



**OBJECTIONS SUBMITTED ON REVISED PLANNING APPLICATION REF. R18/0186 BY THE SAVE COVENTRY SPEEDWAY AND STOX CAMPAIGN GROUP 18<sup>th</sup> AUGUST 2021**

Planning Application No.	Site Address	Description of the revised proposal
R18/0186	Coventry Stadium Rugby Road Coventry CV8 3GJ	Demolition of existing buildings and outline planning application (with matters of access, layout, scale, and appearance included) for residential development of up to 137 dwellings (Use Class C3) including means of access into the site from the Rugby Road, provision of open space and associated infrastructure and provision of sports pitch, erection of pavilion and formation of associated car park (details to be confirmed).

**EXECUTIVE SUMMARY**

The Save Coventry Speedway and Stox Campaign Group is an umbrella grouping of people who wish to see the near century long heritage of Speedway and Stock Car Racing in the area continue.

We wish to place on record in the strongest possible terms, our objections to Planning Application R18/0186 (revised in July 2021), which would result in the inappropriate redevelopment of the site, resulting in the loss of Brandon (aka Coventry) Stadium.

The principle grounds for our objections are shown overleaf.

## EXECUTIVE SUMMARY

Brandon Estates' (BE) evidence is very well presented, but Save Coventry Speedway & Stox Campaign Group (SCS) plead that this should not mislead the reader. Their documents are riddled with untruths and falsehoods, many of which are repeated from the original application despite being disproven, and are exposed in this SCS response.

BE are solely responsible for evicting Speedway and Stock Car Racing from Brandon Stadium at the end of 2016. This was despite a continuing need for both sports to remain at the stadium.

BE's decision to redevelop and close the stadium was made without due consideration of Government national planning policy requirements which protect sports and recreation facilities from redevelopment.

BE have consistently ignored the extent of opposition to their proposals not only from the racing communities but also the local community. SCS contend the abject failure by BE to secure the stadium has been a deliberate tactic to wear down those residents who live in close proximity to the stadium.

BE clearly misinterpret Para 97c of the Government's National Planning Policy Framework by suggesting the proposals are for an appropriate alternative sport or recreation development when the reality is that a sports development ancillary to the main housing proposals is advanced. The sporting benefits would duplicate and compete with existing provision for a sport that is well catered for already

The site lies within confirmed Green Belt and SCS believe that a development of 124 new dwellings cannot possibly be regarded as being compatible with this designation.

BE had their chance to promote the site for redevelopment through the review of the local plan, including attendance at the public examination before an independent, Government appointed Planning Inspector. Their case failed yet they continue to pursue to charge ahead with the proposals contrary to the Local Plan.

SCS disputes BE's contention that the site is brownfield. We accept that parts of the site are brownfield but most of the site should be considered greenfield since those elements have only been used over the years for parking and do not have tarmac or concrete surfaces. These areas could easily be restored to agricultural use in the event the stadium were not reopened.

SCS consider that the affordable housing provisions of BE's proposals are inadequate. It should not be treated as a solely brownfield development. Provision of affordable provision at the appropriate level and mix would have a significant impact on viability. A non-policy compliant proposal should not be entertained in order to justify demolition of the much needed sports stadium.

The open space benefits of the proposed development should not be over-estimated as the areas affected were already open and publicly accessible when the stadium was operational.

BE's own assessment of their proposal conveniently forgets to include reference to some of the most important elements of the Local Plan and Neighbourhood Plan.

The applicant suggests the development would have many benefits and represent a sustainable development but the housing and pitch proposed are either planned to be built elsewhere or, in the case of sports pitches, already exist. The net benefits would therefore be limited and in certain aspects, such as social impacts on the users of Brandon Stadium, negative.

The stadium is not surplus to requirements. It remains in an ideal central location with a near century of established use for motorsports. The limited amount of development that has taken place close to the stadium has been in full knowledge of this position.

The deterioration of the physical condition of the stadium buildings results directly from BE's mismanagement of stadium security. They have flouted their responsibilities under the Occupiers Liability Act 1984 to secure the site and now disgracefully attempt to use the resultant vandalised condition of the stadium to their advantage.

Several proposals to reopen the stadium have been made but in the view of SCS none have been taken seriously by BE and, furthermore, there is no indication that BE ever intended the situation to be any different.

There is no mention of the fact that an offer to buy the stadium by a highly credible businessman remains on the table and has been neither accepted or rejected by BE.

The 3G Artificial Pitch Feasibility Study is fundamentally flawed and both the Football Foundation and Birmingham FA 'believe the proposed location may be too rural to attract sufficient demand'. Despite the inference in the Study, no contracts or agreements are in place for an operator or users of the facility.

Both the Programme of Use and the Financial Projections are unrealistic and the projected marginal profit is highly likely in reality to be a significant loss.

KKP, authors of the 3G Pitch Study emphasize how 'it is imperative that clubs are kept informed' but BE has done the exact opposite of this – having latched onto two clubs who showed an interest, enabling them to be referenced in this application, included in a pitch usage chart and financial projections, they have been dropped like a stone. They have been shamelessly 'used' by unscrupulous developers.

Should this application be approved and a 3G pitch installed, there would be a detrimental impact on other clubs offering similar facilities, in particular the nearby Wolston Leisure and Community Centre.

The new floodlit all-weather football pitch proposed requires intensive use to achieve viability yet the floodlighting will significantly affect nearby residents as well as contributing to urbanisation of a site that forms part of the rural countryside.

Despite having more than 2 years to work on updating the proposals in important respects they remain unacceptably vague, for example in the form of details for the 3G pitch, floodlighting and associated facilities.

The Coventry Stadium Speedway Viability Appraisal is poorly researched, littered with embarrassing errors and untruths, is flawed in almost every respect and is biased in the extreme.

BE have failed in both the original application and this revised version to provide a shred of evidence which relates to Coventry Stadium viability. Throughout the appraisal the profitable nature of Stock Car Racing events is ignored.

BE's analysis of alleged decline in speedway and stock car racing is only correct in one respect. As venues, including some of the most important, have been lost to developers then it is hardly surprising that there will be an impact. This is not an argument that supports the loss of a further venue. It is precisely the opposite case meaning that Brandon should be restored as a major stadium for motorsports.

In an attempt to add credence to Viability Appraisal, BE claim to have spoken to several people associated with Speedway racing yet none of these individuals are actually named, and none of the 'findings' which follow are attributed to any of those individuals.

The Appraisal attempts too, to show a decline in the sport based on the number of fixtures raced, number of teams and television viewing figures. Every aspect of this analysis is riddled with embarrassing errors or disingenuous.

The authors of the Coventry Stadium Speedway Viability Appraisal, KKP, proudly state (on the cover of the document) their values to be "Quality, Integrity, Professionalism". SCS contend the Appraisal is poorly researched, riddled throughout with errors and untruths, makes fanciful assumptions and omits information which if disclosed would paint a different picture and damage the case put forward by the developers.

The proposals and supporting evidence are substantially based on dishonest analysis to address the loss of the stadium and in respect of the alternative proposals advanced.

SCS recognise that the Council are required to enter in discussions on planning applications however, we believe that too much flexibility has been given if BE's claims are to be believed. The Council could and should have refused the original planning application and negotiations over a 2 year period do not appear to be justified.

#### Note

Throughout this document, the following abbreviations are made:

- Brandon Estates – BE
- Save Coventry Speedway & Stox Campaign Group – SCS

Text shown in shaded boxes are extracts / quotes from documents within the Planning Application and the text below the boxes are SCS responses.

## SAVE COVENTRY SPEEDWAY & STOX CAMPAIGN GROUP

### COMMENTS ON: COVERING LETTER BY DPP PLANNING DATED 7<sup>TH</sup> JULY 2021

#### Page 2 Background

At the time, the demolition of the stadium was justified on the basis that the buildings and stadium infrastructure were deemed surplus to requirements. This followed the relocation of the Coventry Bees from the site to the Leicester Speedway in 2017, and likewise the decision of Coventry Racing Club Limited to relocate their events to Stoke Stadium in the same year. During this same period, Coventry Dogs Limited, which previously hosted greyhound racing at the site, had its licence revoked. The company has since dissolved.

This justification was proved to be factually incorrect, and even now its presence at the head of this letter provides a totally false inference that the stadium closed because the sports moved out. This could not be further from the truth.

Speedway and stock car racing were prevented from operating at the stadium in 2017 and beyond because the developers closed it. This fact is not in question.

With no stadium available at Brandon, Coventry Bees initially planned to race in the Premiership at Leicester in 2017 but were prevented from doing so by the governing body a month before the start of the season as there was no certainty that they could fulfil a season at Leicester, or that they would be able to return to Brandon. Consequently, there were no official Coventry Speedway meetings in 2017.

Coventry Racing Club did not “relocate their events to Stoke Speedway in the same year.” They staged four Formula 1 events around the country (compared to their normal eight), one of which took place at Stoke.

Coventry Dogs is irrelevant to this argument as the presence of greyhound racing was never a contributor to the viability of the stadium. As we have already explained, greyhound racing was leased out from 2012 as speedway had been, but the leaseholder pulled out due to uncertainty caused by the sale of the stadium. Greyhound racing at Brandon was always loss-making, but it was never required to be profitable in order for the stadium to be viable.

The implication of these events, which left the stadium without an operational purpose, combined with the spiralling costs associated with reinstating the stadium, rendered the continued operation of the stadium completely unviable.

The spiralling costs associated with reinstating the stadium arise purely because of the developers’ own lack of security and the resulting damage. They never had any intention of reinstating the stadium, as proved in the initial planning application which states that the stadium formally closed in January 2017 – at a time when the developers were stating in public that the future was to be decided. The only reason the stadium was “without an operational purpose” was because the developers stopped the sports which had been running there.

During this period, the applicant was approached by a number of parties interested in acquiring or operating the stadium. However, none of the parties in question were able to produce a credible business plan or demonstrate proof of funding that would enable them to take on the stadium.

This is untrue, as parties who approached the developers were told in no uncertain terms that stock car racing would never be permitted to return to the stadium, and also that offers to buy the site should be based on the value of a housing estate on the basis that an appeal to the Secretary of State would mean “it is almost certain that the application will be granted.” Evidence of this was

provided in the SCS response to the original application but it would appear DPP, as newly appointed consultants have not read previous documents. This point is discussed elsewhere in the SCS response and the evidence previously submitted is included once again.

As such, the application demonstrated that the stadium was surplus to requirements, and that its redevelopment could therefore be supported.

In fact, the application totally failed to make this case and was shot down by the Independent Report provided by WYG.

Officers will recall that the planning application was met with a significant amount of public interest, much of it concerning the demolition of the stadium and the loss of speedway events in Brandon. In particular, the Save Coventry Speedway (SCS), and Stox Campaign Group (SCG) were formed in opposition to the application, and both parties queried aspects of the supporting information, and specifically the viability assessment provided by the applicant.

DPP appear to be confused here but for the avoidance of doubt there is one Campaign Group, the Save Coventry Speedway & Stox Campaign Group. It also fails to mention that the 'public interest' was in fact near unanimous in opposing the application, with levels of opposition unprecedented in Rugby Council history.

### **Page 3 (Regarding the findings of the WYG report)**

This being the case, WYG considered whether the loss of the stadium could be justified under exception b or c of paragraph 97 of NPPF. WYG suggested that a case for the provision of a replacement speedway facility could represent an appropriate means by which the policy requirement could be met. Likewise, they determined that exception c of the policy could also be exercised, which would involve development for alternative sports and recreational provision (the benefits of which would need to clearly outweigh the loss of the current or former use).

A key section of the timeline is missing here, as it was also suggested by WYG that a meeting could take place between the two parties in an attempt to find some mutual common ground. This took place in March 2020, but it was immediately clear that the applicants were not interested in discussing Para 97b, the provision of a replacement speedway (and stox) facility, as "it would impact on their profit". Even though the Campaign Group made suggestions of alternative strategies which could benefit both parties and bring the whole affair to a close, the applicants reneged on their commitment to investigate these, and instead ploughed on with their 97c approach, which we believe was only included in the WYG report for the sake of completeness – bearing in mind the report made it quite clear that the stadium, and its use for motorsport, had not been proven to be surplus to requirements. On that basis, 97c was never likely to be a satisfactory approach.

Since the WYG report was published in 2019, the applicant has worked closely with DPP, and the wider design team to develop an alternative scheme, devised to specifically address the requirements of Paragraph 97 of NPPF through the provision of a replacement sports facility to serve the wider community (in accordance with exception c).

The applicant has misunderstood Paragraph 97c and the alternative scheme does not address it for two principle reasons. Firstly, the application is not for alternative sports and recreational provision, it is for housing, with the football pitch ancillary to it. And secondly, the application fails to demonstrate the proposals "clearly outweigh" those of the former use. This is discussed in detail later in our response.

Since the application was originally submitted, Officers will be aware that the situation with the stadium has continued to deteriorate. The site has been the subject of multiple break ins and arson attempts, and despite coordination with the Police, and the best attempts of the applicant to secure the site, the stadium continues to be targeted by trespassers. Notwithstanding the wider debate relating to the viability of speedway, the cost of reinstating the stadium alone continues to spiral and is likely to have increased further since the estimate of £3.7 million in 2017.

To suggest that the applicants made “best attempts” to secure the site absolutely beggars belief. We have extensive photographic evidence over four and a half years to prove this point, and Council officers have also viewed the non-existent security arrangements, with the court case for the applicant’s failures to comply with the Community Protection Notice originally served in September 2017 pending in October. If the applicants seriously believe they can claim that, to take one example, leaving a main access gate wide open for months on end as has been the case in the summer of 2021, constitutes “best attempts to secure the site” then they cannot be surprised that any of their content is challenged.

Whilst we have no contention with the fact that the costs to reinstate the stadium will indeed have spiralled, we point out again that this has been entirely enabled by the security failings brought about by the applicants, and the estimate provided is not an independent figure. We do not accept that in 2017 reinstatement would have cost £3.7m to bring the stadium back to the condition it was in at the end of the 2016 racing season.

In summary, this revised submission is the product of the comprehensive work undertaken by the applicant and the appointed consultants. The revised proposals seek to gain support for the wider redevelopment of the site under paragraph 97 of the NPPF, whilst resolving the objection of Sport England. Likewise, the revised submission has been devised to positively address the significant issues and challenges associated with the continued uncertainty surrounding the stadium buildings. The scheme seeks to facilitate the redevelopment of the site, through the provision of a scheme which provides an alternative sports and recreation provision to serve local residents and the wider community.

It is our contention that the revised proposals **fail** to properly address Paragraph 97 and as such will not satisfy Sport England.

We also believe the applicants, having ‘enabled’ the buildings to be vandalised and set on fire through their abject (deliberate) failure to secure the site for their own gain, should, through the impending court process be instructed to make the buildings safe and comply with the Community Protection Notice served on them in September 2017.

### **Revised Proposals**

This revised submission now seeks outline planning permission, with matters of access, layout, appearance and scale considered, for the erection of 124 detached dwellings, including access from Rugby Road, provision of open space, and other associated infrastructure, and the provision of a new 3G pitch, pavilion and associated club house. This amendment to the level of detail being considered at this stage reflects the fact that the applicant is keen to implement the scheme as soon as possible, which the reserving of details relating to the residential layout and design would not have allowed. As such, the amendments to the application will see the current issues associated with the declining condition of the stadium buildings resolved as quickly as possible.

The applicant has taken two years (since publication of the wyg report) to come up with this revised scheme. It is quite remarkable that they now regard the “declining condition of the stadium

buildings” (for which they are wholly responsible) as a priority and a means to “implement the scheme as soon as possible”. They almost appear surprised to have been subjected to the proper scrutiny we have provided.

The “current issues associated with the declining condition” are wholly down to the applicants’ complete disregard for security, to the extent that from mid-2020 they terminated the contract of Vacant Property Services, which at that time comprised a brief daily visit.

Now they appear to be attempting to use that as a reason to push through their plans, with phrases such as “the exact details are reserved for a later date.” It suggests their proposals have not been properly considered and will be subject to change. This is discussed further in this response.

The quickest and best way to resolve the problems of declining condition would be to reinstate full security and commence procedures to restore the site for sporting use.

The applicant may well be keen to implement the scheme as soon as possible, but that should not be used as an excuse for submitting poorly prepared application which, just like the original is riddled with ‘errors and untruths’ as will be highlighted later through proper scrutiny.

The residential part of the scheme is comprised of a mix of new build detached houses, designed to meet the needs of the local population. The proposed dwellings range in scale and design and will contribute significantly to the overall supply of housing both locally, and across the wider Rugby authority area. The scheme includes the provision of 25 affordable houses, in accordance with the applicable affordable housing requirement. In addition, a significant extent of open space is included across the layout, in addition to other associated infrastructure.

The proposals are directly contrary to the local plan and we believe the provision of just 25 affordable houses is not compliant with the requirements of a site which is predominantly greenfield. This is discussed further, later in this response.

The proposed pitch will take the form of a full size third generation artificial grass pitch (3G pitch). The pitch will be fitted with operational floodlights, fitted to the requisite standards of the Football Association (the FA).

We discuss this issue in the 3G Pitch Viability section and demonstrate that the business plan put forward by the applicant is fundamentally flawed.

The exact details of the pavilion are reserved for consideration at a later date. However, it is envisaged that the pavilion will be fitted with a green roof, and will include home and away dressing rooms, a changing room for officials, and a flexible community space which can be utilised by a variety of different local community and interest groups. An associated car park area is proposed to serve the pavilion and pitch. The car park will include a number of parking spaces (including disabled parking spaces), a cycle storage facility, an electric vehicle charging point, and a drop off / collection point for up to two minibuses. Exact details of the specific layout of the car park will be determined at a later date

This description is astonishingly vague, despite as previously stated, the applicant has taken two years to present these proposals.

The application proposal would be a major development and yet it appears that significant matters are only to be discussed/proposed/applied for, at a later date.

This is not a sound basis on which to make decisions.

## Planning Considerations

### Page 6 Loss of Coventry Stadium

Reference is made to the provision of the WYG report in that, following the failure of the applicants to prove the stadium was surplus to requirements under NPPF Section A, there could be a possibility of exploring exceptions under sections B and C.

A reminder that at the very end of the WYG report, the following statement was made:

*The applicant may also consider c) but would need to put forward clear plans to demonstrate how alternative sport and leisure offerings on the site would deliver significant sport and physical activity benefits to outweigh the potential loss of the stadium.*

We will demonstrate over the course of our response that the applicant has conclusively failed to make this case.

Following the publishing of this report in 2019, Brandon Estates Ltd engaged Knight, Kavanagh and Page Ltd (KKP), an independent research consultancy, to explore how best the requirements of Paragraph 97 could be met, in a viable and sustainable way. KKP subsequently produced two reports.....

KKP are not independent – they were engaged by the applicant to produce a report which came to a pre-determined conclusion by their paymaster. Scrutiny of these two reports shows the 3G Pitch Viability Study is fundamentally flawed and the Speedway Viability Assessment repeats countless errors and untruths, previously proven to be just that.

### KKP Report – Exception B

We respond to this report in detail later in our submission. For brevity now, however, we would repeat that KKP have quite clearly provided a report designed to fit with a pre-determined conclusion.

We know from our own meeting with the applicants that they had no intention whatsoever of pursuing a Paragraph 97b solution, openly stating such a solution “would impact on their profits”. KKP have therefore ensured a report is produced which projects the sport of speedway in the worst possible way (and makes little reference to the fact that this was also a major stock car stadium).

Mention of greyhound racing is again an irrelevance, but the most damning indictment of the KKP report is that it contains numerous falsehoods which have simply been copied and pasted from the original Viability Report and from an application to redevelop another stadium, Arena Essex. As mentioned above, statements copied from the Viability Report have already been disproved by ourselves with evidence, and for KKP to reproduce statements from the proposal at Arena Essex and present them as if they were fact is appalling. The Arena Essex planning application has not been determined and the statements within are being strongly contested.

It appears to be acceptable practice to form a default position, suiting the outcome of development, and then to repeat that stance even if evidence exists to prove this is false. The reaction of the sports' governing bodies should also be significant here.

Particular attention is drawn to the reference to the National Speedway Stadium in Manchester. Our reaction to this section, with evidence provided by the CEO of Belle Vue (Manchester) Speedway, is covered later in our response. It sends another powerful message that the KKP report cannot possibly be trusted as an accurate indicator of the state of the sport(s).

### **KKP Report – Exception C**

We make the case throughout our response that the provision of a 3G pitch is ancillary to the application for housing and is therefore not compliant with Paragraph 97c. In addition, we make the point the applicant, via the KKP report, fails to make the case that such a provision ‘clearly outweighs the loss of the former use’.

Our detailed response to the 3G Pitch Viability Study will show there is no clear evidence of the need for a pitch, certainly not in rural Brandon and highlight the shallowness of their approach in contacting local football clubs and how those clubs have been shamelessly ‘used’ by the applicant.

It should come as little surprise that this report has concluded there is a “clear need” for increased provision as this is exactly the wording which is required to attempt to satisfy Exception C. However, as will be shown in our response, the truth of the matter is very different.

*KKP contacted a number of community football clubs to ascertain the likely level of interest that a new 3G pitch would generate. Of the clubs contacted, five community clubs (each of which consists of several teams) expressed an interest in utilising a prospective pitch.*

The actual views and responses of the community clubs vary very considerably from the straightforward picture being portrayed here. The conclusion which follows, namely that “a sufficient level of need and interest exists to sustain the provision of a pitch” is purely self-serving and does not stand up to scrutiny – as we will show.

KKP also contacted Sky Blues in the Community (SBitC), the charitable arm of Coventry City FC, to ascertain whether they would have any interest in managing such a facility. SBitC already manage and operate a pitch at Coventry Blue Coat School and confirmed that they benefitted from the requisite experience and knowledge required to operate such a facility.

The stance of SBitC, and Coventry City FC as a whole, is discussed in detail later, but it should be pointed out here that “ascertaining whether they would have any interest in managing such a facility” is not the same as confirming that “they benefitted from the requisite experience and knowledge required to operate such a facility.”

### **Summary**

To summarise this section, the applicant has gone to significant lengths to determine how best the requirements of Paragraph 97 of NPPF can be positively addressed, to the satisfaction of Sports England.

It is our contention that the applicant has gone to significant lengths to conclude, through dishonest analysis, their application is the best solution to address Paragraph 97. The response of Sport England shows very clearly that they are **not** satisfied that the requirements of Paragraph 97 have been addressed.

The reports are clear that addressing the policy requirement through the provision of speedway in a redeveloped or new build facility is simply not viable, and is ultimately not sustainable.

The reports are not independent and once again the provision of stock car racing is ignored completely in a comment regarding viability, and we ask the question again: is it any surprise that a report designed to be included in a 97C application reaches this conclusion?

Equally, there are obvious environmental / noise issues concerning the compatibility of a redeveloped stadium, and the presence of both new build, and existing dwellings.

A redeveloped stadium would not include any 'new builds' and the stadium, established in 1928, pre-dates every house in close proximity to the stadium. Furthermore, this was never a serious issue in all the years the stadium was operational, and there are examples from elsewhere in the UK of new builds closer to existing stadiums, with no noise or environmental concerns.

The reports demonstrate that the only means by which the policy requirement can be met is through the implementation of an alternative sports provision, taking the form of a fully equipped 3G pitch.

This is a ridiculous statement. It is clear that reports have been generated to reach the conclusion that 97b is not an option, and then formulate a case for a 97c solution which singularly fails to meet the requirements of the policy wording, and for which there is no local need.

Whilst regrettable, the research provided by KKP categorically demonstrates that there is no viable future for speedway on the site (or within the vicinity of the site), and that the only achievable means by which the site can be redeveloped is through the delivery of an alternative sports provision designed to maximise community usage.

The research provided by KKP categorically demonstrates no such thing. It is as deficient as the original Viability Report, it is riddled with errors and untruths, it once again takes no serious account of Stock Car racing, and were it to somehow be accepted as fact, it would be copied and pasted into planning applications around the country leading to the loss of more motorsports sites for which there is clear ongoing need.

The word 'regrettable' is particularly galling when it is borne in mind that it was the applicants themselves who closed the stadium when all existing leaseholders wished to continue staging motorsports there.

## **Green Belt**

BE attempt to construct an argument that the proposed development would have limited impact on the openness of Green Belt.

The applicant has gone to significant lengths to ensure that the revised proposals address any impact on openness arising as a result of the proposals. From the outset of the project, Barton Willmore have been involved in the development of the revised proposals, providing input on the landscape and visual implications of the scheme. The layout of the scheme has been devised to ensure the impact on openness is no greater than that associated with the existing stadium and infrastructure.

It is important to consider the context of Green Belt designation which followed on many years after the stadium became established. SCS understands that detailed Green Belt boundaries were established many years after the stadium in its current form had been largely completed. The only significant exception being the greyhound kennels. The washing over of the site reflected its use for outdoor sports which are acceptable within the Green Belt.

The proposed extent and scale of housing proposed would extend well beyond the existing footprint and arguments that the remainder of the site comprises hardstanding are factually incorrect. This means the majority of the site is greenfield and the extensive nature of built development would undeniably have a significant and detrimental impact on the openness of Green Belt. The floodlit 3G pitch, fencing, floodlighting and associated building simply add to the proposed urbanisation of what is currently a site falling within the defined countryside.

BE claim their proposal is consistent with para 145 of the NPPF. We disagree for the reasons set out above but would also point out that their approach towards advancing the development is incompatible with the suite of policies comprising the Green Belt section of the NPPF including paragraphs 137, 138, 140, 141, 142, 143, 144, 147, 148 and 149 as well as paragraph 145. (2021 version of the NPPF).

Therefore, very little comfort exists for BE within the Green Belt as policies set out in the NPPF. Outdoor sports facilities are acceptable within the Green Belt but BE's suggestion that a disused stadium should be used as a comparator for the impact of a form of development that is not, in principle, compatible with Green Belt policy is nonsensical, especially when the applicant is solely responsible for the stadium falling vacant! The fact that a continuing sporting need for the existing stadium exists must be a determining factor in looking at Green Belt impact.

### **Other Benefits**

The proposed development will give rise to a host of other social, economic and environmental benefits, in accordance with the principle of sustainable development, and as outlined in full in the Planning Statement. Crucially, the redevelopment of the site will contribute significantly to the supply of market and affordable housing within Rugby. As a windfall development, the proposed dwellings, including 25 affordable houses, are situated on a previously developed brownfield site and will contribute additional housing in excess of that already allocated within the adopted Local Plan.

The claimed benefits are examined in SCS comments on the Planning Statement. However, we regard these claims as a rather feeble and unconvincing assessment of a proposal that rides up important and established principles attempting to sidestep normal planning procedures.

Perhaps it is deliberate, but the covering letter fails to deal with other matters of principle that will also be determinative including conflict with Green Belt policy, the attempt to sidestep the prevailing up to date adopted development plan and a rather feeble assessment of the sustainability benefits arising from the proposed development. These matters are covered in our observations on the Planning Statement submitted in support of the planning application.

Crucially, the redevelopment of the site will contribute significantly to the supply of market and affordable housing within Rugby.

A supply for which there is no need, as evidenced by the fact that this site does not appear on the Local Plan. The applicant's themselves recognise this by their reference to their proposals being a 'windfall development'.

Furthermore, we strongly contest the claim the whole of the site can be considered as 'previously developed brownfield site', as will be discussed later.

Crucially, the revised proposals will enable the demolition of dangerous buildings which detract from the setting of the site, creating a more sensitive and appropriate form of development.

Incredibly the applicants here attempt to suggest that they intend to provide a valuable local service by the "demolition of dangerous buildings" – when the only reason they are dangerous is because the applicants themselves have enabled them to fall into that condition!

### **Conclusion**

The revised scheme, which includes the provision of a 3G sports pitch and pavilion, satisfactorily addresses the NPPF requirement that the loss of any sporting / recreational buildings is compensated for appropriately.

The application fails at the first hurdle as the development is neither FOR sporting provision, nor does it 'clearly outweigh the loss of the previous use'.

In addition, we demonstrate in our response, through proper scrutiny and with supporting evidence, the case put forward by the applicant categorically does not address the requirements of the NPPF.

The research undertaken by KKP has demonstrated categorically that a return of speedway to Coventry Stadium is simply not a viable or sustainable proposition. However, the provision of a 3G pitch will meet an identified need and will result in a number of benefits to both local residents and the wider community.

This letter again suffers from the failing of attempting to repeat incorrect information often enough for a reader to believe it might be true. So we will repeat here that the KKP 'research' has been formulated in order to result in a pre-determined conclusion, and were it not to reach that conclusion it would not make it into the application, or indeed KKP would not continue as appointed agents for this section of the application!

The only thing that is categoric about the KPP statement is that it cannot be relied on in attempting to justify the application proposal.

## SAVE COVENTRY SPEEDWAY & STOX CAMPAIGN GROUP

### COMMENTS ON PLANNING STATEMENT BY DPP LTD DATED DECEMBER 2020

#### General Observations

1. Brandon Estates' (BE) evidence is very well presented, but Save Coventry Speedway & Stox Campaign Group (SCS) plead that this should not mislead the reader. Their documents are riddled with untruths and falsehoods, many of which are repeated from the original application despite being disproven, and are exposed in this SCS response.
2. We are concerned at the amount of time given by Rugby BC to BE to submit the revised proposals. We believe the Council should not have been so lenient in their dealings with the applicant. It is noted that there is no attempt made by BE to explain why they sacked their initial Planning Consultants nor was there a need for such a delay. Perhaps it was because they had been advised of the very poor case that exists to support redevelopment of the Coventry Stadium site.

#### CHAPTER 2 – BACKGROUND

**Page 7 Para 2.2** The submission of the planning application in 2018 followed extensive discussions with the local authority, local residents and other key stakeholders regarding a redevelopment of the site. As set out in the original submission, the redevelopment of the site was sought on the basis that the stadium had become operationally redundant following the relocation of the Coventry Bees to Leicester Speedway. In this period, Coventry Racing Club Limited also decided to relocate their events to Stoke Stadium in the same year.

This fails to point out the extensive opposition, unprecedented in Rugby Borough Council history, from both local residents and motorsport fans to the redevelopment proposals. It fails to point out too, that it was submitted without consulting the governing bodies of the sports, nor did it include a Sports Needs Assessment, both of which were major omissions. Had BE taken heed of the comments they would not have advanced their proposals. In addition, BE took their decision to proceed without taking due account of Government Policy in respect of the loss of sport and recreation facilities.

The stadium became operationally redundant only because BE evicted Speedway and Stock Car Racing at the end of 2016. The transfer of Coventry Bees Speedway to Leicester, competing in the lowest tier of the sport and funded by a very significant sum of money from the developers, was an attempt to justify the sport had been successfully relocated. The arrangement was only for one year and the attempt failed miserably, with the team unable to complete the season. Regarding Stock Car racing and Coventry Racing Club, the applicant continues to repeat inaccurate information made in their original application in January 2018 and again in October 2018 (in the Sports Needs Assessment), despite it being highlighted as being untrue in the SCS response to that application. To repeat, Coventry Racing Club ran several events in 2017 by renting other tracks while they unsuccessfully attempted to secure an alternative site. Once again, for clarity, only ONE meeting was staged at Stoke, the others were staged at Sheffield, Kings Lynn and Belle Vue.

**Page 7 Para 2.4** As explained in the original submission package, the applicant fielded a number of enquiries from parties interested in either acquiring or operating Coventry Stadium since its original purchase. However, none of the parties in question were able to demonstrate a credible business plan, nor indeed the funds required to acquire the stadium outright.

And as explained in the SCS response to the original submission, this is absolutely nonsense. BE had no intention of responding positively to enquiries made. Evidence was provided by SCS that Mr Warren Hunter, made an approach in March 2017 and submitted his company's accounts as requested. This evidence is once again submitted as Appendix 1

Further evidence was submitted related to enquiries from Gary Townsend when in May 2017 he was advised by an email from solicitor James Crocker, acting for Brandon Estates "I have now taken instruction from Brandon Estates Ltd. Whilst they thank you for your interest, there is no point at the present time in entering into any discussion. Under no circumstances will Brandon Estates permit Stock Car Racing to return to Brandon Stadium".

A second enquiry by Mr Townsend in January 2018, met with the response that "As previously intimated, and for the avoidance of doubt: Stock car racing will never be allowed to return to the Stadium".

Copies of both emails to Mr Townsend were included as evidence to Rugby Council in a document submitted on 8<sup>th</sup> January 2019, entitled "Summary of Errors and Untruths". We include them once again as evidence – Appendices 2 & 3

This application even fails to mention that further discussions were held with Mr Hunter in May 2020 and following an arranged visit to the stadium, accompanied by a representative of Brandon Estates, Mr Hunter emailed a formal offer to buy the stadium on 26<sup>th</sup> May 2020. Their suggestion that this offer by Warren Hunter lacks credibility is insulting.. The response from Brandon Estates on 7<sup>th</sup> July 2020 to this offer said: "As we have confirmed twice since your offer came in we are still considering your proposal and will get back to you when a decision has been made. We would appreciate your patience in this matter and we will get back to you as soon as we can. To either agree or to refuse your offer". To date, Mr Hunter has heard nothing further and his offer remains on the table.

Evidence of Mr Hunter's offer and indeed his credibility was sent to officers at Rugby Council, including the Planning Officer allocated to this case, on 26<sup>th</sup> August 2020. A copy of the offer letter is included as Appendix 4

**Page 7 Para 2.5** On this basis, and with the condition of the stadium fast deteriorating, the applicant submitted the current planning application, to enable the clearance and redevelopment of the site. Indeed, since the submission of the application in 2018, Officers will be well aware that the condition of the stadium has deteriorated further. Despite the applicant's efforts to secure the premises, the site continues to be targeted by trespassers. The site has been the subject of several break-in and arson attempts, and Warwickshire Fire and Rescue have been called out to the site on a number of occasions.

Deterioration of the site is wholly a result of BE's poor (deliberate) handling of security. If the site had been secure the stadium would still be in the same condition it was in December 2016. This is evidenced by the fact that Rugby Council have taken the following action against the owners:

- A Warning Notice was served on the owners in September 2017
- A Community Protection Notice (CPN) which required the owners to secure the site to "prevent access by unauthorised persons" was served on them on 26<sup>th</sup> September 2017.

- Further court action is being pursued by Rugby Council for the continued failures to comply with the CPN and beginning on 11<sup>th</sup> October 2021, the owners will stand trial at a court in Birmingham.

**Page 7 Para 2.6** Officers will recall that the planning application was met with a significant amount of public interest, much of it concerning the demolition of the stadium and the loss of speedway and motor racing events in Brandon.

The opposition was overwhelmingly against the redevelopment proposals.

**Page 7 Para 2.7** Their concerns were noted within a subsequent objection, submitted on behalf of Sport England in April 2018. Sport England Officers advised that the application could not be supported, on the basis that the applicant had failed to demonstrate that the requirements of paragraph 74 of NPPF (now paragraph 99 of the revised NPPF 2019) had been complied with, and that the loss of the stadium as a sporting / recreational offer, could be justified under the provisions of the Framework.

We will demonstrate that this is still the position.

**Page 8 Para 2.8** In particular, Sport England referenced the objections submitted by the various governing bodies associated with the sports previously hosted at Coventry Stadium. The Officer also highlighted the concerns raised by the Stox Campaign, and Save Brandon Speedway, which both suggested that the return of the Coventry Bees to the stadium, ran alongside additional Stock car racing events could be achieved, which would make the operation of the site a viable proposition.

It has always been the case that to be viable the stadium needs to run both stock cars and speedway. Both sports have been staged at the stadium from 1954 every year up until the forced closure at the end of 2016.

**Page 8 Para 2.13** Since the WYG report was published, the application has been held in abeyance. In this time, the applicant has worked closely with DPP, and the wider design team to develop an alternative scheme, devised to specifically address the requirements of Paragraph 97 of NPPF through the provision of a replacement sports facility to serve the wider community (in accordance with exception c). The applicant has remained in contact with the LPA throughout this period.

There seems to be an acceptance by BE that loss of the stadium under NPPF Para 97a cannot be justified. They claim there is no suitable alternative site to meet Para 97b, but do not produce any evidence to demonstrate this is conclusively the case. Their case rests on alleged compliance with 97c.

However, it is our contention that the applicant has misunderstood Para 97c because the application proposal is essentially for 124 new dwellings with ancillary sports and community provision principally in the form of an all-weather football pitch.

## CHAPTER 3 – SITE DESCRIPTION

**Page 11 Para 3.1** The application site is comprised of a parcel of land, measuring approximately 10.86-hectare in area, located at Coventry Stadium, Rugby Road (A428). The site lies between the settlements of Binley Woods, located to the west, and Brandon, situated broadly to the south. The site at present accommodates the now disused Coventry Stadium, which previously had been used for the hosting of speedway, stock car and greyhound racing events. However, from 2016, the stadium ceased hosting such events, and has laid vacant since.

The site is vacant only because BE would not enable speedway and stock car racing to take place on the site.

Evidence referred to above regarding enquiries by Mr Townsend and enquiries and a formal offer to buy the stadium by Warren Hunter support this.

**Page 11 Para 3.3** The remainder of the site, namely the western section, is comprised of a large area of hardstanding, previously used for vehicle parking. Access into the site continues to be gained via two access points located on Speedway Lane and Rugby Road respectively.

The parking areas are not hardstanding. Clinker had been laid at some point, but the car parking and pit areas of the site essentially remain undeveloped and should not be considered as brownfield land. Most of the site could relatively easily be returned to agricultural use if the current stadium use were to cease permanently. [Appendix 5](#) shows a picture of the car park area, clearly showing it to have reverted to pastureland since the stadium was closed by BE.

**Page 12 Para 3.6** In terms of other notable designations, the site falls within the Green Belt as mentioned. Otherwise, the site is not located within or adjacent to a Conservation Area (CA), and there are no listed buildings on or within the vicinity of the site.

This paragraph rather understates the Green Belt factor. The stadium existed prior to definition of the Green Belt but, when the Green Belt was established it was considered it was the type of and density of use that could be wholly washed over.

**Page 12 Para 3.7** In terms of its surroundings, the site falls within close proximity of the village of Binley Woods. Binley Woods accommodates a number of existing service and amenities, including a primary school, and convenience store, a post office, a village hall, a pub and a church. Officers will note that the Site is connected to Binley Woods via an illuminated footway located on Rugby Road.

Users of the stadium contributed considerably to the local businesses operating in both Binley Woods and Brandon and indeed, Wolston.

**Page 13 Para 3.9** The site has been the subject of numerous planning applications over the years, the majority of which relate to the former use of the site as a speedway stadium. The applications are listed as follows:

- Three sided freestanding non-illuminated signs (ref. R04/0300/6592/A, dated 28th July 2014);
- Single storey kennel block (ref. R04/6392/6592/B, dated 6th August 2004);
- Construction of external lift shaft and housing (ref. R04/0226/6592/P, dated 6th May 2004);

- Erection of kennel building (ref. R03/1085/6592/P, dated 18th February 2004);
- Erection of boundary fence (ref. R03/0820/6592/P, dated 4th December 2003);
- Erection of two storey brick building with tiled pitched roof offices and veterinary treatment room (ref. R03/0684/6592/P, dated 22nd October 2003);
- Cladding of two existing workshops and refurbishment of existing turnstiles (ref. R03/0055/6592/P, dated 4th March 2003);
- 6 no. TV commentary positions (ref. R99/5343/6592/B, dated 29th June 1999);
- 3 sets of steal staircases (ref. R98/5028/6592/B, dated 16h February 1998);
- Erection of additional section of perimeter fencing to enable to enlargement of the internal stock car paddock area (ref. R95/0841/6592/P, dated 31st January 1996); and
- Erection of 10m high lighting stands to perimeter of greyhound racing track (ref. R77/1534/6592/P, dated 29th March 1978).

The list is incomplete and excludes a number of other applications, one of which is significant with regard to the site's Green Belt status and brownfield consideration.

On 20<sup>th</sup> June 2007 and application (R07/1268/PLN) was submitted by the previous owner for permission to hold Sunday Markets on the stadium car park.

The application was rejected by Rugby Council with 6 reasons listed for refusal. ([Appendix 6](#))

*Reason for refusal: 1 The site is in the Green Belt where there is a presumption against inappropriate development.....*

There was no recognition by Rugby Council that the car park was brownfield as is now argued by Brandon Estates.

*Reason for refusal: 3 Due to the nature, scale and intensity of the proposed use the development would be detrimental to the amenity of the occupiers of nearby residential properties by reason of noise and nuisance generated by the use of land and associated vehicular activity.*

On the basis of this reason for refusal for a weekly market, the increase in vehicular activity associated with 124 houses and a 3G football pitch and pavilion adjacent to existing properties should similarly be a reason for refusal of this application.

Furthermore, the 'noise and nuisance' generated by a floodlit football pitch and associated car park directly behind properties on Rugby Road and operating every day of the week, often until 10.00pm should similarly be a reason for refusal of this application

#### **CHAPTER 4 – THE PROPOSED DEVELOPMENT**

The original planning application submitted in 2018 had the following description of development:

Demolition of existing buildings and outline planning application for residential development of up to 137 dwellings (Use Class C3) including means of access from the Rugby Road, new open space and associated infrastructure. All other matters reserved.

whereas the revised proposals are described as,

**Page 15 Para 4.1.** Outline permission with matters of access, layout, scale, and appearance is now sought. The full description of development, as agreed with officers, is as follows:

Demolition of existing buildings and outline planning application (with matters of access, layout, scale, and appearance included) for residential development of up to 137 dwellings (Use Class C3) including means of access into the site from the Rugby Road, provision of open space and associated infrastructure and provision of sports pitch, erection of pavilion and formation of associated car park

In our view, the revised proposals mark such a departure from the original proposals that the application is, in effect, a new application. This view is supported by the fact that a new planning application form has been completed and submitted.

Procedurally, we question this approach because if the claims that the revised proposals reflect discussions with Council Officers then, it could be argued that the original planning application could and should have been refused, not least in the light of strong opposition to the scheme in the original planning application.

The applicant's argument that the further detail is required because of the state of the stadium is fanciful because they are responsible for the lack of security that has led to the damage. It is also the case that restoration of the site to its stadium use could be achieved much faster. It is also because the revised proposals attempt to add the new sports pitch as an attempt to add a sticking plaster to their fundamentally flawed proposals.

While the description of the development refers to up to 137 dwellings and the 124 dwellings now proposed is consistent with that, we believe the local community are entitled to greater precision not least because of the length of time the applicants have had to cobble their revised proposals together.

**Page 16 Para 4.5** The residential development is comprised of a mix of detached, semi-detached and terraced dwellings, distributed across the site as demonstrated on the above plan extract. The dwellings are in the eastern section of the site (broadly on the footprint of the existing stadium buildings) as indicated on the submitted illustrative masterplan.

The suggestion that the new dwellings would be roughly on the footprint of the stadium buildings is disputed since the vast majority of the stadium site is open as car parking, pit areas or a sports pitch (the track).

Under the proposed scheme the development extends across a much greater proportion of the site as can be seen in [Appendix 7](#) which shows an overlay of the existing stadium on the proposed layout. Approximately half of the new dwellings proposed cannot be considered to fall within the footprint of the existing stadium buildings.

**Page 16 Para 4.6** The scheme is comprised of a mixture of housing types, sizes and tenures, including the provision of 20% affordable housing (up to 25 units) as indicated in the below table

This paragraph is internally conflicting by stating affordable housing provision of "up to" 25 units and at the same time the provision "will be" 20%. This suggests a lack of commitment to provide the affordable housing.

In addition, a registered social landlord would be involved if the provision were to be affordable yet there is no indication of what organisation this might be.

There is also no explanation why the affordable homes will be 2 and 3 bedrooms with none of the 4-bedroom properties within the affordable categories. There is no logical reason or explanation for this because affordable dwelling need is not directly related to smaller households only. Further justification should be sought.

Policy H2 of the local plan requires 20% affordable housing provision on brownfield sites and 30% on greenfield sites. We believe that the site of Coventry Stadium should be predominantly defined as greenfield and since it lies within countryside covered by Green Belt designation confirms this would be the correct way forward.

Accordingly, the proposed redevelopment provides both an incorrect mix of proposed affordable dwelling sizes and provides up to 50% less affordable housing than should apply on such a site. Given that the proposed site is directly contrary to the provisions of the local plan and, its development for housing was rejected as part of the local plan preparation process then it follows that much greater account of affordable housing need should apply if housing redevelopment is to be considered seriously and the local plan notes that 36% of affordable needs should be affordable.

This is an important point because although the Save Coventry Speedway and Stox Campaign Group do not wish to see redevelopment of the site for housing a more appropriate level of affordable housing in terms of mix and quantum would significantly affect both affordability of the new homes and viability of the site in particular of the alternative proposed sports provision.

**Page 18 Para 4.9** The proposed development otherwise includes the creation of green open spaces, including a large area of open space....

It is clear that vast majority of the land proposed as open space is already open. When the stadium was operational, there were no barriers preventing public access into those areas. We believe it is important that relatively little weight should therefore be attached to the open space proposals as they mainly reflect the pre-existing situation.

#### **Provision of 3G ATP Pitch and Pavilion**

**Page 18 Para 4.12** Permission is also sought for the provision of an artificial turf 3G sports pitch, the erection of a pavilion, and the formation of a car park. Whilst details of the layout of the pitch, pavilion and car park have been included for consideration, the applicant is seeking to reserve the remaining details for consideration at a later date. This is to ensure that any prospective operator has opportunity to input into the design and scope of the facility ultimately delivered.

This paragraph confirms that none of the “detail” in the description of the proposal can be relied upon as all matters are reserved. This is not a sound basis upon which either the retention and reinstatement of the stadium or its redevelopment can be compared.

We are also over unclear about the justification for football facilities to replace motorsport. There is clearly a continuing and unmet need for the latter but this cannot be claimed for the football use. This is discussed further in our comments on the 3G Football Pitch Feasibility Study.

**Page 18 Para 4.13** It is envisaged that the pitch will be enclosed by a 4.5 metre perimeter fence, in accordance with the relevant Football Association (FA) standards. Likewise, the pitch will be illuminated in accordance with a lighting scheme to be agreed should permission be granted.

We have submitted a separate analysis regarding the 3G Pitch and Pavilion so there is no need to go into all the details here but from a planning perspective we would highlight and question the suitability of a 4.5 metre perimeter fence which is at odds with openness and public accessibility and the likely intensity of floodlighting usage. Both attributes point more to an urban rather than rural location as being more suitable for such a facility.

It should also be pointed out that the floodlighting of the football facility would be much more intense than that of the existing stadium when in use. The floodlighting of the stadium is long established and was used between 35 – 40 evenings a year. It does not follow that floodlighting should be acceptable on the alternative football scheme, in use 7 days a week because of the sensitive location of the site both within open countryside and confirmed Green Belt as well as its close proximity to existing housing on Rugby Road.

If floodlighting were not subsequently agreed then this would seriously affect viability of the sporting element of the scheme and thereby the scheme as a whole because the sporting benefits claimed would be seriously undermined.

## **Chapter 5 PLANNING POLICY**

**Page 21 Para 5.1** Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be made in accordance with the development plan unless material considerations indicate otherwise. This section sets out the broad planning policy framework against which the proposals must be assessed, starting with the adopted Development Plan and the other supplementary guidance documents published by the Council.

We are happy to agree with this paragraph which, we would suggest, should see rejection of BE's scheme. This is because it is quite blatantly contrary to up-to-date planning policies operating at National, District and local level.

The analysis of planning policy within the document is both selective and presented in a manner designed to confuse. As examples it skates over the development hierarchy, and its relationship to protection of both the countryside and the Green Belt, affordable housing requirements, the meeting of housing needs on other sites within the District through the local plan (and rejection of the application site as part of the plan-making process), the strengthening of Policy HS4 through the local plan examination process to protect facilities such as Coventry Stadium and rides roughshod over the evidence base behind the local plan.

In addition, certain policies have been 'conveniently' omitted. This is important because these omissions relate to key deficiencies of the proposals but then help the applicant to carry out an extremely biased assessment of their proposals against established planning policy which has been established on the basis of extensive public consultation and the resolution of objections through democratic procedures, evidenced by the local plan public examination process. The effect is that the applicant is attempting to sidestep the democratically established plans to which their own objections, which were considered concurrently, failed.

With respect to the local plan, the applicant's fail to identify Policies HC3 (Protection of Local Shops, Community Facilities and Services) and HC4 (Open Space, Sports Facilities and Recreation) and their supporting text as relevant to consideration of their proposals. These omissions are startling.

Irresponsible behaviour of this type in attempting to manipulate the planning process should not be permitted to stand and, were it be seen to succeed, it would potentially undermine the value of the Rugby Local Plan as a whole.

The applicant's analysis of the Brandon & Bretford Neighbourhood Plan is similarly as deficient and the document clearly twists what the plan says to justify the application proposal when the plan is clear that the community wishes to see Coventry Stadium retained in its former use.

The analysis of the NPPF is also incomplete. It fails to recognise para 92 and in particular 92a) which states, "To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) 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 environments;

It is clear that, taken both individually and in combination the application proposals directly contravene key aspects of planning policy operating at National, District and local levels.

**Page 29 Para 5.48** An assessment has been undertaken to show that the vacant Brandon Stadium is surplus to requirements and its state of disrepair means it is financially unviable. The proposals also include provision of a sports pitch and new open space which is of better quality and more sustainable than what is there currently. The benefits here clearly outweigh the loss of the speedway stadium.

We address these claims elsewhere in our comments but this paragraph is particularly objectionable as every statement in that paragraph is flagrantly untrue. This comment is also put into the chapter which aims to outline relevant policies. It should not attempt to mislead the reader.

The main argument in favour of the scheme proposed is the poor state of the existing site. However, this should not be taken seriously as it is solely as a result of the action, or more appropriately inaction of BE that this situation has arisen.

## CHAPTER 6 - PLANNING CONSIDERATIONS

We agree that an analysis of planning considerations should distinguish between consideration of matters of principle and matters of detail should the proposal be acceptable in principle.

In relation to the matters of principle we believe the analysis has failed to highlight the following:

### Rugby Local Plan

The redevelopment of the stadium site was proposed by BE through the review of the local plan. They failed in those efforts and the adopted plan does not allocate the application site for housing. The housing requirement will be met on sites elsewhere in the Borough and the local plan could not be considered out of date. In these circumstances we have every expectation that the application proposal would be determined in accordance with the adopted development plan and there can be no question that, against the matters of principle, BE's proposals are clearly contrary to the provisions of the development plan.

### Green Belt

The application site falls within the Green Belt and its proposed redevelopment for 124 dwellings would be for a type and scale of development that is blatantly contrary to Green Belt policy. The openness of the Green Belt would be severely affected. BE's arguments rely on the site being brownfield yet this is a matter upon which they should be challenged. Most of the site has been undeveloped except for security fencing and car parking. All of these areas should be considered greenfield and, should the stadium not be reopened then SCS believe those areas should be restored to open pasture or agricultural use.

In the event the stadium site were to be redeveloped for housing then this should be on the basis that the site comes forward in a review of the local plan with the boundaries of the Green Belt (and settlement boundaries) being revised to accommodate the sprawl of urban development into the countryside. In such a scenario, we would also be seeking through the local plan the identification of an alternative site for the relocation of the sports stadium.

**Page 32 Para 6.9** indicates that the Landscape and Visual Impact Assessment prepared by Barton Wilmore concludes:

... the inclusion of the stadium site within the Green Belt is somewhat of an anomaly and contributes little to the purposes of Green Belt.

We absolutely dispute this analysis and contend that reports of this nature should command very little weight because to make the conclusions highlighted in the Planning Statement demonstrates it has been written for a purpose and cannot be regarded as an independent analysis of the matter.

**Page 32 Para 6.10** In support of their claim of the whole site being brownfield, they state:

The site is previously developed land – it contains and comprises the former Coventry Stadium, including a number of sizeable buildings and structures, and its car park and access road. The majority of the site is covered in hardstanding.

This is simply not correct as to be so covered the land would have to either be a tarmac or concrete surfaced. The majority of the site is not covered by hardstanding as evidenced in Appendix 5. This is a fact.

**Page 32 Para 6.14** claims that the existing dwellings on Rugby Road and Speedway Lane would help to contain the proposed development enabling it...

....to be achieved without increasing the impact on openness.

Visibility is not a pre-requisite of openness in planning terms and the claim that 124 dwellings could be built without impact simply highlights the deficiencies in the evidence and thereby, the arguments constructed to support the development.

### **Page 33 Housing Need**

**Page 33 Para 6.23** Notwithstanding such, the Local Plan does not preclude the development of windfall housing. In fact, the Council make an allowance of 630 dwellings from windfall sites within the Local Plan. Notably, the allowance is neither a maximum or minimum figure. It is to be applied flexibly to ensure the Council are able to meet the relevant target.

This suggests that the site would help contribute to housing needs as a windfall site.

We would respectfully point out that windfall sites are invariably small sites, often infill and the suggestion that a 124 dwelling site should fall into this category, thus avoiding proper consideration through the local plan process. This especially the case in respect of the application proposal because housing redevelopment of the site was specifically considered through the Rugby Local Plan.

The applicant has failed to provide much analysis of housing land supply.

In its Interim 5 Year Housing Land Supply Position Statement (June 2021) the Council "*considers it can demonstrate a 5YHLS figure of 5.75 years for the period 2020/21 to 2024/25 based on 2019/20 monitoring data supplemented by partial monitoring for 2020/21 undertaken so far, along with other specific records identified to date and stakeholder engagement.*"

The statement goes on to say that, "*It will be necessary to complete the monitoring for 2020/21 in order to update the position further and this is currently underway. It is expected that an update will be available in August. On the basis of deliverable sites identified so far however, it is possible to make a reasoned assumption that the 5YHLS figure will increase to 6.09 years for the period 2021/22 to 2025/26.*"

This means that Rugby can currently identify a 5YHLS and, as a consequence, the 'tilted balance' provisions of the National Planning Policy Framework would not apply. Even if this were not the case or that the local plan policies were considered to be out of date then the fact that the inclusion of the site within the Green Belt would (through the footnote to Para 11 of the NPPF), trump housing land supply considerations.

These circumstances add a further level of protection against the proposed redevelopment of the stadium site.

### **Page 34 Sporting Provision**

We have provided a detailed response to this topic so we do not address this further at this point. We absolutely dispute the analysis made by the applicant in almost every respect. The fact is that the applicant speculatively purchased the stadium with the sole intention of redeveloping it for housing and to evict the former occupiers without carrying out due analysis of the approach required by para 97 of the NPPF. The applicant has been attempting to cover up this most basic of flaws in its approach and no matter how much they attempt to duck and dive the matter their proposals are fundamentally at odds with national and local planning policy.

### **Page 36 Achieving Sustainable Development**

The benefits claimed are grossly exaggerated.

Economically the benefits of the new housing are limited as any development at the application site would replace or slow down development on other, prioritised allocated sites. Economically, some businesses in Brandon have suffered through the closure of the stadium. Those losses would be restored through reopening of the stadium.

The level of affordable housing provision would have some benefits but again, isn't this simply diverting provision from elsewhere effectively neutralising those benefits?

The open space and new sports pitch would not compensate for the loss of the speedway and stock car racing. We would claim this should score as a negative social impact.

The environmental benefits are fanciful because the site is vacant through the tactics of BE themselves and we contend their assertions that the whole site is brownfield is incorrect. The majority of the site should be considered greenfield.

Other sustainability claims are neutral because, as an example, efficient new homes provided on the application site would be no different to similar homes to be built on allocated sites elsewhere.

In terms of location, the site is located within the countryside outside defined settlement boundaries. The location benefits for housing are not materially different to those that existed when it was a functioning stadium.

The proposed location of the intensively used and floodlit sports pitch cannot be regarded as an environmental benefit as claimed. It would detract from the rural character of the area and be especially disruptive to the existing homes on Rugby Road.

SCS contend that the section of sustainability in the Planning Statement effectively highlights how poorly the proposed development performs in relation to such principles.

### **Page 38 Summary**

This section raises some significant concerns. This suggests Officers raised no significant concerns other than the implications for the loss of the stadium during the initial assessment. For the reasons stated above – and in particular for a development in the Green Belt and a site rejected through the local plan process - we find this a rather unlikely position for Council Officers or Members to have adopted and challenge the applicants to produce the evidence to support their contention.

## **Page 39 Other Technical Matters**

Generally, we would not wish to enter into detailed matters. However, we have the following observations.

In relation to affordable housing the mix proposed (at 20%) is too low because the site should not be regarded as a wholly brownfield site. A very significant proportion of the dwellings would not be built on either the existing development footprint or hardstandings. Affordable housing in respect of all these areas, if not the whole site, should be provided at greenfield levels. To do so would clearly impact on site viability.

## **CHAPTER 7 - CONCLUSIONS**

We continue to dispute BE's analysis and the conclusions drawn out in this section.

We would also like to refer reemphasise the gaping omission in the Planning Statement. This is the complete absence of any substantive material relating to consultations responses which have been demonstrably negative at all stages in the development of the application proposals.

The vast majority of responses at all stages have been demonstrably against the redevelopment of the stadium site and Rugby Council should not determine the application without the extent of that opposition throughout the process being given full weight. BE's approach is, perhaps, not surprising given that they are an off-shore developer with little real concern for the impact of their proposals other than their impact on their bank account balance.

Fortunately, the same does not apply to the Council and we are confident they will adopt a far more reasoned approach and send a clear message to the applicant.

This should reflect the volume of the heart-felt response of both the local and racing communities which should leave the Council with no choice but to refuse the planning application and to resolutely fight any subsequent planning appeal.

## SAVE COVENTRY SPEEDWAY & STOX CAMPAIGN GROUP

### COMMENTS ON: 3G ARTIFICIAL GRASS PITCH FEASIBILITY STUDY BY KKP DATED MAY 2021

#### PART 2: STRATEGIC CONTENT

##### Page 3 National Planning Policy Framework

The NPPF paragraph 97 states that existing open space, sports and recreational buildings and land (which incorporates facilities for speedway) should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) 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
- c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Chapter 13 of the NPPF focuses on protecting Green Belt land. It notes that, once land has been defined, local planning authorities should plan positively to enhance use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

Having failed to demonstrate compliance with Para 97a, this application is aimed at 97c.

It is our contention that the applicant has misunderstood Para 97C because the application proposal is essentially for 124 new dwellings and the sports and community provision principally in the form of an all-weather football pitch is **ancillary** to it.

Secondly, the application fails to make the case that the ancillary provision outweighs the loss of the stadium and we will provide evidence that the number of people actively engaged in sport at the stadium far exceeds those projected to use the proposed football pitch by a factor approaching 3.

The reference to Chapter 13 is particularly distasteful. The owners may argue the land is 'damaged and derelict' but the condition of the stadium is entirely as a result of Brandon Estates' abject (deliberate) failure to secure the site, as referred to previously.

##### Page 3 Rugby Borough Council Local Plan (2011-2031)

Policy HS4 of Rugby's Local Plan aligns to Paragraph 97 of the NPPF, stating that no existing open space, sports and recreational buildings and land should be built on unless planning policy is met. It adds that planning permission will be granted for development that enhances the quality and accessibility of existing open space providing it is accessible and of high quality....

Planning policy is not met (ie Para 97c) as referred to above.

The applicant also fails to make reference the Inspector during the public examination process initially refusing to sign off the Plan and requesting the strengthening of Policy HS4 to protect facilities such as Coventry Stadium

#### Page 4 Coventry stadium - Independent Review

Wyg was appointed by Rugby Borough Council to undertake a review of the sports planning case in respect of Coventry stadium by means of supporting its decision-making process. This followed submission of an outline planning application for the demolition of the speedway track to enable residential development on the site. Supporting documents were presented, including a sports needs assessment; however, a campaign group submitted separate information to counter the evidence provided. The Planning Inspector commented that the Council needed to start from the basis of safeguarding the provision in line with the general policy for sport and recreation buildings and to assess the application in the context of the NPPF.

The Independent Review concluded that there is not an “unequivocal case that Coventry stadium is surplus to requirements”, despite the Sports Needs Assessment intending to prove this. As such, point A of Paragraph 97 of the NPPF which says that “an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements” is deemed not to have been met.

Whilst summarising the main conclusion of the report (that “We do not believe this test (Para 97a) has been met sufficient for Coventry Stadium to be deemed surplus to requirements) this rather understates other comments and conclusions in the report:

- The Sports Needs Assessment (omitted from the original application and submitted several months later), “falls short in certain areas, and there are inaccuracies.... which do impact on the findings and the narrative of the applicant”
- The sport’s governing bodies had not been consulted as part of the SNA, described as “an omission, and would have painted a different picture in terms of needs and outcomes”
- Regarding the condition of the stadium and claims by the developers that it was dilapidated prior to closure, the report stated “The stadium was evidently fit for purpose... Furthermore, whilst investment would have been required, there is no evidence that this was over and above the level expected of a venue of its age and type, and nothing that would have pre-empted its closure on quality grounds.” They went on to say: “In the context of motorsport stadiums Brandon could reasonably be considered to be a quality venue, with no major investment required which might threaten its operation.” They noted the “special significance” and long-term history of Brandon in terms of staging major events, and stated: “Brandon was unquestionably still a significant motorsport venue up to its demise, and was more than just a local track.
- “The National Planning Policy Framework guidelines have not been met by the developers”.

This revised application clearly still fails to address any of these four points.

Due to the above, the Independent Review suggested that the alternatives set out by the NPPF need to be considered, with the applicant instead recommended to explore point B of Paragraph 97, “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 point C, “the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use”.

A meeting took place between Brandon Estates and the Campaign Group on 12<sup>th</sup> March 2020.

During that meeting, Mr Le Neveu (one of the BE representatives) openly stated the meeting was only taking place to comply with the independent consultant's recommendation.

And regarding the discussion related to Paragraph 97b (a replacement stadium), it was absolutely clear BE would not consider this option, saying "the costs of a new stadium was considered to make such a venture prohibitive as it would impact on their potential profit".

#### **Page 4 National Football Facilities Strategy (2018-2028)**

The Football Association's National Football Facilities Strategy (NFFS) provides a strategic framework that sets out key priorities and targets for the national game (i.e. football) over a ten-year period. It sets out aims and objectives shared with the Premier League, Sport England and the Government which are to be delivered with support of the Football Foundation. The stated vision of the Football Foundation is to "deliver great football facilities, wherever they are needed".

One of the key investment priorities of the NFFS is to deliver 1,000 3G pitch 'equivalents', enhancing the quality of the playing experience and supporting a sustainable approach to grass roots provision. Another investment priority is to deliver 1,000 changing pavilions/clubhouses, linked to multi-pitch or hub sites, supporting growth (particularly in women and girls football), sustainability and providing a facility infrastructure to underpin investment in coaching, officials and football development.

This strategy is laudable but in delivering it, it should not be to the detriment of other sports and this should be recognised in this case.

Installing a 3G pitch on the site of Brandon Stadium, a stadium with almost a century of sporting history and a stadium which an independent consultant, commissioned by Rugby Council, concluded "could not be considered as surplus to requirements", is not appropriate.

#### **Page 4 Rugby Borough Council Playing Pitch Strategy – PPS (2015)**

The Rugby PPS identifies a shortfall of two full-sized 3G pitches in the Borough, based on current demand and via the use of future demand modelling projections. It recommends that one of these should be provided at Rugby Town Junior Football Club (which has since been delivered), whilst the location of other is to be determined.

The application quite rightly points out that the PPS is out of date.

It also states: "the location of the other pitch is to be determined".

Section 2.15 of the Rugby Borough Council Playing Pitch Strategy 2015, discusses the subject of accessibility, and making reference to the pitch at Wolston states:

“The distribution of the pitches means that almost everyone with a car can access a 3G pitch of some size within 20 minutes drive time, although the Wolston Community Leisure Centre site is less easily accessible from urban area of Rugby because of its location”.

This suggests that a pitch situated at Brandon (which is a similar distance from Rugby) would not be considered the location of choice to serve Rugby Borough.

This view is borne out by the fact that The Football Foundation and Birmingham FA identified 9 football clubs that may have an interest in utilising a pitch at Brandon. Only 2 of those were in the Borough of Rugby (Lawford United FC and Binley Woods Junior FC) and though both are in close proximity to Brandon, neither showed any interest in using the proposed pitch.

This was a point raised too, by both the Football Foundation and Birmingham FA who stated “as a starting point they believed that the Brandon area in general may be too rural to attract sufficient demand”. This is discussed further below.

A more detailed analysis of potential users is discussed on subsequent pages.

## Page 6 Conclusion

Given the findings of the Independent Review into the planned development of Coventry stadium, the creation of a 3G pitch is now proposed in order to meet point C of Paragraph 97 of the NPPF. It is believed that the creation of the 3G provision will outweigh the loss of the speedway track in terms of overall site usage and lead to an increase in participation in sport and physical activity. Emphasis is placed on the creation of a full size 3G pitch, rather than a smaller sized alternative due to the added outcomes it can enable an operator to achieve.

As is highlighted elsewhere in this SCS response, Paragraph 97c of the NPPF states:

“The development is **for** alternative sports and recreational provision, the needs for which clearly outweigh the loss”.

The operative word is FOR.

The original application submitted in January 2018 was absolutely clear the development was **for** housing, with no provision what-so-ever for sporting use at all. It failed to meet NPPF guidelines.

In a misguided attempt to get around NPPF guidelines, this revised application adds a 3G football pitch to their proposals FOR housing.

Housing clearly remains the primary purpose of the proposed redevelopment of the site, with a 3G football pitch being ancillary to it.

It goes on to say “It is **believed** that the creation of a 3G football pitch will outweigh the loss of the speedway track... and lead to an increase in participation in sport...”

Planning Policy requires the applicant to provide evidence that their proposals ‘**clearly outweigh** the loss of the current or former use’. They do no such thing

This response to the applicant’s 3G Pitch Feasibility Study will demonstrate that:

- There is no clear evidence of need for a 3G pitch

- The rural location of the proposed pitch brings into question the extent to which it would be utilised
- The business plan for the 3G pitch is fundamentally flawed with a projected marginal profit highly likely to be a significant loss
- No contracts or agreements are in place for an operator or users of the facility.
- That should this application be approved, there would be a detrimental impact on other venues offering similar facilities.
- They are unable to provide any evidence of an increase in participation in sport.

In contrast, with regard to the 'Current or previous use' with the stadium being used for motorsports, there is a very clear ongoing need for the facility as demonstrated by:

- An independent consultant, commissioned by Rugby Council concluding 'the stadium is not surplus to requirements'
- The Governing bodies of motorsports, including (for speedway), the British Speedway Promoters Ltd. (BSP), the Speedway Control Bureau (SCB) the Auto Cycle Union (ACU), the Federation of International Motorcycling (FIM) and (for stock cars) the British Stock Car Association (BriSCA), the Oval Racing Council International (ORCi) and the British Stock Car Drivers Association (BSCDA), all recognise the significance of Brandon as one of the most important and well supported venues both nationally and internationally and all support its return for use as a motorsports stadium.
- The offer to buy the stadium, despite its current vandalised condition, by a very credible businessman, with the intention of reinstating it to its former glory.

### Part 3 Assessment of Need

#### Page 7 The Football Foundation and Birmingham FA

After confirming that the shortfalls identified in the LFFPs for Rugby and Coventry are still reflective of the current 3G need across the local authorities, consultation with the football bodies centred around whether or not they felt that Coventry stadium would be a suitable site for provision. To that end, both noted that they would be ultimately guided by what demand could be identified, but as a starting point they believed that the Brandon area in general may be too rural to attract sufficient demand.

Both the Football Foundation and Birmingham FA stated "***as a starting point they believed that the Brandon area in general may be too rural to attract sufficient demand***", yet the Programme of Use shown in the Business Plan shows anticipated usage throughout the week, catering for a full complement of 38 community teams. This is discussed in more detail on subsequent pages.

As such, Birmingham FA identified nine large clubs in the locality of Coventry stadium (within an approximate 5-mile radius) that may have an interest in utilising a 3G pitch were one to be created at the site. It stated that these clubs should be the focus for evidencing demand; they are:

Alvis Junior FC	Lawford United FC
Binley Woods Junior FC	Mount Nod FC
Chapelfield Colts FC	St Finbarrs FC
Christ the King FC	Whitley Juniors FC
Coventry Copeswood FC	

### **Page 8 Community football clubs**

Of the nine clubs contacted, seven responded to consultation requests. It was explained to the clubs via various communication methods that the project concerned the development of a 3G pitch within the Brandon area (finer details were left undisclosed due to the sensitive nature of the work).

It is highly likely that any football club approached regarding a new 3G pitch will show an interest, but of the 9 clubs approached, 2 didn't respond and 5 basically said they were not interested, with principle reasons being they already had access to suitable pitches, they intended to establish their own 3G pitch and not being prepared to travel to Brandon (supporting the view of the Football Foundation, Birmingham FA and Rugby Playing Pitch Strategy regarding its rural location).

The other very significant factor in this assessment of need by community football clubs is the fact that the approach to these clubs was rather vague regarding the precise location, stating "finer details were left undisclosed due to the sensitive nature of the work".

It is not unreasonable to believe that if the approach had disclosed that the site for the proposed pitch was indeed on Coventry Stadium, the response from any local club which showed an interest may well have been very different on the basis that they would not wish their interest in the facility to be to the detriment of other sports and not want to be a party to the redevelopment of a stadium with such a rich sporting heritage.

So just two of the nine expressed an interest – St Finbarrs and Whitley Juniors.

#### St Finbarrs

St Finbarrs), is 10.2 miles away from Brandon (so not in the approx. 5 mile range stated) and furthermore, their website offers their own 3G pitch out for hire.

On 1<sup>st</sup> August 2021, SCS made contact with the secretary of the club (Suki Burai). The conversation was very revealing.

Ms Burai confirmed they were contacted many months ago via email and asked if they would be interested. She went on to say that whilst they confirmed their interest, nothing had been agreed or signed, they didn't know precisely where it was and they had heard nothing since they confirmed their interest. They have consequently gone elsewhere.

### Whitley Juniors

On 6<sup>th</sup> August 2021, SCS had a conversation with Ms Danielle Bivens, Whitley Juniors Club Secretary. She confirmed the club were approached by the applicant's representatives, initially by email and after confirming their interest, by 'phone.

Ms Bivens said they would be interested because whenever pitches become available, the larger clubs get preference and small clubs like Whitley Juniors get 'pushed aside'.

She said the enquiry was last year, around 10 months ago and like St Finbarrs, they have heard nothing since and assumed it had all fallen through.

**It demonstrates the 'shallowness' of the approach by the applicants – they trawled the area trying to latch onto clubs showing an interest, purely and simply to enable their inclusion on a pitch usage plan and financial projections.**

### **Page 9 Sky Blues in the Community (SBitC)**

SBitC is the official charity arm of Coventry City FC. It was contacted as it has previously reported an interest in managing the proposed pitch at Coventry stadium, meaning this was the focus of the discussion. With it already managing the 3G pitch at Coventry Blue Coat School and the 3G pitch being developed at President Kennedy School, it believes that it is well placed and experienced enough to run the site. Furthermore, it is of the opinion that the site is well placed in that it would then run three sites covering a wide area which are relatively equidistant from each other. This would enable it to service several different communities across the locality, without leaving any significant gaps.

The (misguided) cornerstone of the planning application is the provision of a 3G floodlit football pitch in an attempt to comply with NPPF guidelines Paragraph 97c (we make the argument elsewhere that it does no such thing).

In turn, the application is dependent on a suitable operator being in place to manage the facility. The application suggests that SBitC will be that operator. It infers that SBitC has been involved in the details discussed in the remainder of the 3G Feasibility Study, including the development of the Programme of Use and Financial Projections.

A meeting between Save Coventry Speedway & Stox Campaign Group and David Busst (Head of SBitC Charity) on 26<sup>th</sup> July 2021 revealed this was completely untrue.

The meeting highlighted the fact that discussions between BE and SBitC had been very brief, that despite the inference in the application, Mr Busst had had no involvement at all, and in fact, had not even seen the Programme of Use or Financial Projections prior to it being shown to him by SCS. Nor had anything been agreed or signed.

When asked whether the facility was going to be ‘gifted’ to SBitC by Brandon Estates and thereafter SBitC would be responsible for ongoing management including long term financial responsibility, Mr Busst shrugged his shoulders and said none of that had been discussed.

The planning application does not make clear who would be responsible for the ongoing financial accountability for the proposed facility.

Subsequent to that meeting Mr Busst has sent an email to the Principle Planning Officer at Rugby Council, Erica Buchanan to clarify the position of SBitC. That email is included as [Appendix 8](#).

Interestingly, on 10<sup>th</sup> August 2021, SBitC reproduced that email on social media following a backlash from people who saw the original Letter of Support on Rugby Council website.

SBitC is the charitable arm of Coventry City Football Club. It is understood that Brandon Estates (or their representatives) originally approached the football club itself. The Chief Executive of the club, Dave Boddy made SCS aware of the approach and the response by CCFC, which was that they were not interested in taking on / managing the facility. He went further, by writing a piece in the Coventry City match day magazine and posting it on social media saying:

“Coventry City Football Club are pleased to support the campaign for Coventry Bees Speedway to return to Brandon Stadium”. He went on to make reference to the Bees’ rich sporting heritage, “how wonderful it would be to see the famous Coventry Bees in action at Brandon Stadium” and how “We are fully behind their (Campaign Group’s) efforts”.

A copy of Mr Boddy’s programme notes and social media post are included as [Appendix 9](#)

### **Page 9 Conclusion**

The FA’s model for determining the number of 3G pitches required estimates that 38 teams can be accommodated on one full size pitch for training purposes. Therefore, it can also be considered that around 38 teams need to be willing to access a 3G pitch for regular training activity to justify development and to ensure financial sustainability, unless such usage is replaced by other forms of use or demand.

With both St Finbarr’s FC and Whitley Juniors FC willing to relocate all training demand to Brandon, subject to affordability, there are already known to be at least 25 teams interested in accessing the provision. Furthermore, teams from Coventry Sky Blues FC will utilise the pitch, as could some teams from Chapelfield Colts FC, Lawford United FC and Mount Nod FC. When considering that it is also likely that there are smaller clubs in the area looking for a more suitable training venue, such as single team Sunday League clubs that were not contacted as part of this study, attracting at least 38 teams is considered to be achievable. This is especially the case when factoring in increased demand that could be generated by some clubs resulting from the development and the associated increased pitch access.

In trying to demonstrate that 38 teams would use the facility, it firstly assumes St Finbarrs and Whitley Juniors would provide 25 of those. This is by no means certain as they were not made aware

of the fact that the pitch would be on the site of Brandon Stadium and having heard nothing from the developers in 10 months or so, they have been looking elsewhere.

They then go on to say teams from “Coventry Sky Blues FC **will** utilise the pitch, **as could** some teams from Chapelfield Colts, Lawford United and Mount Nod”.

Yet they have already stated that Chapelfield, Lawford and Mount Nod “have relatively good access to provision elsewhere”.

### **Impact on other venues**

If St Finbarrs and Whitley Juniors were to locate all training demand to Brandon (and that is by no means certain given they have not been made aware the pitch is proposed on the site of Coventry Stadium), consideration should be made on the impact that would have on the club(s) they currently utilise for training. It would result in a significant loss of income for those clubs.

#### Wolston Leisure and Community Centre.

The nearest 3G pitch to Coventry Stadium is at Wolston Leisure and Community Centre, just 1.8 miles from the stadium. Whilst this is not a full sized pitch, it offers excellent facilities with a floodlit pitch, gymnasium and sports hall as well as 3 full sized grass pitches, 2 junior pitches and 1 mini sized grass pitch. It was established as a charitable trust.

The planning application for housing at Brandon, which includes a proposed full sized pitch at Brandon would be divided into four smaller pitches for the vast majority of the time, meaning Wolston in fact offers a similar provision.

Wolston 3G pitch is predominantly used during weekday evenings between 6.00pm and 9.00pm with little demand for slots prior to 6.00pm. A 9.00pm curfew is in place because of the close proximity to nearby houses.

Save Coventry Speedway & Stox Campaign Group met with Lisa Jones, manager of the Wolston facility on 29<sup>th</sup> July 2021.

She was unaware of the planning application and proposal to include a 3G pitch at Brandon and was extremely concerned at the impact such a provision might have on the Wolston Centre.

One of the 9 clubs targeted by Brandon Estates was Binley Woods Juniors. They currently use Wolston for their training sessions. As stated above, they showed no interest in using Brandon, much to her relief.

Hire of the 3G pitch is the second highest generator of funds for the centre. Research by SCS into their accounts shows that in 7 of the last 10 years, the centre has made losses and the net losses over that 10 year period is £32,718. The accounts are shown in Appendix 10.

It demonstrates the fragility of their financial position and if they were to lose business to the newly proposed pitch, it would threaten the future of the community facility, including the full time jobs of three people.

Ms Jones made contact with the 10 trustees of the charity and on 10<sup>th</sup> August 2021, sent a letter on behalf of the trustees, expressing their concern and formally objecting to the planning application ([Appendix 11](#))

#### **Page 10 Conclusion (continued)**

With regards to a clubhouse, evidence does not point towards anything more than a basic facility being needed. Two changing rooms and an officials changing area are required to enable the 3G pitch to be used for competitive matches at all levels (some leagues do not allow play without such provision), but any additional changing rooms would rarely be used given that there is only one pitch and given that younger aged teams generally do not want or need access (other than for toilets).

It is noted that whilst the planning application shows the layout of the proposed clubhouse (Page 13) to include not only changing rooms and toilets but a reception area, a kitchen and a main hall, it states (Section 4.12 of the Planning Statement):

Permission is also sought for the provision of an artificial turf 3G sports pitch, the erection of a pavilion, and the formation of a car park. Whilst details of the layout of the pitch, pavilion and car park have been included for consideration, the applicant is seeking to reserve the remaining details for consideration at a later date. This is to ensure that any prospective operator has opportunity to input into the design and scope of the facility ultimately delivered.

This suggests that whilst the planning application portrays an extensive pavilion and includes a 'Flexible community space which can be utilised by a variety of different community and interest groups', it is intended to portray a grand facility which if the application were to be approved, could very likely to be as basic as changing rooms and toilets.

The reference to 'any prospective operator' having an opportunity to influence the design, also confirms that no agreement is in place with SBitC to be that operator.

#### **Part 5: Business Plan**

##### **Page 14**

With it being considered that a full size 3G pitch is warranted at the site, this section details a revenue business plan to firstly ensure that the proposal is financially viable and also to showcase how such viability can be achieved. The plan has been developed based on known running costs from other similar 3G pitches throughout the country and via projects that KKP has delivered in partnership with the Football Foundation. It takes into account assumed staffing costs on the assumption that SBitC operates the facility.

It is **not** considered that a full size 3G football pitch is warranted at the site. In earlier sections of this response, reference has been made to both the Football Foundation and Birmingham FA stating they “believed that the Brandon area in general may be too rural to attract sufficient demand”.

In addition, the Rugby Council Playing Pitch Strategy states “Wolston Community Leisure Centre site is less easily accessible from urban area of Rugby because of its location”. As Brandon is just 1.8 miles from the Wolston Centre, it is reasonable to assume the comment would apply to a pitch at Brandon too.

## Page 14 Programme

The following programme of use is anticipated for the pitch:

Day	Time													
	9-10	10-11	11-12	12-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	
<b>Monday</b>	Predominantly closed, but with some SBitC delivered sessions (e.g. walking football, etc)							SBitC Wildcats	SBitC PDC	5-a-side leagues/block bookings				
<b>Tuesday</b>	Predominantly closed, but with some SBitC delivered sessions (e.g. walking football, etc)							SBitC PDC		Community club training				
<b>Wednesday</b>	Predominantly closed, but with some SBitC delivered sessions (e.g. walking football, etc)							SBitC Wildcats	SBitC PDC	Community club training				
<b>Thursday</b>	Predominantly closed, but with some SBitC delivered sessions (e.g. walking football, etc)							SBitC PDC		Community club training				
<b>Friday</b>	Predominantly closed, but with some SBitC delivered sessions (e.g. walking football, etc)							SBitC Wildcats	5-a-side leagues/block bookings		SBitC Youth engagement			
<b>Saturday</b>	Mini soccer and community club fixtures					Adult club fixtures								
<b>Sunday</b>	Mini soccer and community club fixtures								5-a-side leagues/block bookings					

The following observations are made regarding the proposed Programme of Use:

- As previously stated, despite the inference in the planning application, SBitC have had no input to this. It is remarkable therefore that potential activities for SBitC appear to play such a fundamental part of the Programme of use and Financial Projections.
- Though the proposed pitch is full sized, for 95% of the time it is divided into four, for training sessions, 5-a-side games, junior games, Wildcats and Community Club Training etc. The only time period where it would be used as a full size pitch is Saturday afternoons for 3 hours.
- Analysis shows that within a 10 miles radius of Brandon, there are 69 artificial pitches (see [Appendices 12 & 13](#)), all of which are floodlit, have adequate parking facilities, changing rooms and are available to hire.
- The nearest 3G pitch is at Wolston Leisure and Community Centre (WLCC) just 1.8 miles away from Brandon. Whilst not a full sized pitch, it offers similar opportunities for 5-a-side, junior games and community club training etc. A meeting between SCS and WLCC manager Lisa Jones on 29<sup>th</sup> July 2021 revealed that whilst for the time period from 6.00pm – 9.00pm was well utilised it is rarely used between 4.00pm – 6.00pm.
- Page 26 (Para 2.45) of the Rugby Playing Pitch Strategy refers to the FA utilisation model (which is the model used in this business plan). It supports the experience of WLCC, saying,

“over the course of a week certain slots such as 5-6 pm and 9-10 pm, and Fridays all evening are difficult to fill”

- Usage up until 10.00pm at night for 4 evenings a week is not compatible with countryside or Green Belt settings or when in close proximity to housing as is proposed. A 9.00pm curfew is likely to be imposed similar to that at Wolston.
- Further analysis of just two other pitches (as examples) shows there to be very many vacant slots. When SCS went on their pitch booking site on 27<sup>th</sup> July, it showed numerous vacant slots for the following 5 days. ([Appendix 14](#)). Looking further forward to September ([Appendix 15](#)), when the football season has begun, it still shows countless vacant slots available for hire.
- A similar analysis was carried out for Warwick University Westwood and Cryfield full sized pitches both of which also showed countless available slots for hire ([Appendices 16 & 17](#))

### Pages 15 – 17 Financial Projections

Pitch certification - FA requirement - £1,500 every 3 years	500	510	520	531	54
<b>Total</b>	<b>29,100</b>	<b>29,682</b>	<b>30,276</b>	<b>30,881</b>	<b>31,499</b>
<b>Pavilion</b>					
Equipment - new	500	510	520	531	541
First aid equipment	200	204	208	212	216
Clothing and uniforms	200	204	208	212	216
Utilities	2000	2,040	2,081	2,122	2,165
Cleaning	1000	1,020	1,040	1,061	1,082
Printing and stationery	500	510	520	531	541
Telephones	500	510	520	531	541
<b>Total</b>	<b>4,900</b>	<b>4,998</b>	<b>5,098</b>	<b>5,200</b>	<b>5,304</b>
<b>TOTAL EXPENDITURE</b>	<b>53,625</b>	<b>54,698</b>	<b>55,791</b>	<b>56,907</b>	<b>58,045</b>
<b>SURPLUS/(DEFICIT)</b>	<b>10,276</b>	<b>25,179</b>	<b>25,682</b>	<b>26,196</b>	<b>26,720</b>
3G carpet - sinking fund	-20,000	-20,000	-20,000	-20,000	-20,000
<b>NET SURPLUS DEFICIT</b>	<b>-9,724</b>	<b>5,179</b>	<b>5,682</b>	<b>6,196</b>	<b>6,720</b>

The table above shows just a section of the financial projections covered on Pages 15 – 17 of the 3G Pitch Feasibility Study.

The Financial Projections are unrealistic:

- They are based on income generated by an unrealistic Pitch Usage model for reasons outlined above
- Their assumption of 90% occupancy for 40 weeks of the year is unrealistic as during summer months when it is daylight until 9.30pm, teams train on grass pitches to avoid the cost of pitch hire.
- Staffing costs are insufficient. Just 30 hours per week for an attendant when the proposals suggest usage for up to 13 hours per day. It also makes no provision for the ‘pavilion’ / changing rooms cleaning and administration.
- The sink fund for carpet replacement is shown as just £20k per year. Other business models for similar facilities, including the President Kennedy School pitch, allocate £30k.

## Part 6: Conclusion

Page 17

“It is projected that the facility will generally generate a surplus of income to ensure long-term viability, providing that it is established as set out in this report”.

It states it will “**generally** generate a surplus of income.....**provided** it is established as set out in this report”.

It seems the author is not really convinced, with good reason:

The Programme of Use put forward by BE is unrealistic - despite SBitC having had no input into the Business Plan, despite the FA model stating certain slots are difficult to fill, despite many other pitches including Wolston just a short distance away not being fully utilised and despite the probability of a curfew being imposed, the programme put forward by the developers has completely ignored all these issues.

The 5 year financial forecast indicates after making a loss in year 1, the following four years the venture would turn a profit. The average income over that 5 year period is <£80k per year and the average profit circa £2.8k per year.

It is far more likely, based on a realistic pitch usage and revised revenue model, the facility would generate a significant loss but that would be of little concern to BE as the inclusion of the proposed 3G pitch is nothing more than a misguided attempt to get around planning policy.

Furthermore, there is no reference at all to capital costs.

The proposed 3G pitch at President Kennedy School is costing £750k (for the pitch, perimeter fencing, lighting and store for pitch cleaning machinery).

Page 28 of the Rugby Playing Pitch Strategy suggest the cost of a pitch is £965k (at 2015 prices).

Given that these prices do not include provision of changing rooms or a ‘pavilion’ as is proposed for Brandon, the cost of the Brandon facility must therefore exceed £1m.

It is not clear whether Brandon Estates are proposing to ‘gift’ the facility to an operator (whether SBitC or anyone else).

What is clear however that given the financial projections in their revenue model – even if realistic - annual profit is <£3k per year

So it is evident, there will **never** be a return on the investment.

“Sport England could still object to the development if it does not consider the proposal to be sufficient mitigation for the loss of the speedway track, as per NPPF point C” and “support is not guaranteed from either the FA or the Football Foundation given that the project was not identified as part of the LFFP process”.

With reference to the LFFP it says:

“Sustainability may be somewhat impacted upon if the pitches that are in the LFFP are delivered over its ten-year lifespan”

These two statements appear to indicate that consultants KKP, themselves believe the case for the creation of a 3G pitch in an urban setting, on the site of a venue with a rich sporting history, which is not identified in the LFFP, is weak.

“A final factor to consider is that it is not unusual for clubs to say that they will use a pitch for the purposes of a study like this only for them not to access it when it is established. As such, to limit this possibility, it is imperative that the relevant clubs are kept informed of the project as it develops and made to feel like important partners”.

**The applicant has done the exact opposite of this – having latched onto two clubs who showed an interest, enabling them to be referenced in this application, included in a pitch usage chart and financial projections, they have been dropped like a stone. They have been shamelessly ‘used’ by unscrupulous developers, interested in one thing only – making many millions of pounds from housing.**

#### **Impact on other venues**

If this application were to be approved and a 3G pitch installed, there would be a detrimental impact on other clubs offering similar facilities.

As referred to above, on 29<sup>th</sup> July, SCS met with the manager of the Wolston Leisure and Community Centre, Lisa Jones to try and establish what the utilisation of their 3G pitch was. Whilst is not full sized, as previously stated, the proposed full sized pitch at Brandon would be divided into four smaller pitches for the vast majority of the time, meaning Wolston in fact offers a similar provision.

Users of the facility include local club Binley Woods Juniors who were targeted by the developers as a potential user of the proposed facility. Much to Ms Jones’ relief, they were not interested.

Wolston is highlighted as one existing club which would suffer if the proposed pitch was installed and there is no doubt that other clubs would similarly be impacted.

## SAVE COVENTRY SPEEDWAY & STOX CAMPAIGN GROUP

### COMMENTS ON: COVENTRY STADIUM SPEEDWAY VIABILITY APPRAISAL BY KKP DATED DECEMBER 2020

In both the original application and this revised application, the applicant has failed to provide a shred of evidence which relates to the viability of Coventry Stadium.

It therefore resorts to a review of Speedway racing as a whole in an attempt to arrive at a conclusion that Coventry Stadium is not viable.

This poorly researched appraisal, littered with embarrassing errors and untruths, is flawed in almost every respect as will be demonstrated. It demonstrates a poor understanding of the sport and is biased to arrive at a pre-determined conclusion.

It should be noted too, that the title of this document is incorrect. Coventry Stadium was both a speedway and a stock car stadium. The viability of speedway depended on stock car racing, and essentially vice versa. The two sports complemented each other. Therefore, any viability appraisal should take into account both sports as being equally fundamental to the operation of the site. Stock car racing is treated in this document as little more than an afterthought.

#### PART 1: INTRODUCTION

**Page 1** Plans are in place for development of 137 dwellings at the site in place of the existing speedway provision, which is no longer operational.

This paragraph misses out the words “and stock car racing,” and fails to state the reason that it is no longer operational: because the applicants closed the stadium.

**Page 1** An independent review into the loss of the track was undertaken in September 2019. This concluded that the track could not, at this point, be deemed to be surplus to requirements.

This is a conclusion which remains the case to this day. There is no evidence, either from within the sports of speedway and stock car racing, or from within the planning application itself, that the stadium (not the track) is surplus to requirements.

**Page 1** This report considers the viability of re-developing or replacing the speedway track to provide appropriate mitigation, either on-site or off-site, and assesses whether or not this is a practical solution. It is being conducted concurrently with a feasibility study that is evaluating the potential to install a full size third generation artificial grass pitch (3G pitch) and associated facilities onto the site. Both are being conducted to gauge which, if either, would be the best, most realistic and viable option in terms of mitigation.

Once again, this report has been written in order to comply with a pre-determined conclusion. KKP's clients wish for the speedway and stock car stadium to be replaced by a 3G pitch. Were they not to reach this conclusion, the report would not be submitted. Therefore, it is inevitable that the content over the pages which follow will contain factual inaccuracies and untruths as they attempt to build the case required, rather than the conclusions which would be derived from a truly independent report, such as the one commissioned by Rugby Council in 2018/19.

**Page 2** To inform the above, the process has incorporated consultation with operators of other speedway facilities across England. This has been done in order to ensure that the study is informed by a sound understanding of the factors required to make provision sustainable in the long-term. A focus has been placed on aspects such as facility and operational needs, existing business models, current demand and likely future trends. It has included discussion with:

- CEO - Gaming International (owner of Swindon and Poole speedway stadiums)
- Owner – Swindon Robins Speedway
- Former Chairman – British Speedway Promoters Association (BSPA)
- Co-ordinator - Speedway Control Board (SCB)

This section is remarkable. Several ‘positions’ held by individuals are quoted here as having had discussions with KKP – yet none of these individuals are actually named, and none of the ‘findings’ which follow are attributed to any of those individuals.

SCS have been in touch with several of the named parties:

**The owner of Swindon Robins Speedway**, Terry Russell, has confirmed he has not spoken in any official capacity over Coventry Speedway, and indeed has also stated his opinion that both Coventry Speedway and Swindon Speedway are two of the best-supported clubs in the sport and can operate successfully notwithstanding the current economic challenges.

Mr Russell has had conversations with Mr Clark Osborne of **Gaming International** due to GI’s ownership of Swindon and Poole Stadiums, with the Swindon site due to be refurbished for continued speedway and greyhound use.

Mr Osborne had a previous involvement with speedway at Bristol, which operated briefly in the late-1970s, and therefore he cannot be seriously recognised as a current authority on the state of the sport, even if KKP have indeed spoken to him.

The “**former Chairman – BSPA**” has not been named, so initially we would ask why, if KKP require accurate, up-to-date information, would they not speak to the current Chairman of BSP Ltd, Rob Godfrey?

We have also established that of previous Chairmen dating back over a decade, neither Keith Chapman (2017-19) or Alex Harkess (2011-16) have been contacted, or indeed Chris Van Straaten who has held senior roles throughout the majority of the last two decades – which raises very severe questions over the accuracy or relevance of any information provided, as well as the motives of the writers for either establishing the truth or making it seem as though they have contacted the authorities which as noted as an omission in the WYG report.

We have spoken to the **SCB co-ordinator**, Neil Vatcher, who has confirmed he has not been in touch with KKP. So why has his role been listed here? The true position of the SCB, and other current-day speedway authorities, will doubtless be expressed in their own consultation responses.

The paragraph appears to simply be a ‘name-dropping’ exercise in order to somehow add credence to the ‘evidence’ which follows. Unfortunately, as we will demonstrate, much of it is as worthless and inaccurate as the original Viability document.

This revised application, prepared by consultants KKP is no better than the discredited original Viability Report prepared by Turley. Large sections have been copied and pasted from that report and indeed other planning applications on speedway stadiums, and they repeat many basic errors. It also introduces new ‘errors and untruths’ as will be demonstrate.

## PART 2: STRATEGIC CONTEXT

The National Planning Policy Framework Paragraph 97 has been dealt with in previous sections of our response so we will not comment on that.

### Rugby Borough Council Local Plan (2011 – 2031)

**Page 3** Policy HS4 of Rugby's Local Plan aligns to Paragraph 97 of the NPPF, stating that no existing open space, sports and recreational buildings and land should be built on unless one of the three exceptions are met.

This reference to Policy HS4 does not fully reflect the content of the Local Plan, with the Inspector stating at the time of a site visit that "additional protection should be given to the Brandon Stadium site."

Attention is drawn to the following wording in HS4, as issued in May 2019:

*"However, the absence of a policy to safeguard existing sports and recreational buildings generally in the borough from being built on unless surplus to requirements or replaced elsewhere, in line with paragraph 74 of the NPPF, does render the Plan unsound."*

Revised wording therefore includes:

Public open space, **sports and recreational buildings and land, including playing fields** (*REMOVED: assets identified*) within the Open Space Audit evidence and/or defined on the (*REMOVED:Proposals*) **Policies** Map **and/or last in sporting or recreational use** (*REMOVED: will be protected from development*) **should not be built upon** unless:

- An assessment has been undertaken which has clearly shown the open space, building or land to be surplus to requirements; or
- it can be demonstrated that 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 sports and recreational provision, the needs for which clearly outweigh the loss.

It will be shown throughout our response to the planning application that the "need" for a 3G pitch cannot in any way be seen to "clearly outweigh" the loss of the motorsports venue. It has already been proved via the WYG report that the stadium was not, and is not, surplus to requirements, and the applicants have made no provision for the re-location of the sports elsewhere.

### Coventry Stadium – Independent Review

**Page 4** The Planning Inspector commented that the Council needed to start from the basis of safeguarding provision in line with the general policy for sport and recreation buildings and to assess the application in the context of the NPPF.

He also made specific reference (rather than a generalisation) to Brandon Stadium, having made a site visit, understanding that it had until recently been in use for speedway and stock car racing, and that it had been fit for purpose at the time.

**Page 4** Due to the above, the report suggests that the alternatives set out by the NPPF need to be considered, with the applicant instead being recommended to explore point B of Paragraph 97, “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 point C, “the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

The ‘recommendation’ here is in a very short section at the end of the report, and regarding point C in particular, it merely repeats the requirements of NPPF regarding section 97C and states that the applicant would need to put forward clear plans showing how they would meet these requirements. The brevity of this section would suggest that WYG themselves do not believe this would be an appropriate step, and indeed it is clear that in the resulting application, the applicants have singularly failed to provide an offering which will “deliver significant sport and physical activity benefits to outweigh the potential loss of the stadium.”

It was quite clear from the meeting held between SCS and the applicants in March 2020 that there was no interest whatsoever on the part of the applicants to explore the 97b route as “It would impact on our profit”.

**Page 4** Further the above, the wyg study highlights that the question of viability of speedway operation at Coventry stadium is a difficult to interrogate and respond to.

The fact that speedway ran successfully at Coventry Stadium for nearly 90 years, and stock car racing for over 60, would strongly suggest that operations at the venue were viable – otherwise, why would operators continue to utilise the site for sporting use? They did not leave because it was unviable, they left because they were forced out. Evidence has already been provided from the former stadium owners confirming the reason for the sale and from his accountant, that the stadium made profit every year when running speedway and stock car racing.

#### **Governance of Speedway and other activities.**

The heading ‘Governance of Speedway and other activities’ demonstrates again the aversion to mentioning Stock Car racing, when it was fundamental to the operation of the site. The fact that speedway is the only sport recognised by Sport England that might use the venue does not mean Stock Car racing should simply be ignored, as this sport has its own extensive following and was therefore a vital contributor towards the viability of the site.

The author lists the governing bodies of the sports, providing a brief explanation of their roles:

- The Auto Cycle Union (ACU)
- Federation Internationale de L’Automobile (FIA)
- British Speedway Promoters Association (BSPA)
- Speedway Control Burea (SCB)
- British Stock Car Association (BriSCA)

The list is incorrect.

The FIA have no involvement in speedway. The governing body for global motorcycle racing including the Speedway Grand Prix and Speedway of Nations is the Federation Internationale de Motocyclisme (FIM).

Likewise, references to the BSPA are inaccurate as this was replaced by the limited company British Speedway Promoters Ltd, incorporated in February 2019.

It is also inaccurate to state that the BSPA/BSP is responsible for the management of the GB Speedway Team as, since 2018, this has been outsourced to a separate company (Rob Painter/VRX Motorsport) on a long-term deal.

The list also omits the Oval Racing Council International (ORCI)

Reference to the Greyhound Board of Great Britain (GBGB) are, as explained in the initial submission, irrelevant. Greyhound racing did take place at Brandon briefly, at various stages, but it was never fundamental to the business of the stadium, and would not be part of any bid to return the site to motorsport.

We make these points simply because they underline the lack of depth, research and knowledge which has gone into the information that follows.

However, it is also pertinent to note that the independent report from WYG criticised the applicant for not consulting the governing body of the sports – yet KKP, despite listing all of them, similarly failed to consult any of them.

## Summary

**Page 6** Given the findings of the Independent Review into the development of Coventry stadium, it is clear that some form of mitigation is required to enable the housing proposal to go ahead on the basis that the existing provision has not been deemed to be surplus to requirements.

This is a key sentence because it offers confirmation, in planning documentation, that “***the existing provision has not been deemed to be surplus to requirements.***” This being the case, what possible justification is there for its closure and replacement? There would still be a requirement for the existing provision, whether at this site or somewhere else in the locality.

“***Some form of mitigation***” by way of a totally different sporting offering is a solution underlines the desperate nature of this backdoor attempt to justify the eviction of two sports with large, established followings, which ran successfully at the stadium.

## PART 3: HISTORY OF COVENTRY STADIUM

**Page 7** As part of this, Coventry stadium has traditionally hosted a variety of motorsports, with speedway and banger/stock car (including BriSCA F1) racing being the primary formats.

The primary formats were Speedway and Formula 1 stock car racing. A whole host of other four wheeled formats, *including* Banger racing ran as ‘support’ events either on the same programme as F1 meetings, or in their own right under the promotion of Startrax.

**Page 7** The Coventry Bees and its promotional rights were subsequently acquired by local businessman Michael Horton in September 2011.

As was pointed out and corrected in the 2018 response, Michael (Mick) Horton is not a local businessman. He runs a printing company approximately 70 miles away in Peterborough.

**Page 7** lists the achievements of the Coventry Bees speedway team in terms of trophies and titles. It does not, however, make any mention of the extensive series of World and British Championship events which took place at the stadium, with Brandon for many years considered to be the best speedway venue in the country.

It fails to mention that throughout its history, Brandon staged most of the big meetings on both the speedway and stock car calendars. If we just look at speedway meetings staged there since the turn of the Millennium, Brandon hosted:

- The FIM World Speedway Championship British Grand Prix
- The FIM World Speedway Under-21 Final
- The FIM Speedway World Cup
- The FIM Speedway Grand Prix Challenge
- The British Speedway Final
- The Elite League Riders' Speedway Championship
- The British Speedway Under-21 and Under-19 Finals

**Page 8** For the majority of the Club's history, it has operated with one adult team, although this was complemented by the addition of Coventry Storm from 2014 onwards. Coventry Storm acted as a feeder team for Coventry Bees and competed in the National Development League.

This is incorrect, as Coventry Storm were in fact formed for the 2013 season, not 2014 as stated.

### TABLE 3.1

This table appears to be making the case that the health of the sport of speedway can directly be determined by the number of fixtures which operate at a venue.

But the data is flawed and incorrect for two key reasons.

Firstly, the number of meetings staged during a season is directly related to the number of clubs competing in the league... but it does not necessarily follow that the fewer the number of clubs in the league, the fewer the number of fixtures.

This is because, were there to be eight teams competing in the league, the format would be for clubs to race two home and two away fixtures against each opponent, giving a total of 14 home fixtures. However, were there to be 12 teams, it is likely that only one home, one away would take place, meaning 11 home fixtures.

Moreover, the total number of fixtures is most dependent upon the success or otherwise of the team. If the team finishes in the top four of the league and makes the play-offs, and if it makes progress in the various Cup competitions, that automatically means more fixtures. Should the team endure a poor season, they will contest a minimum number of fixtures.

The major flaw in the data, however, is that despite looking at the Save Coventry Speedway website for information on fixtures dating back to 2000, the authors have made the rather embarrassing error of including every meeting which was postponed due to bad weather (or for any other reason) and re-staged at a later date. This varies from year to year depending on the weather

All of those dates appear in the fixture list, with P-P against those which were postponed, but of course those meetings did not actually take place.

This figure naturally varies from year to year, as in some years a club can be fortunate with the weather and experience only two or three postponements; but in other years it can be as many as 8-10.

Ironically, this of course means the authors have actually over-estimated the number of speedway meetings which took place over the period - but attempting to explain any trend in favour of their argument is impossible.

To highlight the failings, we can look at the 2000 figure of 33 fixtures, and the 2013 figure of 19 fixtures, which have been used by the applicant to suggest a decline.

#### 2000

- They have mistakenly counted 4 meetings which were postponed due to poor weather. These were rearranged and staged at a later, meaning they have double counted them.
- The team were very successful that year in two cup competitions reaching the semi-final and final of both the Knock Out Cup and Craven Shield resulting in 4 additional home meetings.
- In addition, Brandon staged a Testimonial meeting (for a long serving rider), the British Championship Final, the Midland Trophy, the FIM World Championship British Grand Prix, the FIM World Team Cup and the Elite League Riders Championship.

#### 2013

- In contrast to 2000, the team had a poor season, finishing bottom of the league meaning they did not have the additional play-off fixtures.
- In that year, the club only staged two additional fixture, the Brandonapolis and the British U19 Final.
- The applicant once again makes another embarrassing mistake by not including the Coventry Storm meetings

The chart and in particular the contrast between the 'high' number of fixtures in 2000 and the 'low' number in 2013 was included in an attempt to demonstrate a decline in the sport.

It does nothing of the sort.

**It demonstrates a complete lack of understanding of the sport, highlights embarrassing errors and renders their desk top analysis as fundamentally flawed.**

**Page 8** Following closure of Coventry stadium, Coventry Bees entered into a groundshare agreement with Leicester Lions at Beaumont Park Stadium. However, due to capacity issues, it was not allowed to participate in the Premiership due to being unable to satisfy the BSPA that it could fulfil all its fixtures.

It is unclear what is meant by "capacity issues." The club were removed from the Premiership a month before the start of the season because firstly, the groundshare was only agreed for, at most, the first half of the 'home' match schedule, and secondly because there were very real concerns that the club would be unable to see out the season financially, given that attendances would be expected to suffer an alarming dip as any sports club carrying the name of a town or city needs to be competing in that area.

However, the statement **correctly** contradicts statements made elsewhere in the application and specifically in the Planning Statement that “Coventry Stadium closed after Coventry Bees relocated to Leicester and Stock Cars to Stoke”.

It was closed by the owners, forcing Coventry Bees to find another track on which to race and forcing Coventry Racing Club (Stock Cars) to hire other stadiums for their events.

**Page 8** In 2018, the Club reformed to compete in the National League, with fixtures again being scheduled at Beaumont Park Stadium. This, however, lasted just one season as Leicester’s promotion then decided to run its own National League team at Coventry Bees’ expense.

The National League project did not cease due to the Leicester promotion deciding to run its own NL team – although it would undeniably have been an obstacle to future entry.

The fact is that Coventry had already withdrawn at the end of the 2018 season, having failed to complete their fixtures, due to the total folly of asking supporters accustomed to watching International stars racing in their own stadium, to travel 30 miles to an inferior (although perfectly fit for purpose) venue to watch Development league racing.

This is not a fact unique to speedway. We have previously pointed out the effect on attendances when Coventry City FC entered into a groundshare with Northampton Town FC, and this was for an identical product to that which would have appeared at the Ricoh Arena. Even when playing at Birmingham City FC in 2019/20 (pre-pandemic), attendances were around 50% of what would be expected in Coventry, despite the better team performance at that stage. We again make the point: a team needs to be competing in the area in which it takes its name, and the attempted relocation of Coventry Bees was always going to be a complete failure.

**Page 8** As such, Coventry Bees has not participated since and is now considered homeless (if not defunct).

This, however, would not prevent an alternative promotion from taking the rights to the club and building a competitive team should they be able to race at a venue in Coventry once again.

### **Coventry Stox (BriSCA racing)**

**Page 9** BriSCA F1 racing began at Coventry stadium in 1958 and ran on the first Saturday of every month from April until November before ending with closure in 2016.

In listing the major events staged at the stadium since stock cars were first introduced to the stadium in 1954, they rather undermine their own case – Brandon was unrivalled as the major venue for all of the sport’s premier competitions.

The statement, just like the analysis of speedway fixtures, highlights further embarrassing mistakes by the applicant. They state stock car racing began at Brandon in 1958 – it was actually 1954.

In their original application they omitted to mention the World Stock Car Championship was staged at Brandon in 2016. Despite this being pointed out in the SCS response, they repeat that same error again.

For clarity, the World Stock Car Championship was staged at Brandon on 22 occasions. This includes 2016 with more than 11,000 people from all over the country, and beyond, attending.

**Page 9** There is limited data available on the number of stock car events held at the Stadium prior to 2010.

The data is freely available, but clearly the applicant has failed to research it properly.

**Page 9** In that year, 19 events were staged, whilst only nine were held in 2016, suggesting a significant reduction over the time period.

The statement, just like the analysis of speedway fixtures, highlights further embarrassing mistakes by the applicant. They state stock car racing began at Brandon in 1958 – it was actually 1954.

They go on to incorrectly state 19 stock car events were staged in 2010 and only 9 in 2016 suggesting this reflects a decline in the sport.

The figure of 19 includes not only F1 stock car events but all other various formats promoted by Startrax (F2, Mini Stox, Junior Stox, Classic Stox, Bangers etc)

The figure of 9 quoted for 2016 is F1 meetings only – they omit to include the 7 Startrax events (staged on 12 March, 23 April, 28 May, 18 June, 16 July, 20 August, 22 October)

The full data would be available by contacting stock car historians, but clearly it is deemed acceptable practice here to 'guess', turn that guess into a conclusion, and get it horribly wrong.

### **Greyhound Racing**

The circumstances surrounding greyhound racing at the stadium have already been explained on numerous occasions, and it is wrong for this viability assessment to make any mention of this sport as it was never a fundamental part of stadium operations.

### **PART 4: NATIONAL TRENDS**

**Page 10** The primary purpose has been to analyse the information that is known and to use this wherever possible, to make realistic, appropriate but caveated statements and assumptions.

As we show throughout this response, much of the information presented is based on false or misleading data, leading to unrealistic, inappropriate statements and assumptions which vary wildly from the truth.

**Page 10** Some national trends were presented as part of the consultation for the redevelopment of Essex Arena in Thurrock (application reference 18/01671/FUL).

This application itself is not yet determined and is being strongly contested, and it is totally unacceptable and unethical for the authors to simply copy and paste statements from that application and pass them off as the established national position.

Furthermore, the Needs Assessment for Arena Essex, was produced by author Neil Allen of WYG consultants and commissioned and paid for by the developers.

Mr Allen also conducted a review of the Coventry application. That review was commissioned and paid for by Rugby Council – that is, it was an independent review. It came up with very different conclusions.

Having made these points and questioning the validity of much of this section, there are a number of points which cannot go unchallenged.

**Page 10** Motorsports participation including speedway, go karting and moto-cross has been in decline nationally and in 2016 adult participation had fallen to 0.06% of the population participating at least once a week; this is a reduction from 0.10% of the population in 2008.

‘Motorsports’ is wide-ranging and as the authors say, ‘includes’ speedway. It cannot be assumed that the decline is necessarily true of speedway. And even if that decline is true, there is a case for halting the decline and supporting motorsports to ensure Great Britain develops World Champions of the future, such as Lewis Hamilton and Tai Woffinden (World Speedway Champion 2013 / 2015 / 2018)

**Page 10** Speedway has been in historic decline as a spectator sport. This is exemplified by the fact that television audiences have declined by 77% over a 10-year period.

The analysis of TV figures (copied and pasted from the Arena-Essex report) is false and misleading, as shown below. Additionally, documents have been provided to Sport England by British Speedway Promoters’ Ltd regarding these figures.

The following points are worthy of note:

The author has been disingenuous in selecting the range between 2008 and 2017 simply because they show the peak (2008) and the low (2017) to come to a conclusion which supports the predetermined outcome required by their paymasters (Table 4.1 is shown on Page 11).

The explanation for the ‘low’ year is because a new deal was struck with BT Sport to screen speedway, replacing Sky Sports. Sky have 23m subscribers, BT Sport just 2m.

A similar example can be drawn with football when in 2016, the Champions League competition switched to BT Sport, with UEFA “Concerned by BT’s dismal Champions League viewing figures... attracting a peak audience of less than 200,000, compared to a peak of 4.4million the previous year”.

It was clearly not in the author’s interests to update the figures to include the new deal with Eurosport which began in 2021 (delayed from 2020 due to the pandemic). With the sport now being shown on a much wider platform, viewing figures have increased three-fold when compared to figures for BT Sport. This three-fold increase excludes viewers who watch the free-to-air highlights on Quest.

Appendix 18 shows a true reflection of TV audience figures for a period going back to 2000 and updated to present day, as opposed to the selective years presented by the applicant. Current viewing figures, rather than showing a decline, are the highest in more than a decade.

**Page 10** The sport has struggled to adapt to attract new participants and spectators while others have successfully drawn in new audiences.

On the contrary, the level of new participants is most encouraging due to the flourishing British Youth programme and associated training schemes.

There is also encouraging feedback from several tracks following the post-pandemic re-opening. Many have been able to take advantage of the fact that speedway was one of the first clubs which was able to re-open to the public following the May 17 easing of restrictions.

**Page 10** Speedway is an adult male dominated sport in terms of both riders and spectators.

The applicant provides no evidence to support this statement regarding the speedway demographic. Certainly in terms of spectators, speedway has always rightly been regarded as, and sold itself as, a family sport.

**Page 10** Most speedway clubs now struggle to run training schools or junior development programmes that would, were they operational, assist in developing the sport.

The reason why they do not is that they frequently do not have access to their own stadiums. This also explains why the thriving junior programme, which is not run by the clubs themselves, is the most successful way to achieve progression. It make use of the tracks which are available on a day-to-day basis, and in addition they arrange international meetings in Poland, Germany and elsewhere to give the Youth riders valuable experience

**Page 10** The sport only has a small number of riders who are transient in terms of the clubs for which they ride and do not usually have an association with the local area in which clubs are based.

*“Having an association with the local area”* is not remotely a prerequisite for the competitors in any team sport and this can be seen from the squad rosters not just of Premier League football clubs but indeed all the way down the pyramid.

**Page 10** Further to the above, a Needs Assessment for the Essex Arena Development was produced by wyg. This concludes that the venue is not a viable operation due to declining interest in speedway, stating that the alternative provision proposed “will far outweigh” the benefit of the current motorsport provision. Over the period 2008-2017, average attendance for fixtures declined by 59% from an average of c.860 to an average of c.340

The author is unable to make any reference to attendance figures for Coventry Stadium so resorts to references to Arena Essex, which as previously stated, is an application which is yet to be determined and is being vigorously contested.

In addition, the specific circumstances of the Arena-Essex Raceway should not be considered relevant anyway, as the two clubs and venues were totally different. But it is important to note the attendance figure quoted for 2017 was for the season in which the club (Arena-Essex) had switched to National League racing, where such a crowd level would be wholly anticipated. It is interesting to note that average crowd level for the 2018 season, when Lakeside raced at the higher Championship level, is not included here.

**Page 10** A number of speedway teams are currently up for sale or seeking alternative owners, whilst there are also plans within the sport to merge the top two leagues and reduce the total number of teams in an attempt to provide a more sustainable future.

Both of these statements are completely untrue. There are, to the best of our knowledge, **no** current speedway teams which are currently up for sale. If the authors know of any, maybe they should list them? Additionally, there are no plans to reduce the total number of teams or indeed to merge the top two leagues. Why on earth would there be a “*more sustainable future*” with fewer teams competing? The authors themselves attempt to argue that a declining number of tracks is a signal of a declining sport!

**Page 11** It can be argued that speedway has failed to reinvent itself and adapt to the 21st century. Other sports have engineered a shift to provide greater entertainment value with a focus on attracting new audiences and enhancing the spectator experience. This often takes the form of adding production value to fixtures and trying to make the sport more interactive and engaging for a wider range of spectators. There is no evidence of this happening in speedway; although there are no available statistics on age demographics of fans in the sport, the primary consumer is thought to comprise predominantly of older males.

It is false to state that there is no evidence of speedway attempting to make the sport more engaging and interactive. A counter argument to this is the increase in speedway’s social media traffic over recent years, with in 2021 the official British Speedway Twitter account receiving the ‘blue tick’ to indicate that it is authentic, notable and active.

Contrary to the final sentence in this section, speedway has always been regarded as a ‘family sport’ and many clubs work hard to increase the number of children in attendance and lay on additional entertainment for them on race-nights.

The statement has been made after no discussions or consultation with the sport’s governing body, and totally fails to recognise that the essence of speedway is that it is already a ‘short’ form of motorsport.

T20 cricket sought to reduce a 3-5 day game into a three-hour burst, and did so successfully – although even the popularity of this format has waned, arguably due to over-exposure, hence the arrival of the new ‘Hundred’ format.

A speedway meeting typically comprises of 15 one-minute ‘bursts’ of activity, along with associated atmosphere and presentation, something which many clubs have improved in recent years. Indeed, the Speedway Premiership in 2019 trialled a new rule whereby supporters could vote for their preferred riders for a particular race in the Cup competition via social media. However, taking radical action over the format of a two-hour event where the races are one minute long is not a realistic option, especially as any major change would require approval at FIM (worldwide) level.

**Page 11** These two factors mean that the sport is struggling for sustainability and is clearly in a state of retraction, team sales and closures.

The only team sales which have taken place in recent years have been at Newcastle (2019/20), Peterborough (2018/19), Birmingham (2017/18) and Leicester (2016/17). An average of one per year can hardly be deemed as excessive. The vast majority of closures have been caused by stadiums becoming unavailable, and not because of financially related matters.

**Page 11** In 2017, Sky Sports took the decision to stop broadcasting live speedway fixtures after being the home for UK speedway broadcasting for over 20 years and despite its contract having two years left to run. This was due to a substantial decline in viewership, with average numbers reducing from 145,550 in 2008 to just 34,000 in 2017.

This statement is untrue and misleading for several reasons.

Factually, Sky Sports was not the home of UK speedway broadcasting for over 20 years – it covered UK league fixtures from 1999-2016.

Sky Sports did not terminate their contract due to a substantial decline in viewership.

They terminated their contract due to a change of policy at the head of the operation, resulting in those in charge electing to focus their attention on other sports. The spiralling cost of rights for other sports such as Premier League football and their increased focus on F1 motor racing may also have impacted upon the decision.

However, reference to average numbers reducing to “just 34,000 in 2017” is totally disingenuous because 2017 was the first year in which Sky Sports did **not** broadcast the sport, and coverage had **already** passed to BT Sport.

#### **Page 11 TABLE 4.1**

No source is quoted for this table; however, it is clear that the information has been derived from the blog website of author Jeff Scott, presumably by doing a Google search for “speedway TV audience figures” or similar.

TV viewing figures vary considerably according to the quantity of live sport taking place on the same evening on different channels. The numbers cannot be accepted as a hard and fast guide to the success or decline of the sport in terms of supporter interest. A great deal of TV viewing comes from ‘casual’ viewers who are looking for some live sport to watch, regardless of what it is.

Had the authors re-produced the full information in tables from Jeff Scott, they would have noted that even in the years of ‘decline’ the top-rated meetings in any season would ordinarily attract over 100,000 viewers.

As previously stated, the viewing figures are shown in [Appendix 18](#), which reflect a more representative period.

**Page 11** Coverage was picked up by BT Sport, although the audience viewer base subsequently declined by a further 50%.

This makes the false inference that the coverage was picked up by BT Sport after the period shown in the table, hence viewer base would have declined to 17,000, but this again is totally false. 2017 was the first year of BT Sport, who continued to show the sport (with rising audience figures, also down to their increased subscriber numbers) in 2017-19 before the new five-year deal was agreed with Eurosport. Following the cancellation of the 2020 season due to the pandemic, this deal commenced in 2021. This means the sport is no longer on a solely digital platform; it is also available free-to-air via a highlights package on Quest. Eurosport wish to grow the sport, in association with British Speedway Promoters Ltd, in addition to their other two-wheeled offerings.

**Page 11** Added to this, the quality of speedway stadia in the UK is generally considered to be poor, with the possible exception of the National Speedway Stadium in Manchester which received significant investment from Manchester City Council in 2016. The challenges and general decline of speedway in the UK has led to a number of stadia closures, with the primary drivers being unsustainable revenue streams due to declining attendances and fewer broadcasting deals.

This is a statement which we completely dispute. It is not correct to state that the quality of speedway stadia in the UK is '*generally considered to be poor*' – although it is a slight improvement on the equivalent paragraph the Arena-Essex report where the wording as "*not fit for purpose.*"

What we do have to explain, though, is that speedway stadia are not of an equivalent level to, for example, modern all-seater football stadia. This is an outdoor sport where the majority of spectators actually prefer to stand on terracing. This notwithstanding, most UK stadia do offer indoor facilities for viewing and dining, and several venues include modern, plush facilities. It is the spectators' choice as to which they choose to use.

It is also interesting to note that given this assessment is supposedly about Coventry Stadium, the author makes no reference to the report by wyg which disagreed with the applicant's statement regarding the condition of Brandon Stadium, stating "The stadium was evidently fit for purpose.... In the context of motorsport stadiums, Brandon could reasonably be considered to be a quality venue".

The primary drivers for the closures have generally been nothing to do with "declining attendances" and entirely nothing to do with "fewer broadcasting deals." The one most primary driver for stadium closures has been the acquisition of sites by developers.

**Page 12** Analysis of BSPA fixture data clearly shows that participation in the sport is in decline; the primary factor in the high number of clubs that are folding and/or stadiums closing. From a high of 43 teams participating in 2006, there are now just 26; there has been a particularly sharp year-on-year decline from 2016 onwards.

The 'team' data shown in Table 4.2 once again contains fundamental and embarrassing inaccuracies which totally invalidate the arguments put forward by the applicant.

- The first thing to note is the figure of 43 teams quoted for 2006. This is wrong. In 2006 there were indeed 11 teams in the Premiership and 14 in the Championship, but the National League comprised 8, not 18 – meaning the total should be 33.
- The errors actually start in 2005 where the National League total is quoted as zero – whereas in fact this league did exist, known as the Conference League, with 12 teams competing.
- The authors are also confused between "teams" and "clubs". Throughout the period, several clubs operated two teams – one at Premiership/Championship level, and one for development purposes in the National League. Consequently, without making this distinction, the table provided is worthless. For example, in 2013-16 Coventry operated in both the Premiership (as the Bees) and the National Development League (as the Storm) – but they appear in the total here as two separate clubs.

**Table 4.3** is no better as there are clubs listed which should not be there, and specific circumstances relating to others, which prove that KKP have not researched speedway extensively enough to be able to come to informed conclusions.

- BOSTON and HACKNEY were never clubs operating at their own venue in their own right. BOSTON ran out of King's Lynn's Adrian Flux Arena and subsequently became King's Lynn's own National League team. HACKNEY was a one-year project racing at Lakeside in an attempt to raise awareness for the need for a venue in East London. Neither of these clubs 'folded' in the sense that the authors are trying to convey.
- Of the other examples quoted, only HULL, NEWPORT and WORKINGTON (the Comets, not the Comments) folded for financial reasons – and even in the case of Workington, the

intention was for them to compete in 2019 before a planned financial injection failed to materialise in time for the new season. Newport was, in fact, a similar case, as the club's future was thought to have been secured for 2012 and beyond only for a major deal which would have brought car racing to the stadium to fall through on the eve of the season. WEYMOUTH were evicted due to the repossession of their stadium, which they did not own.

- The primary reason for the majority of the other closures – EXETER, WIMBLEDON, OXFORD, READING, LAKESIDE and STOKE – was the same as COVENTRY - the site being acquired by developers.
- Interestingly in the cases of Oxford, Reading, Lakeside and Stoke, no such development has yet taken place, and indeed has been rebuffed to such an extent at Oxford that the site is to return to sporting use in 2022.

**Page 13** In March 2019, The Guardian published an article focusing on the challenges faced by speedway, 'Out of time and on the skids: speedway's struggle for survival'. This provides some insight into the demise of Workington Comets in particular, stating that the Club announced it was pulling out of the sport despite winning three trophies the prior year. This was a result of it "losing money every year and the sporting success coming at a huge financial cost".

British Speedway Promoters' Ltd were approached by the writer of the article, Giles Richards, for comments. It was immediately clear that the writer had spoken to some supporters and some ex-promoters with no current involvement. It was therefore agreed that the President of the Association would speak to the writer, which took place – but when the article was published, it did not cover any of the points made by the President. The writer clearly had an agenda to write a report in the style he wanted, and several items were taken totally out of context. Attention is drawn to the evidence provided by Adrian Smith, CEO of Belle Vue Speedway ([Appendix 19](#)) to confirm this point.

An unbiased assessment could have presented an entirely different and very positive view of speedway racing, such as the article produced in Motor Cycle News in May 2019 ([Appendix 20](#))

Before commenting on the sections below, we note that they – as with the previous TV data - have been directly lifted from the Arena-Essex planning application.

**Page 13** Speedway participation is transient. Most riders participate in at least two, sometimes three, and occasionally four European leagues at one time, meaning there is little club loyalty among riders.

Speedway riders have competed for clubs in different European countries for decades, so this is nothing new. It is also true to say that riders from countries outside of Europe, notably Australia and the United States, make Britain their home as they strive to develop their speedway careers by racing in the British leagues. As they are self-employed, maximizing their income by racing in different countries is quite natural, and is not regarded as a problem. Riders are not paid a set salary by their club, they are paid according to performance and points scored. As far as 'loyalty' is concerned, it is a fact that in any professional sport, the majority competitors will look for the best deal for themselves and their families upon completion of a contract. Very few footballers nowadays remain with the same club for multiple seasons, and in fact many are transferred during the period of their contracts. This is the nature of sport overall nowadays, and not a specific speedway problem. It should also be emphasised that, as with the majority of team sports, the main loyalty is from the supporters to their local clubs. This is a major reason why clubs must race in the area which bears their name, contrary to the assertions in the following sections.

**Page 13** They can easily switch clubs or may be dropped without notice if they suffer an injury or have a poor run of form.

This is a very obvious statement and again is not specific to speedway, nor is it a problem. In the case of a long-term injury, it is clearly not feasible for a rider to remain in a particular team. In the case of a poor run of form, as in any sport, a rider risks being dropped from the team, and a switch of clubs could result if another team feels they can get the best out of that rider.

**Page 13** In that sense, it can be argued that speedway is not really a true ‘team’ sport, but rather that the ‘teams’ consist of individuals who also race for other ‘teams’ across Europe.

There are seven riders in a speedway team, and the self-employed nature of the sport means they can appear for teams in other countries and, in certain cases, in more than one league in the UK. We are prepared to explain the ‘guest rider’ regulations in more detail should that be required. Speedway also has a successful team equalisation structure which means that essentially at the start of every season, every club has a roughly equal chance of success – this does on occasion generate rider movement but also ensures that the ‘richest’ club cannot simply sign the best seven riders in the world and win every competition they enter

**Page 13** Clubs would ideally have a youth policy and develop their own riders, putting them on contracts, which would encourage trust and loyalty on both sides; however, for a variety of reasons, they now rarely run training schools or junior development programmes. Finance is a crucial factor, but this is also affected by reliance on hired stadia not enabling clubs to access tracks for practice outside of race days.

This is simply not feasible given that a speedway club does not operate like a Premier League football team which secures players from all over the world, sometimes at the age of under 10, and then runs teams at numerous different age levels. Lack of access to facilities other than on their designated race-nights is an obvious barrier for several clubs to operate a full youth policy. Having said that, many senior speedway clubs do carefully observe the young talent coming through, and put them onto club contracts at the age of 16, pending a potential move into their senior team when they are of an appropriate standard.

**Page 13** The picture is similar for participation in stock car racing; the number of events is declining as the number of available speedway venues reduce. Based on the BriSCA fixture lists, 12 venues ran a total of 43 BriSCA F1 events in 2019, as detailed in Table 4.4 below. There is no data available for the 2020 season as fixtures were restricted due to the Covid-19 Pandemic.

This statement is complete nonsense, and the chart which follows (Table 4.4) is meaningless – as it lists the number of F1 events in 2019, but does not compare it to any other year, and then states the numbers are declining!

The authors also appear to believe that stock car racing only takes place at speedway venues, which is patently untrue.

- The chart shows a total of 43 F1 stock car events in 2019
- Once again, they have not updated their data to show fixtures for 2021 **because it disproves their point.**
- Despite the 2021 season not commencing until May 22 (nearly two months later than normal) due to Covid restrictions, the fixture list shows the number of F1 fixtures to be 42!

- Additionally, the authors do not fully understand the ‘oval racing’ world and all the different formulas that compete. In addition to F1 stock cars, other formulas include F2, Rebels, V8 Stox, National Mini Stox, Heritage Stox, UK Modified, Micro F2, Ladies Stox, National Saloons, Bangers and Stoxcars.
- Many of these formulas competed at Brandon, sometimes supporting F1 events, sometimes as separate events, as well as numerous other venues such as St Day, Crimond, Bristol, Cowdenbeath, Taunton, Nutts Corner.

**Page 13** Similarly, as noted earlier, greyhound racing is also seemingly in decline, with, as mentioned previously, only five speedway venues now doubling up. At present, just 19 active facilities host greyhound racing, despite there having been over 100 operating in the 1950’s, 40+ at the start of the 1990’s and a total of 298 sites that, at one point, have accommodated the sport. Attendances are also reportedly in decline, as is gambling on the sport, which is what ultimately provides its financial footing.

The repeated reference to greyhound racing is irrelevant to the case under consideration. We have never suggested that greyhound racing should return, nor has it ever been required to ensure the viability of the site.

#### **PART 5: ASSESSMENT OF VIABILITY**

**Page 14** The Independent Review into Coventry stadium identifies that the viability of the facility was difficult to establish.

Coventry Stadium has been viable since it first opened in 1928. It was the most famous club in the world, and one of, if not the best supported speedway club in the country. It was the ‘Wembley’ of the stock car world attracting the biggest driver entry and biggest crowds.

In the SCS response to the original application, accountants Guest Wilson, acting for the previous owner provided evidence which stated: “We have acted for Coventry Racing Club Ltd since 2008. We can confirm that in every year since 2008 the company has run speedway and stock cars at Coventry Stadium and only in the period 2009 – 2011 the company also ran greyhound racing. In the years when greyhound racing was run the company made considerable losses. In all other years (ie. only speedway and stock car racing conducted by the company) the company has made a profit.”

Further evidence was provided by SCS (Document ‘Summary of Errors and Untruths’ Appendix 21) with an email from the previous owner Avtar Sandhu, which explained the circumstances of the stadium sale. It made it quite clear the sale was forced by RBS bank demanding repayment of loans from 5,000 small business owners. It was a national scandal raised in parliament and forced many companies into bankruptcy. The loan Mr Sandhu was unable to repay was £4.5m, taken out to finance other business ventures not related to the stadium.

**Page 14** As a starting point, it is reported in the Independent Review that, through condition survey work, the estimated cost of re-instating the Stadium (at 2017 prices) is £3.73 million due to the significant quality issues that have been exacerbated through a lack of maintenance since closure. This substantial amount is considered to be the minimum that any future operator would have to put forward in order for appropriate licences to be accredited.

This statement is the most galling of all and a reflection of the morals of the applicant.

Firstly, the figure of £3.73million to reinstate the stadium has been provided by engineers commissioned by the applicant and is not an independent figure as the author implies, just because it is then quoted in the Independent Review!

Secondly, to suggest this is “due to the significant quality issues that have been exacerbated through a lack of maintenance since closure,” beggars belief. Whatever the true figure is, it is directly as a result of the owners’ abject failure to secure the site, enabling traveller incursions, major fires (the latest one as recent as 7th August 2021), and countless cases of mindless vandalism resulting in the iconic venue being absolutely trashed.

This is why the owners were served with a Warning Notice, a Community Protection Notice and will face a trial in October 2021 for breaches of that Community Protection Notice.

For the owners to then use the cost of reinstatement as a reason why it is not viable and a reason why their application for houses should be approved is appalling and extremely distasteful.

There is a very apt legal doctrine “Ex turpi causa non oritur actio” which should apply in this case.

Thirdly, the author once again conveniently omits to make reference to the fact that a very credible individual (Warren Hunter), following a visit to the stadium accompanied by a representative of the owner, who has clearly seen the condition of the stadium, made an offer to buy it with the intention of reinstating it to its former glory.

**Page 14** In the year prior to the closure of Coventry stadium, 37 speedway fixtures were held in addition to nine stock car fixtures. When put to providers of other facilities, this is deemed to be nowhere near sufficient for a viable operation, their contention being that significantly more meetings are required. As such, the long-term viability of redeveloping the track must be questioned, especially when considering that participation would at first likely be below pre-closure levels. Coventry Bees previously had two teams, whilst it would be more likely to have just one team were it to be re-established; at least initially. There is also no guarantee that stock car racing would return to the site.

The author repeats the error by omitting seven further events staged at the stadium (four wheeled formulas), as well as over-stating the number of speedway fixtures.

“When put to providers of other facilities...”. Which other providers? Who are they and why are they not named? And it would be ‘their opinion’ not based on fact as they have no knowledge of the income generated or costs associated with Brandon, which contradicts the factual statement from the previous owner’s accountant.

The claim that after previously having two teams “it would be more likely to have just one team were it to be re-established” is complete nonsense as the author could not possibly know this – and in all truth, it makes little difference whether one or two teams were racing. Coventry only had two teams from 2013-2016, and the second team (National League) is never entered with the intention of making substantial profits from the operation: it is entered purely to aid progression of younger riders at a level of the sport which attracts a mere fraction of the costs associated with the professional levels.

And finally, to say “there is no guarantee that stock car racing would return to the site” is quite ludicrous. The man to have made the offer to buy it, is a ‘stock car man’ (a former driver himself whose son is a current driver). The governing body of the sport BriSCA would welcome a return with

open arms as would the British Stock Car Drivers Association (BSCDA), as indicated in letters to case officer Erica Buchanan and included in appendices (App 6 and 22 in the 'Summary of Errors and Untruths' document).

Whoever owned the stadium, were it to be used for motorsports, would ensure that stock car racing would be a part of it, because it is a fundamental part of the viability of the venue. It is only the applicants who have chosen to take a position that stock car racing will not be allowed to return – **because they know its presence, when combined with speedway, makes the venue viable.**

**Page 14** Furthermore, the viability of a speedway operation has been heavily linked to commercial income for many years. This has evidently declined significantly in recent years exacerbated by the loss of the Sky TV deal and it shows no signs of improving for the foreseeable future

Unfortunately for the authors of this report, it already **has improved** with the sport securing a five-year broadcast deal with Eurosport carrying with it a number of financial and other benefits.

**Page 14** This decline has meant that providers are now more reliant on income from spectator attendance and secondary spend, although the number of spectators has also been reducing across the Country, as evidenced at the Essex Arena, which was the home of a team (Lakeside Hammers) competing in the same league as Coventry Bees.

The authors stated at the head of the report that they were unable to access attendance figures as they are not published by the ACU, SCB or BSP. Now they appear to be trying to suggest that just because they **do** have figures for Arena-Essex, these can be extrapolated across the country with identical trends – with absolutely zero evidence for this.

**Page 14** When engaging with consultees for this report, it was stated that revenue produced from attendance at home fixtures can now equate to up to 50% of all revenue for speedway operations.

It is not really clear what this statement is attempting to prove. Clearly revenue for speedway operations is going to be largely provided by supporter attendance at the turnstiles. In addition, several clubs benefit from team sponsorship deals enabling five-figure sums to be added to their revenue. But the relevance of the 50% figure, either good or bad, is difficult to assess.

### **National Speedway Stadium – Manchester (Page 14-15)**

The authors have either misunderstood or deliberately misrepresented the nature of operations at this stadium. Once again, they have done so without making any contact with those who could have given them accurate information.

Attention is strongly drawn towards the letter from Adrian Smith, CEO of Belle Vue Speedway 2017 Ltd ([Appendix 19](#)) which lays out the situation.

The first point to note is that whilst the venue is called the National Speedway Stadium, it was not built solely for speedway. It was built with the intention of being a multi-user operation, and it continues to do that today.

Not only do Belle Vue Speedway use the venue, it is also heavily used by UCFB – University Campus of Football Business – as an additional lecture and training facility with 3G pitches available. It is also used by the Manchester Junior Football League, Manchester Titans (American Football), and it is also hired out to local schools. It is a multi-user facility.

So when the authors state that Belle Vue 2017 Ltd took over the lease, they did not. They have a lease to use the stadium for speedway; they did not take over lease of the whole of the speedway stadium.

The speedway stadium is operated by Manchester City Council, meaning there is a clear distinction between the scenario painted in this report and the reality. All activities aside from speedway are either joint ventures or run by the Council.

It is clear that the authors, when stating that the stadium will not make any profit, actually mean that they feel the speedway operation itself will not make any profit.

As the letter from Mr Smith demonstrates, although when Belle Vue Speedway 2017 Ltd came into the sport they fully expected to make losses in the early years and then reach a break-even point in 2020, and then expected to make profits after that. Had it not been for Covid, this would have been reached in 2020.

As Belle Vue Speedway 2017 Ltd and the National Speedway Stadium are two totally different entities, the criticism aimed at the stadium ("*its lack of profitability*") is entirely misplaced.

### **Covid-19**

**Page 15** Whilst the impact of fixture/event cancellations due to the Covid-19 pandemic are yet to be fully seen, it is suggested that speedway and other sports that can utilise speedway venues have been and will be further damaged in the resulting economic fallout.

Any suggestions can be made, but a clear trend cannot be identified until there is clear evidence. The reality of the situation is that since the sport returned in May 2021, some clubs have encountered severe difficulties, largely as a result of restrictions imposed by local authorities until the final 'unlocking' in July. Closures cannot, unfortunately, be ruled out in limited cases, as has been the case with business throughout the country. In other cases, the picture is far brighter with increased attendances and supporters clearly determined to enjoy their ability to get out more when compared to the year of 2020.

**Page 15** It is widely understood that venues operate on the limits of commercial viability and were not prepared for what has happened.

Due to the fact that the 2020 season did not happen at all (lockdown was called almost exactly at the time the season was due to start) there were no commercial viability issues caused at all by that situation. The picture may have been substantially different had the season started, and then been terminated in April.

**Page 15** As such, re-developing a speedway facility in the current climate could be accompanied by significant added risk, although demand could also be higher from fans and participants if other facilities are lost as there will be fewer clubs as a result.

The authors again appear to be suggesting that if clubs close, attendances at other clubs will automatically rise. This is simply not the case. As has already been shown, supporters support their local club. They do not transfer their support elsewhere in any great numbers should their local club close.

## Other considerations

**Page 15** This report set out to assess the environmental impact that coincides with an operational speedway facility, particularly in terms of air and noise pollution. However, very little information has been unearthed, at least in formal terms, with evidence with regard to any issues essentially available in anecdotal form at present.

This at least appears to be an acceptance that there is no discernible environmental impact, and it cannot be used as a reason to put forward closure of a site.

**Page 15** In that regard, consultation with the operator of the Swindon and Poole speedway facilities identifies that it is a growing concern and is becoming more and more of an issue with residents and campaign groups.

The phrase “*operator of the Swindon and Poole speedway facilities*” is disingenuous in the extreme. Swindon and Poole STADIUMS are owned by the same company, but this company (Gaming International) is **not** the operator of speedway at **either** venue.

It is understood that during the 2019 season at Swindon Speedway, a venue where housing development has moved extremely close to the existing speedway stadium, in fact the only complaints which were received occurred when the club staged a short firework display at the conclusion of their final meeting of the season when they had just been crowned league champions!

## Summary/Conclusion

The intention of this Viability Appraisal was to reach a pre-determined conclusion that the use of Coventry Stadium for motorsport is unviable.

Whilst many of the original tables and data from the original Sports Needs Analysis regarding ‘alternative provision’ have been removed, as they were shown to be totally flawed and incorrect, the data which has replaced them is similarly poor, and does not offer any proof of the point the authors are attempting to make.

The penultimate paragraph includes the following line:

**Page 16** It is therefore considered that the re-development of Coventry stadium is not a viable option, unless evidence can be provided to show that demand exists for sufficient events at the site, and that attendance at such events will provide adequate income.

This is a quite ludicrous statement to make.

They attempt to state as fact that the re-development of Coventry Stadium is not a viable option, when it is their contention that this is the case.

They fail to provide a shred of evidence that Coventry Stadium was not and would not, in the event of redevelopment, be viable, so desperately resort to attempts to attack the sport as a whole.

They then incredibly suggest the onus is on others to provide evidence that ‘*demand exists for sufficient events at the site, and that attendance at such events will provide adequate income*’

**“Quality, Integrity, Professionalism” are the values Knight, Kavanagh & Page Ltd proudly state on the cover of the Coventry Stadium Speedway Viability document and on their website.**

**This Appraisal is poorly researched, riddled throughout with errors and untruths, many of which are repeated from the original submission despite evidence which disproved them.**

**It also makes fanciful assumptions and omits information which if disclosed would paint a different picture and damage the case put forward by the developers.**

**We believe it to be biased in the extreme and fails to live up to any of those stated values.**

**It reflects very badly on KKP and damages their reputation.**

## LIST OF APPENDICES

Appendix No	Subject
1	Initial approach by Warren Hunter (to buy Coventry Stadium)
2	James Crocker email 1
3	James Crocker email 2
4	Evidence of offer to buy Coventry Stadium
5	View of car park reverted to pastureland
6	Refusal for planning permission for Sunday Market
7	Footprint of Stadium buildings overlaid on housing proposals
8	Letter of clarification from Dave Busst of SBitC
9	Article in CCFC programme supporting the campaign to save Brandon
10	Wolston Leisure and Community Centre (WLCC) accounts
11	Letter of objection on behalf of WLCC Board of Trustees
12	Location of pitches within a 10 mile radius of Brandon
13	Analysis of pitches within a 10 mile radius of Brandon
14	Sidney Stringer 3G pitch availability analysis – July 2021
15	Sidney Stringer 3G pitch availability analysis – September 2021
16	Warwick University Westwood pitch availability analysis
17	Warwick University Cryfield pitch availability analysis
18	Television viewing trends
19	Letter from Adrian Smith CEO of Belle Vue Speedway Ltd
20	Artcile in Motor Cycle News



Jeff Davies &lt;jeffdavies170@gmail.com&gt;

**Fwd: Coventry Stadium**

8 messages

**Nigel Harrhy** <nharrhy@aol.com>  
To: jeffdavies170@gmail.com

Wed, Feb 7, 2018 at 1:17 PM

Reply from Will Hunter

-----Original Message-----

From: Will Hunter <Will.Hunter@huntapac.co.uk>  
To: Nigel Harrhy <nharrhy@aol.com>  
Sent: Wed, 7 Feb 2018 10:04  
Subject: Coventry Stadium

Hi Nigel,

It's good to understand the current position and that work is still on going to get the stadium back up and running.

In reply to your questions;

**Is Coventry Stadium a viable business?** – This one is relatively simple... it depends what the purchase price is! However, I doubt Rob Speak would have purchased Skegness Stadium if it wasn't a viable business, and we only showed interest in the stadium as we felt it would be a viable business, but to reiterate this entirely depends on the purchase price.

**Who we contacted regarding a purchase of Brandon?** – After initial phone calls to find the right contact we were informed to correspond with Deborah Clamp who works for 'Invest in PLC' this email was then passed on to their solicitors, within a matter of days we received a letter from the solicitors 'Howell & Co' (James Crocker), following this letter we exchanged 1 more email with James and then conversations ended.

Our initial email included our business background, financial information and the following questions.

- *Is Brandon Stadium for sale or lease?*
- *Is there a sports recreation clause on Brandon Stadium?*
- *Is there any current lease on Brandon Stadium?*
- *Is there any current license?*
- *Is there any key information we should be aware of?*
- *Are there any restrictions on Brandon Stadium?*

**Any proof/correspondence between parties?** – At this point we don't feel its professional to show any evidence of correspondence, as this was a private and confidential conversation. However, below are some of the key points from the letter we received that I feel are worth noting...

*"Our Clients are experienced enough and certainly pragmatic enough to know that the most likely outcome of a planning application is that it will be recommended for approval by the Planning Officers but then rejected by the Planning Committee. On Appeal to the secretary of state it is almost certain that the application will be granted.*

*I hope that this information helps you assess a value for the site. Our clients will carefully consider any offer that you make"*

Our interpretation of this is that they clearly welcomed an offer for Brandon Stadium but that the value would be based on it being sold as land for housing development. Taking this into consideration it clearly makes it unviable as a sports stadium. Hence our reason for not taking conversations any further.

I hope this helps and we are still interested in the site, but at the time (March 2017) it was made very clear that it was valued way above what would be viable.

Kind Regards.

Will Hunter  
Operations Director

Huntapac Produce Ltd.  
293 Blackgate Lane,  
Tarleton, Holmes,  
Preston. PR4 6JJ.

Mob: 07980798251  
Tel: 01772 280626

Web: [www.huntapac.co.uk](http://www.huntapac.co.uk)

UK Veg Grower of the Year 2015

## Appendix 2

**From:** Jim Crocker <[JCrocker@howell-solicitors.co.uk](mailto:JCrocker@howell-solicitors.co.uk)>  
**Date:** 11 May 2017 at 16:56:53 BST  
**To:** "[garrytownsend223@yahoo.co.uk](mailto:garrytownsend223@yahoo.co.uk)" <[garrytownsend223@yahoo.co.uk](mailto:garrytownsend223@yahoo.co.uk)>  
**Cc:** Rhys Baker <[RBaker@howell-solicitors.co.uk](mailto:RBaker@howell-solicitors.co.uk)>  
**Subject:** **Brandon Stadium**

Dear Mr Townsend

I have now taken instructions from Brandon Estates Ltd. Whilst they thank you for your interest, there is no point at the present time entering into any discussions. Under no circumstances will Brandon Estates permit Stock Car Racing to return to Brandon Stadium.

Kind regards.

**James Crocker**  
Partner

**From:** Jim Crocker <[JCrocker@howell-solicitors.co.uk](mailto:JCrocker@howell-solicitors.co.uk)>  
**Date:** 11 January 2018 at 16:42:06 GMT  
**To:** Garry Townsend <[garrytownsend223@yahoo.co.uk](mailto:garrytownsend223@yahoo.co.uk)>  
**Cc:** Rhys Baker <[RBaker@howell-solicitors.co.uk](mailto:RBaker@howell-solicitors.co.uk)>  
**Subject:** Brandon Stadium

**Dictated by James Crocker but not seen before transmission**

Dear Mr Townsend

Although I am currently abroad, I have had an opportunity of reviewing the historical correspondence between us.

As previously intimated, and for the avoidance of doubt:-

1. Stock car racing will never be allowed to return to the Stadium.
2. Mick Horton has now moved his Speedway to Leicester.
3. Mick Horton has publically confirmed that Speedway at Brandon Stadium is financially unviable.

Therefore, in order for my clients to consider any request by you, I think it better that you set out in writing exactly what you propose. I will then take instructions on the same.

Yours sincerely

**James Crocker**  
Partner

**From:** Will Hunter  
**Sent:** 27 May 2020 10:36  
**To:** Jon Burgwin <[jon.burgwin@investinplc.com](mailto:jon.burgwin@investinplc.com)>; John Downer <[john.downer@investinjersey.com](mailto:john.downer@investinjersey.com)>  
**Cc:** Alastair Burgwin <[Alastair.Burgwin@investinplc.com](mailto:Alastair.Burgwin@investinplc.com)>; 'Antony Harrison (harrisonath@aol.com)' <[harrisonath@aol.com](mailto:harrisonath@aol.com)>; Warren Hunter <[WWH@huntapac.co.uk](mailto:WWH@huntapac.co.uk)>  
**Subject:** Coventry Stadium

Hi Jon & John,

Hope you are well?

Following our visit to Coventry Stadium we have spent some time reviewing purchases for similar sites and have also made considerations towards the current state of the stadium.

As you highlighted and demonstrated during our visit, Coventry Stadium is in a very poor state and needs a lot of work to get it back in working order.

After reviewing the above we still feel we can make this a viable business.

We would need to be able to have the option to run the following at the stadium, which we believe would have no detrimental effect on the value property:

- Motorsports
- Dog Racing
- Cycling
- Skate Boarding

Our offer based on the points above would be **(REMOVED)**

Look forward to hearing from you.

**Will Hunter**

Operations Director

Huntapac Produce Ltd, [293 Blackgate Lane,](#)

[Tarleton, Preston, Lancs, PR4 6JJ](#)

T 01772 280 626

M 07980 798 251

E [will.hunter@huntapac.co.uk](mailto:will.hunter@huntapac.co.uk)

[www.huntapac.co.uk](http://www.huntapac.co.uk)



A view of the car park taken from the Gossett Lane corner of the site looking towards the stadium itself. The land has quite clearly reverted to pastureland and should not be considered to be brownfield.



**THE RUGBY BOROUGH COUNCIL**  
**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**  
**REFUSAL OF PLANNING PERMISSION**

Notice is hereby given that the Borough Council in pursuance of its powers under the above mentioned Act, as amended and Rules, Orders and Regulations made there under, refuses planning permission for the development referred to hereunder for the reasons specified.

**APPLICATION NUMBER:**

R07/1268/PLN

**DATE OF APPLICATION:**

20/06/2007

**ADDRESS OF DEVELOPMENT:**

Coventry Stadium  
Rugby Road  
Brandon  
Coventry  
Warwickshire  
CV8 3GJ

**APPLICANT/AGENT:**

Greyhounds At Coventry Ltd  
Coventry Stadium  
Rugby Road  
Brandon  
Coventry  
Warwickshire  
CV8 3GJ

**APPLICATION DESCRIPTION:**

Change of use of the car park to use for a Sunday market.

**RELEVANT DEVELOPMENT PLAN POLICIES & PROPOSALS/REASON(S) FOR REFUSAL:**

**REASON FOR REFUSAL: 1**

The site is located in the Green Belt where there is a presumption against inappropriate development. It is the policy of the Local Planning Authority, as set out in the Development Plan and having regard to guidance contained in PPG2 Green Belts not to grant planning permission except in very special circumstances, for changes of use other than for the purposes of agriculture and forestry, outdoor sports and recreation facilities, cemeteries and other uses which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it.

The proposed development does not fall within any of the categories which are normally acceptable in the Green Belt and as such, constitutes inappropriate development having an adverse effect on the rural character of the area and detrimental to the openness of the Green Belt. In the opinion of the Local Planning Authority, there are no special circumstances, which would justify the granting of planning permission in the face of a strong presumption against inappropriate development derived from the prevailing policies and it is considered that the development fails to preserve the openness and character of the Green Belt. The proposed development is therefore contrary to Policies E1 and E2 of the Rugby Borough Local Plan 2006.

R07/1268/PLN

## **REASON FOR REFUSAL: 2**

The proposals would introduce a range of stalls and vehicles into the area. These would be out of keeping with the character of the area and would have a detrimental impact on visual amenity. The proposals are therefore contrary to policies GP1 and E5 of the Rugby Borough Local Plan 2006 which seek to ensure that all new development is in character with its surroundings.

## **REASON FOR REFUSAL: 3**

Due to the nature, scale and intensity of the proposed use the development would be detrimental to the amenity of the occupiers of nearby residential properties by reason of noise and nuisance generated by the use of the land and associated vehicular activity. The proposals are therefore contrary to policy GP3 of the Rugby Borough Local Plan 2006 that specifically seeks to protect amenity.

## **REASON FOR REFUSAL: 4**

The site is situated outside the boundary of Rugby Town Centre as defined in Rugby Borough Local Plan 2006. Policy TCR2 of the Rugby Borough Local Plan 2006 state that retail uses should be developed in town centre locations unless it can be demonstrated that there is a need for the facility and that no suitable sites are available in a town centre, or edge of centre, location. No information has been submitted with the application to demonstrate that there is a need for an additional market in the Rugby area. The proposal is therefore contrary to policy TCR2 of the Rugby Borough Local Plan 2006 that requires a need for facilities to be demonstrated when they are proposed outside of the town centre.

## **REASON FOR REFUSAL: 5**

The application has not been accompanied by a Transport Assessment to demonstrate whether the impact of the proposals on the local highway network, as such it has not been demonstrated whether the proposals meet the current highway standards set out in PPG13 Transport. Based on the information submitted the Local Planning Authority is of the opinion that the possible intensification of the use of the access, may be detrimental to highway safety and contrary to policies T1 and T3 of the Rugby Borough Local Plan 2006 which seek to ensure that development does not affect the safety of road users.

## **REASON FOR REFUSAL: 6**

The site is located in a rural location that may not be easily accessible by sustainable modes of transport. The application has not been accompanied by a Green Travel Plan to demonstrate what measures will be implemented to reduce the reliance on private car travel and promote sustainable travel. The proposal is therefore contrary to policy T2 of the Rugby Borough Local Plan 2006 that specifically requires the submission of a Green Travel Plan for none residential developments of this size.

## **ADOPTED POLICIES:**

Policies GP1, GP3, E1, E2, E5, T1, T2, T3, T5 and TCR2

The development plan policies referred to above are available for inspection on the Borough Council's web-site [www.rugby.gov.uk](http://www.rugby.gov.uk) or at the Council Offices.



---

**ANNA E. ROSE** Head of Planning and Culture

PLANNING DEPARTMENT,  
TOWN HALL,  
EVREUX WAY,  
RUGBY,  
CV21 2RR

DATE: 26/09/2007

Existing stadium overlaid onto proposed development



The statement made in the Planning Statement that the dwellings are 'broadly on the footprint of the existing stadium buildings' is quite clearly incorrect.

On the diagramme above, the buildings are shown in red, the track(s) in shades of yellow and the track infield and terracing in grey.

The dwellings extend way beyond the buildings.



Jeff Davies &lt;jeffdavies170@gmail.com&gt;

**Brandon Stadium**

1 message

Dave Busst &lt;David.Busst@sbitc.org.uk&gt;

Thu, Jul 29, 2021 at 2:51 PM

To: "erica.buchanan@rugby.gov.uk" &lt;erica.buchanan@rugby.gov.uk&gt;

Hi Erica,

My name is David Busst from SBITC and im emailing you in reference to the planning application recently submitted for the Brandon Stadium site and wanted to clarify our standing regarding this.

- SBITC support the objectives of the FA, and both Rugby Borough Council and Coventry City Council, to increase the number of artificial pitches and people playing football and as such are naturally interested in the provision of pitches locally. An example of this is our involvement with the pitch proposed at President Kennedy School in Coventry.
- The letter does not confirm any support for the proposals at the Brandon site prior to planning permission being granted. Discussions regarding the management of the proposed pitch have been very brief, with no agreement in place and we have had no input to the programme of use or the cost projections outlined in that business plan.
- Having spoken to the parties involved and various stakeholders, we understand the complexities surrounding the application and history of the site and remain neutral on the matter. Our letter was intended to state that if a facility of this nature was in existence in the area, we would consider managing it as part of our charitable work in the region.

Thankyou for your time and please feel free to contact me should you require me to clarify anything,

Regards Dave

David Busst

Head of Community

[Sky Blues in the Community](#)

Registered Charity Number: 1127014

T: 024 7678 6371

M: 07766 365672

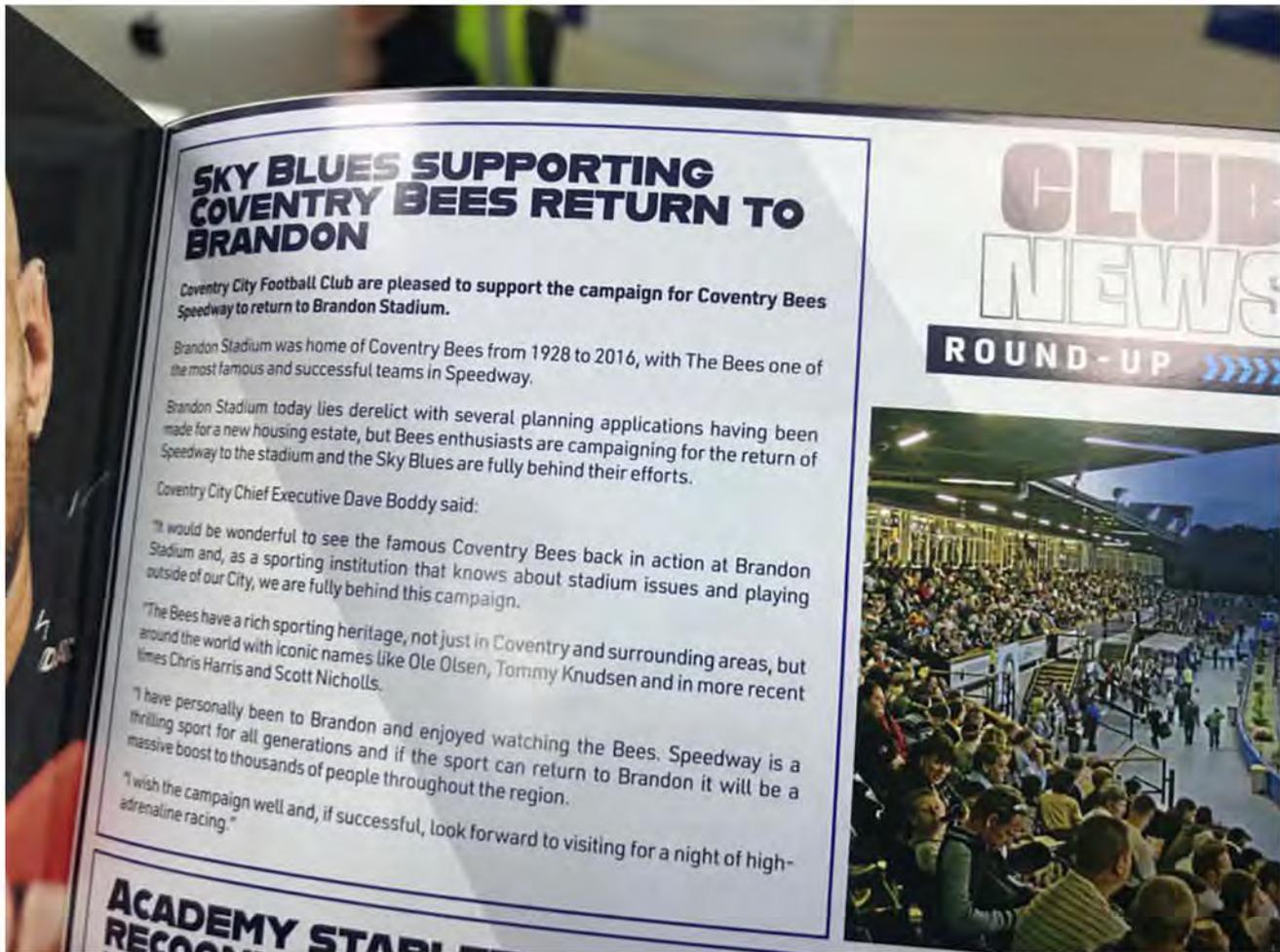
W: [www.cfc.co.uk/community](http://www.cfc.co.uk/community)

Making a difference to the lives of people across Coventry & Warwickshire.



## Coventry City Football Club supporting the campaign for a Bees return

Following an approach by BE, which was spurned, in December 2020, CCFC wrote an article in their matchday magazine (top) and posted on their social media platforms supporting the Campaign Group in their efforts to bring about a return of speedway racing to Brandon.



### SKY BLUES SUPPORTING COVENTRY BEES RETURN TO BRANDON

Coventry City Football Club are pleased to support the campaign for Coventry Bees Speedway to return to Brandon Stadium.

Brandon Stadium was home of Coventry Bees from 1928 to 2016, with The Bees one of the most famous and successful teams in Speedway.

Brandon Stadium today lies derelict with several planning applications having been made for a new housing estate, but Bees enthusiasts are campaigning for the return of Speedway to the stadium and the Sky Blues are fully behind their efforts.

Coventry City Chief Executive Dave Boddy said:

"It would be wonderful to see the famous Coventry Bees back in action at Brandon Stadium and, as a sporting institution that knows about stadium issues and playing outside of our City, we are fully behind this campaign.

"The Bees have a rich sporting heritage, not just in Coventry and surrounding areas, but around the world with iconic names like Ole Olsen, Tommy Knudsen and in more recent times Chris Harris and Scott Nicholls.

"I have personally been to Brandon and enjoyed watching the Bees. Speedway is a thrilling sport for all generations and if the sport can return to Brandon it will be a massive boost to thousands of people throughout the region.

"I wish the campaign well and, if successful, look forward to visiting for a night of high-adrenaline racing."

### CLUB NEWS

ROUND-UP



WOLSTON LEISURE AND COMMUNITY CENTRE ACCOUNTS  
(Source: Companies House website)

Year Ending	Filed on	Income	Spending	Surplus / Deficit
31/03/20	06/11/20	97,644	93,157	4,487
31/03/19	08/08/19	80,456	81,718	-1,262
31/03/18	05/09/18	70,993	72,803	-1,810
31/03/17	07/11/17	73,167	76,893	-3,726
31/03/16	21/10/16	67,598	77,196	-9,598
31/03/15	13/07/15	71,151	74,604	-3,453
31/03/14	04/08/14	71,861	68,012	3,849
31/03/13	04/07/13	72,481	63,364	9,117
31/03/12	28/12/12	146,106	162,877	-16,771
31/03/11	14/12/11	78,951	92,502	-13,551
		830,408	863,126	-32,718

# WOLSTON LEISURE & COMMUNITY CENTRE

Registered Charity No. 1090744

Old School Fields  
Manor Estate  
Wolston  
Coventry  
CV8 3PD  
Tel: 024 7654 1212

Appendix 11

E-mail: [wolstonlcc@outlook.com](mailto:wolstonlcc@outlook.com)  
[www.wolstonleisureandcommunitycentre.co.uk](http://www.wolstonleisureandcommunitycentre.co.uk)

10 August 2021

LETTER OF OBJECTION (IN PART)

Erica Buchanan  
Principal Planning Officer  
Rugby Borough Council  
By email: [erica.buchanan@rugby.gov.uk](mailto:erica.buchanan@rugby.gov.uk)

Dear Madam

## **PLANNING APPLICATION: R18/0186 – COVENTRY STADIUM, RUGBY ROAD**

On behalf of the Board of Trustees, this letter is a formal objection to the provision of a sports pitch. The applicant's intention is to offer '*alternative sports and recreational provision*' to meet one of the criteria required as part of the National Planning Policy Framework.

The proposed application is causing serious concern as we are located 1.6 miles from the Coventry Stadium and know of at least 10 other venues offering 3G pitch hire within an 8-mile radius. If this were to be approved then the competition ie targeting the same users within close proximity, could have a detrimental impact on the Centre's income. Our facility is used by several local football clubs (junior and senior teams), the residents of Wolston, Brandon, Bretford, Binley Woods, Brinklow and even groups from Coventry.

Having perused supporting documentation, it implies that a full-sized 3G pitch is needed within the Rugby Borough. However, the applicant's proposed timetable of use suggests the pitch would only be used as a full-sized 3G pitch for competitive football on Saturday afternoons. Therefore, this proposed new facility would only be accommodating **one** senior football team at a competitive level. The pitch would then be used for training purposes, no different to the facility we offer and the various other venues nearby.

As a registered charity, our main purpose is to serve the local community and surrounding villages. We are not Government funded and rely on the income generated from the services and facilities we provide.

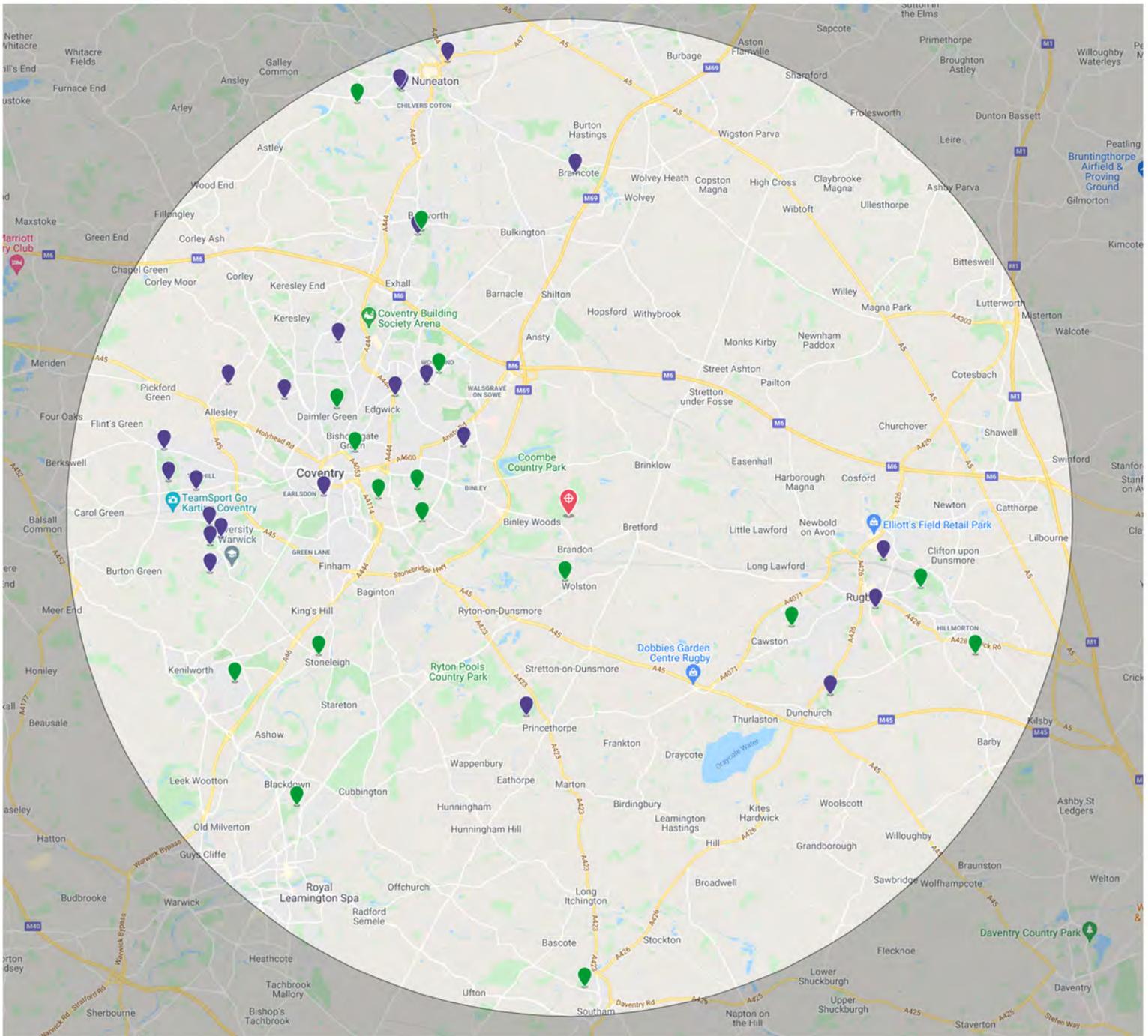
The monies received from 3Gpitch hire is the second highest generator of income for the Centre. If the application were to be approved in its entirety, then this could potentially threaten the future of a local community building.

If there are any questions you would like to ask in respect of this objection, please do not hesitate to contact me.

Yours faithfully

*L Jones*

Ms L Jones (Centre Manager)



The map shows the location of facilities, all within a 10 mile radius of Coventry Stadium, Brandon (shown in the centre red spot), which offer floodlit, artificial football pitches which are open to public bookings.

The analysis identified 39 such locations (shown as green or blue icons), with a combined total of 69 pitches available.

Of those 70, 28 of them are full size pitches.

## FOOTBALL PITCH ANALYSIS

(Source: Pitchfinder\*)

Appendix 13

Facility Name & Location	Distance (miles) from Brandon	Travel time (Mins)	Grass Pitches			Artificial Pitches							Car Park Spaces
			Adult	Junior	Mini	Full size		Medium		Small		Total	
						3G	Sand	3G	Sand	3G	Sand		
Wolston Leisure & Community Centre	1.8	6	3	2	1			1				1	94
Alan Higgs Centre Coventry	3.3	10	1	1	2	2						2	100
Ryona Engineering Stadium (Sphinx) Coventry	3.6	13	3	8				1				1	100
Blue Coat School Coventry	4.4	14				1						1	100
Caludon Castle School Coventry	3.3	9	2	1			1					1	150
Sidney Stringer Academy Coventry	4.9	17				1						1	20
Henley College Coventry	4.6	13	2						1			1	200
Moat House Leisure Centre Coventry	4.7	14				1						1	97
Goals Soccer Centre Coventry	5	16						1		8		9	100
King Henry VIII School Coventry	5.4	17						1				1	40
Daimler Green Community Centre Coventry	6.7	23	1	1				1				1	50
Bablake Playing Fields Coventry	7.2	23	1	1			3					3	130
Jaguar Leisure Centre Coventry	9.2	27	1					1				1	120
Hereward College Sports Centre Coventry	8.8	18						1				1	45
XCEL Leisure Centre Coventry	7.8	15	1	1							2	2	50
Coventry University (The Place)	8.5	17	4	2	2		1					1	100
Warwick University Wellness Centre Coventry	8.2	16	3			1				5		6	40
Warwick University Westwood Campus	8	15				1		2				3	50
Warwick University Cryfield (4G)	8	15				1							50
West Coventry Academy	9.3	20			1		1					1	50
Powerleague Coventry	8.8	18						2		6		8	70
North Leamington School	10	18	3									0	200
Bilton School Rugby	6.7	15	2	1			1		1			2	100
Bilton Grange School Rugby	8.3	16					1					1	50
Rugby School Sports Centre	7.8	19	3				3					3	30
Warwickshire College Rugby	8.6	18					1					1	200
Rugby Town Football Club	8.9	21	1			1		1				2	500
Rugby Borough Sports Trust	10	25	2	6	12	2		1		1		4	241
Princethorpe College Rugby	5.4	12	2				1					1	50
Kenilworth School	8.4	16		2		1						1	100
St Finbarrs Sports Ground	10.3	18	1					1				1	85
Southam College	11.2	22	2	2		1						1	70
Nuneaton Academy Sports Centre	12.8	23				1						1	100
The Oval Bedworth	9.3	18				1						1	140
Bedworth Leisure Centre	9.3	18								1		1	100
Gamecock Barracks Nuneaton	10.1	21	3					1		1		2	600
Jubilee Sports Centre Nuneaton	12	21								1		1	100
St Thomas More Sixth Form College Nuneaton	12	21	1							1		1	50
<b>TOTAL</b>			<b>42</b>	<b>28</b>	<b>18</b>	<b>15</b>	<b>13</b>	<b>15</b>	<b>2</b>	<b>24</b>	<b>2</b>	<b>70</b>	

### SEARCH CRITERIA:

Facilities within a 10 mile radius of Brandon Stadium (as crow flies)  
 Facilities with artificial pitches (by type and size)  
 Artificial pitches must be floodlit  
 Pitches must accept public bookings and have changing rooms

### RESULTS SHOW:

There are 39 sites within that 10 mile radius  
 Those 39 sites have 70 All Weather artificial pitches  
 Of those 70, 28 of them are full size pitches.

### SOURCE OF ANALYSIS:

\* Pitchfinder - is the largest database of football pitches in England and supported by the Football Foundation which is gthe charity of the Premier League, The FA and Government, through Sport England.

### DISTANCE / TRAVEL TIMES SOURCE:

RAC Routefinder

# Analysis of pitch availability - Sidney Stringer Academy

Appendix 14

## 3G Football Pitch

Sidney Stringer Academy



Booking

Calendar

JULY 2021

MO	TU	WE	TH	FR	SA	SU
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

18:00 - 19:30 £ 45.00

19:00 - 19:30 £ 45.00

19:30 - 20:00 £ 45.00

20:00 - 20:30 £ 45.00

20:30 - 21:00 £ 45.00

21:00 - 21:30 £ 45.00

21:30 - 22:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Tue, 27 Jul 2021 Start: 17:00 End: 18:00

Booking option: Full pitch (11-a-side)

Book Now

Calendar

JULY 2021

MO	TU	WE	TH	FR	SA	SU
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

BOOK NOW

MESSAGE

## Look around



Booking

Calendar

JULY 2021

MO	TU	WE	TH	FR	SA	SU
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

18:00 - 19:30 £ 45.00

18:30 - 19:00 £ 45.00

19:00 - 19:30 £ 45.00

19:30 - 20:00 £ 45.00

20:00 - 20:30 £ 45.00

20:30 - 21:00 £ 45.00

21:00 - 21:30 £ 45.00

21:30 - 22:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Wed, 28 Jul 2021 Start: 18:00 End: 18:30

Booking option: Full pitch (11-a-side)

Book Now

Booking

Calendar

JULY 2021

MO	TU	WE	TH	FR	SA	SU
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

18:00 - 18:30 £ 45.00

18:30 - 19:00 £ 45.00

19:00 - 19:30 £ 45.00

19:30 - 20:00 £ 45.00

20:00 - 20:30 £ 45.00

20:30 - 21:00 £ 45.00

21:00 - 21:30 £ 45.00

21:30 - 22:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Thu, 29 Jul 2021 Start: 17:30 End: 18:00

Booking option: Full pitch (11-a-side)

Book Now

Booking

Calendar

JULY 2021

MO	TU	WE	TH	FR	SA	SU
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

18:00 - 18:30 £ 45.00

18:30 - 19:00 £ 45.00

19:00 - 19:30 £ 45.00

19:30 - 20:00 £ 45.00

20:00 - 20:30 £ 45.00

20:30 - 21:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Fri, 30 Jul 2021 Start: 18:00 End: 18:30

Booking option: Full pitch (11-a-side)

Book Now

Booking

Calendar

JULY 2021

MO	TU	WE	TH	FR	SA	SU
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

09:00 - 09:30 £ 33.50

09:30 - 10:00 £ 33.50

10:00 - 10:30 £ 33.50

10:30 - 11:00 £ 33.50

11:00 - 11:30 £ 33.50

11:30 - 12:00 £ 33.50

12:00 - 12:30 £ 33.50

12:30 - 13:00 £ 33.50

13:00 - 13:30 £ 33.50

13:30 - 14:00 £ 33.50

14:00 - 14:30 £ 33.50

Facility: 3G Football Pitch (ID: 2722) Date: Sat, 31 Jul 2021 Start: 11:00 End: 11:30

Booking option: Full pitch (11-a-side)

Book Now

Booking

Calendar

JULY 2021

MO	TU	WE	TH	FR	SA	SU
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

10:30 - 11:00 £ 33.50

11:00 - 11:30 £ 33.50

11:30 - 12:00 £ 33.50

12:00 - 12:30 £ 33.50

12:30 - 13:00 £ 33.50

13:00 - 13:30 £ 33.50

13:30 - 14:00 £ 33.50

14:00 - 14:30 £ 33.50

Facility: 3G Football Pitch (ID: 2722) Date: Sat, 31 Jul 2021 Start: 11:00 End: 11:30

Booking option: Full pitch (11-a-side)

Book Now

A search on Sydney Stringer Academy website enables the pitch to be booked on line. This is their full sized, 3G, floodlit pitch.

This analysis was made on 27th July for pitch availability for the remainder of the week (ie Tuesday 27th - Saturday 31st).

Unavailable slots are greyed out and quite clearly, countless slots are available every day for the remainder of the week.

**Booking**

Calendar

SEPTEMBER 2021

MO TU WE TH FR SA SU

7 8 9 10 11 12

13 14 15 16 17 18 19

20 21 22 23 24 25 26

27 28 29 30

18:00 - 18:30 £ 45.00

19:00 - 19:30 £ 45.00

20:30 - 21:00 £ 45.00

21:00 - 21:30 £ 45.00

21:30 - 22:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Mon, 06 Sep 2021 Start: 18:00 End: 18:30

Booking option: Full pitch (11-a-side) [Book Now](#)

**Booking**

Calendar

SEPTEMBER 2021

MO TU WE TH FR SA SU

7 8 9 10 11 12

13 14 15 16 17 18 19

20 21 22 23 24 25 26

27 28 29 30

20:00 - 20:30 £ 45.00

20:30 - 21:00 £ 45.00

21:00 - 21:30 £ 45.00

21:30 - 22:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Tue, 07 Sep 2021 Start: 18:00 End: 18:30

Booking option: Full pitch (11-a-side) [Book Now](#)

**Booking**

Calendar

SEPTEMBER 2021

MO TU WE TH FR SA SU

7 8 9 10 11 12

13 14 15 16 17 18 19

20 21 22 23 24 25 26

27 28 29 30

18:00 - 18:30 £ 45.00

18:30 - 19:00 £ 45.00

19:00 - 19:30 £ 45.00

19:30 - 20:00 £ 45.00

20:00 - 20:30 £ 45.00

20:30 - 21:00 £ 45.00

21:00 - 21:30 £ 45.00

21:30 - 22:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Wed, 08 Sep 2021 Start: 18:00 End: 18:30

Booking option: Full pitch (11-a-side) [Book Now](#)

**Booking**

Calendar

SEPTEMBER 2021

MO TU WE TH FR SA SU

6 7 8 9 10 11 12

13 14 15 16 17 18 19

20 21 22 23 24 25 26

27 28 29 30

19:00 - 19:30 £ 45.00

19:30 - 20:00 £ 45.00

20:00 - 20:30 £ 45.00

20:30 - 21:00 £ 45.00

21:00 - 21:30 £ 45.00

21:30 - 22:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Thu, 09 Sep 2021 Start: 17:30 End: 18:00

Booking option: Full pitch (11-a-side) [Book Now](#)

**Booking**

Calendar

SEPTEMBER 2021

MO TU WE TH FR SA SU

6 7 8 9 10 11 12

13 14 15 16 17 18 19

20 21 22 23 24 25 26

27 28 29 30

18:00 - 18:30 £ 45.00

18:30 - 19:00 £ 45.00

19:00 - 19:30 £ 45.00

19:30 - 20:00 £ 45.00

20:00 - 20:30 £ 45.00

20:30 - 21:00 £ 45.00

Facility: 3G Football Pitch (ID: 2722) Date: Fri, 10 Sep 2021 Start: 18:00 End: 18:30

Booking option: Full pitch (11-a-side) [Book Now](#)

**Booking**

Calendar

SEPTEMBER 2021

MO TU WE TH FR SA SU

6 7 8 9 10 11 12

13 14 15 16 17 18 19

20 21 22 23 24 25 26

27 28 29 30

09:00 - 09:30 £ 33.50

09:30 - 10:00 £ 33.50

10:00 - 10:30 £ 33.50

10:30 - 11:00 £ 33.50

11:00 - 11:30 £ 33.50

Facility: 3G Football Pitch (ID: 2722) Date: Sat, 11 Sep 2021 Start: 11:00 End: 11:30

Booking option: Full pitch (11-a-side) [Book Now](#)

**Booking**

Calendar

SEPTEMBER 2021

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6 7 8 9 10 11 12

13 14 15 16 17 18 19

20 21 22 23 24 25 26

27 28 29 30

10:30 - 11:00 £ 33.50

11:00 - 11:30 £ 33.50

13:00 - 13:30 £ 33.50

13:30 - 14:00 £ 33.50

14:00 - 14:30 £ 33.50

Facility: 3G Football Pitch (ID: 2722) Date: Sat, 11 Sep 2021 Start: 11:00 End: 11:30

Booking option: Full pitch (11-a-side) [Book Now](#)

**Booking**

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27 28 29 30

09:00 - 09:30 £ 33.50

09:30 - 10:00 £ 33.50

10:00 - 10:30 £ 33.50

10:30 - 11:00 £ 33.50

12:00 - 12:30 £ 33.50

Facility: 3G Football Pitch (ID: 2722) Date: Sun, 12 Sep 2021 Start: 12:00 End: 12:30

Booking option: Full pitch (11-a-side) [Book Now](#)

**Booking**

Calendar

SEPTEMBER 2021

MO TU WE TH FR SA SU

6 7 8 9 10 11 12

13 14 15 16 17 18 19

20 21 22 23 24 25 26

27 28 29 30

10:30 - 11:00 £ 33.50

12:00 - 12:30 £ 33.50

13:30 - 14:00 £ 33.50

14:00 - 14:30 £ 33.50

Facility: 3G Football Pitch (ID: 2722) Date: Sun, 12 Sep 2021 Start: 12:00 End: 12:30

Booking option: Full pitch (11-a-side) [Book Now](#)

A case could be made that the previous analysis of availability for the last week in July is not representative as the football season has not started, so further analysis was made on 27th July looking forward to pitch availability in September (when the season has commenced).

It showed a similar picture to July, with countless slots available. If the shortage of pitches was as acute as BE would have us believe, these slots would all have been taken with block bookings.



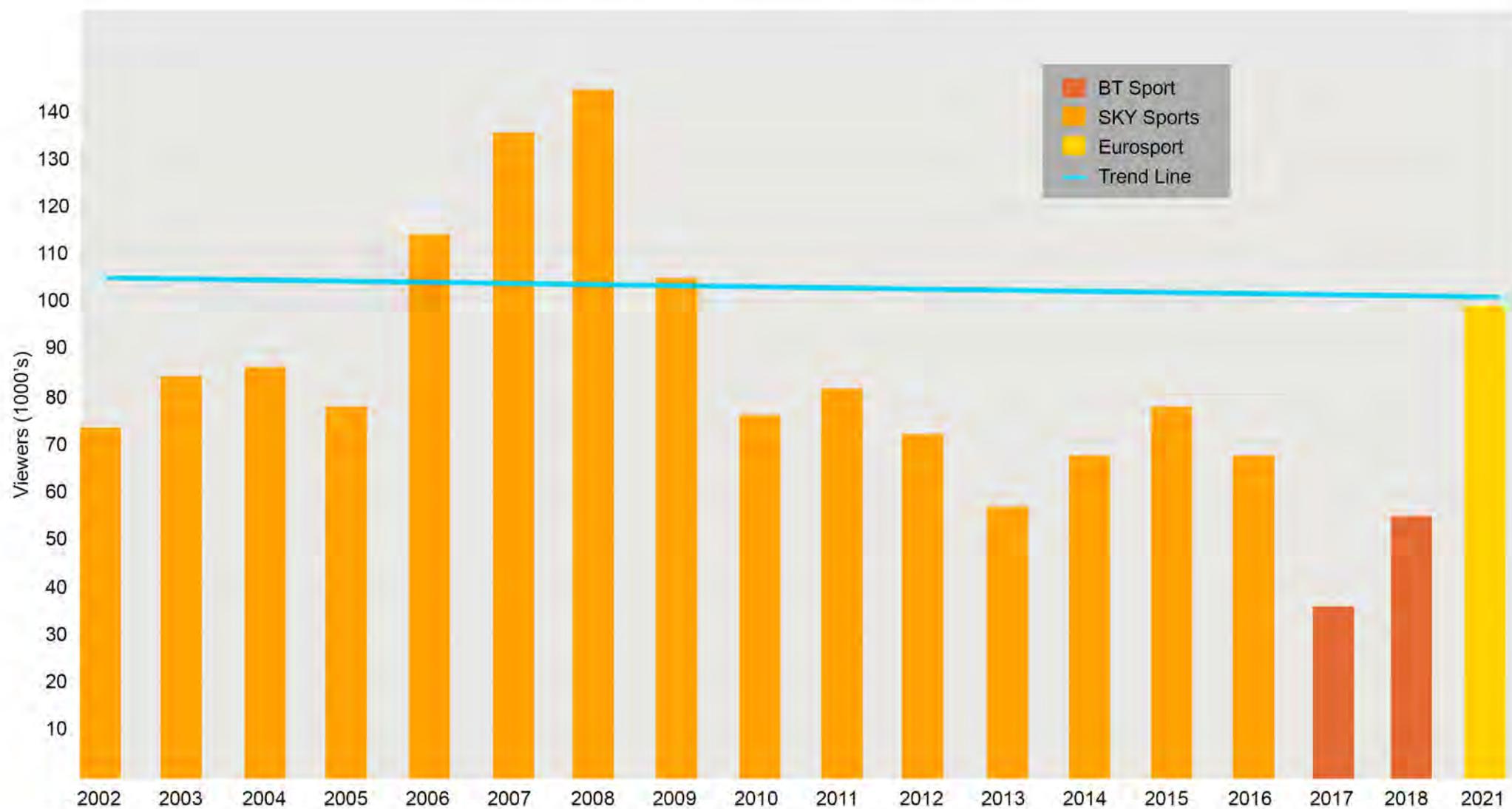
	Thu 12 Aug	Fri 13 Aug	Sat 14 Aug	Sun 15 Aug	Mon 16 Aug	Tue 17 Aug	Wed 18 Aug
07:00	Not Available	Available	Available	Available	Available	Available	Available
07:30	Not Available	Available	Available	Available	Available	Available	Available
08:00	Not Available	Available	Available	Available	Available	Available	Available
08:30	Not Available	Available	Available	Available	Available	Available	Available
09:00	Not Available	Available	Available	Available	Available	Available	Available
09:30	Not Available	Available	Available	Not Available	Available	Not Available	Available
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11:30	Not Available	Not Available	Not Available	Not Available	Available	Not Available	Not Available
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22:30	Not Available						

**Analysis of pitch availability  
Warwick University Cryfield 4G Pitch**

The chart left, shows availability of the 4G pitch at Cryfield for the period between 12th August - 18th August.

Similar to the 3G pitch at Westwood, it shows countless time slots available.

## TELEVISION VIEWING TREND



Source: BARB



Belle Vue Speedway 2017 Limited  
National Speedway Stadium  
Belle Vue Sports Village  
148 Kirkmanshulme Lane  
Gorton  
Manchester  
M12 4WB

4<sup>th</sup> August 2021

Mr J Davies  
Save Coventry Speedway  
170 Lillington Road  
Leamington Spa  
Warwickshire  
CV32 6LN

Dear Jeff

**Application ref: R18/0186 - Coventry Stadium, Rugby Road, Coventry**

With reference to the above planning application, and your request to provide some comment on the various references made about National Speedway Stadium and Belle Vue Speedway 2017 Ltd contained within the planning application and associated supporting documents, we would make the following points:

**Coventry Speedway  
Speedway Viability Appraisal – December 2020  
Knight Kavanagh & Page**

The applicant is relying heavily on the report it commissioned by Knight Kavanagh & Page. Contained within the report are comments made about Belle Vue Speedway 2017 Ltd and the National Speedway Stadium. It is unfortunate that the authors of the report failed to contact both Belle Vue Speedway 2017 Ltd and the operators of the National Speedway Stadium as the report appears to suit the narrative of the applicant's requirement rather than current situation.

TV Viewing Figures - Page 11 of the Knight Kavanagh & Page report includes a table of the UK Average Speedway TV Viewers which stops at 2017. The Report then makes comment that viewing figures reduced by a further 50%. I do not believe this comment to be true. It is my understanding that the average viewing figures for 2018 amounted to 53,000 which compared to 2017 would be an increase of 56%.

It is also worth noting that during 2019, I chaired the working party of the British Speedway Promoters Association (now known as British Speedway Promoters Limited) review of its TV media contract. The working party engaged an external consultant to assist with the review. The outcome of this project was to agree a new 5 year TV media deal with Eurosport on much improved terms. This would not have been achieved if sporting broadcasters felt that speedway was in the decline that the Knight Kavanagh & Page report would have you believe.

Due to Covid, the start of the new broadcasting deal with Eurosport only began this season (2021). The early indications are that viewing figures are extremely good not only on both the on-demand and digital platforms but also the free to air channel – Quest. This is extremely encouraging and, in my opinion, the wider audience numbers that Eurosport have will drive a further increase in viewer numbers over the life of the contract.

Guarding Report – March 2019 – Page 13 of the Knight Kavanagh & Page report reference an article in the Guarding written by Giles Richards. Prior to the article being published in 2019, the writer made contact with me and we discussed speedway and our positive new involvement in the sport. At that time, the writer expressed his assurance to want to provide a balanced article on Speedway and therefore, the BSP Ltd was interviewed by Mr Richards. Unfortunately, Mr Richards choose not to report on any of the positive work and developments that the sport was undertaking and having spoken to Mr Richards post the articles publication, in my own view, I believe he had an agenda to write a negative article about the sport regardless of what the BSP Ltd or I had said.

National Speedway Stadium – Manchester - Page 14 of the report references the National Speedway Stadium which was opened in 2016. The report suggests that the National Speedway Stadium was set up for single use and is part of a wider development. In reality that National Speedway Stadium was always designed to be a multi-user facility as most successful new stadiums now function.

In this regard, the National Speedway Stadium is a successful facility and attracts use from National & International speedway events including training days, weekly Junior & Adult football, use by local schools, men's and women's American football and it is also home to the University Campus of Football Business. In addition, the stadium has a 350-seat hospitality suite available for event hire.

The report makes further comment on Belle Vue Speedway 2017 Ltd own financial record. The current owners took over the Belle Vue Speedway in February 2017 and but for Covid-19 affecting all sports in, it had budgeted to at least break-even in 2020.

The suggestion from Knight Kavanagh & Page is that the National Speedway Stadium is not a viable facility. I am not sure what financial reports they have based that assertion on as Belle Vue Speedway 2017 Limited and the National Speedway Stadium are very different businesses with their own financial accounts.

It is unfortunate that the Knight Kavanagh & Page report has chosen to reference our business without the courtesy to formally contact us to discuss. Had they have chosen to speak to us, they would have seen that far from the criticism they seek to aim at the National Speedway Stadium, they would have seen an actively utilised facility that is continually developing.

### **Planning Statement**

Item 6.29 of the planning statement reiterates the comments made about the National Speedway Stadium contained in the Knight Kavanagh & Page report. It is my view that these comments have been made without the full knowledge and understanding of how the National Speedway Stadium is operated.

I trust my comments above are of some assistance to you. Should you have any queries, please contact me.

Yours sincerely



Adrian Smith

CEO

Belle Vue Speedway 2017 Ltd

# Motor Cycle News 22nd May 2019

GREAT EXPERIENCES

**THE BUCKET LIST**  
**MOTORCYCLING MUST-DOS**

# WATCH A SPEEDWAY RACE

Check out the UK's most high-octane motorsport event



The further you are from the track, the less chance there is of getting shade any more here

● **'A bobble hat is considered to be part of the uniform!'**



Time to make it clear who we're supporting...



In three or four seconds, all hell will break loose

**'WE DID IT!'**

**'It has it all; it's just an amazing night out'**

Pauline Clements, 80 years, Martin and Nancy "I've been coming to the speedway since 2002, and I absolutely love it. The sport, the track action, the friendly atmosphere, it has it all and is just an amazing night out. The action out on track is spectacular and you simply can't understand how the riders manage to do what they do. It's a good value as well, with the results in all part of it and it's good value as well, especially if you are a season ticket holder like we are. When Peterborough won the league in 2004 it was the best night of my life, such an adrenalin buzz as it went down to the wire."



It's a scrappily pet friendly sport

Imagine a race series where every single corner is contested as fiercely as the last lap of a Rossi vs Marquez MotoGP battle. Then imagine that you get 15 races of equal ferocity in the space of just a few hours. Add in the fact that the bikes spend more time sideways than in a straight line, you can stand just a few metres away from the action and the riders walk into the crowds at the end of the evening to greet the fans, and you have the recipe for a great night of motorsport action. And that's the race series called Speedway. Silly – and it is happening as a track near you this evening this week!



**BY JOHN LINDSEY**  
Nearby converted speedway addict and MCM contributor

Speedway arrived in the UK from Australia in 1928 and was an instant hit. Consists of over 20,000 venues the swarm to watch the action at venues like Wembley, always anything a football match of the era would attract. But since then, its popularity has been hit by a rollercoaster ride, peaking again in the 1970s but falling off through the 1980s and 1990s. However, it is now attracting a whole new fan base, thanks in part to BT Sport showing matches on TV, but also the success of the UK round of the Speedway GP series and Britain having one of the world's best riders in the shape of three-time world champion Tai Woffinden.

● **'Racers barge each other, battling bucking bikes'**

and many speedway fans spend the evening meticulously filling in their scorecards, there is a big going on. But if you just want to see some racing, you're well catered for.

"With some sports you have to wait a long time between races, but with speedway they hit it hard and fast and there is virtually no break in the action," Colin Pratt, President for Peterborough Panthers Speedway Team and former high-level color and manager, explains to me. And he isn't wrong. When you arrive at a speedway meet, the first thing that strikes you is the noise and smell. The air is thick with the sweet aroma of burnt methanol as these 500cc singles start and buckle as they are being warmed up. If you want to check out the bikes you can just lean over a fence and watch the activity in the pits (some venues do pit walk) and it will very relaxed as riders walk around and team managers keep the crowd amused, but it has the racing over it all becomes extremely serious. Here is a tip: if you spot a viewing area next to the track that is badly devoid of spectators, there is a reason. Speedway bikes kick up a lot of dirt and unless you want your face shot-blinded, it is best to avoid these areas. But, having said that, getting as close as possible is far better than standing in the stands and a beer full of shite does add to the experience. On track, the action is hectic as every race lasts around a minute. It falls out from the moment the flag raises to the point the flag drops four laps later. Riders physically barge one another out of the way, drift sideways with in millimetres of each other, battle locking bikes and basically race every corner as if it was the last bend of the race and their lives depended on coming out to the lead. As a spectator sport it is physically draining to watch as you spend the entire time on the edge of your seat watching for a huge accident to avoid (happily it seldom does) as riders display what looks like a total lack of self-preservation. In short, it is simply fabulous and makes MotoGP look like a gentleman's Sunday parade. If you have ever been to a speedway race, make this the year you do it. It is a method-fueled evening of amazing action that will leave you speechless and wondering why you took so long to discover this fantastic sport. And it is also one of the few race events where a bobble hat is considered part of the uniform. [www.speedway.org.uk](http://www.speedway.org.uk)

**'If you only go to one, make it the GP!'**

Tony Hearn, *International Motor Sport* Speedway is always intense, but the British GP at Cardiff's Principality Stadium is on another level. Virtually every British rider either and better towards a world championship. The atmosphere under the closed roof is charged and could power the national grid with it, especially if home hero Tai Woffinden is in contention. He's never won a British GP, but he's a perennial contender for it. It's the penultimate championship round this year as Woffinden could seal a fourth world title on home soil and lead the stadium calling the roofer.

**YOU CAN DO IT**

There are three divisions in the UK: Premiership, Championship and National League. Entrance fees vary, but expect roughly £18 for an adult, £10 for a junior and kids under 16 go free for free. For more info, and to find your local team, go to [www.speedway.org.uk](http://www.speedway.org.uk) The British round of the GP series is on Saturday, Sept 21 at Cardiff's Principality Stadium. [www.speedway.com](http://www.speedway.com)

A feature in the Motor Cycle News in May 2019 by a journalist who was a first time visitor to a speedway meeting.

Imagine a race series where every single corner is contested as fiercely as the last lap of a Rossi vs Marquez MotoGP battle. Then imagine you get 15 races of equal ferocity in the space of just a few hours. Add in the fact that the bikes spend more time sideways than in a straight line, you can stand just a few metres away from the action and the riders walk into the crowds at the end of the evening to greet the fans, and you have the recipe for a great night of motorsport action.