15 September 2020

Pete Styles – President & Promoter
Australian Lightning Sprints Association (ALSA)
2 Charlotte Crescent
Albion Park NSW 2527

REF: SSI- 10048 – Sydney International Speedway

Dear Planning Minister,

Mandatory Elements of the Submission

Position

Here with I attach my **Submission of Support** in my capacity as President of the Australian Lightning Sprints Association, a divisional racing body under Speedway Australia that currently represents approximately 70 race teams on the east coast, with up to 30 cars registered to compete at Valvoline Raceway and the new Sydney International Speedway. Our 40th annual Australian Title is scheduled to be held on the 6th March 2021 as farewell to Valvoline Raceway. A fitting of the tribute to a venue has played a huge part for us over the last 40 years.

Our submission of support does contain some very specific areas of Objection to aspects of the proposal, but overwhelmingly seeks to demonstrate support and explore opportunities to further improve the current design.

Summary of Reasons

Our overwhelming reason for support is the survival and growth of our sport in Australia, recognising the critical role that a home track in Sydney holds, for us to compete here in NSW. Sydney's Valvoline Raceway is the foundation stone of our division in NSW. While our division is recognised as an International Division from Australia, New Zealand and America, its local base started right here in NSW 40 years ago. Our original roots of the Litre Sprintcar division broke away from the Compact Speedcar division, which is our sister (wingless) division who now have over 60 years history.

Without a presence here in Sydney, our division would likely die a slow painful death. We need our home in Sydney because of the impact Metro is having on Valvoline Raceway. This was perfectly described after our community became aware the track was to be demolished, when Wade Aunger described the community feeling to the evening news – *" A five finger death punch".*

We are a budget racing division that is the second fastest around Valvoline Raceway. The only division boasting faster laps than ours is the 410 Sprintcars (Elite level Formula 1 on dirt). If they are Formula 1, then from a pace perspective, we would almost certainly be Formula 2. Our division feeds talent to the elite divisions like 410 Sprintcars and Midgets on a regular basis, just as other divisions feed us. The entire sport is built on budget racers spread over many layers of divisions graded and varying in expenses that feed up like a gigantic pyramid to the elite level divisions. Tracks like Valvoline Raceway give us solid grounding to exist.

Our local registered teams are based between Newcastle, Bathurst, Nowra and Goulburn, but the lion's share of them are based in Greater Sydney. Travelling teams come from Victoria, Mid North Coast Queensland, and the ACT. We are all left uncertain of our investments at this time. With most of us sitting on $30,000 to $60,000 of sunk capital racing investment, the building of Sydney International Speedway to replace Valvoline Raceway (impacted by Metro Stabling Facility) gives us certainty of a future here in Sydney.

We spend our money all over Sydney and the state to keep our cars running their best. From American Racing Tyre, to Hoosier, Rocket to Pass Coatings, Speedflow and Motorcycle Manufacturers, to simple Bunnings / Mitre 10 / Supercheap Auto / Bursons Auto Parts suppliers, we literally spend every spare cent we have inside an industry that is primarily composed of self-sustaining small businesses generating billions in the Australian economy. Here in NSW these companies are bleeding out, while this drags on. The lack of pre planning and engagement with our sport, to plan ahead for this move hurts us week by week and indeed, day by day.

We need a venue now.

Statement of Political Donations

As an individual and President of ALSA, I confirm no reportable political donations to declare.

Bottom line

Practically no prior engagement has occurred with us, our current track promoter, the fans, or our sport as a whole. While we are thankful Speedway Australia was at the table, our community was not involved in developing the project. We had no information on ways to engage, up until now leaving us very little time of ability to improve on the design. With construction tenders out we remain hopeful this feedback will be taken on board.

In line with Section 25.4 on Page 318 of the EIS

- Allow for refinement to the project design in response to submissions received in response to the exhibition of this Environmental Impact Statement

We offer a detailed submission below which aims to highlight issues and opportunities that we see with the Sydney International Speedway proposal as it stands in the EIS.

We thank you for developing this proposal and welcome further discussions at any time.

Sincerely,

Pete Styles - President
Australian Lightning Sprints Association
0414 354 674

Detailed Feedback - Issues & Opportunities

1) Spectator Viewing Opportunities

We welcome the colosseum feel of the venue with opportunities for amenities, food venues and corporate boxes. Bringing the crowd closer to the action will be a great new change that goes back to our early days of Sydney Showground where crowds enjoyed an atmosphere that is still recalled today. This will help us showcase our division to fans. The amenities and forecourt leading into the venue are top notch. The design and visual elements all add promotional potential and atmosphere to a new venue.

That said, this design and visualisations do miss a crucial element from the point of view of the spectators. There is no open spectator viewing area located on Turn 1 - the most exciting part of the track.

Turn 1 and 2 (first curve of the oval) currently fronts to the competitor pit area, which means the crowd opportunities are significantly missed in this design. The action is full and fast in the first turn from the very start. Many spectators at almost every venue in the country will gravitate towards the main straight and turn 1. This is not by coincidence.

The design should extend the spectator grandstand area further around by going over the race track return chute and on top of the first three working sheds in the competitors pit. This area exclusive to fans only, separated from the competitor pits, can give fans and family of the racers a prime location to sit while also adding much needed venue seating capacity in that prime viewing area.

We see limited written reference to a multimedia big screen or variable message sign to provide action replays, real time lap time data, laps remaining data or race positions on. This is a key element that presents the action to the fans and competitors on real time linked to the commentary team. It's a huge part of the fan experience when action is underway or during breaks in the racing over the course of the night. The location was not described in the EIS.

These changes to the design add significant promotable value to the venue, making it far more likely to generate revenue back into the promoter, the sport and of course National Parklands Trust. Ultimately these changes contribute to the viability of the venue long term.

Opportunity 1a: Extend spectator grandstand / public access viewing areas around Turn 1 over the return chute and above 2 of the pit working sheds to increase capacity and viewing of the prime race track viewing points.

Opportunity 1b: Provide a big screen multimedia viewing screen and a variable message sign for lap time / laps remaining board next to the race track out chute.

2) Dust Management Measures

We question the practicality and object to need for real time dust monitoring, dust walls and implementing strict operator conditions if dust limits are exceeded.

The current state of the barren land inside the facility and beside the drag strip, is currently generating frequent dust from wind. The site also gathers regular windblown dust from the nearby Suez tip and Austral brick facility. We question how realistic the drag way representatives were being, when informing the proposal about the need for this level of dust suppression measures. All of these measures combine to further restrict the speedway venue viability due to limits they place on size, seated capacity and operational conditions.

To our knowledge in all of WSID years of operation, a drag racing event has never been cancelled due to dust, despite operating beside a dust generating site for its entire existence.

It's critical that a real time dust monitor does not lead to having to stop speedway races in the middle of a race or major event. Promoters can't be stopping a $50,000 to win race with 10 laps to go, simply because a dust monitor was tripped. We compare this to stopping the V8 supercars at Newcastle, mid race on Sunday, because the noise level was tipped by an extra 1db over predicted noise limits. Or stopping a top fuel drag run mid track for a noise complaint. The below statement from page 138 of the EIS could be interpreted many ways.

> In the event the dust trigger level is exceeded, then the speedway would cease to operate until the operator completes all necessary action to rectify the breach and perform a test that it can comply with its dust control obligations.

We acknowledge that a dust barrier and trees could reduce our potential airborne dust on the drag way after a speedway event, but nothing would have a bigger influence than choosing the right clay for the racing surface.

Capturing and managing dust after it has been generated is much less practical than avoiding the dust lifting in the first place. The right clay is crucial here we cannot simply provide an additive into the existing site material (Table 2.4 Pg15 & Section 5.3.3 Pg46).

Locally sourced materials (sandstone based clays) are some of the highest dust generating clays we see in Australia. Second only to inland bulls dust clays.

The past two seasons at VR have demonstrated the failings of local clay already. After local clay was used to regenerate the racing surface, it dramatically increased dust levels. Crowd feedback and complaints lifted almost immediately.

It's very important we find less powdery, darker, loamy clay with moderate elasticity and a sound binding particle.

The material that Lismore Speedway (NSW), Archerfield Speedway (QLD), Simpson Speedway (VIC) and former Newcastle Speedway (NSW) run all generate ¼ of the dust that Valvoline Raceway does.

The use of additives for the clay during racing was also mentioned on Page 49 & 137 of the EIS (Section 5 & 9). Products such as Dustex exist in the market but they cannot be used in Speedway. These products would increase mechanical grip with the track quickly taking rubber which would quickly convert speedway to some kind of NASCAR race. It's a known side effect of the Dustex product. Tyres are our divisions highest expense item for ongoing costs and the use of Dustex would have a massive impact on our tyre wear rates.

9.6 Avoidance and minimisation of impacts

The racetrack design, layout and operational procedures include dust control and mitigation measures to minimise dust generation and offsite settlement, including:

- Vegetation along the boundary between the speedway racetrack and Sydney Dragway
- Installation of dust screens to reduce windspeed and migration of dust
- Curation of the track including water suppression during race events and potentially combining the clay used in the track with additives, which would minimise the mobilisation of dust during the use of the racetrack.

We strongly object to the use of any kind of dust suppression additive such as Dustex on the speedway racing surface.

We believe a back straight grandstand with overhead awnings would be far more effective as it cuts any upward vortexing dust lift, but the practicality of this request and the need to complete the project by September 2021 would make this an opportunity to explore in the future as part of the masterplan (built by others).

Opportunity 2a: Identify a suitable surface clay material in partnership between Geotechnical Engineers, Speedway Australia and the track promoters of the aforementioned racing facilities.

Opportunity 2b: Remove operator conditions from real time dust monitoring triggers for the first 3 years of operation. Following 3 years of data collection review and consider the need to retain dust monitors or implement more appropriate operating conditions.

Opportunity 2c: Identify a back straight grandstand with overhead awning in the site masterplan between the speedway and the drag way return chute as a long term permanent means to contain airborne dust travel to the east, improve spectator capacity and open up further venue viewing areas.

3) Capacity Issues

We are concerned that the overall capacity of the venue falls short or requirements. The seated capacity described by the EIS identifies only 3750 seated capacity within the grandstand supported by terrace seating and corporate boxes to reach 7,000 (EIS Section 1.4 pg3 & Table 5-3 pg 47).

The 7,000 spectator capacity, the immediate parking for 600 spaces and the overflow 460 space drag way parking in section C (Section 5.3.1 Pg45) would generally be sufficient for the regular lower attended weekly events run at the new venue but would fall short during peak season and major events needing to use Section D to full capacity. It is very important to understand Valvoline Raceway patrons currently flood the adjoining streets of the area on any given night, but major events often leave people parking many kilometres away. Valvoline Raceway run a courtesy bus for this reason. The existing VR carpark is not even close to handling our capacity today.

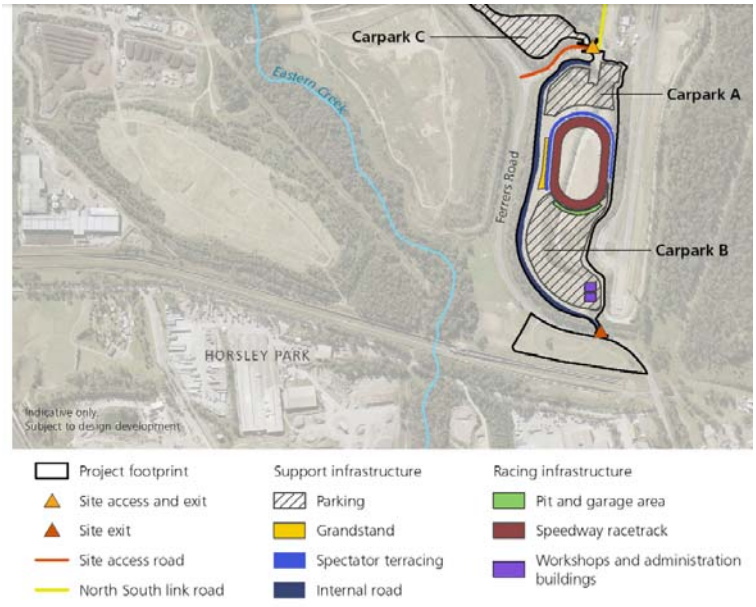
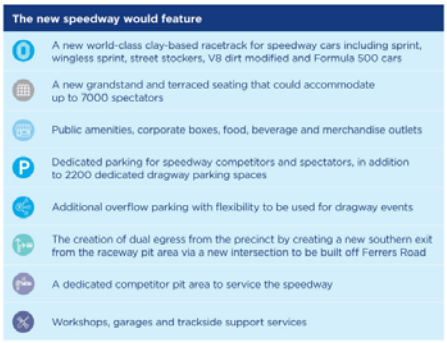


Figure 5-1 Overview of the project

This arrangement severely limits crowd capacity for major events even with support of the extra 1760 spaces in section D. With limitations on open grass space that we currently have available at Valvoline Raceway, this design appears to fall short in terms of the capacity needed for a world class multi-use site.



Upgrading drag way parking amenity is something we support for WSID and SIS use (Section 5.3.1 Pg44 & Section 5.6.2 Pg56), but this should not detract from the project budget or inclusions within the speedway site itself. Carpark C & D need careful scoping so we don't waste a large portion of the project budget on extensive earthworks and asphalt sealing this location to replace a dirt carpark the drags barely use now.

Maintaining focus on increasing the venue capacity is directly aligned with the project objectives. As a world class venue the capacity is very important to enable us to hold world class events. The track design is good, but the capacity is not.

The venue seated capacity described by the EIS appears to fall short on the first project objective by a long way.

- Deliver a world class speedway within Greater Metropolitan Sydney that would cater for local, regional, national and international racing events while continuing the growth of speedway racing in NSW

The new venue being built to accommodate world FIM Speedway Grand Prix racing implies a bigger facility. More info on SGP here - https://www.speedwaygp.com

SGP event attendance figures from 2015, 2016 and 2017 suggest a venue would need to cater for over 20,000 spectators. Both the seating capacity and parking capacity would severely limit the viability of running SGP events here in Sydney. By comparison the Docklands Stadium in Melbourne which hosts the SGP event has a seated capacity that exceeds 53,000 and Etihad Stadium had a capacity of 42,000. SGP promoters sight attendance figures in excess of 45,000 at the first two events but Wikipedia does identify that at least 26,609 fans attended in 2015.

Opportunity 3a: Expand the grandstand seated capacity to provide for 7,000 seated spectators by extending it over the track return chute and in front of the competitor pit area to the south. Combined with the terraced areas for another 3,000 people this would provide 10,000 capacity for opening day.

Opportunity 3b: Consider forward planning to accommodate SGP events to a 27,000 crowd capacity in line with SGP crowd statistics forecasts for Sydney.

Opportunity 3c: Carpark C&D should be grass paddocks supported by sealed service laneways to reduce burden on the SIS project budget and reduce urban heat of the area.

4) Heavy Vehicle Access

Based on the urban design visualisation layouts presented, there appears to be an issue with two 90 degree dog leg turns within the 600 space spectator carpark, that would restrict B doubles from negotiating the carpark part of the competitor vehicle access route.

We note that no formal design plans or 3d CAD / MX designs were presented in any form taking us down to the higher level of detail one would expect in a Concept Design. Aspects such as heavy vehicle access are difficult to extract from visualisation images such as this.

As indicated below by the red line, the route to the competitor pits should be relocated around the main carpark running along the boundary line. This would avoid spectator parking issues and safety issues involving kids and families waiting for the event.

Opportunity 4a: To provide B Double Truck access, avoid spectator parking blockages and safety issues between spectator traffic and competitor haulers, the route to the competitor pits should be relocated around the main carpark running along the boundary line.

5) Operation Hours

Various sections of the EIS appear to identify hours of operation concluding at 10pm with most traffic leaving between 9 - 10pm for instance (Section6.4.2 Pg 68 & 69).

The operation of a speedway venue including capacity for running late in the event of light rain, serious crashes or other delays, means we need to be able to operate to 11pm on any given night. The impact of racing at night during summer also means racing doesn't normally get into full swing until 7pm onwards, simply due to the delayed sunset.

It should be understood by the EIS that competition would likely conclude between 10pm and 11pm. The traffic study by way of example would better reflect likely traffic impact by assuming a 10pm to 11pm window for peak traffic.

Opportunity 5a: Confirm the operation hours within operation documents extend normal operating hours of race events typically concluding between 10pm and 11pm.