



# STATEMENT OF CASE

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## BRANDON ESTATES LTD

APPEAL AGAINST THE REFUSAL OF PLANNING APPLICATION  
REFERENCE R18/0186 AT COVENTRY STADIUM, RUGBY ROAD,  
BINLEY WOODS





# STATEMENT OF CASE

**On behalf of: Brandon Estates Ltd**

**In respect of: APPEAL AGAINST THE REFUSAL OF PLANNING APPLICATION REFERENCE R18/0186 AT COVENTRY STADIUM, RUGBY ROAD, BIRMINGHAM**

**Date: May 2023**

**Reference: SOC0001**

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## 1.0 Introduction

- 1.1 This Statement of Case ('SoC') has been prepared by DPP Planning on behalf of Brandon Estates Ltd ('the Appellant').
- 1.2 It is submitted as part of an appeal ('the Appeal') pursuant to Section 78 of the Town and Country Planning Act 1990 in relation to the refusal by Rugby Borough Council ('the Council') of a planning application for the demolition of existing buildings and outline planning application (with matters of access, layout, scale, and appearance included) for residential development (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 at Coventry Stadium, Rugby Road, Brandon, Rugby ('the site') under planning application reference R18/0186 ('the Appeal Application').
- 1.3 The Appeal Application was validated on 16<sup>th</sup> January 2018. The Appeal Application was recommended for approval by officers of the Council ('LPA Officers') and was presented to Planning Committee on the 11<sup>th</sup> of November 2022. The Officer's recommendation was overturned, and the Appeal Application was refused, with the Committee citing a single reason for refusal.
- 1.4 On the basis that the Appellant is seeking consideration of the appeal through a public inquiry, this SoC sets out the Appellant's case in relation to the acceptability of the Appeal Scheme, ahead of providing full evidence at the appropriate time.
- 1.5 The SoC covers the following matters: -
  - Appeal Scheme and Planning History;
  - The Appellant's Case for the Appeal Proposal;
  - Other Representations;
  - Conditions & Obligations; and
  - Appeal Procedure.



## 2.0 The Appeal Site

- 2.1 The evidence will describe the Site, its location, and the surrounding context. The evidence will focus on the fact the Site lies within the Green Belt, but it is accepted by the LPA as being previously developed, comprising of the former speedway track and ancillary buildings and structures.
- 2.2 To the extent that it is not agreed in the draft SOCG, the evidence will set out all other relevant designations and features of the Site.
- 2.3 The evidence will subsequently refer to existing services and facilities available in the immediate area and within this part of Rugby borough, and it will demonstrate that the Site is sustainably located.
- 2.4 Thereafter, to the extent that it is not agreed in the draft SOCG, the evidence will describe the previous use of the Site, and the current condition of the various buildings and structures comprising the former speedway stadium.

### **3.0 Appeal Proposal and Planning History**

- 3.1 To the extent that it is not agreed in the draft SOCG, the Appellant's evidence will describe the planning history of the Site.
- 3.2 The evidence will then describe the Appeal Proposal, including the number and type of proposed dwellings, the sports pitch and associated pavilion, and the amount of open space being provided. The evidence will also describe how the Site will be accessed.
- 3.3 The evidence will then describe how the Appeal Application was amended following consultation with the LPA and other statutory bodies. The evidence will show that there are no technical issues which would preclude development.
- 3.4 The evidence will also identify the key issues to which LPA Officers gave weight in their report to committee and it will comment upon these matters.

## 4.0 The Appellant's Case for Development

4.1 The Appeal Application was refused on the 16<sup>th</sup> of November 2022, with the single reason for refusal stating as follows:

*“The development would result in the loss of a sporting facility that has both local and national significance and although an alternative sporting provision is proposed there is not a clearly identified need for the alternative sporting provision and therefore it is considered that the proposed benefits of the new facility do not clearly outweigh the loss of the stadium. The proposal would therefore be contrary to Policy HS4(C) of the Local Plan (2019), Policy LF1 of the Brandon and Bretford Neighbourhood Development Plan (2019) and Paragraph 99(c) of the National Planning Policy Framework (2021).”*

4.2 The Appellant's evidence will address the reason for refusal, focusing on the following points:

- The identified need for the Proposed Sports Pitch;
- The viability of the former stadium including an assessment of its re-instatement; and
- The benefits of the new facility and the wider application proposals including, but not limited to, the economic, biodiversity net gain and affordable housing benefits of the proposals.

4.3 In addition to the reasons for refusal, the Appellant's evidence will also address the following:

- The Principle of Development within the Green Belt
- The Need for Housing
- Housing Mix
- Achieving Sustainable Development
- Previously Developed Land
- Layout and Design
- Amenity
- Other Technical Matters
- Planning Obligations and Conditions
- Updated Surveys

4.4 Each point is addressed, in outline, below.

### Identified Need for the Proposed Sports Pitch

4.5 The evidence, provided by KKP, has demonstrated that there is demand for additional 3G pitches. The evidence has drawn on data collected relating to both the Coventry City Council and Rugby Borough Council Playing Field Assessments. The evidence has demonstrated that the supply of existing pitches in both authorities' area is insufficient, when assessed against the demand generated by the existing clubs (and their respective teams) located throughout Rugby and

Coventry. The data shows that there is a shortfall of suitable playing pitches to accommodate the demand generated, with reference made to particular need within the north of Rugby (which accommodates the Appeal Site), and to a lesser degree, within the south east of Coventry (in close proximity to the Appeal Site).

- 4.6 The evidence has also set out details of the consultation undertaken by KKP, to gauge the level of interest forthcoming from local clubs. The evidence presented has demonstrated that there are a number of clubs, all of which accommodate multiple teams, who have expressed an interest in utilising the proposed pitch, confirming a clear need.
- 4.7 Based on the updated evidence submitted with this appeal, KKP will set out in evidence how the need for the 3G pitch proposed and its associated benefits clearly outweighs the loss of the Speedway Stadium in compliance with criterion (c) of Paragraph 99 of the NPPF.
- 4.8 Where not agreed as Common Ground, evidence will be presented that Paragraph 99 of the NPPF requires only one of the three listed criteria to be satisfied by any development.
- 4.9 Further, the work undertaken by KKP demonstrates that any such pitch, including the proposed pavilion, would be a viable proposition. The evidence demonstrate that the income generated by the pitch would enable it to remain viable and operational in the long term.
- 4.10 The evidence has confirmed that additional usage would likely arise should any clubs be willing to take on management of the pitch fulltime, and deliver other Football Association initiatives, including Wildcats, Walking Football, and Player Development Centre training sessions.
- 4.11 The evidence has demonstrated that there are no other pitches at planning stage in the locality that would reduce the demand identified. Equally, the data has indicated that there is sufficient need to ensure that the provision of an additional pitch would not unduly impact the viability of existing operators.

### **The Viability of the Former Stadium**

- 4.12 The evidence previously submitted by KKP and updated with this appeal submission has demonstrated that Speedway is a sport in decline across the UK. The evidence has considered the history of the stadium, and the events that culminated in the stadium's former tenant, the Coventry Bees, vacating the stadium. In doing so, the evidence has demonstrated that the attendance at speedway events, both at Coventry Stadium, and nationwide, are in decline, as are the number of active teams, and events held across each site. Equally, the evidence has considered the decreasing number of participants in the sport, and the diminishing pool of professional riders able to sustain the number of teams across the sport.
- 4.13 The evidence as updated and submitted with this appeal has considered the other challenges facing the sport. It has assessed the issues the sport faces in garnering interest from a younger and more engaged audience. It has considered the corresponding impact of declining tv viewership, and the



- subsequent effect on commercial sponsorship and the ability for clubs to generate any meaningful revenue.
- 4.14 The evidence has referred to a number of comparable case studies, demonstrating that even those clubs and speedway sites that have recently been redeveloped and upgraded (including National Speedway Stadium in Manchester) are struggling against a backdrop of declining participation and interest in the sport.
- 4.15 The evidence has also considered the decline in British Stock Car Racing, which has historically been held at speedway stadiums as a means of increasing revenue and cross-subsidising speedway. Likewise, the evidence has demonstrated that the decline in greyhound racing (which has operated in a similar way) has further diminished the ability of speedway clubs to remain viable in an everchanging economic landscape. The decline of both sports, which have both historically sought to share facilities with speedway clubs, has further diminished the prospects of speedway clubs in sustaining a viable future.
- 4.16 Finally, the evidence has considered various issues relating to increased costs relating to the operation of speedway. Notwithstanding the capital costs required to reinstate the stadium (which is referred to later in the Appellant's evidence), the costs required simply to illuminate and power stadiums is likely to be prohibitive, particular in the context of decreased attendances and commercial revenue. Likewise, increasingly stringent and restrictive licensing requirements further limit the number of events that can be held and the ability to generate revenue.
- 4.17 To summarise, the evidence has demonstrated that speedway as a sport is in a period of decline, and that there is no realistic evidence to suggest that this situation will change in the foreseeable future. As such, the evidence has demonstrated that the prospect of re-developing the stadium at this time would not be advisable, as mirrored by the issues presently faced at the purpose-built National Speedway Stadium in Manchester. Subsequently, evidence will be presented that the appeal proposals could also satisfy criterion (a) of Paragraph 99 of the NPPF by demonstrating that the Speedway Stadium is surplus to requirements.
- 4.18 The Appellant's evidence will also include a detailed consideration of the cost of re-instating the former stadium to enable it to host speedway again. Informed by Speedway stadia operators, Gaming International, evidence will be presented on the physical extent and associated cost of creating a facility capable of meeting the requirements to accommodate speedway.
- 4.19 The evidence will set out an assessment of the condition of the existing track and various grandstands and ancillary structures that comprise the stadium. The evidence will demonstrate that the condition of the buildings is such that re-using and redeveloping the existing facilities would be financially unviable.
- 4.20 The evidence will include an assessment of the total of cost of creating a stadium which would be capable of meeting the alleged need for a speedway facility at the site. The evidence will go on to comment on the other operational costs associated with holding racing events. The evidence will demonstrate that the capital costs of reinstating the stadium, in tandem with the operational costs,

means that the reinstating of speedway is completely unviable and is clearly outweighed by the benefit offered by the creation of the proposed sports pitch.

- 4.21 Notwithstanding the policy requirement to only satisfy one criterion, taking into consideration the submitted KKP reports regarding 3G feasibility and Speedway viability, it is evidenced that both criteria (a) and (c) of Paragraph 99 within the NPPF are satisfied. Evidence from Gaming International will be submitted to further support this position. As such, the proposals are exceeding the policy requirements and are evidenced to satisfy Paragraph 99 of the NPPF.

### **The Benefits Associated with the Application Proposals**

- 4.22 The benefits of the new facility and the wider application proposals including but not limited to the economic, biodiversity net gain and affordable housing benefits of the proposals.
- 4.23 Where not agreed as Common Ground, evidence will be presented by Tetlow King setting out in detail the Council's track record of delivering affordable housing. The evidence will assess a wide range of affordability data, including information from the Council's Housing Register alongside other published datasets in relation to housing costs, affordability and tenure. The evidence will demonstrate that there are widespread and enduring issues of affordability within the Rugby area, which in turn is preventing members of the public in accessing the property ladder.
- 4.24 The evidence will demonstrate that the extent of unmet need is unlikely to be addressed by the future supply of affordable housing.
- 4.25 The evidence will demonstrate that there is significant need for affordable housing, and that the type and tenure of affordable housing proposed is suitable for the rural setting of the appeal site.
- 4.26 In conclusion, evidence will be presented that that against the scale of unmet need across the Borough, the provision of 25 affordable homes in full compliance with Local Plan policy H3 will make a substantial contribution towards affordable housing in Rugby and that substantial weight should therefore be afforded to this in the determination of this appeal.
- 4.27 In addition, the Appellants' evidence will set out the economic, social and environmental benefits of the proposal. Evidence will be presented as to the significant economic benefits associated with the construction of the dwellings and their occupation, induced benefits and benefits to the wider economy. In addition, evidence will be presented confirming the significant biodiversity net gain associated with the proposals.
- 4.28 The updated Biodiversity Net Gain calculation submitted with this appeal demonstrates that the appeal proposals will result in a significant gain being achieved at the site. The updated calculation demonstrates that the gain is more significant than assessed at the point of determining the planning application.

### **Other Factors Our Evidence Will Address**

### ***The Principle of Development within the Green Belt***

- 4.29 Permission is sought for the redevelopment of the existing stadium buildings. Given the site's location within both the Green Belt and open countryside, it must therefore determine whether the impact on openness associated with proposed development would be greater than that associated with the existing buildings.
- 4.30 As far as it is not agreed as Common Ground between the parties, evidence will be presented which refers to the submitted Landscape Visual Impact Assessment (LVIA) prepared by Barton Wilmore to demonstrate how the site contributes little to the purposes of the Green Belt. Evidence will also set out that the site's inclusion within the wider Green Belt is an anomaly given that the site shares very few characteristics of what one would reasonably consider to be open countryside or Green Belt.
- 4.31 Evidence will also demonstrate that the site is completely obscured by the existing boundaries, the majority of which consists of established hedgerow and mature trees which prevent views into and out of the site. Evidence has been presented that demonstrates that the existing boundaries and a number of sizeable residential dwellings further diminish the sense of openness achievable within the site.
- 4.32 Evidence will demonstrate that most of the proposed dwellings are located on the footprint of the existing stadium buildings, whilst the ridge heights are not greater than the height of the existing stadium structure. On this basis, evidence will draw upon the submitted LVIA to demonstrate that the development can be achieved without increasing the impact upon openness.
- 4.33 Evidence will confirm that the proposals are consistent with Paragraph 145 of the NPPF.

### ***Need for Housing***

- 4.34 Evidence will be presented on the need for housing, confirming that the NPPF sets out a clear priority to significantly boost the supply of housing across the country. The evidence will refer to Local Plan Policy DS1, which establishes a target of 12,400 units across the plan period (663 dwellings per annum from 2018 onwards).
- 4.35 Evidence will highlight that the Local Plan does not preclude the development of windfall housing, with the council making an allowance of 630 dwellings from windfall sites within the Local Plan. Notably, the allowance is neither a maximum or minimum figure and it is to be applied flexibly to ensure the Council are able to meet the relevant target.
- 4.36 As referred to above, if not agreed as common ground between the parties, evidence will be presented by Tetlow King on the widespread and enduring issues of affordability within the Rugby area.

### ***Housing Mix***

- 4.37 Evidence will be presented that demonstrates that the appeal proposals will deliver a broad range of houses, varying in size and scale, and type, in compliance with Local Plan Policy H1.
- 4.38 As far as it is not agreed as Common Ground, the appellant will also present evidence that confirms that the proposals include a policy compliant level of affordable housing. The scheme includes 25 discounted units, which comprises 20% of the scheme, to be secured via Section 106 Agreement to be agreed with the Council. This level of affordable housing provision is compliant with Policy H2 of the Rugby Local Plan.
- 4.39 Turning to the affordable Housing Mix, although the proposed mix deviates from The Local Plan requirement, evidence will be presented by Tetlow King that demonstrates that there is a lack of demand for social rent in the area. Evidence by Tetlow King will demonstrate that the proposed mix of 56% social rent and 44% shared ownership is much more reflective of the housing demand as evidenced within the latest Strategic Housing Market Assessment.

### ***Achieving Sustainable Development***

- 4.40 Evidence will be presented that demonstrates that the appeal proposals are consistent with the principles of sustainable development. Evidence will draw on Local Plan Policy GP1 which states that a positive approach will be taken on development that reflects the presumption in favour of sustainable development and to secure development that improves the economic, social and environmental conditions in the area.
- 4.41 Evidence will be presented that argues that to achieve such a purpose, development must adhere to an economic, environmental, and social objective. Evidence will be presented which makes clear that the proposals will give rise to benefits relation to all three objectives.
- 4.42 In terms of economic benefits, evidence will be presented that demonstrates the construction benefits and operational and expenditure benefits of the proposals. Benefits to local authority revenue will also be presented.
- 4.43 In terms of social benefits, evidence will set out that the proposals include a sizeable area of open space, made accessible to members of the public. The delivery of open space as part of the wider scheme not only serves to reduce the visual impact of the scheme, it also accords with the Council's policy concerning the provision of Open Space, particularly local Plan Policy HS4. In addition to the open space, the provision of new public footpaths across the site, and enhanced pedestrian and cycle links into and out of the site also provide a notable social benefit.
- 4.44 In terms of environmental benefits, evidence will be presented that as a previously developed site, the proposals will reduce the need for the development of greenfield sites across the authority area. Indeed, the development of brownfield sites is advocated in both NPPF, and throughout the Local Plan. This is a significant environmental benefit. Furthermore, the provision of a comprehensive scheme of landscaping, required to strengthen the existing boundaries, will give rise to considerable gains for biodiversity. Evidence will be presented on the biodiversity gain which results from the appeal proposals, demonstrating that the policy requirement is exceeded.



- 4.45 Evidence will draw on the submitted Sustainability Statement which shows how the development will deliver sustainable new homes with resource efficient, climate resistant, low carbon homes to be delivered in a sustainable location, responding positively to the Council's local sustainability policies and latest sustainability appraisal objectives.
- 4.46 Evidence will be presented that demonstrates that the appeal proposals are located in a sustainable setting. The site falls adjacent to Binley Woods which accommodates a number of existing services and amenities which will be accessible to residents of the prospective development. Binley Wood falls within reasonable walking distance to the site, whilst pedestrian access is achievable via an illuminated footway located on Rugby Road. Equally, the site is well served by an existing bus link, accessible from Rugby Road, which provides frequent services into Coventry. Evidence will draw upon the submitted Transport Assessment Addendum which sets out how the proposed layout provides for pedestrian and cycle links into the application site, therefore encouraging accessible means of travel, in accordance with the requirements of the Framework.

### ***Previously Developed Land***

- 4.47 As far as it is not agreed through Common Ground, evidence will be presented that confirms that the site is classified as previously developed land and the appeal proposals are consistent with Local Plan Policy GP3 Previously Developed Land and Conversions and Policy H2 of the Brandon and Bretford Neighbourhood Plan, both of which support the redevelopment of brownfield land to create homes.

### ***Layout and Design***

- 4.48 Evidence will be presented that confirms that the appeal scheme meets the requirements of Local Plan Policy SDC1. Evidence will set out that three key principles relating to Connected Green Infrastructure; Linking the Community; and Creating Places and Spaces have guided the scheme to ensure high quality design will be achieved on site.

### ***Amenity***

- 4.49 The appellant will demonstrate that the proposal would not have a detrimental impact upon the residential amenity of existing neighbouring dwellings and that the scheme has been designed to ensure good residential amenity for future occupiers subject to the detailed landscape being submitted at reserved matters stage.

### ***Other Technical Issues***

### **Flooding and Drainage**

- 4.50 Through the planning application process, the appellant demonstrated through a flood risk and drainage assessments how the proposal does not increase in the residual flood risk to other areas and confirms that the surface water will drain to two attenuation ponds, with subsequent controlled discharge into the nearby watercourse.
- 4.51 The foul Sewage and Utilities Assessment also evidences that there is sufficient capacity in the existing network to accommodate the proposed development.
- 4.52 If matters relating to flooding and drainage are not confirmed as matters in agreement, evidence will be presented which confirms the acceptability of the proposals in this regard.

### **Access**

- 4.53 As outlined in the Transport Assessment Addendum, the applicant has evidenced how the new proposed access to the site, in the form of a priority T-junction, can provide safe access to the site. This access in principle has also been previously agreed with Warwickshire County Council, with the Highways Authority of the view that there were no justifiable grounds upon which an objection in relation to highways matters could be sustained.
- 4.54 On this basis, and subject to the imposition of various conditions and obligations, the authority were able to support the access arrangement.
- 4.55 If matters relating to access are not confirmed as matters in agreement, evidence will be presented which confirms the acceptability of the proposals in this regard.

### **Trees**

- 4.56 The appeal proposals retain the vast majority of tree cover and this is incorporated throughout the development. Furthermore, mitigation for the small number of tree losses will be extensive and would include landscaping of the new open space; associated gardens and green spaces with new tree planting providing additional green corridors throughout the site.
- 4.57 If matters relating to trees are not confirmed as matters in agreement, evidence will be presented which confirms the acceptability of the proposals in this regard.

### **Air Quality**

- 4.58 An Air Quality Assessment was submitted as part of the planning application. This confirms that the site is not located within a designated Air Quality Management Area (AQMA). The assessment evidences how the proposed development would not generate significant air quality impacts both during the construction and operational phase of development and no objection was raised.
- 4.59 If matters relating to air quality are not confirmed as matters in agreement, evidence will be presented which confirms the acceptability of the proposals in this regard.

### **Noise**

- 4.60 The appellant has demonstrated through a Noise Constraint Assessment submitted at planning application stage that the proposal will not create unacceptable noise impacts. As such, no objection was raised.
- 4.61 If matters relating to noise are not confirmed as matters in agreement, evidence will be presented which confirms the acceptability of the proposals in this regard.

### **Heritage and Archaeology**

- 4.62 It is evidenced through a Written Scheme of Investigation submitted as part of the planning application that the site is identified as having low archaeological potential.
- 4.63 If matters relating to heritage and archaeology are not confirmed as matters in agreement, evidence will be presented which confirms the acceptability of the proposals in this regard.

### ***Updated Evidence***

- 4.64 Due to the length of time taken in determining the planning application, the appellant has chosen to undertake updates to the previous prepared ecological surveys, Habitat Plan and Biodiversity Calculations to ensure this present the current position on site.
- 4.65 The updated Habitat Plan and Biodiversity Calculation are included with the appeal submission, but the seasons associated with the ecological surveys mean that these will be submitted at a later date.

## 5.0 Other Representations

- 5.1 The Appellant will address in its evidence the representations made by statutory consultees and third parties to the Planning Application and the Appeal.
- 5.2 The Appellant will also address residual concerns raised by third parties relating to the site's location within the Green Belt, appropriateness of the Appeal Scheme and the viability of operating a Speedway stadium at the Appeal Site.
- 5.3 The majority of these matters are set out within the draft SoCG, to be agreed with the Council. Any matters of dispute or later raised by any Rule 6 parties would be covered in the Appellant's evidence.



## 6.0 Conditions and Obligations

- 6.1 The Appellant will demonstrate that planning conditions and obligations can satisfactorily deal with all matters in order to make the Appeal Scheme acceptable.
- 6.2 The draft SoCG sets out the scope of the planning conditions and obligations agreed with the Council as referenced in the Committee Report.
- 6.3 As required by the Procedural Guide, a draft of the proposed Section 106 Agreement will be submitted to the Inspector at least 10 days prior to the opening of the Inquiry.

## 7.0 Appeal Procedure

7.1 The Appellant asks that this Appeal follows the Inquiry procedure.

7.2 We confirm that notification was provided to the Planning Inspectorate and the Council more than 10 working days prior to submission of this Appeal.

7.3 Having regard to, among other things, the factors identified in Annexe K of the PINS Procedural Guide, the Appellant considers an Inquiry to be the most appropriate procedure for the following reasons:

- The Appeal Scheme is a major development and the Site context is complex, there are objections from consultees/third parties.
- The key issues, namely the viability of operating speedway from the Appeal Site and the identified need for the alternative sports pitch provision, are matters that require detailed technical and complex evidence to be submitted and tested through cross-examination.
- There is significant public interest in the Appeal Scheme with 93 objections from Local Residents and a further 1400 objections received from the wider demographic, which again warrants an Inquiry to allow for the structured examination of evidence and to give all interested parties a fair opportunity to present their views on the scheme.

## Appendix 1: Documents to be referred to

In addition to the Appeal Application and its supporting documentation, correspondence with the LPA, committee reports and minutes, and other submissions of relevance, the Appellants will or may refer to the following documents:

- 1) National Planning Policy Framework and Guidance and Ministerial Statements.
- 2) Policies of the Development Plan
- 3) The Binley Woods and Brandon Neighbourhood Plan.
- 4) Supplementary Planning Guidance and other local policies.
- 5) The Councils Annual Monitoring Reports, including the Councils most up to date Strategic Housing Land Available Assessment and Strategic Housing Market Assessment.
- 6) Relevant Case Law and Appeal Decisions.
- 7) The Appeal Application.

### Drawings and Documents Submitted as Part of the Original Application

Document	Reference	Consultant
Site Boundary Plan	9000 Rev. B	Barton Willmore
Constraints and Opportunities Plan	9101 Rev. D	Barton Willmore
Illustrative Masterplan	9401 Rev. C	Barton Willmore
Land Use Parameter Plan	9600 Rev. B	Barton Willmore
Building Heights Parameter Plan	9601 Rev. C	Barton Willmore
Comparative Coverage Plan	9901 Rev. B	Barton Willmore
Application Form	12/01/2018	Framptons
Planning Statement	PF/9189 (January 2018)	Framptons
Design and Access Statement	Date 12.01.2018 Status Final Rev E	Barton Willmore
Statement of Community Involvement	PF/9189 (January 2018)	Framptons
Sustainability and Energy Statemen	INVZ3001 (December 2017)	Turley Sustainable
Landscape and Visual Assessment	Date 10.01.2018 Status Final Rev C	Barton Willmore
Noise Assessment	AC103800-1R1	REC

Document	Reference	Consultant
Ecological Appraisal	2014-03(08) Rev A	EcoLocation
Reptile Survey Report	2014-03(08) Rev A (13th October 2017)	EcoLocation
Bat Report	2014-03(08) Rev B 13 <sup>th</sup> October 2017	EcoLocation
Bat Hibernation Check	2014-03(08) (30th September 2016)	EcoLocaiton
Biodiversity Impact Assessment calculation	2017-01(06) (5th October 2017)	EcoLocation
Transport Assessment (inc Draft Travel Plan)	SP/TM 16115-01 (December 2017)	david tucker associates
Arboricultural Assessment	December 2017	FPCR
Aerchological Evaluation	December 2017	Headland Archaeology
Archaeological Desk Based Assessment	00200A	Archaeology Collective
Written Scheme of Investigation for a programme of archaeological work	V.02 20/09/2017	Headland Archaeology
Air Quality Assessment	AQ103803R3	REC
Site Investigation	C5887 (October 2014)	Sirus
Flood Risk Assessment Part 1	INV109/FRA December 2017	ASC
Flood Risk Assessment Part 2	INV109/FRA December 2017	ASC
Foul Sewage & Utilities Assessment	INV109/FS&UA (October 2017)	ASC
Financial Assessment Non-Technical Summary	November 2017	Turley
Speedway and Stockcar Needs Assessment	PF/9189	Framptons
Coventry Stox Programme	November 2017	



### Drawings and Documents Submitted Through the Course of the Application

Document	Reference	Consultant
Illustrative Landscape Masterplan	27510 001 I	Barton Wilmore
Site Layout	343A08_101	Malcom Payne Group
Road Hierarchy Plan	343A08_102	Malcom Payne Group
Highways Adoptability Plan	343A08_103	Malcom Payne Group
Area of Development Plan	343A08_104	Malcom Payne Group
3G Sports Pitch & Car Park Landscape Concept	27510 BL_L_SK-003 E	Barton Wilmore
Illustrative Landscape Masterplan	27510 001 K	Barton Wilmore
Combined House Types	343A08_000	Malcom Payne Group
Site Layout	343A08_101_C	Malcom Payne Group
Road Hierarchy Plan	343A08_102_B	Malcom Payne Group
Highways Adoptability Plan	343A08_103_B	Malcom Payne Group
Area of Development Plan	343A08_104_B	Malcom Payne Group
Barwick-Brick	343A08_110	Malcom Payne Group
Beaufort-Brick	343A08_111	Malcom Payne Group
Beaufort-Render	343A08_112	Malcom Payne Group
Carlton-Brick	343A08_113	Malcom Payne Group
Beaufort-Render	343A08_114	Malcom Payne Group
Cofton-Brick	343A08_115	Malcom Payne Group
Cofton-Render	343A08_116	Malcom Payne Group
Crawford-Brick	343A08_117_A	Malcom Payne Group
Crawford-Render	343A08_118_A	Malcom Payne Group
Freemont-Brick	343A08_119	Malcom Payne Group
Freemont-Render	343A08_120	Malcom Payne Group
Montague-Brick	343A08_121	Malcom Payne Group
Montague-Render	343A08_122	Malcom Payne Group
Olton-Brick	343A08_123	Malcom Payne Group
Olton-Render	343A08_124	Malcom Payne Group

Document	Reference	Consultant
Ravenhurst-Brick	343A08_125	Malcom Payne Group
Ravenhurst-Render	343A08_126	Malcom Payne Group
Tansley-Brick	343A08_127	Malcom Payne Group
Tansley-Render	343A08_128	Malcom Payne Group
Garage-Brick	343A08_129	Malcom Payne Group
Streetscenes	343A08_140	Malcom Payne Group
Character Area Elevations	343A08_141	Malcom Payne Group
3G Sports Pitch & Car Park Landscape Concept	BR-L-SK003 RevH	Barton Willmore
Revised Application Forms and Certificate	12/07/2021	DPP
Design and Access Statement	27510 DAS (July 2021) 05 Final LR	Barton Willmore
Landscape and Visual Assessment	27510 LVIA A03 Date 07.07.2021	Barton Willmore
Bat Report	2020-01(08) 2 <sup>nd</sup> July 2021	EcoLocation
Biodiversity Impact Assessment Calculator	2020-01(08) 27 <sup>th</sup> June 2022	EcoLocation
Biodiversity Impact Assessment Calculator	22 <sup>nd</sup> August 2022 916BIA_rev1_	EcoLocation
Great Crested Newt Survey Letter	2020-01(08) 1 <sup>st</sup> July 2022	EcoLocation
BIA Habitat Sketch	916	EcoLocation
Reptile Assessment	2020-01(08) Rev B 9 <sup>th</sup> October 2020	EcoLocation
Ecological Appraisal	2020-01(08) Rev A 5 <sup>th</sup> July 2021	EcoLocation
Addendum to Ecological Impact Assessment	2020-01(08) 21.10.2021	EcoLocation
Designer's Response to Stage 1 RSA of Proposed Internal Site Layout	16115-13	
Tree Survey	8135 AA_B	FPCR
Tree Survey and AIA	8135AA (July 2021)	FPCR

Document	Reference	Consultant
Transport Assessment Addendum	SP/TM 16115-12 (July 2021)	david tucker associates
Flood Risk Assessment	INV109/2021/FRA	ASC
Foul Sewage & Utilities Assessment	INV109A-101-GA	ASC
Surface Water Drainage Strategy Plan	INV109/101/P	ASC
Planning Statement	R001	DPP
Letter of Support	595572	Sky Blues
Noise Assessment Addendum	AC107085-1r0 (1 <sup>st</sup> July 2021)	REC
Viability Assessment	July 2021	Turley
Speedway Viability Appraisal	December 2020	KKP
3G Artificial Grass Pitch Feasibility Study	May 2021	KKP
Viability Addendum Letter - Coventry Stadium, Brandon	(February 2022)	CBRE

### Drawings and Documents on which the Application was Decided

Document	Reference	Consultant
Illustrative Landscape Masterplan	27510 001 K	Barton Wilmore
Site Layout	343A08_101_C	Malcom Payne Group
Road Hierarchy Plan	343A08_102_B	Malcom Payne Group
Highways Adoptability Plan	343A08_103_B	Malcom Payne Group
Area of Development Plan	343A08_104_B	Malcom Payne Group
Barwick-Brick	343A08_110	Malcom Payne Group
Beaufort-Brick	343A08_111	Malcom Payne Group
Beaufort-Render	343A08_112	Malcom Payne Group
Carlton-Brick	343A08_113	Malcom Payne Group
Beaufort-Render	343A08_114	Malcom Payne Group
Cofton-Brick	343A08_115	Malcom Payne Group
Cofton-Render	343A08_116	Malcom Payne Group
Crawford-Brick	343A08_117_A	Malcom Payne Group
Crawford-Render	343A08_118_A	Malcom Payne Group

Document	Reference	Consultant
Freemont-Brick	343A08_119	Malcom Payne Group
Freemont-Render	343A08_120	Malcom Payne Group
Montague-Brick	343A08_121	Malcom Payne Group
Montague-Render	343A08_122	Malcom Payne Group
Olton-Brick	343A08_123	Malcom Payne Group
Olton-Render	343A08_124	Malcom Payne Group
Ravenhurst-Brick	343A08_125	Malcom Payne Group
Ravenhurst-Render	343A08_126	Malcom Payne Group
Tansley-Brick	343A08_127	Malcom Payne Group
Tansley-Render	343A08_128	Malcom Payne Group
Garage-Brick	343A08_129	Malcom Payne Group
Streetscenes	343A08_140	Malcom Payne Group
Character Area Elevations	343A08_141	Malcom Payne Group
3G Sports Pitch & Car Park Landscape Concept	BR-L-SK003 RevH	Barton Willmore
Revised Application Forms and Certificate	12/07/2021	DPP
Statement of Community Involvement	PF/9189 (January 2018)	Framptons
Sustainability and Energy Statement	INVZ3001 (December 2017)	Turley Sustainable
Transport Assessment Addendum	SP/TM 16115-12 (July 2021)	david tucker associates
Archaeological Evaluation	December 2017	Headland Archaeology
Archaeological Desk Based Assessment	00200A	Archaeology Collective
Written Scheme of Investigation for a programme of archaeological work	V.02 20/09/2017	Headland Archaeology
Air Quality Assessment	AQ103803R3	REC
Site Investigation	C5887 (October 2014)	Sirus
Design and Access Statement	27510 DAS (July 2021) 05 Final LR	Barton Willmore
Landscape and Visual Assessment	27510 LVIA A03 Date 07.07.2021	Barton Willmore
Bat Report	2020-01(08) 2 <sup>nd</sup> July 2021	EcoLocation

Document	Reference	Consultant
Biodiversity Calculations	916BIA REV 1	EcoLocation
Biological Impact Assessment	2020-01(08) 22 <sup>nd</sup> August 2022	EcoLocation
Great Crested Newt Survey Letter	2020-01(08) 1 <sup>st</sup> July 2022	EcoLocation
BIA Habitat Sketch	916	EcoLocation
Reptile Assessment	2020-01(08) Rev B 9 <sup>th</sup> October 2020	EcoLocation
Ecological Appraisal	2020-01(08) Rev A 5 <sup>th</sup> July 2021	EcoLocation
Addendum to Ecological Impact Assessment	2020-01(08) 21.10.2021	EcoLocation
Designer's Response to Stage 1 RSA of Proposed Internal Site Layout	16115-13	
Noise Assessment	AC103800-1R1	REC
Speedway Viability Appraisal	December 2020	KKP
3G Artificial Grass Pitch Feasibility Study	May 2021	KKP
Viability Addendum Letter - Coventry Stadium, Brandon	(February 2022)	CBRE
Planning Statement	R001	DPP
Flood Risk Assessment	INV109/2021/FRA	ASC
Foul Sewage & Utilities Assessment	INV109A-101-GA	ASC
Surface Water Drainage Strategy Plan	INV109/101/P	ASC
Tree Survey	8135 AA_B	FPCR
Tree Survey and AIA	8135AA (July 2021)	FPCR

#### Additional plans, drawings or documents not previously seen by the LPA

Document	Reference	Consultant
3G Feasibility Study	March 2023	KKP
Speedway Viability Review	April 2023	KKP

Document	Reference	Consultant
Metric 4.0 Calculation Tool	916 1145	EcoLocation
Biodiversity Impact Assessment	2020-01(08) 2 <sup>nd</sup> May 2023	EcoLocation
Brandon Landscape Scheme	1145 Rev 0	Ecolocation
Statement of Common Ground	SoCG001	DPP
Statement of Case	SoC001	DPP
EIA Screening Letter	EIA001	DPP
Coventry Stadium Infographic	LF66288-01	Lichfields
Coventry Stadium Infographic Calculations	EBI[2]	Lichfields

The Appellants reserves the right to refer to other documents where appropriate should the need arise.





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