

Cannock Chase Council: Cannock Chase Local Plan Representation Form



and your data will not be shared. You may unsubscribe at any time by email or writing to us using the details on this form. Data will only be held until adoption of the Cannock Chase Local Plan.

Making a representation: We cannot accept anonymous representations. You must provide your contact details but only your name and comments will be published on the website. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Once the plan is submitted your comments will be shared with the Planning Inspectorate and an independent inspector will review representations. You have the right to withdraw your representation and your data will be destroyed. Data will only be held until adoption of the Cannock Chase Local Plan.

Part B: Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**. We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	David Carter representing Spedeworth Motorsports (incorporating Incarace Ltd)
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Q1. To which document does this representation relate? (Please tick one box)

- Cannock Chase Local Plan 2018-2040
- Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

Q2. To which part of the document does this representation relate?

Para-graph:	Various	Policy:	Various	Site:	N/A	Policies Map:	Yes
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Q3. Do you consider the Cannock Chase Local Plan is:

- A. Legally compliant Yes: No:
 - B. Sound Yes: No:
 - C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).*

For office use	Part B reference	
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Q4. Please give details of why you consider the Cannock Chase Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Cannock Chase Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Spedeworth Motorsports (incorporating Incarace Ltd) are promoters of short circuit oval motorsports at venues across the U.K. Hednesford Hills Raceway was established in the 1950's and is one of the premier venues in the country for stadium motorsports, staging events of national and international significance. The venue attracts participants in a wide range of different race classes not only locally and from across the U.K. but also internationally, particularly from Mainland Europe and Eire. These participants form part of an active driver base comprising many thousands of people.

The events are spectacular and regularly draw large crowds to the venue. As such the raceway also represents one of the most important visitor attractions in Cannock Chase. Users of the stadium make a significant contribution to the local economy in a number of ways. Numerous local businesses build, service and maintain competitor cars and visiting spectators stay overnight in nearby hotels and utilise local services and facilities. While the racing activities are a noisy sport, the number of events is approximately 20 per annum meaning that the site, which lies at the heart of the surrounding SSSI, is maintained and kept secure at all other times. This is a considerable community benefit.

Since the existing local plan was adopted in 2014 several motorsport venues in the West Midlands have been lost. In most cases this was as a result of the facilities being destroyed by property or development proposals and, in all cases at the time this objection was prepared none have either been protected in situ or replaced by facilities of least as good quality on alternative sites as they be, in accordance with national planning policy. None of the closures have been as a result of either business failure or the absence of a continuing need for the sports and recreation facilities. This situation is not acceptable and is the rationale for these objections.

The oval motorsport facilities lost since 2014 are as follows:

Coventry Stadium. Closed for Speedway and Stock Car Racing at the end of 2016 after 88 years. In January 2024 an appeal against the refusal of planning permission for housing redevelopment of the stadium was dismissed (APP/E3715/W/23/3322013). This is being seen as a major milestone in the campaign to ensure that oval motorsports, while minority sports, play a very important role in the communities in which they are located but also in the 'communities of interest' that have not only local but regional, national and even international profiles.

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Birmingham Wheels Park, proposed for redevelopment for industry/ warehousing leading to the eviction of Stock Car Racing, Go-karts, Drifting and Rally stages. All users required to vacate the site by the site owners, Birmingham City Council.

Stoke Speedway and Stock Car Stadium, Chesterton. Demolished for industrial/warehousing scheme.

Monmore Green Stadium, where Speedway racing was evicted after almost a century at the venue. The stadium also hosted Stock Car Racing in the 1970's and 1980's.

Birmingham's **Perry Barr Stadium** currently hosts the Brummies Speedway team is also under threat from redevelopment where, once again Birmingham City Council is the freeholder.

In relation to Hednesford Hills Raceway, there is a good relationship between the Council (the land owner) and stadium operators, but it is clear from the situation elsewhere that public ownership in itself can be insufficient to protect valued facilities on its own and that the weight of the planning system also needs to be in-place.

Representations seeking a strengthening of the approach in the Cannock Chase Local Plan Review in respect of Hednesford Hills Raceway were made in the earlier consultation stage, yet those representations, while summarised in the documentation seem to have little or no effect.

Accordingly, the case for the strengthening of the local plan review is set out again. There might be different ways in the plan could be improved but we have made some suggestions how this could be easily achieved.

From our analysis, as was the case in the earlier consultation, there is no reference to Hednesford Hills Raceway and its significance as both a sports stadium and important visitor attraction. As a sports venue the need for the raceway is clear and continuing, as evinced by the number of drivers who wish to participate at the venue. As a visitor attraction, major events continue to attract large numbers of spectators. While many of those spectators will not come from the local community they are sourced from wider 'communities of interest'. This is a strategic consideration that should be reflected by the local plan.

Our request is that the Local Plan Review Inspector should consider amendments to the local plan, so the rich heritage and continuing importance of Hednesford Hills Raceway is both recognised and protected. Ideally this would be reflected not only in policy but also through identification of the stadium site (including the parking area) on the policies map. The policy reference might usefully draw attention to the nature of the activities that take place and, how any nearby future developments (especially new housing) need to take full account of this.

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In reaching our views we acknowledge the extensive evidence base that lies behind the local plan review including the following documents:

- * Cannock Chase Sport and Leisure Facilities Needs Assessment (August 2018).
- * Cannock Chase District Council Playing Pitch Strategy & Action Plan (May 2019).
- * Cannock Chase Open Space Assessment (2023).

Unfortunately, this evidence base is incomplete and deficient since it neither covers motorsport of any type both from participatory or spectator perspectives. It therefore cannot be relied upon to justify why earlier representations to strengthen the support for Hednesford Hills Raceway have not been taken on-board.

Incidentally, we believe that the similar representations to those above regarding the lack of recognition in the local plan to Hednesford Town Football Club might also apply.

Without the changes to the local plan review that we suggest, we contend that the plan would be unsound as it would fail to be consistent with the provisions of national planning policy as set out in the National Planning Policy Framework.

It is also telling that the Policies Map (rightly) provides protection to a very extensive open space network yet that same Policies Map leaves both Hednesford Hills Raceway and Hednesford Town Football Club's Stadia as unallocated land. This is a serious omission undervaluing the importance of these assets to the District.

Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The **District Profile** fails to make any mention of Hednesford Hills Raceway and the role that it plays in providing active participation in sport and its role in supporting the mental health and well-being of all of its users. The Health and Education section reflects the bias of the evidence base towards mainstream sports of Football, Rugby and Cricket, highlighting the need to rebalance the plan.

Putting in place policy changes along the lines we propose would not just be for the benefit of sports enthusiasts but for the entire community that cherishes the rich history and exhilarating moments the venue has provided over many years.

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It would mean more than safeguarding bricks and mortar; it would preserve tradition, the celebration of memories and the sustaining heartbeat of motorsports in the region which have woven themselves into the fabric of the community. Examples of working with the local community include local schools where pupils come for cross country sports days and the Police for training purposes

Adopting these proposals would add significant protection to the venue ensuring generations to come will have the opportunity to enjoy the thrill of motor racing, either as a participant or a spectator.

Strategic Objective 2 should be strengthened to read:

"• *Safeguard the provision of community facilities **should be protected and improved** (such as schools, ~~and~~ health centres **and sport and recreation facilities including stadia***) and ensure that development contributes towards new community facilities which are easily accessible to the local community (SO2.1).*

• **Provide Protect and improve** open space, sports and recreational buildings and land including playing fields and **stadia***, by ensuring that development proposals contribute to meeting the demands generated by the development (SO2.3)."

Footnote: * Sports stadia within Cannock Chase District include Hednesford Hills Raceway, one of the premier venues for oval motor racing in the U.K. and other TBD by the Council.

These changes would bring the plan into line with paragraphs 97(a) and (c), 102 and 103 of the NPPF (Dec 2023).

While paragraph 6.47 of the local plan review states that, "Local planning policies should also plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environment", it is clear this fails to achieve this in respect of sports stadia such as Hednesford hills Raceway.

POLICY SO2.1: SAFEGUARDING THE PROVISION OF COMMUNITY FACILITIES is unclear if recreation facilities and sports stadia such as Hednesford Hills Raceway are regarded as community facilities. The first paragraph of the policy should be amended as follows: "Community facilities include health facilities (GP surgeries and health centres), education facilities (nursery and early years, primary, secondary), cultural facilities (meeting places, theatres and other cultural buildings, public houses, places of worship, village halls and active leisure and sports **and recreation** facilities **including sports stadia**), and local shops and other facilities."

POLICY SO2.3: PROVISION OF OPEN SPACE, SPORTS AND RECREATIONAL BUILDINGS AND LAND, INCLUDING PLAYING FIELDS AND SPORTS STADIA

“The local planning authority will require development to maintain and support the improvement to the level of provision of open space, sports and recreational buildings and land, including playing fields and sports stadia and resist development which restricts physical access to them.

Any development proposals that would result in a reduction in the provision will only be supported where Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- An assessment has been undertaken which has clearly shown the open space, sports and recreational buildings or land, including playing fields to be surplus to requirements; an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or***
- The loss of provision resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable and accessible location; the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or***
- The development is for alternative provision, the benefits of which clearly outweigh the loss of the current or former provision and meets an identified need within the Cannock Chase Playing Pitch Strategy (and any subsequent updates). the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”***

The changes suggested above would clarify that the policy applies to sports stadia as well as bring the policy into line with the NPPF. The 3rd bullet as currently included in the plan would restrict any sporting benefit only to those activities covered by the Playing Pitch Strategy. This is unduly restrictive.

POLICY SO4.4: SUSTAINABLE TOURISM AND THE RURAL ECONOMY

Should the above suggestions be adopted, or other changes with a similar effect, then changes to Policy SO4.4 might not be necessary. It is interesting to note, however, that the significance of Hednesford Hills Raceway to the local tourist economy does not appear to be either recognised or safeguarded.

Policies Map

It is suggested that Hednesford Hills Raceway should be designated as a sports and recreation stadium on the Policies Map tied to the above policies. At present it is unallocated and thereby potentially unnecessarily vulnerable to alternative development proposals.

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In addition to the above objections we would like to express support for the approach towards heritage in the built environment as set out in the following paragraphs:

"6.22. Non-designated heritage assets include Locally Listed historic areas, sites, buildings and archaeological remains which are valued for their local architectural or historic character, their contribution to the local scene, or their local historical associations. Locally Listed buildings and features have no statutory protection, but any impact on them will be considered in the assessment of planning applications and will need to be given weight in decision making. They include archaeological features of interest, potential sites of national importance related to military activities and locally significant historic farmsteads. Development proposals affecting a Locally Listed building or feature will need to demonstrate how the design of the development has considered its defined significance.

6.23. Preparation of a Local List for the District is being taken forward through the District Design Guide SPD which includes a procedure for compiling a Local List of local heritage assets which are valued by the community in contributing to the local distinctiveness, character and appearance of the area."

We would especially like to support preparation of the local list for the District which should include Hednesford Hills Raceway. The raceway was constructed inside the site of a former reservoir. The reservoir fell out of use from leaks and through the vision of Bill Morris, it was converted to a purpose-built banked oval raceway used for Stock Car Racing and becoming the 'Home of Hot Rod Racing' in the U.K. As such, its heritage value is very high and its inclusion in the local list would be warranted.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Given the ongoing threat to motorsport venues in the West Midlands and wider afield, it is necessary and appropriate to ensure that every opportunity is taken to ensure that the mat-

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ters raised are fully considered through the planning process. It is evident from recent closures that this has not been the case and the importance of motorsports have been underplayed within the planning system.

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:	
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Date:	18 March 2024
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