

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

Coventry Stadium, Rugby Road, Coventry, CV8 3GJ

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

I, William Warren Hunter, company director will say as follows;

1. I have considered the Proofs of Evidence of Gareth Hooper, Clarke Osborne and John Eady and have prepared this Proof to rebut some of the points raised. What I refer to is within my knowledge.
2. The Appellant suggests that Coventry Stadium is surplus to requirements, it is not viable to restore Motorsport and that Motorsport cannot viably operate at Coventry Stadium. I reject these suggestions.
3. I stand by the evidence in my Proof and rebut the evidence of Gareth Hooper, Clarke Osborne and John Eady.

Gareth Hooper

4. I rebut the suggestions in the following paragraphs of Gareth Hooper's proof;

(a) Paragraph 5.26 in which it is suggested that;

'It is clear from the Farrow Walsh Consulting report that the former stadium could not host any form of events without demolition and significant re-instatement. The condition of the former stadium will be apparent to the Inspector and all parties when the site visit is undertaken.'

Motorsport can be reinstated without using the Grandstand. The works referred to will not be required to resume Motorsport use.

(b) In paragraphs 5.29 – 5.33 it is suggested that to bring the '*stadium back to a level where it could host the same level of activity as it did at the point of closure in 2016*' (para 5.29) would require;

- i) *"Demolition of the existing Main Stand replacement with a 1,000-seater stand including hospitality, club shop, offices, kitchen and lounge;*
- ii) *Refurbishment of the existing smaller stand;*
- iii) *Refurbishment of the existing maintenance sheds;*
- iv) *Demolition of existing ancillary buildings/structures and fencing;*
- v) *Repair/minimal intervention to existing hard standings*
- vi) *New surfacing to speedway and greyhound track*
- vii) *New kennel, garages, ticketing/entrance/turnstiles etc.'* (paragraph 5.30).

I believe that the restoration of Motorsport would require cordoning off the Grandstand, the laying of a shale track surface, restoration of the electricity supply, restoration and

repairs to safety fences, repairs to the spectator terraces, the construction of new facilities for event officials including the Speedway Referee and the repositioning of the starting gate/line. I reject many of the items suggested as being necessary work required to restore Motorsport.

- (c) I reject the suggestion that the total cost of the work required would be £13.7 million (paragraph 5.32).

I believe that the cost to reinstate Motorsport would be in the region of £736,575.

- (d) In paragraph 5.32 it is suggested that the main grandstand as well as other structures on site would need to be demolished before the site could be safely used again.

I reject this suggestion. I believe that the Appeal site could be safely used for Motorsport without demolition of the Grandstand.

- (e) In paragraphs 5.78 it is suggested that;

'In the absence of intervention from the Council, the purchase of the site by Save Coventry Speedway or others, on a commercially attractive basis would need to be added to the cost of works to re-instate the stadium outlined earlier in my evidence, making the viability of any operation at the site severely challenged.'

I rebut the suggestion that the purchase of the Appeal site, the reinstatement of Motorsport and its future operation as a Motorsport venue is '*severely challenged*'. I have the means to both purchase Coventry Stadium and carry out the works necessary to restart racing.

- (f) In paragraphs 5.85 – 5.90 it is suggested that there is no need for the Former Stadium use. I reject the suggestion.

No reference is made to Coventry Stadium's use for Stock Car racing including its use for the highest profile event, the World Stock Car Championship, held on average once every three years since the mid 1950's.

- (g) At paragraphs 7.3 – 7.7 the support of some local residents for the Appeal scheme is referred to..

I am aware that it has been suggested that I will use Coventry Stadium for parking for heavy goods vehicles used by my business. This is not the case. I reject the suggestion.

(h) In paragraph 7.15 it is suggested that;

'no viable offers have been forthcoming to purchase and re-instate the site.'

This is not correct. I made an offer to buy the Appeal site on 27 May 2020 (CD15.5.14). The Appellant's solicitor's letter of 7 July 2020 acknowledged my offer but did not accept or reject it (CD15.5.14). There has been no further communication about my offer from or on behalf of the Appellant.

Clarke Osborne

5. I rebut the suggestions in the following paragraphs of Mr Osborne's proof;

(a) Paragraph 9 in which it is suggested that;

'My conclusion is that there is no financial justification for the development of speedway racing facilities at Coventry Stadium and in the absence of a substantial grant of funds for the development of facilities and the subsidy of operation costs the operation of speedway racing at Coventry Stadium is not feasible at any level.'

This suggestion ignores the fact that before acquisition of the Appeal site by the Appellant Motorsport at Coventry Stadium included Speedway and Stock Cars and that the intention is to restore both.

(b) Paragraph 2.1 in which it is suggested that;

'I am advised that the primary use to be considered is speedway racing to which other events may be added where they can be shown to supplement the income to the Stadium and the speedway promotion.'

The objective is to restore Speedway and Stock Car racing and for the two sports to enjoy a full programme of competition.

(c) Paragraph 2.3 in which it is suggested that;

'Stock Car racing events are best promoted on tarmacadam tracks, speedway always on compacted shale, and greyhound racing on high loam content silica sand.'

This is not correct. Some Stock Car tracks are tarmacadam. Others, including Coventry are shale.

(d) Paragraph 3.4 in which it is suggested that;

'The following additional specification is applied to facilitate Stock Car racing; -
• Oval Tarmacadam Track
• Safety fencing
• Race control equipment (Starting lights, Safety lights).'

An oval tarmacadam track is not required to restore Stock Car racing at the Appeal site.

(e) Paragraph 3.14, bullet point 6;

'The terraces around the two bends are best covered to become grassed banks. They are beyond economic repair to meet regulations.'

Based on the recent experience at Oxford Stadium in 2022 when similar terracing was restored after a 15 year period during which it was not used, I believe that it will be relatively simple and inexpensive to make it good.

(f) Paragraph 8.4 refers to a likely cost of £400,000 to make a full planning application. Motorsport use can resume without any further planning permission.

(g) In Paragraph 8.5 it is suggested that;

'Promoters and Operators of Speedway and Stock Car racing have limited covenant strength and the debt market is restricted to a point where I consider that very limited debt could be raised, and therefore requiring significant equity investment.'

Whilst Mr Osborne's suggestion was made without sight of my Proof of evidence in which I confirmed that I have access to the funds required to restore Motorsport to the Appeal site, I think it important for me to address it in this rebuttal.

I will fund the acquisition and the works necessary to restore racing. In his letter to the Inspector of 17 August 2023 the West Midlands Mayor indicates that he may step in as a funder of last resort if there is a funding gap.

John Eady

6. While no reference is made by Mr Eady to Stock Cars, I rebut his suggestion, summary and conclusion that there is any justification for the replacement of what I believe to be the 'Wembley' of the Stock Car world with a 3G sports pitch.

5 September 2023