design Principles:

"Any application shall be accompanied by an assessment of Speedway and motorsport needs prepared in accordance with Sport England's Assessing Needs and Opportunities Guide, in consultation with Sport England and the British Speedway Promoters Limited / Speedway Control Bureau."

If the Inspector concludes that the data centre should occupy the stadium land, the alternative modification is:

"Development which would result in the loss of the Arena Essex stadium will be permitted only where replacement Speedway provision, equivalent or better in terms of quantity and quality and in a suitable location within Thurrock, has been secured by planning obligation and is available for use before the existing facility is lost, consistent with the approach in Policies NS21 and NS42."

Failing either, SS03 should be deleted. These modifications would make the allocation consistent with paragraphs 98, 103 and 104, justified by the evidence and consistent with the plan's own treatment of other sports facilities.

R2 - Policy SP03 The Economy and Skills, point 3 and paragraphs 4.2.4 and 4.2.17

Legally compliant: yes. **Sound:** no - not justified; not consistent with national policy.

SP03 point 3 supports digital growth "by allocating approximately 27 hectares of land at the Arena Essex site for the provision of a new data centre campus". The objection is the same as to SS03. In

addition, SP03 lists the strategic allocations made "through amendments to Green Belt boundaries" and sets the data centre out separately, yet the Policies Map removes the data centre footprint from the Green Belt. The plan should say whether the site is being released and justify any release. Speedway use needs no release: facilities for outdoor sport are not inappropriate in the Green Belt (paragraph 154 and Policy DMP39 part 4). The exceptional circumstances case has been used to displace a use that did not need it. Paragraph 4.2.17 describes the benefits of the data centre, including "open space provision", without mentioning the loss of the sports facility.

SP03 also says nothing about leisure or sports employment, although point 11 supports the visitor economy and Speedway was the Borough's best attended spectator sport.

Modification sought.

Amend point 3: "... by allocating land at the Arena Essex site for the provision of a new data centre campus, outside the land safeguarded for Speedway under Policies SS03 and DMP27A."

State in the supporting text whether, and to what extent, the SS03 site is released from the Green Belt and the exceptional circumstances relied on.

Add a new point 12: "Supporting the provision of a Speedway venue, indoor or outdoor, including on land within designated Employment Areas and on employment site allocations (whether or not yet developed), in accordance with Policies DMP08 and DMP27A, as a sports, leisure and visitor economy use that generates employment."

R3 - New Policy DMP27A Speedway and Motorsport Venues (section 6.5)

Legally compliant: yes. **Sound:** no - not positively prepared; not effective.

The plan makes no provision for Speedway or motorsport, although the issue was raised at every stage, the Council resolved to use the plan to retain Speedway and Sport England asked for an assessment. Paragraph 98(a) requires positive planning for sports venues. Rugby's emerging plan shows how this is done: Policy W1B supports the restoration of Coventry Stadium for Speedway and states that permission will not be granted for development conflicting with that objective. Sport England supported that policy. A Thurrock policy should do the same for Arena Essex and should also provide a clear route for a new venue, indoor or outdoor, so that Speedway can return whether or not the Arena Essex site is retained.

Modification sought. Insert a new policy after DMP27:

DMP27A - Speedway and Motorsport Venues

1. The Council supports the return of Speedway to Thurrock. The Arena Essex stadium, Arterial Road, Purfleet-on-Thames, as shown on the Policies Map, is safeguarded for the restoration of Speedway and associated motorsport together with other community uses. Planning permission will not be granted for development which would conflict with this objective, unless replacement Speedway provision, equivalent or better in terms of quantity and quality and in a suitable location within Thurrock, has been secured and is available for use before the existing facility is lost.

2. Proposals for a new Speedway venue, whether indoor or outdoor, will be supported where:

- a. noise, lighting, dust and hours of use can be controlled by condition to protect the amenity of noise-sensitive uses;
- b. safe access can be provided and the venue is accessible by the road or highway network which can accommodate event traffic with appropriate management; and
- c. for an outdoor venue in the Green Belt, the proposal is for a facility for outdoor sport which preserves openness in accordance with national policy and Policy DMP39.

3. An indoor Speedway venue, including within a new or existing warehouse or industrial building, will be supported in principle within a designated Employment Area and on an employment site allocation, including land allocated but not yet developed. It is a sui generis employment-generating use for the purposes of Policy DMP08. It will not be necessary to show that the land or premises are surplus to or no longer required for employment use, to market them or to provide a viability assessment. Such a proposal is in accordance with this Plan and will not require a sequential test or impact assessment.

4. New noise-sensitive development near an established or safeguarded Speedway venue must incorporate the mitigation needed to ensure that the venue does not have unreasonable restrictions placed on it, in accordance with Policy DMP30.

5. Once established, a Speedway venue is an existing sports facility protected by Policy DMP27 part A.

Add the following supporting text after Policy DMP27A:

Policy Explanation

Speedway has been part of Thurrock's sporting life since 1984, when it was introduced at the Arena Essex Raceway on the Arterial Road, Purfleet-on-Thames. The stadium opened in 1978 for stock car and banger racing. Speedway is authorised by planning permission 77/00170A/FUL, "Use of land for stock car, banger and Speedway racing with ancillary car parking, access roads etc.", issued on 25 January 1982, which was implemented and remains extant.

Riders from the club have between them won the individual world championship 8 times, 22 Speedway Grand Prix, the world team cup 9 times, the under 21 world championship 3 times, the world long track championship 7 times and the British Championship 8 times. The track was licensed by the Fédération Internationale de Motocyclisme to hold world championship events. It hosted the World Under 21 Team Cup semi-finals in June 2012 and the British Under 21 Championship in 2009, 2011 and 2012. It also hosted the two best attended Speedway meetings in the United Kingdom outside Grand Prix events in the last thirty years: Lakeside v Poole in 2008 and the Lee Richardson Memorial in 2012. Total attendances across all events at the stadium exceeded 100,000 in 2008. Speedway at Arena Essex was the highest quality sport in Thurrock and was regularly broadcast live on Sky Sports.

In 2017 a Speedway led consortium including the Homes and Communities Agency (now Homes England) was negotiating to buy the site when the then landowner sold it to London Strategic Land. Speedway was evicted in 2018 although the club was ready, able and willing to operate. The site was sold to its present owner on 31 July 2023. Thurrock Hammers Limited, formed in 2019, runs the Thurrock Hammers Speedway team, which has raced without a home track, including at Kent Kings at Sittingbourne in 2019, at Iwade in Kent in 2024, 2025 and 2026, Isle of Wight in 2025 and Mildenhall in 2019 and 2026. It has maintained a youth pathway for locally born riders including Cooper Rushen, Jamie Etherington, Harrison Rogers and Kenzie Cossey. Cooper Rushen of Maldon, Essex is a fifteen times British Youth Champion and at 16 the current and youngest ever British Under 21 Champion, yet cannot ride in his own county.

On 25 January 2023 full Council resolved "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 motion was carried with 42 votes for and no vote against is recorded. Proposing it, Councillor Kent referred to the Lakeside Hammers "who had been displaced by the potential development of Arena Essex". Councillor Jefferies said that the local plan "was about providing a community with sports, leisure and entertainment with football and speedway being at the heart of that local plan". This policy gives effect to that resolution.

There is now no Speedway track anywhere in Essex, Hertfordshire or Greater London. Rayleigh Weir (1948 to 1973) and Arena Essex (1984 to 2018) have both been lost. Rye House, Hoddesdon lost its track without planning permission and is the subject of enforcement appeals APP/J1915/C/24/3343929 and 3343930. Peterborough's club was evicted from the East of England Showground. Riders and supporters from Thurrock and South Essex must travel to Kent, Suffolk or further. Speedway venues need large sites separated from noise-sensitive uses and cannot readily be found or replaced. As the Inspector found in the Coventry Stadium appeal decision (APP/E3715/W/23/3322013, paragraph 33), the closure of tracks "does not indicate a sport in severe decline, rather it reinforces the need for existing stadiums to be retained".

The policy follows the approach of Rugby Borough Council's emerging Local Plan. Its Policy W1B provides: "The council supports the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses. Planning permission will not be granted for development proposals which would conflict with these objectives." Sport England, the statutory consultee on sport, supported that policy in its representation 257 to the Rugby Proposed Submission Local Plan (March 2026): "Sport England supports the objective of the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses." In the same representation Sport England objected to marketing and viability tests for sports facilities because "a marketing exercise and viability assessment cannot demonstrate that a sports facility is surplus to requirements". For that reason part 3 of this policy does not apply such tests to Speedway venues.

A Speedway venue need not be an outdoor stadium. A track can be laid within a large warehouse or industrial building, where noise, light and dust are contained and meetings can be held all year. Part 3 therefore supports indoor venues in designated Employment Areas and on employment site allocations, including land not yet developed, without any requirement to show that the land is surplus to employment requirements or to market it.

R4 - Policy DMP27 Open Spaces, Sports and Recreation, part A (page 335)

Legally compliant: yes. **Sound:** no - not consistent with national policy; not effective.

DMP27 part A.1 protects "Designated areas of open space, sports and recreation, as shown on the Policies Map" and part A.2 applies its criteria only to "the loss in full or in part of designated areas". Paragraph 104 has no designation threshold; it applies to all "existing open space, sports and recreational buildings and land". Adopted Policy PMD5 safeguards "all existing" facilities. DMP27 is materially less protective than both.

The Policies Map completes the effect: the SS03 data centre footprint is shown as a Designated Employment Area with no open space, sports or recreation designation. The loss of the stadium would therefore never engage DMP27. The applicant for 25/00573/OUT already argues that, because the stadium is not shown on the Core Strategy policies map, it "appears to be afforded no protection". That argument fails against PMD5 and CSTP9, which are criteria-based. DMP27 would give it a foothold. As national decision-making policy HC7 also has no designation threshold, DMP27 would attract very limited weight under Annex A, paragraph 2 of the August 2026 Framework from adoption.

DMP27 also omits the PMD5 requirement that replacement facilities be available before the existing facility is lost, although the plan applies that requirement in NS21 and NS42.

The difference must be corrected now. At examination, consistency with national policy is a test of soundness (sections 19(2)(a) and 20(5) of the 2004 Act) and a less protective local policy can be required to change. After adoption, section 38(6) requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise. An applicant proposing to build on undesignated sports land could then say that the plan does not engage the protective test at all, leaving national policy to be argued only as a material consideration against a scheme that complies with the plan. At Coventry the local and neighbourhood plan policies both reflected national policy and the Inspector found conflict with all three. A narrowed DMP27 would be a poor instrument for the Council as well as for objectors.

Modification sought.

Replace A.1 and the opening of A.2 with:

"1. Existing open space, sports and recreational buildings and land, including playing fields, formal play spaces and facilities currently or last used for sport, whether or not designated on the Policies Map, will be protected and enhanced. Designated areas are shown on the Policies Map.

2. Development proposals that would result in the loss in full or in part of such open space, sports or recreational buildings or land will only be permitted where one of the following criteria is met: ..."

Add to criterion A.2(b): "... and the replacement provision is available for use before the existing provision is lost."

R5 - Policy DMP33 Community, Health, Leisure and Cultural Facilities, part B.1(b) (page 348)

Legally compliant: yes. **Sound:** no - not consistent with national policy.

DMP33 part B permits the loss of valued facilities "currently or last used for the provision of community, leisure and cultural activities" where, under B.1(b), it is "no longer practical, desirable or viable to retain them", supported by marketing "for a minimum of one year". Applied to a sports facility, that is a viability gateway that paragraph 104 does not contain. Sport England objected to the same type of test at Rugby on the ground that "a marketing exercise and viability assessment cannot demonstrate that a sports facility is surplus to requirements" and the Coventry Inspector held that need and viability are distinct (paragraph 28). Under the August 2026 Framework the marketing test sits in policy HC6, which expressly "excludes recreational land and facilities which are addressed in policy HC7". Limb (d) also permits loss on a broad community benefit balance, which is weaker than paragraph 104(c) because it does not require the benefit to be alternative sports and recreational provision. Part B.1 as a whole should therefore not apply to sports facilities.

Modification sought.

Add to part B: "3. Part B.1 does not apply to open space, sports and recreational buildings and land, including facilities currently or last used for sport, the loss of which will be assessed against Policy DMP27 part A and national policy."

R6 - Policies DMP08 Protecting Designated Employment Areas and DMP09 Employment Uses Outside Designated Employment Areas (pages 309 to 313)

Legally compliant: yes. **Sound:** no - not positively prepared; not effective.

For the reasons in section 6, DMP08 and DMP09 would prevent an indoor Speedway venue in a warehouse or industrial building, or an outdoor venue on employment land, unless the land were shown to be no longer required, had been marketed for at least 12 months and was shown by a viability assessment to be unsuitable for employment use. Those tests would apply equally to land allocated for employment but not yet developed. The plan's employment land supply is more than twice the requirement, so a Speedway venue would not prejudice it. Paragraphs 86(e) and 87 require flexibility for needs not anticipated and for the locational requirements of different sectors. DMP08(6) already shows that the Council will make specific provision for particular operations such as data centres.

Modification sought.

Add to DMP08 a new criterion:

"7. Proposals for a Speedway venue, whether indoor (including within a new or existing warehouse or industrial building) or outdoor, will be supported in principle within a designated Employment Area and on an employment site allocation, including land allocated for employment use but not yet developed, where the venue would not prejudice the operation of neighbouring employment uses and accords with Policy DMP27A. A Speedway venue is a sui generis employment-generating use and a main employment use for the purposes of criterion 1. Criteria 2 and 5 do not apply: it will not be necessary to demonstrate that the land or premises are no longer required or surplus to requirements for employment use, to market them or to provide a viability assessment."

Add to DMP09 part 2: "Part 2 does not apply to proposals for a Speedway venue in accordance with Policies DMP08(7) and DMP27A."

Add to paragraph 6.2.3: "Sui generis employment uses include Speedway venues, which by their nature require large buildings or sites away from housing and are supported in designated Employment Areas and on employment allocations under criterion 7."

R7 - Policy SP04 Thurrock's Centres and their Futures, part E and Policies DMP19 Centres Sequential Test and DMP20 Local Impact Assessment

Legally compliant: yes. **Sound:** no - not effective; not consistent with national policy.

SP04 part E directs "New facilities for commercial leisure" to centres first. DMP19 requires a sequential test for main town centre uses outside centres and DMP20 an impact assessment for leisure over 280 sqm. A Speedway venue, if treated as a leisure or "more intensive sport and recreation" use, could never pass a sequential test, since no centre or edge of centre site can accommodate a track. Paragraphs 91 and 94 apply the tests only to proposals "not in accordance with an up-to-date plan". If the plan supports Speedway venues on employment land (R3 and R6), the tests should be stated not to apply.

Modification sought.

Add to SP04 part E: "This does not apply to Speedway venues, which will be assessed under Policy DMP27A."

Add to DMP19 and DMP20: "A Speedway venue within a designated Employment Area or on an employment site allocation, or otherwise in accordance with Policy DMP27A, is in accordance with this Plan and does not require a sequential test or impact assessment."

R8 - Policy DMP30 Minimising Pollution and Impacts on Amenity, Health and Safety, part B.2

Legally compliant: yes. **Sound:** no - not effective.

We support DMP30 B.2, which requires noise assessments to have regard to the agent of change principle. Paragraph 200 refers in terms to "pubs, music venues and sports clubs". The policy does not identify the existing activities to be protected. A Speedway venue, once established or

safeguarded, must be protected from later noise-sensitive development nearby, including at Arena Essex if housing or other sensitive uses come forward around Lakeside under PP02.

Modification sought.

Add to B.2: "Existing activities include music and entertainment venues, public houses and sports venues, including the Arena Essex stadium and any other Speedway venue that is established or safeguarded under Policy DMP27A. The applicant for the new development is responsible for the mitigation required."

R9 - The Spatial Vision, Objective 1, section 5.1 (Grays, West Thurrock and Purfleet-on-Thames) and Policy PP02 Lakeside Regional Town Centre

Legally compliant: yes. **Sound:** no - not positively prepared.

The vision and Objective 1 refer to recreational facilities in general terms only. The place chapter for Grays, West Thurrock and Purfleet-on-Thames describes Lakeside and the area's assets without mentioning Arena Essex as a sports venue. PP02 makes Lakeside "the principal focus for retail and leisure provision" but makes no provision for sport, although Core Strategy CSTP9 2.1.ii committed the Council to identify "Leisure and sports facilities for Lakeside" in this plan. The 25 January 2023 resolution is nowhere recorded.

Modification sought.

Add to Objective 1: "... including protecting and restoring sports facilities of regional significance and supporting the return of Speedway to Thurrock, in accordance with the Council's resolution of 25 January 2023."

Add to the section 5.1 place description: "The Arena Essex stadium, Arterial Road, was the home of Speedway in Essex from 1984 to 2018 and is safeguarded for its restoration under Policies SS03 and DMP27A."

Add to PP02: "7. Support sports and leisure facilities serving Lakeside, including the restoration of Speedway at the Arena Essex stadium."

R10 - Policy NS01 Blackshots Estate Redevelopment (pages 81 to 83)

Legally compliant: yes. **Sound:** no - not justified; not consistent with national policy.

The Initial Proposals required that "Any sports provision and open space that is lost through the redevelopment of Blackshots Estate must be re-provided" and Sport England welcomed that requirement (IP0279). NS01 requires only "New functional public realm which provides safe and accessible open space and children's play spaces". The deletion is not explained in the Consultation Report and is inconsistent with paragraph 104. It is the only change the Council made to the part of the Initial Proposals Sport England supported.

Modification sought.

Reinstate in NS01: "Any sports provision and open space that is lost through the redevelopment of Blackshots Estate must be re-provided, to an equivalent or better standard in terms of quantity and quality, before the existing provision is lost."

R11 - The evidence base for sport and leisure

Legally compliant: yes. **Sound:** no - not justified.

For the reasons in sections 4 and 5, no evidence document assesses the need for Speedway or motorsport, despite the Council's undertaking to Sport England. The Playing Pitch and Outdoor Sport Strategy and the Indoor Sports Assessment exclude motorsport; the Open Space Assessment removes Arena Essex from its audit; the Site Selection Methodology applies no sports evidence to employment sites; the Infrastructure Delivery Plan contains no Speedway requirement; and the commercial leisure evidence does not measure demand for spectator sport. Paragraphs 32 and 103 are not met and the plan's choices on SS03, DMP27 and DMP33 are not justified. The commercial leisure evidence also quantifies need only for cinema screens and gyms, has no contemporary

tourism data and does not assess leakage of spending on family entertainment and events or the need for leisure uses that cannot locate in centres.

Modification sought.

Before submission, prepare and publish an assessment of Speedway and motorsport needs in accordance with Sport England's Assessing Needs and Opportunities Guide, at a sub-regional scale and in consultation with Sport England, the British Speedway Promoters Limited / Speedway Control Bureau, Thurrock Hammers Limited and neighbouring authorities, covering quantity, quality, accessibility and availability, displaced and latent demand and the Coventry Stadium decision of 19 January 2024.

Re-run Stage 5 of the Site Selection Methodology for employment sites against the sports evidence, starting with SS03.

Add Speedway provision to the Infrastructure Delivery Plan and record the gap in spectator sport and stadium-scale leisure provision in the leisure evidence.

Extend the leisure evidence to assess the need for leisure uses that cannot be accommodated in centres, including spectator sport, family entertainment and events, with current visitor economy data, and identify sites or criteria in the plan to meet that need.

R12 - The Integrated Impact Assessment (July 2026)

Legally compliant: no. **Sound:** no - not justified.

Section 19(5) of the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004 require an appraisal of the likely significant effects of the plan and of reasonable alternatives. The IIA appraises SS03 at paragraphs 6.119 to 6.122 and Table 6.6. It scores the allocation positive for health and double positive for access to services and facilities, because open space around the lake "is likely to promote healthier lifestyle choices amongst employees". It never records that the allocation would extinguish a sports facility; the words Speedway and motorsport do not appear. Yet the IIA's own decision-aiding question under objective 2 asks whether the plan maintains "recreation, play and sports facilities". The site was appraised policy-off as option 60981. No option retaining the sporting use and no alternative location for the data centre was appraised. The Initial Proposals IIA (November 2023) did not mention Speedway or the stadium either. An appraisal that does not identify an effect cannot have assessed it.

Modification sought.

Revise the IIA to appraise the loss of the sports facility at Arena Essex against objectives 2 and 4 and to appraise reasonable alternatives, including retention of a Speedway facility on the site and location of the data centre on other employment land. The findings should be consulted on before submission.

R13 - Legal compliance: consultation, Regulation 8(5) and the duty to cooperate

Legally compliant: no. **Sound:** not applicable.

Consultation (Regulations 18 and 22(1)(c)). The Council must take into account representations made at Regulation 18 and, on submission, set out how the main issues raised have been taken into account. Speedway was one of the main issues: the Report gives it its own heading and calls the support "very significant". Every individual comment received a reply of a few words that answers nothing. Points on the same site about the Green Belt and wildlife received substantive replies and changes to the plan. We ask the Inspector to examine whether the regulation 22(1)(c) statement shows how the Speedway representations were taken into account.

Regulation 8(5). Where a local plan policy is intended to supersede a policy in the adopted development plan, the plan must state that fact and identify the superseded policy. We have found no such statement in the plan. In particular it does not say whether Core Strategy policies CSTP9 and PMD5, which protect all existing sports facilities, are superseded and by what.

Duty to cooperate (section 33A). Sport England is a prescribed body. The Council undertook to act on its advice on Speedway and has not done so. Speedway provision in South Essex is a cross-boundary matter: neither Thurrock nor Basildon makes provision and the catchment of a venue is

sub-regional. We ask the Inspector to examine the Council's engagement with Sport England and with Basildon Borough Council on this matter.

Modification sought.

Publish, with the submission documents, a statement of how the Regulation 18 Speedway representations and Sport England's advice were taken into account; add to the plan a schedule of the adopted policies it supersedes; and prepare Statements of Common Ground with Sport England and Basildon Borough Council on Speedway provision.

R14 - Policies Map (August 2026)

Legally compliant: yes. **Sound:** no - not effective; not consistent with national policy.

The Policies Map shows the eastern part of SS03 as a Designated Employment Area, outside the Green Belt and with no open space, sports or recreation designation, so the stadium is shown as employment land. The green hatching over the western part is either LP Open Spaces or a Local Wildlife Site; the two symbols cannot be told apart in the key even at full resolution. The plan refers to "the existing on-site Local Wildlife Site" and the Open Space Assessment excluded the site, so the hatching is probably the Local Wildlife Site. The Council should confirm which it is, because if any part is LP Open Space then DMP27 part A is engaged for that part.

Modification sought.

Show the Arena Essex stadium and its operational land as safeguarded for Speedway under Policy DMP27A and as an area of open space, sports and recreation under DMP27; retain the SS03 site in the Green Belt unless and until the paragraph 104 tests and the exceptional circumstances test are met; and amend the key so that LP Open Spaces and Local Wildlife Sites are distinguishable.

R15 - Policy SS03: deliverability, viability and waste; Policy SP10 Circular economy and waste

Legally compliant: yes. **Sound:** no - not justified; not effective.

This representation is directed at soundness, not at the merits of any planning application. The allocation is built over former quarry landfills. The applicant's Environmental Statement for 25/00573/OUT, on the Council's own file, identifies the Central Landfill (THU079, in places up to about 16 metres of fill) and the Eastern Landfill (THU054, around 6 metres deep) as sources of asbestos fibres and asbestos containing materials. Asbestos was found in 18 of the 71 samples tested across the two landfills, recorded as loose fibres of amosite, chrysotile and crocidolite (brown, white and blue asbestos). Eighteen of 39 samples tested in the Eastern Landfill were classified as hazardous waste. The extent has not been established: the applicant records that the site "was not fully accessible" and that further trial pitting is required. For the previous scheme on the same land in 2018, Arup estimated approximately 400,000 tonnes of imported material in the inert landfill to be excavated and screened, approximately 300,000 cubic metres of soils to be moved and up to 100,000 tonnes of stone and rock fill to infill the northern part of the lake.

Not effective. SS03 places the whole 135,000 sqm in the 2029/34 tranche. Nothing in the plan or its evidence tests whether a site requiring that volume of landfill excavation, containing crocidolite and amosite of unknown extent, can be remediated and built out within one five year period. Deliverability is a soundness question (paragraph 36(c)). The Viability Assessment (June 2026) does not appraise SS03; its only data centre typology (EMP_GF_6) is greenfield, 50 hectares and 150,000 sqm, and is "The sole typology shown to be unviable" (paragraph 7.78). Paragraph ES27 expects abnormal costs to be reflected in a reduced land value, but whether any land value remains to absorb the remediation of this site is not tested, and SS03 is not among the strategic sites appraised at Table 8.2.

Not justified. At paragraph 2.4.19 the plan itself records that "Contamination and remediation liabilities on docklands and former industrial estates increase site preparation costs and delivery timeframes" and identifies "Contamination, remediation and viability gaps" in Purfleet-on-Thames, Tilbury and parts of Grays. Arena Essex, where the documented evidence is strongest, is not named.

Waste. SP10 identifies "Hazardous waste treatment and transfer capacity" among the capacities to be provided. The Waste Arisings and Capacity Assessment (February 2026) concludes that "Hazardous waste presents a clear challenge. By 2044, Thurrock is expected to face a shortfall in hazardous waste treatment capacity" and that "the Local Plan must address the anticipated capacity gap". It also records that "No new waste management or waste treatment site allocations have been identified through Thurrock Council's Call for Sites process, and no waste-related allocations are currently proposed in the draft Local Plan". The forecasts were projected from population and employment trends, not built up from the plan's allocations, so the hazardous asbestos-bearing waste SS03 would generate is not in them. Paragraph 4.2.51 addresses non-hazardous landfill capacity only. NPPF paragraphs 196 and 197 require policies to ensure that a site is suitable for its proposed use taking account of ground conditions and contamination, on adequate site investigation. SS03 requires only that contamination be investigated and risks minimised, which secures nothing about extent, quantity, phasing or cost.

Modification sought.

Add to the Development & Design Principles of SS03: "Given the site's history as a former quarry and landfill, any future application shall be accompanied by an investigation which establishes the lateral and vertical extent of the landfills and of asbestos contamination within them; a quantification of the hazardous waste arising and of its intended destination; and a remediation programme demonstrating that the site can be brought forward within the phasing set out in this Plan."

Amend the indicative phasing of SS03 to reflect the remediation period that investigation shows to be necessary. The Council should demonstrate how SS03 can be delivered within the phasing stated, given that the only data centre typology tested was unviable on greenfield assumptions, and how the hazardous waste arising from SS03 is to be managed given the shortfall its own evidence identifies.

8. Participation in the examination

We wish to take part in the hearing sessions on the matters above. The soundness of SS03 turns on evidence that does not exist and that the Council undertook to produce. That can only be tested properly by questions to the Council and to Sport England at a hearing. The application of paragraph 104 to a closed but permitted Speedway stadium, the relationship between DMP27, DMP33 and national policy and the provision for an indoor Speedway venue on employment land are matters on which the Coventry, Rugby and other Speedway cases are directly relevant. Our modifications are likely to be refined in discussion.

9. Conclusion

Thurrock had the only Speedway track in Essex. The plan allocates it for a data centre without assessing whether it is needed, without requiring replacement and without mentioning the sport, the stadium, the Council's own resolution, the hundreds of Regulation 18 representations or Sport England's advice. It also leaves no practical route for a new venue.

The modifications above would make the plan sound and legally compliant. They follow the approach Sport England has supported at Rugby, apply to Arena Essex the principle the plan already applies to Tilbury Football Club and the Springhouse and allow a Speedway venue, including an indoor venue, on employment land without surplus, marketing or viability tests. We ask the Council to make them before submission or to put them to the Inspector as proposed modifications. We also ask to be notified of the submission of the plan, the publication of the Inspector's report and the examination timetable.

Thurrock Hammers Limited remains ready to discuss the retention of a track at Arena Essex, or the identification of an alternative site through the Local Plan process, without call on the Council's capital or revenue budgets.

Mark Sexton

Director, for and on behalf of Thurrock Hammers Limited

13 October 2026

Appendix A - Sport England's Regulation 18 representations and the Council's responses

Wording as summarised in the Thurrock Local Plan Initial Proposals (Regulation 18) Consultation Report 2026, pages 177 to 178. Sport England is classed in the Report as a Duty to Cooperate Body (respondent 0121).

ID / subject	Sport England (as summarised)	Council response	Position at Regulation 19
IP0277 Boroughwide (Neutral)	"The current evidence base for community sports facilities is not robust and is out of date - this needs to be addressed to be able to protect sports facilities as well as justify developer contributions to new provision. Sport England would expect proposals for community sports. Welcome the recognition that further evidence is needed."	"The Council is to prepare a Playing Pitch Assessment/ Strategy and an Indoor Sports and Leisure Facility Assessment to support the Local Plan process which will supersede the current evidence base. An Open Space Assessment is also to be prepared."	PPOSS, Indoor Sports Assessment and Open Space Assessment prepared; none covers motorsport or golf
IP0278 Boroughwide (Neutral)	"Supports the Vision. Supports the Strategic Priorities - the council is encouraged to include a policy to protect, enhance and provide for sport and physical activity and creating environments that support active lifestyles. Planning for active lifestyles cuts across all of the suggested local plan themes. Sport England has produced guidance 'Active Design' ..."	"Support for vision and strategic priorities noted. The Council will consider the Sport England recommendations and will review guidance."	DMP27 protects only designated land; no policy to protect, enhance and provide for sport as a whole
IP0279 Grays conurbation (Neutral)	"Considers that the proposed allocation of the Arena Essex for a tier 1 employment area must be informed by an up to date and objective assessment of speedway needs, given the site's historic use - the study should consider if the speedway facilities are surplus to requirements and the council should engage with the British Speedway Promoters Limited / Speedway Control Bureau on the preparation of the needs assessment. Advises that the appeal decision at Coventry Speedway Stadium is worth reviewing. Notes that the consultation document does not state that the site is a speedway stadium. Welcomes the requirements for the replacement of any sports provision lost through the redevelopment of the Blackshots Estate."	"The recommendation to prepare an assessment of speedway needs is noted and appeal decision will be reviewed."	No assessment; no engagement with the British Speedway Promoters Limited / Speedway Control Bureau shown; Coventry not referred to; plan still does not state that the site is a Speedway stadium; Blackshots requirement deleted
IP0280 Corringham (Disagree)	Objects to the Corringham neighbourhood as it "would appear to result in the loss of the playing fields of Gable Hall school. This is the home ground of the local youth football club ... Current Playing Pitch Strategy (2020) recommends retention of these playing fields ... Advises that the Council should engage with Sport England before the Regulation 19 plan consultation."	"Sport England's objection is noted - The Council is to prepare a Playing Pitch Assessment/ Strategy and an Indoor Sports and Leisure Facility Assessment ... The Council will work with Sport England as it prepares the next stage of the Local Plan."	Not examined further in these representations
IP0281 South Ockendon (Disagree)	Objects "unless a robust and objective assessment of golf facility needs is undertaken and confirms that the facility is surplus to requirements" (Mardyke Valley Golf Club)	As IP0280	No golf needs assessment in the evidence
IP0282 Stanford- le-Hope (Disagree)	Objects "on basis of loss of part of St Clere's Hall Golf Club site, unless a robust and objective assessment of golf facility needs is undertaken"	As IP0280	No golf needs assessment in the evidence
IP0283 New Places (Neutral)	"... there should be an assessment of sports facility infrastructure needs. Developments at scale need their own on-site sports facility or significant capacity enhancements to off-site facilities."	"The Council is to prepare a Playing Pitch Assessment/ Strategy and an Indoor Sports and Leisure Facility Assessment ... Infrastructure Delivery Plan ..."	New settlement policies require sports facilities

Appendix B - Sources

- Thurrock Local Plan 2024 - 2044, Regulation 19 Publication Version (August 2026) and Policies Map: Vision and Objectives, SP03, SP04, PP02, SS03, SS10, NS01, NS21, NS42, NS43, DMP08, DMP09, DMP19, DMP20, DMP27, DMP30, DMP33 and DMP39.
- Thurrock Local Plan Initial Proposals (Regulation 18) Document (December 2023) and Initial Proposals Integrated Impact Assessment (November 2023).

- Thurrock Local Plan Initial Proposals (Regulation 18) Consultation Report 2026: sections 6.12 and the infrastructure summary; Appendix 3 entries IP0277 to IP0283, IP0289 to IP0299, IP0465, IP0467, IP0479 and IP1170.
- Thurrock Local Plan Issues and Options (Stage 2) Report of Consultation (2019).
- Thurrock Local Plan Integrated Impact Assessment and Appendices (July 2026), paragraphs 6.119 to 6.122 and Table 6.6.
- Thurrock Playing Pitch and Outdoor Sport Strategy, Assessment and Strategy Reports (October 2025); Indoor Sports Assessment and Strategy (October 2025); Open Space Assessment (February 2026), site 126.
- Centres, Retail and Commercial Leisure Needs Assessment, Volumes 1 and 4 (December 2025), section 8, Tables 18 and 19, Questions 43 and 53.
- Thurrock Local Plan Evidence Update - Waste Arisings and Capacity Assessment Report (February 2026); Environmental Statement Chapter 7 and Appendices 7.3 to 7.6, application 25/00573/OUT (April 2025); Arup Environmental Statement ground conditions chapter, application 18/01671/FUL (2018).
- Thurrock Economic Development Needs Assessment (August 2025); Employment Land Availability Assessment (June 2025); Site Selection Methodology (July 2026); Infrastructure Delivery Plan (July 2026); Local Plan and CIL Viability Assessment (June 2026), paragraphs 7.77 to 7.80.
- Thurrock Core Strategy and Policies for the Management of Development (2011, amended 2015): CSTP9 and PMD5.
- Report to Cabinet: Thurrock Local Plan, 26 August 2026.
- Thurrock Council minutes, 25 January 2023, Motion 3; planning permission 77/00170A/FUL (25 January 1982); applications 18/01671/FUL, 13/01021/OUT and 25/00573/OUT.
- Sport England representation 257 to the Rugby Proposed Submission Local Plan (March 2026).
- Appeal decision APP/E3715/W/23/3322013, Coventry Stadium, Brandon (19 January 2024); Secretary of State decision APP/M1595/V/14/2214081 (8 January 2015).
- National Planning Policy Framework (December 2024), paragraphs 20, 32, 36, 86, 87, 90, 91, 94, 96, 98, 103, 104, 154, 196, 197 and 200; National Planning Policy Framework (August 2026), Annex A, Annex B glossary and policies HC1, HC6 and HC7.
- Planning and Compulsory Purchase Act 2004, sections 19, 20, 33A and 38(6); Town and Country Planning (Local Planning) (England) Regulations 2012, regulations 8, 18, 19, 20 and 22; Town and Country Planning (Use Classes) Order 1987 as amended, Classes E(d) and F2(c).
- Sport England: Assessing Needs and Opportunities Guide; Playing Pitch Strategy Guidance; Planning for Sport Guidance (2019).