

Perth Entertainment and Sport Precinct - Environmental Assessment Process. Help Needed!

The Perth Entertainment and Sporting Precinct (PESP) project has been referred to the Environmental Protection Authority (EPA). The State Government is expecting that this referral will be given the green light resulting in the immediate start of construction for the project.

The public have only 7 days to respond with their objections and concerns for the project via the online consultation platform. No public feedback will ensure the project will proceed without any further requirements. **Hence it is vital that as a concerned community we have as many people as possible respond to the proposal on this platform immediately.** Significant public attention and legitimate concerns for the project may force the EPA to go to a full Environmental Impact Assessment, which will lead to the required level of transparency and community consultation.

Comments on individual submissions can be statements or questions that are specifically targeted at the key environmental factors seen in the below diagram. These should be in your own words and target the key issues/impacts you see to you and the community. Multiple comments can be made by individuals, and each comment should specifically target one of the key environmental factors. When lodging your submission, the required detail will be: Name, Email address, indication of whether acting as an individual or organisation, and uploading of a Word or PDF document <8Mb on their online portal (consultation hub). [Environmental Protection Authority - Citizen Space](#).



Key impacts are seen around Social Surroundings (Noise, Urban development, Greenspace, Aboriginal Heritage), Inland Waters (Swan River Conservation Category Wetland, contaminated site, environmental degradation), Human Health (Contaminated site, noise etc), Fauna and Flora and Greenhouse Gas Emissions / Air Quality.

Below are examples of questions and statements for some of these environmental factors that may assist you in formulating your own list of ideas, issues and concerns to the EPA.

Noise Health and Social Surrounding Issues

- The Claremont Raceway in Claremont was closed in 2000 due to '*Noise to householders*' and replaced by the Kwinana MotorPlex built in a non-urban area. Why is it now acceptable for the much higher-density residential Burswood Community? What has changed?
- The Perth airport RAC DTEC motor racetrack was closed in 2017 due to '*noise levels related to motor sport activity exceeding the maximum allowable noise limits. Unfortunately, none of the solutions identified by experts adequately reduce the noise impact on the local community*'. Why is it now acceptable for the much higher-density residential Burswood Community? What has changed?
- The Burswood Community successfully stopped the Helipad at Crown due to noise complaints. Why is V8 Supercar noise now acceptable?
- Supercars are deliberately made as loud as possible (above their own guidelines) as this is what attracts the crowd. What independent assessment has been undertaken to determine the actual noise levels emitted from recent Supercar events? (Not just Supercar/CAMs-provided numbers)
- Does the noise modelling include the accumulated effect of 24 cars, 50,000 spectators, PA systems, background trains, planes and traffic etc?
- Will the event be policed for noise levels? What will be the outcome of that policing when Supercars own operational requirements will be exceeded – Warnings? Fines? Termination of Event?
- Has the Noise management modelling adequately considered the unique landscape of Burswood Park and these higher noise levels? Has vibration modelling been undertaken?
- Has the Noise management modelling adequately considered the future Burswood landscape including the sixth/seventh Burswood Towers& Ador apartments, and the high-rise development plans at Burswood Point, The Springs and East Perth?
- Has the noise modelling only assumed a 3-day V8 Supercar race? The original intent (and given the price tag of construction), was to also run Formula E and Moto GP races. Have these been modelled?
- Has the cumulative effect of 10hrs of Supercar racing during the day and 3hrs of Rock Concerts been modelled together?
- WorkSafe WA noise recommendations are set at 85dB over 8 hours, where continual exposure above this level can cause permanent hearing damage. Why is 100db over 3, 12-hour days acceptable to the viewing public?
- The impact is particularly concerning for the most vulnerable – infants and young children, elderly, the physically and mentally impaired and pets. How are these people cared for during racing?
- Smoking packets have graphic health warnings; will Supercar tickets have graphic health warnings?
- Working sites demand hearing protection and signage above 85db. Will there be warning signs erected at events?
- Will earplugs be handed out? Will there be education before entry - like a site induction and instruction on proposed use of ear plugs? ([Note: even standard ear plugs only reduce noise by approximately 10db so noise levels will still be exceeded within 100m of the track with ear plugs].

- As no noise mitigation is possible, how will the community (non-viewing public) be compensated?
- I work from home. I will be forced to leave my premises as the noise, vibration and fumes will make working from home untenable. How will I be compensated?
- I work night shift and am concerned I must leave home during racing events and find other accommodation to sleep. Will I be compensated?
- Has vibration modelling and testing been undertaken? Noise and vibrations close to existing residential houses have the potential to cause significant structural damage. Will the community be compensated for a full structural engineering audit being completed prior to construction? Will the community be compensated for structural damage?
- Who will be responsible for community complaints and/or non-compliance to guidelines? Will these just be 'hand-balled' between the various groups (State Government, Victoria Park Council, Supercars) with no single entity accountable as per other Supercar events?
- Will the community be provided hearing protection with adequate training in its application and use?
- Will the community be compensated when leaving our homes over the three days? This includes extension to pet care.
- Will the community be compensated for completing preliminary hearing tests, then annual hearing tests and for all medical bills associated with loss of hearing?
- Businesses outside the 'Major Event Area' have a duty of care to staff and patrons and will be heavily affected. Will businesses inside the 85db range (e.g. Tennis Australia, Mini Golf, Burswood Café's etc) be compensated for closure of business?
- Within the 75db range, will Belmont Park and Gloucester Park close due to their duty of care to racehorses and the public?
- Will outdoor premises within the 60db range also suffer as this sits within the audible range and 'region of annoyance'?
- The Keysbrook Motor Sport Complex in a non-urban area was referred to full EIA and sets the precedent for new motorsport infrastructure. Previous referrals to the EPA at Burswood Peninsula (e.g. Crown Towers, Optus Stadium) did not include a racetrack, nor an outdoor event hosting >50,000 spectators. The significant issues with outdoor events of this scale involving noise in a high-density urban environment in addition to significant airborne contaminants and groundwater contaminants to the Swan River, warrants a full independent environmental assessment.
- The Kwinana Motorplex was the last racetrack to be built in the Perth area and it was in an industrial area, not residential. It underwent an EPA assessment and sets the precedent for all new motorsport infrastructure.
- Even noise at 55-60 dB (like normal conversation or background music) is considered disturbing and becoming annoying if unwanted and exposed to over an extended period. How will the government handle all those noise complaints? How will residents, businesses and people working from home be compensated? How long will it take and what will be the trigger before the event is forced to close like Claremont?

Other Health and Social Surrounding Issues

- The community is very concerned about disturbance of the buried contaminated site at Burswood, which includes cinders, asbestos, chemical and organic waste. How will we be assured that this is not exposed during construction?

- Dust is a particular issue at Burswood. Given the contaminated site and prevailing wind directions how will dust levels be monitored and managed?
- Driving of deep pylons through this contaminated substrate for infrastructure stability is a real concern for residents in creating airborne contaminants and releasing trapped gases.
- Claims of a significant and abnormal spike in cancer-related illness from long term residents present during Optus Stadium and Crown Towers construction is of a critical concern throughout the Burswood community. How will these contaminants be monitored during construction?
- What levels of airborne pollutants like Nitrogen Dioxide, Sulphur Dioxide and Carbon Monoxide will be emitted from the race cars? What effect will this have on our most vulnerable in the community who chose not to attend the race? How will these contaminants be monitored during racing?
- The 'Event' will force closure of Burswood Park to the Community for up to ten weeks with significant disruption to health-promoting activities such as walking and cycling. Will the event guidelines give a specific maximum allowable time for park closure during bump in/bump out for the Street Circuit?
- More than 80% of Burswood Park is eliminated in the racetrack construction, with complete destruction of the greenspace. Given the lack of tree canopy, no shade and large crowds in a small area, at what temperature are the event organisers determining the cancellation of events?
- What facilities are being added to handle the potential high rates of heat-related illnesses affecting the large crowds crammed into a small area of concrete, steel and bitumen with no shade?
- Given the large number of large temporary steel grandstands, what controls are in place during lightning storm events?
- Why is the standard duty of care to ensure driver, track official and spectator safety and health being compromised by building a racetrack within a 25ha area, where the WA Motor Sport Strategy (2019) published by the WA Labor Government clearly defines the requirement for any new racing circuit to have a minimum 50ha area. The 50ha minimum ensures sufficient runoff areas for cars and drivers, sufficient set back of the public and track officials from flying debris, and critically, the ability to safely control a crowd expected >50,000.
- How are 50,000 spectators able to exit the venue quickly in the case of an emergency (e.g. fire or car crash) given there will be major congestion points associated with limited track bridges and gate exits. The risk of a multi-fatality event is high.
- Are all the temporary facilities included in the PESP proposal (grandstands for 50,000 spectators, safety barriers and fences, 10+ corporate facilities, hospitality and merchandise vehicles) in determining both the crowd control measures and the impact of heat and fumes within such a confined space?
- The high-speed criterium track is in the middle of the open pedestrian park. How are cycling and pedestrian interactions to be managed to avoid major incidents associated with Criterium racing?
- How are cycling and pedestrian interactions to be managed outside of cycle racing in an open park?
- There is a proven direct link between motor sport and poor driver behaviour and road safety in young adults - increased risk taking, speed, alcohol consumption, and road accident statistics. What measures will be put in place to minimise these future risks?
- How will hoon driving be managed on parts of the racetrack open to the driving public all year round? [Example – girl seriously injured on Camfield Drive in July]

- Mental Health is fast becoming the number one issue in public health. Not surprising given the reduction in connection to nature. Is the increased cost of mental health issues caused by the loss of this important greenspace in a high-density residential area factored into the Business Case?
- Motor sport and park destruction is a complete mismatch with the current local community demographics which is dominated by new retirees downsizing their footprint and young families, attracted by the quiet inner-city lifestyle and greenspace. Has any compensation been proposed for all these residents who will want to now leave the area concerned for their own health and wellbeing?
- Has a curfew time been placed on rock concerts at the Amphitheatre given the large number of school-aged children in the community?
- Our community will be a major thoroughfare post racing and rock concerts in the new plan and are concerned by drunken and unruly behaviour. Will our community be provided extra security? Will the community and businesses be compensated by the extra vandalism caused by these events?

Inland Waters Issues

- The Swan River borders the racetrack to the west and east and is classified as a Conservation Category Wetland (CCW). Construction of the racetrack will inevitably result in degradation of the Swan River and hence should not be undertaken.
- Most of the designated planned racetrack sits within the 100yr Swan River flood zone. Climate change has the potential to impact this further. This flooding event could be catastrophic for the Swan River.
- The current racetrack design requires the filling in of several multiple-use wetlands. This will destroy the current bird, turtle and aquatic life. Will measures will be undertaken to minimise the destruction of their habitat?
- The Swan River is an important corridor for migrating birds. What measures will be in place to minimise activity during important seasonal variations?
- Significant non-recyclable rubbish is left behind after these large outdoor events. These include cable ties from temporary fencing, cigarette butts, disposable earplugs, broken shards of plastic beer glasses, plastic bags, fast food containers, shredded pieces of tyre from the racing cars and bitumen ripped off from the racetrack. These particles become airborne and end up in the Swan River and other wetlands. This process is made even worse through subsequent grass mowing where pieces of rubbish break down into even smaller pieces with longer term airborne addition into the Swan River. What measures will be in place to ensure these small fragments of plastic, rubber, bitumen and steel do not end up in the Swan River?
- Significant hazardous waste (e.g. oils, petrol, chemicals for fire suppression etc) is generated in a major V8 supercar event and encapsulated into water runoff & subsequent groundwater. What measures are in place to ensure no contamination to the Swan River? Will the race be shutdown if contamination occurs?
- Given the complex land ownership, who will be responsible for community complaints and/or non-compliance to environmental guidelines? Will these just be 'hand-balled' between the various groups (State Government, Victoria Park Council, Supercars, Crown, Venues West) with no single entity accountable as per the Supercars event in Newcastle?
- Soil and water contamination is inevitable from the hazardous fuels, lubricants, heavy metals and chemicals essential for vehicle operation, track cleaning and fire suppression. What measures will be in place to stop the contamination of the soils

from these substances, the increase in groundwater contamination, and the subsequent leakage into the Swan River?

- Surface runoff cannot be all contained in heavy rainfall events given the flat topography, high water table, and the impermeability of the subsurface black muds. These materials make it into groundwater that eventually enters the Swan River. Is this contamination acceptable in the community?
- How will the existing acid sulphate soils be managed in construction and contouring? What is the penalty for non-compliance?
- This substrate is a contaminated site and contains an abundant array of materials, several of which are highly toxic – including cinders, asbestos, chemical and domestic waste, all sitting above a thin layer of sand fill. Driving of deep pile footings through this substrate for infrastructure stability is a real concern in creating airborne contaminants, releasing trapped gases and increasing the connectivity between the buried contaminated waste and the Swan River through contaminated groundwater. What measures will be in place to ensure no increase in groundwater contamination flow into the Swan River or airborne contaminants from these deep pile footings?
- The significant issues with outdoor events of this scale involving significant airborne contaminants and groundwater contaminants to the Swan River, in addition to noise in a high-density urban environment warrants a full independent environmental assessment. The Keysbrook Motor Sport Complex was referred to full EIA and sets the precedent for new motorsport infrastructure in WA.

Terrestrial Flora and Fauna Issues

- Supercars have a clear track record for removing significantly more vegetation than allowed under their approved work plan and not delivering on net zero tree loss commitments as demonstrated by the most recently failed Newcastle and Homebush Street circuits. What will be the penalty when planned clearances are exceeded at Burswood?
- More urban greenspace is needed – not less, to protect our vulnerable wildlife and diversity. The cramming of the racetrack into 25ha (where the Government's own Motor Sport Strategy document (2019) sets out a minimum of 50ha) with required infrastructure for 50k spectators, clearance for driver and spectator safety, and spectator viewing, plus an Amphitheatre and a Criterium track – all means no vegetation remains.
- Perth has the embarrassment of the barest tree canopy of any capital city in the country. How does this project affect Perth's tree canopy targets? Are projects proposed and costed to offset these losses?
- Why are we removing more trees given the devastation from the highly invasive polyphagous shot hole borer elsewhere?
- The Burswood Park environment is extremely unique in having a main brackish river channel (Swan River), multiple freshwater wetlands, native bushland and large open grasslands in one area. This has created a very diverse ecosystem so close to the CBD. Given Kings Park is WA's number one tourism benefit, has the loss of this current and future tourist benefit been costed in the Burswood Racetrack Business Plan?
- How will the project ensure that the Heritage-listed Burswood Canal is not impacted? Will the project require restoration funding for this site?
- The new Motor Complex will mean the near-threatened long-necked turtle will cease to exist at Burswood Park. The infrastructure will destroy half the wetlands, all migration

routes and sites for breeding and nesting, and with the additional noise and pollution will die. Will the current resident turtles be saved and relocated to other areas?

- And a racetrack so close to the Swan River - what will happen to our resident dolphin population? Will all activities associated with construction and/or racing be reduced during the dolphin breeding season?
- Birdwatching is now the number one hobby in the world. Burswood Park showcases a wonderful ecosystem with over 35-40 individual bird species to be spotted, many unique to the southwest of Western Australia. A unique experience within 3km of a city's CBD of Perth's size, and hard to beat elsewhere in Perth. Is the loss of this habitat acceptable to the public who are 90% opposed to the racetrack?
- The beautiful, and normally rare and shy, Buff Banded Rail is not seen anywhere else in Perth with such numbers. They thrive in this system, much like the Little Grassbirds. This opportunity for these observations will be lost forever. Is this acceptable to the public who are 90% opposed to the racetrack?
- Will any of these current resident birds be identified and relocated to other areas?
- Given Camfield Drive currently has a speed limit of 40kmph due to risk of bird/ vehicle interactions, what safety measures will be put in place to protect the abundant birdlife and ensure driver safety during racing?
- I see the joy of international visitors to the Crown (and Optus stadium pedestrians) seeing the ever-popular Black Swans with their cygnets, and the Pacific Black and Maned Duck with their numerous chicks will become rare as these will all leave, fighting a losing battle for survival elsewhere in an ever-diminishing environment. Is the loss of this habitat acceptable to the public?
- Has the area been surveyed recently during the nesting season for Carnaby and Red-Tailed Black Cockatoos?
- Has the area been recently surveyed during peak shore bird migration periods?

Greenhouse Gas Emissions Issues

- How does a high CO2 emitting industry get front stage in WA tourism spending?
- How does a racetrack fit into Tourism WA emission targets? The Labor State Government and Tourism Council of WA announcement in June 2024 laid out key commitments favouring sustainable tourism and reduction in CO2 emissions in their WA Tourism Emissions Reduction Program. Key players in this 2024 announcement said:
 - 'The next generation of visitors to WA are looking for low emission, accessible, and sustainable tourism experiences in our unique natural environment'. [Tourism Council WA CEO Evan Hall]
 - 'The approach announced today by industry is a critical step forward in sustainable tourism in Western Australia'. [Deputy Premier Hon Rita Saffioti MLA]
 - 'The Cook Government is committed to working with and supporting Tourism Council WA to encourage greater standards in sustainability and accessibility in WA's tourism industry'. [Previous Environment Minister and now Tourism Minister Hon Reece Whitby MLA]
- What are the total CO2 emissions from both racing and the significant bump in/ bump out process? An independent report for the 2023 Newcastle 500 street circuit showed >100 tonnes of pure carbon emitted for each Supercar event. The nature of street circuits in general, where each year infrastructure needs 10 weeks of intense

construction and dismantling (temporary steel grandstands for 50k spectators, corporate tents, concrete and steel safety barriers, fencing, generators etc) for the 3-day event. Street circuits increase these emissions exponentially compared to permanent tracks such as at the existing Wanneroo circuit.

- Will the oil and gas giant **bp**  be the major sponsor for the event, the same as the Adelaide 500 event? Will bp get naming rights in Western Australia too?
- How does this proposal fit into Western Australia's commitment for a whole-of-government 2030 greenhouse gas emissions reduction target of 80% below 2020 levels?
- How does a racetrack in the middle of the CBD and the complete destruction of Burswood Park fit with its increased Urban Tree Canopy targets?

Aboriginal Cultural Heritage Social Surrounding Issues

- Significant Aboriginal heritage value occurs on the site including burial grounds. There is a strong cultural connection as this part of the river was an initial camping place and a birthing ground for women. Has this history been researched and documented and included in the EPA Referral? Is a V8 Supercar MotorPlex a cultural fit to the history of the Peninsula?
- What steps have been taken to consult the local indigenous groups? Which groups have been consulted?
- What has been the level of consultation with the local indigenous groups?
- The Whadjuk Aboriginal Corporation totally oppose the proposal as there is significant aboriginal heritage value on the site. 'No one living here ever expected such a poorly considered event would be inflicted on them'. Why is their voice not considered?
- The Whadjuk Aboriginal Corporation is responsible for the Indigenous Land Use agreement and were never notified of the Government's announcement for this project. Why is this acceptable?
- Has the Whadjuk Aboriginal Corporation been consulted in the Referral documents?
- The Whadjuk Aboriginal Corporation refused permission to undertake the preliminary drilling on this project. The drilling went ahead anyway. Government is required by law to go through a consultation process with the Whadjuk Aboriginal Corporation. If drilling commenced without permission, are they not in contravention of the Aboriginal Heritage Act, even if there are no specific heritage places listed? Did this consultation go through the Department for Planning, Lands and Heritage?
- Were the South West Aboriginal Land and Seas' Council (a service provider) notified and did they direct consultation to the Whadjuk Aboriginal Corporation?
- What is the process during construction when items of significant heritage value are encountered?
- Who has policed the Aboriginal employment and service provider targets in the pre-development work? Have these targets been met?
- What targets have been set for Aboriginal employment and service providers in the full project implementation? Who will police this, and will the public be given access to the findings?