

APPEAL REF: APP/E3715/W/23/3322013

Coventry Stadium, Rugby Road, Coventry, CV8 3GJ

Demolition of existing buildings and outline application (with matters of access, layout, scale and appearance included) for residential development (Use Class C3) including means of access into the site from Rugby Road, provision of open space and associated infrastructure and provision of sports pitch, erection of pavilion and formation of associated car park.



I, Phillip Morris will say as follows;

1. I am the Chief Executive Officer of the British Speedway Premiership having been appointed by Speedway's National Governing Body, British Speedway Promoters Limited, which operates Speedway in the United Kingdom under the delegated authority of the Auto Cycle Union (ACU). I am also the Race Director of the highest level FIM (Fédération Internationale de Motocyclisme) international Speedway competitions including the Speedway Grand Prix series (the international Speedway World Championship event), the Speedway of Nations and the Speedway World Cup, the biggest international Speedway events.
2. I was born in Wales and was the Welsh Schoolboy Grasstrack champion at the age of nine and British Youth Grasstrack Champion from the age of 11 and which I won five times. I was signed as a professional Speedway rider by the Reading Speedway team just before on my 16<sup>th</sup> birthday and raced for a number of teams professionally from 1991 until my retirement from racing in 2008.
3. I was appointed Head Coach of the 2009 Great Britain under 21 team following which I was given responsibility for the management, development and co-ordination of activities of the under 21 and under 19 riders. I was also responsible for the running of the British under 16 Championship for riders from 8 – 16 years of age. In 2012 I was appointed Assistant Team Manager of the Senior Squad and led Team GB to a series victory over Australia in a series of meetings held on Premier League tracks.
4. I played a key role in the development of the Elite League Rider draft system, which saw young British riders fast tracked into the 2013 - 2014 Elite League teams. In December 2014, I was appointed the new Race Director for the Speedway Grand Prix World Championship series and the Speedway World Cup by the Swiss headquartered FIM.
5. Speedway's National Governing Body is interested in the Appeal and appears as a Third Party. We want Speedway to return to Coventry Stadium and I make this Proof to oppose the Appeal. The facts to which I refer are within my own knowledge unless otherwise stated in which case I believe them to be true.

### **UK Speedway**

6. Speedway, which is now 100 years old, is a popular professional motorcycle sport introduced in the United Kingdom in 1928. The senior professional sport is competed by riders on 500cc motorcycles fuelled by methanol, the cleanest fuel used in Motorsport. Speedway tracks are loose surface oval tracks on which riders turn corners by a powerslide, a form of powered high speed controlled skid. Part of Speedway's popularity

is that, unlike for example Formula 1, Moto GP, World Rally Championship, it is one of very few motorsports where spectators can see all parts the racing from start to finish.

7. Following its introduction in 1928 many Speedway tracks were constructed at greyhound racing stadia following the introduction of greyhound racing from the United States a few years earlier.
8. At no time has trackside betting been permitted.
9. A league system has been in operation in the United Kingdom since 1929. Twenty four teams now compete in three leagues. Since its introduction UK Speedway has attracted riders from around the world. Six of the world's top ten riders (according to the current Grand Prix standings) and the 2012, 2013, 2015, 2017, 2018 and 2021 World Champions ride for UK teams.
10. Speedway racing also includes individual events, the most significant being the World Championship which was competed every year at Wembley from its inception in 1936 until 1967 when it was staged in rotation with tracks in Sweden and Poland until 1981. From 1982 the World Championship Final (World Final) was held at other UK tracks in rotation with overseas venues. Since 1996 the World Championship has been competed on a Grand Prix basis with events held in the United Kingdom, Australia, Austria, Croatia, Czech Republic, Denmark, Finland, Germany, Italy, Latvia, New Zealand, Norway, Poland, Russia, Slovenia and Sweden. I am Race Director of the Grand Prix series.
11. Since 2000 the British Grand Prix has been held at the Principality Stadium (formerly the Millennium Stadium) in Cardiff where a temporary Speedway track is constructed. The Cardiff event is widely thought of as one of the pinnacles of the Grand Prix season. The last British Grand Prix not held at Cardiff were held at the Coventry Stadium in 1998, 1999 and 2000. I should also add that Coventry Stadium was the venue for the World Under 21 Finals in 1991 and 2012.
12. At the highest level Speedway Grand Prix riders earn in excess of one million Euros per annum.
13. A British rider has won the World Championship three times in the last 10 years.
14. The FIM also hold international team events. Since its opening in 2016 the National Speedway Stadium in Manchester has become one of the favoured venues for FIM international team events having held the Speedway World Cup in 2016 and the Speedway of Nations in 2021. These are the highest level international team championships.

15. The GB Team won the World Speedway of Nations event in 2021, came runner up in the same event in 2022 and runner up in the Speedway World Cup in 2023.
16. Despite the loss of the full season of events of the UK's three Speedway leagues in 2021 due to Covid, as far as I am aware no British Government furlough funds were claimed or received by any Speedway team or promotion.
17. In 2022 after a 15 year interval Speedway was restored at Oxford Stadium following the local Council's resistance of the landowner's development attempts. Speedway's return has been a huge success with capacity crowds in attendance on many occasions. Given Coventry Stadium's heritage there is no reason why this will not be repeated if Speedway is restored at the Appeal site.

### **Broadcasting**

18. In 2021 following a competitive bidding process and as part of its €100 million investment over 10 years in World Speedway Warner Brothers Discovery Channel was awarded the promotion and broadcast rights for the Speedway Grand Prix Series and the major international team events; Speedway of Nations, Speedway World Cup, SGP2, SGP3, SGP4 and SoN2. This will include 19 World Championship events per season.
19. Warner Brothers Discovery is one of the world's major media conglomerates, headquartered in New York with an annual turnover in excess of \$33 billion. With Olympics, Winter Olympics, Grand Slam Tennis and Grand Tour Cycling (Giro d'Italia, Tour de France and Vuelta a España) Grand Prix Speedway is one of Warner Brothers Discovery 'Gold Sports'.
20. Premiership Speedway is broadcast live on Eurosport in the United Kingdom, Poland and Denmark. Warner Brothers Discovery / Discovery+ subscribers throughout the world have access to British Premiership Speedway and the Grand Prix Speedway broadcasts, live and streamed.
21. Eurosport and Discovery+ also broadcast 18 live UK Premiership League Speedway meetings in the United Kingdom, Denmark and Poland having bought the rights to do so as a result of a competitive tendering process. The bid is commercially confidential information. I am able to say that the investment in UK league Speedway by Warner Brothers Discovery is in excess of a seven figure sum per annum.
22. British Speedway Network is a new 'over the top (OTT)' live stream subscription broadcast service. This season it will broadcast 54 live Speedway meetings on a commercially viable basis.

23. Many Speedway clubs also have their own commercially viable streaming service.
24. The result is that between Eurosport, Discovery+ and British Speedway Network 72 Speedway meetings will be broadcast live in 2023. It is usual for there to be three live meetings a week from these broadcasters.
25. It is right for me to say that there is a healthy level of broadcast coverage enabling Speedway to be enjoyed by many millions of people throughout the world.

### **Team GB**

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

### **Youth Policy**

27. The youth policy of the British Speedway Promoters runs throughout Speedway in the United Kingdom. Each Elite League team is required to have a junior GB rider. This is designed to ensure that young GB riders can develop their skills in a highly competitive league environment.
28. The Youth development programme has been a great success for many years with a whole host of current Professional Riders riding in Britain and Europe having come through the British Youth System.
29. Since 2018 the Great Britain Under 21 Team have achieved success on the World stage claiming a World Championship medal each year from 2018 - 2022.
30. Since 2018 the Great Britain senior team have also had success on the World Stage having won a Silver Medal in 2018, 2022 and 2023 as well as being crowned World Champions in 2021.
31. Since 2018 the Great Britain Speedway Team has increased its activities both on and off track, this includes the creation of our youth development pathway, the GB Academy for riders aged 12+. The GB Academy features the top 18 male and female riders from across the country who race 125, 250 and 500cc bikes who take part in a series of on track coached training and development sessions.
32. In addition to the GB Academy we have our 'Tracking Success' programme for elite riders aged 16+. The programme which is led by our Head of Performance, Chris Neville and Performance Psychologist, Jeremy Holt is a data driven development pathway with a four pillar structure of Physical, Technical, Mechanical and Mindset. In-depth mechanical,

physical and medical data is collected at both on and off track events that enable us to build a picture of what elite level performance looks like in a Speedway athlete.

33. The policies have already borne fruit. For the final day of the competition the winning GB Speedway of Nations team in 2021 was made up of 3 riders; Robert Lambert, Dan Bewley and Tom Brennan who had all won the British under 21 Championship; Lambert in 2017, 2018 & 2019, Bewley in 2020 and Brennan in 2021. I am also proud to say that Robert Lambert and Tom Brennan won the British Under 16 Championship, Lambert in 2010 and Brennan in 2015.
34. In 2017 Robert Lambert also won the European Individual Speedway Junior Championship and in 2020 he became the first British rider to win the Speedway European Championship. He finished 5<sup>th</sup> in the 2022 Speedway Grand Prix series.
35. The 2023 British Speedway Season has been another good year for Youth Development with 6 clubs hosting British Youth Championship Rounds involving up to 45 riders which included 3 female riders and all riders being under the age of 16, and depending on their age category riding 3 different class of motorcycles being either 500cc, 250cc or 125cc's.
36. For the first time in 2023 British Speedway also ran a Woman's Championship alongside the Youth Championship which included German Speedway Grand Prix Junior Rider Celina Liebmann as well as a number of British Women. This Championship was run over 3 rounds at 3 different venues during June.
37. Looking forward there is another batch of young British Riders who will be making their names on the World Stage within the next couple of seasons which includes 16-year old's Ashton Boughen, Luke Harrison, William Cairns who is just 14 and 13-year-old Cooper Rushen again just naming a few of what could be many.

#### **Gender Equality / Women in Speedway**

38. In line with the FIM initiatives to increase the participation of women in all areas of Speedway from officials down to Riders BSPL has held events for Women in Speedway. In 2023 the British open was held which we will be extending to host at more race tracks more local to the participants in 2024. This is to support the FIM objective to establish international and world championship ranking events.
39. There was also a women's Speedway Academy held at the National Speedway Stadium in Manchester. I attended in my role as Race Director offering a 360 degree approach to Speedway which included classroom sections as well as on track training.
40. A number of athletes were competitors from other motorcycle sports such as road racing,

Motocross and Enduro. The event was so successful some of the athletes have decided to take up Speedway and are purchasing the equipment to do so.

41. This Academy also attracted big corporate companies such as Karcher to support this initiative because is aligned with their ethos of supporting, diversity in sports that are family welcoming environment such as Speedway and whose marketing director confirmed that she feels much safer as a women attending a Speedway event rather than a football event with its hooligan element. Hooliganism and crowd violence has never been a feature of Speedway.

### **Environment**

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

### **Land Tenure**

47. In many cases since 1928 Speedway has operated on tracks at greyhound racing stadia which had been constructed following the introduction of greyhound racing from the United States a few years earlier. In some cases Speedway Clubs were licensees and did not have a 'stake in the ground'. They were unable to make decisions about land use so that in many cases land uses without Speedway were adopted without any ability to influence or control the decisions taken by landowners.
48. This continues to be a live issue. Wolverhampton Speedway is well supported having raced

at the Speedway track in Wolverhampton since 1929. However, racing will cease at the end of the 2023 season, not because of any issues of popularity or viability but because the landowner wants to operate greyhound racing for international sports betting broadcasting on additional days with a view to the development of the Stadium site.

49. Birmingham Speedway is at risk for the same reason as a result of the decision of the same land owner. Peterborough Speedway is at risk because of an application for planning permission on the Stadium site.

### **Rebuttal**

50. Speedway is not a dying sport as suggested by the Appellant at paragraph 6.1 of its April 2023 Speedway Viability Appraisal.

51. I have read and take issue with the Proofs of Gareth Hooper, Clarke Osborne and John Eady. I rebut their evidence as follows.

### **Gareth Hooper**

52. Mr Hooper adopts a number of points to support the Appellant's arguments about Speedway. I reject his propositions and what he says are the relevant facts on which they are based.

53. In particular, Mr Hooper suggests in paragraph 5.2 that from;

*'my own personal knowledge of having been involved in planning applications relating to the redevelopment of two speedway tracks elsewhere in the UK, it is clear that the viability of speedway as a sport as a whole is severely challenged, the impact of which is that the need for the former stadium to be retained does not exist and it is surplus to requirements'*

I find it impossible to reconcile this opinion with the mission of Swindon Motorsport Limited to (p. );

*'locate, acquire, obtain planning permission, develop and operate a show ground including a speedway and car racing oval arena with an expandable capacity of up to 5,000 spectators'*

and Mr Hooper's role as one of Swindon Motorsport Limited's professional team (p. 2).

### **Clarke Osborne**

- (a) I rebut the suggestions in the following paragraphs of Clarke Osborne's proof;

- (a) In paragraph 8.9 Mr Osborne suggests that;

*'My view is that Speedway racing has a declining market and rising costs, squeezing any opportunity for profit and contribution to investment costs. The outlook is for further decline and closure of existing facilities due to the accumulation of operating losses.'*

This opinion is at odds with the mission of Swindon Motorsport Limited (p. 3), a company of which Mr Osborne is a director and his company Gaming International Limited holds the largest shareholding.

### **John Eady**

(b) I rebut the suggestions in the following paragraphs of John Eady's proof;

(a) In paragraph 2.10 it is suggested that;

*'Since 2016, eight speedway teams (excluding Coventry Bees) have gone into administration and, to the best of our knowledge, not reappeared in another guise. These include Lakeside Hammers and Rye House Rockets and Coventry Bees (2018), Workington Comets and Stoke Potters (2019), Eastbourne Eagles (2021), Newcastle Diamonds (2022) and most recently Swindon Robins (2023).'*

All the teams referred to have stopped racing; Coventry having been unable to race at the Appeal site, Lakeside having been unable to race following the acquisition of Arena Essex for property development, Rye House following the takeover by management unfamiliar with Speedway and the closure of the track by new landowners as part of its development plans, the redevelopment of the Stoke track and the redevelopment plans of Swindon. As far as I am aware only Eastbourne, Newcastle and Workington have gone into Administration. I believe that there are plans to restore Speedway at Eastbourne and Rye House.

Land tenure issues resulted in the closure of four of the tracks referred to by Mr Eady..

Mr Eady's suggestion makes no mention and fails to take into account the reinstatement of Speedway at Oxford and the reinstatement of Speedway at Workington following the construction of a new track.

Mr Eady gives no comparable figures for the Administrations of other sports such as Football or Rugby Union.

(b) In paragraph 2.10 it is also suggested that;

*'It is also understood that Monmore Stadium (up until this year the home of Wolverhampton Wolves) will cease to accommodate speedway as of 2024, choosing to focus solely on greyhound racing.'*

On 28 August 2023 it was announced that Wolverhampton Speedway will not compete in 2024 following the landowner's decision not to allow Speedway at Monmore Green Stadium which brings Speedway to an end in Wolverhampton after 95 years at the same track. Again, Speedway's absence will not be because of any lack of popularity or viability but because of its lack of a stake in the ground and a decision about land use made by a stadium owner. The local Council is assisting in arrangements to

relocate the Speedway track.

- (c) In paragraph 2.11 Mr Eady makes a number of suggestions about broadcast viewing figures. For the reasons outlined above I rebut these suggestions.
- (d) In paragraphs 2.12 – 2.14 a number of suggestions are made about the National Speedway Stadium in Manchester said to be based on statements made by a Manchester City Council employee. These paragraphs fail to mention;
  - (1) that Belle Vue Speedway in Manchester had competed successfully in a purpose built stadium from 1929, from 1987 to the end of the 2015 season from the Belle Vue Greyhound Stadium in Manchester up to the end of the 2015 season before moving to the NSS
  - (2) that the NSS could not be used for several months at the start of the 2016 season as a result of a number of construction defects which also resulted in the abandonment of the first meeting in 2016 and its impact on the accounts of the business.
  - (3) the popularity of the National Speedway Stadium for international events.

I refer to the e-mail exchange of 5 September 2023 between the Belle Vue Manager Mark Lemon and Nicky Boothroyd, Facility Contracts Manager of MCRactive as what appears to be a more accurate expression of the views expressed (pages 8 - 11).

- (e) A number of suggestions are made in paragraph 2.20. These ignore the facts about Speedway at Coventry Stadium, nationally and internationally.

Mr Eady does not refer to the reinstatement or the capacity crowds attending Speedway at Oxford.

5 September 2023