SUMMARY OF ERRORS AND UNTRUTHS RELATED TO DOCUMENTS SUBMITTED ON BEHALF OF BRANDON ESTATES

PLANNING APPLICATION FOR BRANDON STADIUM Ref: R18/0186

Produced by the Save Coventry Speedway and Stox Campaign Group $$8^{\rm th}$$ January 2019

Source Reference	Statement made by Brandon Estates / Framptons	Response from Save Coventry Speedway & Stox Campaign Group and reference supporting evidence
Non- technical Summary (NTS) 1.7	The subject premises comprises a disused greyhound racing and speedway / stock car motor racing circuit together with Grandstand, which provided visitor viewing and dining facilities, ancillary buildings and a substantial area of car parking (part- gravel and part-hardstanding). The Stadium had a maximum capacity of 5,000 people. Other buildings on site included storage areas, dog kennels, a shop, laundry room, offices and first aid room.	 When negotiations regarding the sale of the stadium began in 2013 resulting in the subsequent acquisition by Brandon Estates, it was a fully operational and successful motorsports venue as it had been for almost 100 years and was, right up until it's forced closure at the end of 2016. Evidence: Appendix 1 - Chartered Accountant's Statement The capacity figure of 5000 is incorrect. It is 12,500. Just one month before the forced closure of the stadium, 10,500 people attended the 2016 BriSCA F1 World Stock Car Championship meeting. Evidence: Appendix 2 - Marketing document prepared by GVA in 2013 during the stadium sale process clearly stating a capacity of 12,500
NTS 1.10	The subject premises were subject to acquisition by the applicant in November 2015 following a protracted marketing and negotiation period, which had first commenced in early 2013. It is understood that GVA received a total of 6 tenders. All offers were submitted by parties who did not intend to continue to run the existing facility as a stadium or offer any continuation of the exiting Speedway, Greyhound or Stock Car meetings. All parties interested in the property sought to redevelop the property for alternative uses.	The Campaign Group considers this exercise should be given little, if any, weight since the sales particulars invited tenders based on vacant possession of the property. Given the use of the site as an active sports stadium for Speedway and Stock Car Racing, the correct approach would have been to seek tenders based on continuing the sporting activities on the site. The Stadium was never actively marketed under its existing and established use as a sports venue. Had that been the case, interest from the Speedway and Stock Car sectors would have followed, and indeed Mr Keith Chapman, Chairman of Speedway's governing body (British Speedway Promoters' Association) has stated they would most certainly have been interested in acquiring the stadium. The Campaign Group are aware of, and have evidence of, interested parties who remain keen to take over and return the stadium to its long established use as a motorsport venue. Evidence: Appendix 2 - Marketing document prepared by GVA which clearly states "offers invited based on vacant possession".
NTS 1.13	Following acquisition, the applicant agreed new leases with the existing tenants to allow operations and events to proceed unhindered for a period of 12 months (until late 2016). New lease/licence terms were offered to Coventry Speedway Limited (owners of Coventry Bees speedway team and racing licence holder) and Coventry Racing Club Limited (owners of Coventry Stox stock car/banger racing and associated licence holder) in mid-late 2016.	Representations were submitted in Feb 2018 by the Campaign Group which stated "Coventry Racing Club categorically deny ever being offered a new lease in mid – late 2016". (Rugby Council confirm Framptons were provided with a copy). Despite pointing this out, Brandon Estates repeated the claim in Para 1.15 of the 'Needs Assessment' document submitted in October 2018 and only when threatened with legal action by Coventry Racing Club in a letter on 3 rd October (2018), was a letter of apology sent by Framptons (acting on behalf of Brandon Estates) on 7 th November, stating it was an "error in the instructions received". Evidence: Appendix 3 – Letter of apology from Framptons to Coventry Racing Club

NTS	However, the tenants did not agree lease (or licence) terms and	This section totally contradicts previous statements from Brandon Estates Ltd and
1.14	the head-lease remained unsigned. Correspondence between	Coventry Speedway Ltd because, as Brandon Estates issued a press release which
	the tenants and the applicant (as landlord) confirms that	commenced by stating that a lease had been signed by Coventry Speedway Ltd for the
	neither tenant was willing to meet the operational costs of	2017 season, and two more years subject to conditions. This press release was
	Coventry Stadium in full or in equal part. As no lease was signed	subsequently carried on the official Coventry Speedway website.
	with tenants, Coventry Stadium closed in November 2016.	Evidence: Appendix 4 – Press release from Brandon Estates on 3 rd November 2016
NTS	Coventry Racing Club Limited subsequently moved their events	Coventry Racing Club did not move their events to Stoke as stated – four of
1.15	to Stoke Stadium in 2017, and have recently announced that	Coventry's events were transferred, one each to Stoke, Belle Vue, King's Lynn and
	the Coventry Stox operations will cease for 2018 and 2019	Sheffield. Though this was pointed out in the Campaign Group representations in
	seasons (at least) whilst venue and financial arrangements are	February 2018, Brandon Estates repeated the claim in the 'Needs Assessment' document
	addressed.	in October 2018.
		Evidence: Appendix 5 - Email from the Chairman BriSCA
		There is no basis for stating the financial position is behind the decision for Coventry
		Racing Club not to run in 2018/19. The Chairman of BriSCA, have clearly stated Coventry
		Racing Club has always been a viable operation in the separate letter of objection.
		Evidence: Appendix 6 Email from Chairman of BriSCA to Erica Buchanan in Feb 2018
NTS	Coventry Speedway Limited had their licence to compete in	The Coventry Speedway 'deal' to compete at Leicester Stadium in 2018 was a one
1.16	speedway as the Coventry Bees racing team frozen by the	year arrangement, not a rolling one 'from' 2018. Additionally, this was for racing in the
	governing body for the 2017 season. In November 2017	third (bottom) tier of the sport, the National Development League – not the top level at
	Coventry Speedway Limited announced that Coventry Bees	which the club has always previously raced.
	speedway team had reached agreement with the Leicester	Since this statement was made in January 2018, Coventry Speedway, whilst completing
	Lions speedway team to share facilities at the Leicester	the 2018 season at Leicester, has announced it will not compete in 2019 as the venture at
	Speedway stadium from 2018 and would not return to Coventry	Leicester was a 'disaster'.
	Stadium.	Evidence: Appendix 19 - Letter from BSPA (Dec 2018) confirming Coventry Bees will not
		compete in 2019
NTS	Following leases not being renewed by both operators the	The statement that the stadium formally closed in January 2017 casts doubt over
1.17	stadium formally closed in January 2017.	statements made by the owners to the press in the first half of the year which clearly
		stated the future of the site would not be decided until the conclusion of the police
		investigation into the removal of assets. This demonstrates the owner's determination to
		close the stadium, but to keep that intention out of the public domain until the
		submission of the planning application (see also 5.13).
		Evidence: Appendix 7A - Statement from James Crocker of Howell & Co, Solicitors in the
		Coventry Telegraph on 27 th March 2017

NTS 1.18	The applicant has received several enquiries from parties interested in either acquiring or operating Coventry Stadium since its original purchase. The applicant has willingly engaged with these parties. Based on correspondence provided by the applicant, to date none of the parties seeking to re-use the facilities have demonstrated a credible business case or professional team to operate the stadium or have failed to provide suitable evidence of funds to either operate or acquire the subject site and premises.	It is stated that the applicant has "willingly engaged" with interested parties. However, there is evidence from a very credible interested party who wished to BUY the stadium in March 2017 but was put off by an implied demand for the value of housing – as Brandon Estates expect their planning application to succeed on appeal. This is demonstrated by the following quote sent by James Crocker of Howell & Co Solicitors to the potential purchaser on behalf of Brandon Estates: "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."
		Evidence: Appendix 8 - Email from Will Hunter, Director of Huntapac Produce Ltd
		There is also evidence of an interested party to LEASE the stadium (on two separate occasions) who was clearly rebuffed with a response that Stock Cars will not be considered at the stadium under any circumstances. In May 2017 a potential leasee was told:
		<i>"Under no circumstances will Brandon Estates permit Stock Car Racing to return to Brandon Stadium."</i>
		Evidence: Appendix 9 - Email from James Crocker of Howell & Co to Rugby Businessman, Gary Townsend on 11 th May 2017
		This message was repeated following a further enquiry in January 2018: "As previously intimated, and for the avoidance of doubt: Stock car racing will never be allowed to return to the Stadium."
		Evidence: Appendix 10 - Email from James Crocker to Rugby Businessman, Gary Townsend on 11 th January 2018
		Given that it is an accepted fact that Stock Car racing largely funds the operational costs for the stadium, the exclusion of Stock Cars was clearly aimed at making it unviable. Additionally, attempts by the Campaign Group to arrange to meet with the applicants in a
		bid to establish a mutually suitable way forward were turned down on the basis that they were confident their impending Planning Application would be successful.

NTS 1.20	However, in late November 2016, substantial damage was done to the subject premises by a third party. Damage included the removal of a substantial amount of essential fixtures and fittings, belonging to the applicant , including the shale on the racetrack, floodlights and stadium seats.	This matter was reported to the police by James Crocker of Howell & Co, accusing Avtar Sandhu of criminal damage and an investigation ensued. The Police investigation into this incident was dropped in May 2017 with no case to answer, and the threat of civil action never materialised. For the first five months of 2017, all public statements from Brandon Estates were of the Stadium site being a crime scene, and therefore no possibility of racing could be considered. This was clearly a delaying tactic when paragraph 1.17 states the stadium was formally closed in January 2017. Evidence: Appendix 7 – Police statement in Coventry Telegraph 10 th May 2017
		Evidence: Appendix 11 – Statement from James Crocker in Coventry Telegraph 11 th May confirming civil action would be taken against Avtar Sandhu.
NTS 1.22	The damage caused is understood to have played a significant part in the financial decision of Coventry Speedway Limited not to take up the lease offered by the applicant.	There is no mention of the fact that Coventry Racing Club, on several occasions, offered publicly to re-instate the stadium at their own cost if they could be permitted to run Stock Cars there.
NTS 1.23	Despite the applicant undertaking significant works and incurring costs to secure the subject site, there have been repeated recorded occurrences of trespassing and further criminal damage to the premises over the course of 2017 to date. Prior to the first break-in the applicant implemented additional security measures including employment of on-site security staff, installation of security gates and digging of trenches to restrict vehicular access amongst a wider package of measures.	 Evidence: Appendix 12 – Avtar Sandhu press release No trenches or security gate were in place prior to the first break-in. On-site security staff had also been removed prior to the break-ins, and the automated warning system fed back to an office in Halesowen – 45 minutes' drive away! This was subsequently broken and disabled by the Gypsies in any case. Welding of gates and placement of concrete-filled barrels was carried out by local residents living in fear of the incursions, frustrated by the lack of action from Brandon Estates to improve security. Evidence: Appendix 13 – photographic evidence taken throughout 2017 showing the claims to be a complete fabrication. Further extensive photographic evidence is available in a separate document entitled 'The Systematic Damage to the Iconic Brandon Stadium' is available if required. Evidence: Appendix 14 – Emails from a local resident to James Crocker in July 2017 regarding lack of security and failure to secure the site and his reply. Evidence: Appendix 15 – Email from Lisa Hayes (Rugby Council Environmental Health Officer.) to James Crocker on 4th July 2017.
NTS 1.27	Analysis of the published abbreviated accounts for Coventry Speedway Limited confirms that liabilities have consistently exceeded assets in each year of trading with the business recording annual operating losses. The company has not turned a profit in any year of trading since incorporation in 2011.	The accounts of Coventry Speedway Ltd are taken in isolation and are not relevant as they were merely tenants of the stadium , contributing via rent, to the overall profitability of the stadium and Coventry Racing Club. The liabilities of Coventry Speedway Limited will, in the early years of trading, have included the cost of purchasing the speedway business from Coventry Racing Club Ltd, the cost of which is known to have been £200k.

NTS 1.28	Turley has directly liaised with Mr Michael Horton, the Company Director of Coventry Speedway Limited to obtain management accounts in order further understand the detailed operational trading performance of the Coventry Bees speedway team.	Little weight should be attached to the statements made by the director of Coventry Speedway Ltd to Turley, as it is known that he has received a substantial sum of money from the applicant. Evidence: This is formally recorded in the minutes of the Speedway Control Bureau minutes on 9 th January 2018, following which approval was granted for Coventry to compete in the third (bottom) tier of the sport at Leicester. Evidence: Appendix 11 – Statement from James Crocker of Howell & Company in the Telegraph 13 th May 2017 (column 4) Evidence: A video recording of James Crocker addressing fans at a protest on 10 th March 2017 is available on request. He clearly states (10mins into the video) that £50k had been
		deposited into Mr Horton's solicitor's account
NTS 1.29	This evidence confirms that operating the Coventry Bees speedway team at the subject premises has consistently represented a financially unviable business proposition. Essentially, on average, each track meeting is run at an operating loss.	The assertion that speedway represents an unviable business as it registers losses in every meeting on average is inconsistent with the reports filed at Companies House, which clearly show that profits were made in 2014 and 2015. Evidence: Appendix 16 – Summary of Coventry Speedway Ltd accounts
NTS 1.30	Even excluding costs and assuming the stadium landlord would offer non-commercial terms to the Coventry Bees, the team would still generate an operating loss. It therefore confirms why Coventry Speedway Limited did not take up the head-lease offered by the applicant (as landlord) in January 2017. Given Coventry Speedway Limited could not break-even before contributing significantly towards the operating costs of Coventry Stadium, it is rational to conclude that should such costs have been added these would have further deepened operating losses.	It is stated that Coventry Speedway Ltd did not take up the head-lease because the team would generate an operating loss. This does not, however, explain why therefore they had negotiated a deal for the head-lease, and according to the press statement of 3 November 2016, had signed it! It is difficult to imagine that Coventry Speedway Ltd would find itself in a better position when operating 27 miles away at Leicester, with the consequent drop in attendance levels and relative lack of support for bottom-tier racing.
NTS 1.31	Turley has not been provided with management accounts of Coventry Stadium, and hence the trading performance cannot be determined definitively. Some revenue and operating cost information has, however, been provided to the applicant by the former vendor to inform lease negotiations. Supplementary information has also been provided by Coventry Speedway Limited, which traded from the premises for five years.	The absence of full accounts of Coventry Stadium must surely make the speculation over financial performance in previous sections inappropriate, and therefore undermines the applicant's arguments regarding viability. The notion that Mr Horton of Coventry Speedway Ltd, who was merely a tenant at the stadium, would have any insight or access to the accounts of Coventry Racing Club Ltd is ludicrous and any information he has provided should be discounted. Unfortunately, as financial information has been withheld (for confidentiality reasons), claims are unable to be scrutinised.

NTS	Operational trading performance analysis suggests that a very	This extraordinary paragraph appears to be a section to cover the authors who have
1.32	slim positive trading margin would be achievable in a best-case	reached the conclusion required from their brief in previous sections – only to now
	scenario where all tenants met their lease obligations and paid	correctly state that positive trading could be achieved where tenants meet their lease
	their rent on time and in full. Given the challenges faced by	obligations.
	Coventry Speedway Limited in meeting their lease obligations,	The accounts of Coventry Racing Club Ltd (Appendix 1) confirm this is the case, and that
	this represents an unlikely scenario. Moreover, should either	Speedway and Stock Car Racing is a viable use of the site.
	speedway or stock car events be withdrawn or reduced the	
	impact on operating margin is significant and would tip the	
	stadium into an operating loss. This risk was likely evident to	
	Coventry Racing Club Limited and Coventry Speedway Limited,	
	with neither willing nor able to meet the stadium operational	
	costs in part or in totality.	
NTS	Moreover, there are no licence holders willing to hold motor	Clearly no licence holders are willing to hold motor racing events at the stadium in its
1.37	racing events at the stadium, and there is no active greyhound	current condition – but they would be if it was in a repaired condition, and they would
	racing licence, which leaves Coventry Stadium without a	have been had terms been offered to Coventry Racing Club during 2016 (Appendix 3
	business case for reopening or operational purpose.	Letter of apology confirms that they were never given the opportunity).
		Speedway and Stock Car Racing together – as they had been from 1954 to 2016 - make
		the stadium viable.
Planning	The site is currently occupied by a disused stadium, which has	Whilst the statement is factually correct, it implies the stadium was disused and not
Statement	previously been used for stock car racing, speedway and	operational when it was purchased by the applicant.
2.3	greyhound racing. The site comprises a racing circuit with a	This misleading statement led to consultee Sport England submitting a response believing
	grandstand providing visitor viewing and dining, bar and toilet	the stadium to have been closed and disused prior to acquisition and when informed of
	facilities, ancillary buildings (storage areas, dog kennel, shop,	the true situation, a revised document was submitted to Rugby Council.
	laundry room, officers, first aid room and smaller buildings	When the stadium was marketed in 2013, it was advertised for sale with 'vacant
	housing a score boards and food outlets); and a substantial	possession' (Appendix 2) when in fact, it was fully operational as a motorsports stadium
	area of car parking comprising gravel and hardstanding. The	with a lease which ran until 2023.
	track is surrounded by viewing platform on each side. The site	The fact is, it was disused as a result of the forced closure by the applicant. Claims that discussions were held with the previous owner (Coventry Racing Club) with regard to
	is secured by barriers and a gate. The site and premises are not	extending the lease have been exposed as untrue (Appendix 3 Letter of apology), as have
	currently operational.	claims that no parties were interested in buying or leasing the stadium (Appendices 8, 9
		and 10).

Planning Statement 6.35	It is submitted that the buildings are surplus to requirements. The Viability Assessment confirms that the challenges and general decline in the speedway, stock car and greyhound sector has led to a substantial number of closures of stadia nationally, with financial difficulties in the face of falling attendances and revenues the primary driver cited. In order to share the operational costs, it is common that stock car race grounds are used for other sports including speedway and greyhound racing.	The Viability report makes no such assertion concerning a general decline in Speedway or Stock Car Racing. While it is correct that stadiums may come and go, particularly those located in urban areas, the number of venues used for Speedway in the UK has remained remarkably constant. In 1998 there were 25 operational speedway venues staging league racing. In 2018, there are 27 operational venues staging league racing. Since 2008, the number of venues has always been between 26 and 29. Evidence: Appendix 17 – Chart showing number of operational stadiums in last 20 years.
Covering letter (3 rd Oct 2018) Relating to Alternative Provision (Page 1)	In our telephone conversation you stated that we had satisfactorily demonstrated that there was alternative provision for the previous speedway use on the site but that you required details regarding possible alternative provision for the previous stockcar use on the site.	The previous speedway use on the site was for the Coventry Bees club racing at the top level of the sport (in addition to major events as required). It served the Coventry/Rugby audience. The 'alternative' does not serve the Coventry/Rugby public in any way as it is 30 miles away, and is for speedway in the lowest league. It is the equivalent of Manchester United being re-located to Crewe and playing in the bottom tier of league football. The outrageous claim was made in the January planning application that the Bees had moved to a venue which was "better suited to its use as a speedway stadium for a number of reasons including its accessibility" From the point of view of a Coventry team racing there, the factual position has been proved that it is not, and never was, a viable alternative. When Louise Steele of Framptons wrote this comment in the covering letter, she clearly had no idea that the venture at Leicester had been a 'disaster' and that Coventry Bees would be withdrawn from all competition for the 2019 season. Evidence: Appendix 18 – Letter from Mick Horton 20 th October 2018 Evidence: Appendix 19 – Email from Speedway Governing Body (BSPA) confirming Coventry would not be competing in 2019 and that the arrangement at Leicester was only ever a one year deal.
Covering Letter 1.11	Ultimately the stadium ceased operations in November 2016 and has remained closed since.	The stadium was closed due to Brandon Estates' refusal to extend the lease as they were unwilling for Stock Car racing to continue. It is known that as early as October 2016, the speedway promoter was aware that Stock Car racing would not be permitted. The two appendices below demonstrate Coventry Racing Club wanted to continue operating at the stadium but were refused the opportunity. Evidence: Appendix 3 - Letter of apology Evidence: Appendix 12 - Press release from Avtar Sandhu

Covering	In mid-2016 negotiations between the applicant and Coventry	Despite being made aware in February 2018 that "Coventry Racing Club categorically deny
Letter	Racing Club Limited ensued with respect to agreeing a new	ever being offered a new lease in mid – late 2016", the statement was repeated in the
1.15	lease for 2017 onwards.	Covering Letter in October 2018.
1.15		In a letter dated 3rd October 2018, Coventry Racing Club advised Framptons that legal
		action would follow if they did not withdraw the statement.
		A letter of apology was sent from Framptons to Coventry Racing Club on 7 th November,
		claiming "there had been an error in instructions received".
		It is understood Rugby Council has NOT been forwarded this letter of apology to consultees (as at 6 th Jan 2019).
		The admission that Coventry Racing Club were NOT offered a new lease, makes many
		other statements in the documents submitted by Framptons invalid (eg NTS 1.17 -
		Following leases not being renewed by both operators the stadium formally closed in
		January 2017.)
		Evidence: Appendix 3 – Letter of apology
Covering	However, due to the financial difficulties faced by Coventry	Financial difficulties were not being faced by Coventry Racing Club itself. Owner Mr
Letter	Stadium Limited (and Coventry Racing Club Limited), which	Sandhu had (and still has) numerous businesses and it is not uncommon for businesses to
1.16	had ultimately led to the sale of the subject site, the applicant	take out loans to finance new ventures with assets being offered as security for those
	was legally advised not to grant a further lease to Coventry	loans.
	Racing Club Limited. There was considered a high risk that the	Some years after the 'financial crash' a scandal was revealed regarding the Royal Bank of
	terms of any subsequent lease would be breached.	Scotland, themselves having been 'bailed out' by the government, acting improperly
		toward 5,900 SME's.
		Mr Sandhu was a victim of this scandal and faced with repayment of a £4.5m loan
		resulting in the bank effectively forcing the sale of the stadium.
		All inferences by the applicant regarding the financial situation of both Coventry Racing
		Club and Mr Sandhu himself are not factual. It was the unreasonable and immoral actions
		of RBS which forced the sale of the stadium.
		Evidence: Appendix 20 – Newspaper articles referring to RBS scandal
		Evidence: Appendix 21 – Letter from Avtar Sandhu regarding £4.5m loan
Covering	During 2017 the Coventry Stox held their events at Stoke	Despite being advised in February 2018 that this statement was incorrect, they repeated it
Letter	stadium and shared the facilities.	again in October 2018.
1.17		Coventry Stox held ONE event at Stoke in 2017. The others were held at Sheffield, King's
		Lynn and Belle Vue. A normal quota for a Coventry Stox season would be 8-9 Formula 1
		meetings; however there were not sufficient opportunities within the fixture list and
		availability of venues to operate every month.
		Evidence: Appendix 5 - Letter from Governing Body (BSDA)
		Evidence: Appendix 22 - Letter from the Drivers Association (BSDA

Covering Letter 1.19	Specifically, on page 20, the management confirm that the Coventry Stox have struggled to trade viably in 2017: "it's unlikely that the Coventry Stox team will be touring the 'first Saturday of the month' dates in 2018. The dates used this year haven't been very well supported by fans and drivers alike – why I don't really know but that's how things are. It has been quite difficult to turn a decent profit and unfortunately running next year can't be justified. I can totally understand this but it doesn't make it any easier."	The management confirm no such thing. The article referred to in page 20 of the programme is written by an infrequent contributor (Ian Bennett) who is NOT a member of the Coventry Stox management, and would not have access to, or be in a position to understand their business position or all of the issues involved. It is noted on page 2 of the programme that <i>'opinions expressed in this programme by contributors are not necessarily those of Coventry Racing Club Ltd.'</i> Evidence: Appendix 23 – Coventry Stox Programme from Stoke 4 th Nov 2017 Evidence: Appendix 22 – Letter from BSCDA
Covering Letter 1.22	Based on review of the BriSCA fixture list there were approximately 10 UK stadiums that held BriSCA F1 racing in 2017. Each stadium holds a varying number of meetings and fixtures throughout the season. There is no principal national stadium for the sport. The major championship events are held at varying stadiums determined through a bidding process undertaken by each stadium's Stock Car promoter. It is therefore possible for a stadium to have more than one stock car promoter.	In 2018 there were 13 UK stadiums which held BriSCA F1 racing. These were: Belle Vue, King's Lynn, Skegness, Stoke, Mildenhall, Hednesford, Sheffield, Buxton, Cowdenbeath, Lochgelly, Ipswich, Northampton and Birmingham Wheels. The principal stadium WAS Coventry – which is clearly demonstrated by the list of Major Events staged there, as noted in 1.8. Coventry has staged 22 World Finals since 1960, a ratio of roughly once every three years, despite there currently being 13 operational stadia. The majority of stadiums quoted above are unsuitable for the hosting of Major Events. Several require temporary grandstands, and extra catering and toilet facilities to be brought in, to even approach the standard of Coventry. The beauty of Coventry is that this was all available on-site, 24 hours a day, 7 days a week. The attendance for this year's World Final (at Skegness) was around 50% of the Coventry event in 2016. Operators of those other stadia therefore chose to rent Coventry on several occasions if they were successful in their bids for a Major Event.
Covering Letter 1.23	Also of note, in order to share the operational costs it is common that stock car race grounds are used for other sports including speedway and greyhound racing. The use of these stadiums could help sustain the sport and provide additional revenue for other stadiums.	This suggests that the closing down of Coventry somehow improves other stadiums, which is patently nonsense. From a speedway perspective, evidence provided by the Birmingham and Wolverhampton promotions totally contradicts this. Evidence: Appendix 24 – Letter from Birmingham Speedway Promoter Evidence: Appendix 25 – Letter from Wolverhampton Speedway Promoter

Covering	We have therefore undertaken a review of stadiums within 70	This is nothing more than a desktop exercise, searching for venues which stage
Letter	miles of the site which could accommodate stock car racing. 70	motorsport within a 70 mile radius of Coventry with no research whatsoever to look into
1.24	miles has been chosen as this is the distance that the stockcar	the suitability of these venues and based on a random distance of 70 miles.
	fans were travelling to at Stoke Stadium. This is as set out	One would have thought that the author, Louise Steele as an Associate Director of
	below:	Framptons would have researched this more thoroughly before formally submitting it.
	Stoke Stadium, Loomer Road	Had she done that, and it wasn't difficult to do, she would have concluded the following
	Perry Bar Stadium, Birmingham	with respect to each of the venues:
	Beaumont Park, Leicester	
	Birmingham Wheels	Stoke Stadium – is a F1 Stock Car (and speedway) venue which staged one of Coventry's
	Brafield Stadium, Northampton	meetings in 2017. It has very basic facilities, covering on part of the home straight area
	Hendesfrod Hills Raceway, Cannock	only, and no seating.
	Trent Raceway, Burton-on-Trent	
		Perry Bar - This stadium is totally unsuitable for Stock Car racing for a number of reasons.
	Note – in the Framptons document, a more detailed description	It does not operate "similar types of uses" to stock car racing. It runs speedway and
	of each stadium is provided (often totally inaccurate – see	greyhound racing only. When planning permission was granted for speedway racing to
	response on the right).	take place at Perry Bar, all other forms of motorsport other than speedway, were
		specifically excluded.
		Evidence: Appendix 24 – Letter from Birmingham Speedway Promoter
		Evidence: Appendix 26 – Birmingham Planning Consent
		Beaumont Park - We can confirm that this stadium could not be used for stock car racing.
		In fact, three previous parties (including Coventry Stox) have looked into the feasibility of
		doing so, and come to the conclusion that it would not be possible. There is insufficient
		access and parking for the large transportation vehicles associated with the sport, and the
		circuit itself would require extensive modifications which the speedway owners and
		stadium leaseholders are not prepared to make.
		It is also incorrect to state that the stadium is running "similar types of uses" to F1 stock
		cars – it is used for motorcycle and occasional sidecar racing only Evidence: Appendix 27 - Letter from Leicester Speedway Promoter
		Louence. Appendix 27 - Letter from Leicester Speedway Promoter
		Birmingham Wheels - Birmingham Wheels is a F1 Stock Car track which is itself under
		threat and therefore cannot be regarded as a suitable alternative. It is also a tarmac track,
		whereas Coventry is shale, which is another of the reasons why Coventry is a special
		venue.

		 Brafield – Is a F1 Stock Car track and one of the sport's original stadiums, but it only has very basic facilities, for example no covered accommodation, or seating or even concrete terracing for spectators, meaning it cannot be regarded as a serious alternative to Coventry. Hednesford Hills - This is unsuitable as a replacement for Coventry, as there are severe restrictions on race dates/times. Racing is only permitted on Sunday and Bank Holiday afternoons, with one Saturday (per year) permitted to early evening as part of a weekend, and one Sunday permitted to evening in order to conclude with fireworks. In 2018, just one event was staged there. As with Birmingham Wheels, it is a tarmac track and for these reasons cannot replace Coventry. Trent Raceway - is a 'pirate' dirt track. It has no terracing, no cover and no grandstands – effectively, events take place in a field. It does not have planning permission for regular racing and operates under the '14 day rule'. Evidence: Appendix 5 (letter from BriSCA) and Appendix 22 (letter from BSCDA) each concur with the comments above for each venue. Evidence: Appendix 28 – Stadium comparisons (aerial views of various stadiums) which show pictorially, the standard of location (regarding seating, terracing, covered areas etc) and in particular space limitations for cars / transporters.
Covering Letter 1.25	It is considered therefore that there is possibility of alternative provision at several sites within 70 miles of the site	The evidence above confirms that there is no suitable alternative stock car provision at any sites within 70 miles of Brandon, or beyond. The authors themselves are unconvinced, due to the usage of the word "possibility"!
Covering Letter 2.1	As set out above there clearly are alternative locations and possible alternative sites where stockcar racing could be held. As noted in our planning application submission the stock car	This has clearly been proved to be false. The authors' position has switched in the space of one paragraph from "there is possibility of alternative provision" to "there clearly are alternative locations" !
	operators have either lost their license or as set out in the evidence as part of the planning application submission have not been able to operate viably.	The stock car operators have NOT lost their license but froze their license after their four events staged elsewhere in 2017, but were always able to operate viably at Brandon. Their business position when operating at other venues is entirely their own prerogative. Evidence: Appendix 6 – Letter from BriSCA stating that Coventry Racing Club's license is 'frozen for 2018 and a period beyond'.

Covering	The proposals on the site will make use of previously developed	We dispute the notion of 'previously developed land.' Only the footprint of grandstands
Letter 2.5	land. It will complement the existing residential community and	and outbuildings can be regarded as brownfield, which occupy only a small proportion of
Letter 2.5	provide new public open space and will improve the quality of	the site area. Sports facilities and car parks are frequently found in Green Belt and would
	the surrounding environment.	not be regarded as brownfield.
Covering	Notably regarding speedway, you recently noted that it had	We would respectfully query why Framptons are being asked questions relating to the
Letter	been reported to you that the Coventry Bees Speedway team	administration of speedway. Rather than ask the question of the governing body (BSPA),
Final Para	was having performance success at Leicester and you queried whether Leicester could accommodate the Bees if they went up	Framptons chose to make the vague and totally inaccurate statement that it 'suggests the Bees could be accommodated if promoted'.
	a League. It is noted that the Leicester team (Leicester Lions) is	In this particular case, the answer again demonstrates the lack of speedway
	in a higher league than the Bees, this suggests Leicester	understanding prevalent throughout the reports, unless of course they are a deliberate
	facilities can accommodate the Bees if they are promoted.	attempt to mislead.
		We can confirm that in speedway, clubs do not get promoted (or relegated) based on
		performance success (or failure). A club will always operate at the level it believes
		provides the best opportunity for business strength and stability, and their results on-
		track would generally be the last consideration when assessing a possible move up or
		down.
		In moving the Bees to Leicester, Mr Horton chose to race in the lowest tier of speedway
		(National Development League), even though the club had a history of always racing in
		the top flight.
		This decision was based on operating at the significantly reduced cost base in the lowest
		tier, in anticipation of a drop in attendances as a result of racing 30 miles away (and in the
		lowest tier).
		Had Ms Steel (who submitted this information on 3 rd Oct), carried out any research at all,
		she would have seen an article in the Coventry Telegraph published a few weeks earlier.
		Has she contacted the Coventry Speedway promoter (Mr Horton), she would have
		established that the venture had been a 'disaster' and that the Bees were about to be
		withdrawn from all competition, as outlined in Appendix 18
		In that letter, Mr Horton concludes that the Coventry team must race in the
		Coventry/Rugby area. This has always been the case, and the only way in which to serve
		the Coventry/Rugby public.
		Evidence: Appendix 18 – Letter from Mr Horton
		Evidence: Appendix 18A – Coventry Telegraph article 10 th September 2018

Needs Assessment 1.3	This report supports the planning application submission and seeks to make the case that Coventry Stadium is surplus to requirements in line with National Planning Policy (NPPF).	It should be noted that this assessment has only been carried out at a very late stage. It was NOT carried out as part of the preparatory work to inform the redevelopment proposals and was submitted in response to the Interim Report from Government Inspector Mr Hayden regarding queries related to alternative provision for stock car racing (there was no reference whatsoever to this in the planning application). It is hardly surprising in this respect that it comes to the (flawed) conclusions set out. The Campaign Group consider the approach by Brandon Estates and their advisors in this regard is unacceptable.
Needs Assessment 1.10	Speedway and stock car racing does not however operate on the basis of Council boundaries. It has been assumed that the primary catchment area for speedway and stock car racing is a 60-minute driving catchment is a reasonable travel time to a stadium. There are no confirmed drive times for speedway or stock car racing and the 60-minute driving catchment is an assumption only based on the fact that speedway racing for the Coventry Bees is currently held in Leicester an approximately 35-45 minute drive from Coventry Stadium and stock car racing for Coventry Stox was most recently held at Stoke Stadium an approximate 1.25 – 1.35 drive from the stadium. Therefore, in undertaking an analysis of need it is more relevant to consider catchment areas as opposed to local authority boundaries	The Campaign Group considers the 60-minute travel time to be unsuitable for both sports but particularly for the assessment of Speedway. The Group considers that any facility accommodating the Coventry or Brandon Bees by definition has to be located very close to the existing stadium. The experience of a third-tier Coventry Bees team being based in Leicester has not worked. The support base is not prepared to travel on a regular basis. (See Appendix 18.) A similar experience was felt by Coventry City Football Club when they played a season at Sixfields Stadium in Northampton when they lost access to the Ricoh Arena. Supporters could not, or would not, travel, and crowds dropped to circa 1,000-2,000. Back at the Ricoh Arena since September 2014, crowds are now regulary back over 10,000. Speedway is primarily a team-based sport, and the teams must be based in their respective areas. Possibly the most significant point completely missed in this assessment is the role played by Brandon Stadium in both sports. In stock car racing it was regarded as the 'Wembley Stadium' of the sport. Its central location close to national transport networks, and the quality of facilities meant that the stadium has hosted more of the sports major events than any other stadium in the history of the sport. In speedway it also regularly hosted major national and International events. Suggested alternatives are either incorrect, or unsuitable as replacements (as covered earlier in this document).
Needs Assessment 1.16	As set out in the previously submitted Turley Assessment, the subject premises comprises a disused greyhound racing and speedway / stock car motor racing circuit together with grandstand, which provided visitor viewing and dining facilities, ancillary buildings and a substantial area of car parking (part-gravel and part hardstanding).	The stadium is disused purely and simply because Brandon Estates terminated the sporting activities. Turley report is discredited as it contains numerous inaccuracies and untruths.

Needs Assessment	Prior to the closure and substantial damage, the subject premises previously operated as the Coventry (or Brandon)	The damage to the stadium has been caused as a direct result of the failure of Brandon Estates to provide adequate security on the site, and their failure to comply with a
1.17	Stadium ('the Stadium'). The speedway track had a length of 300m and was surrounded by the greyhound track which was 400m in length.	Community Protection Notice served upon them by Rugby Borough Council, which ultimately had to be settled in court.
Needs Assessment 2.27	The quality of speedway stadia in the UK is generally poor, which a major reason for the limited number of FIM international events other than the British Grand Prix which are hosted in the UK.	This statement is a misrepresentation of both the relative quality of UK speedway stadia, and the standing of the UK in terms of staging FIM international events. The quality of speedway stadia in the UK does not match that of new, all-seater football stadia, but for the purpose of outdoor motorsport, all are acceptable and compare favorably with European equivalent venues, with the exception of modern Council- funded stadia in Poland. For decades, the UK has staged a significant number of major FIM events in addition to the British Grand Prix and it has been confirmed in 2019 Great Britain will stage three of the biggest and most important FIM major events: Speedway of Nations at Belle Vue; World Under-21 Team Cup Final at Belle Vue; and Grand Prix Qualifier at Glasgow. The FIM Track Racing chief Armando Castagna, quoted in a recent issue of Speedway Star magazine, said: "I really appreciate the support we are receiving at the moment from Great Britain in speedway I am very happy with the situation we have." Such comments are totally at odds with the statement provided by Framptons.
Needs Assessment 2.35	Wimbledon Stadium opened on 19 May 1928. It operated as a greyhound racing track and also hosted motor racing events. The stadium closed in March 2017.	This section of the Needs Assessment refers to the 'Decline of Greyhound, Speedway and Stock Car Stadia' and makes reference to two examples, Wimbledon and Hall Green. Like many other statements made by Framptons in the Needs Assessment, they are very poorly researched and appear to be 'lifted' from Wikipedia.
Needs Assessment 2.35	Until 2005 the stadium hosted speedway events and, for circa 50 years, was home to the Wimbledon Dons speedway team (now defunct). It is understood that the team disbanded due to financial difficulties, which were exacerbated by an inability to meet the increased rental cost within lease terms proposed by the stadium's owners.	The assertion that 'Wimbledon speedway team disbanded due to financial difficulties' is completely untrue, with the facts made clear in a letter from Mr Ian Perkins, Chairman of Wimbledon Speedway between 2002-2005). Evidence: Appendix 29 – Letter from Ian Perkin explaining the circumstances of Wimbledon's closure.

Needs Assessment 2.36	The stadium also hosted stock car and other small circuit motor racing events from 1962 until circa 2008	Stock car racing in fact continued right through until closure in 2017, and did not cease in 2008 as stated here.
Needs Assessment 2.37	In 2007 the stadium was acquired by Galliard Homes Limited following it being put up for sale by the former owners. A joint planning application made by Galliard Homes and AFC Wimbledon to build 600 apartments on the site and a new 11,000 seater football stadium, which will be the new home of AFC Wimbledon football club.	This is a critical point. The redevelopment of Wimbledon involved the site hosting alternative sports facilities . We do not like the removal of motorsport, but it does make it compliant with the National Planning Policy, unlike this Brandon Estates application.
Needs Assessment 2.40	The Hall Green Stadium was opened on 24 August 1927 and was Birmingham's first greyhound track. The stadium closed in July 2017.	Hall Green Stadium only ever accommodated Greyhound Racing only. Its loss, therefore, is not particularly relevant to the consideration of Brandon Stadium. It is surprising that the example has even been quoted given that 2.23 states "greyhound need is not considered further in this report."
Needs Assessment 3.1	The supply of speedway and stock car facilities and tracks is based on a desk top search of facilities.	This section deals with 'Supply Analysis' and the desktop search referred to has not produced wholly accurate results, with the result that the stated conclusions are not based on facts and should be disregarded . See below.
Needs Assessment 3.1	The following speedway and stock car facilities are identified within a 60-minute driving catchment of Coventry Stadium. Table 3.1 shows Beaumont Park Leicester, Perry Bar Birmingham and Ladbroke Stadium Wolverhampton as being active speedway venues. Table 3.2 shows Perry Bar Birmingham, Birmingham Wheels, Brafield Northampton and Hednesford Hills Cannock being active stock car venues.	 Most importantly, Perry Barr is not a stock car track. The Birmingham Wheels venue (very brief past use as speedway in 1985/86) is itself under threat of redevelopment, and is a tarmac track. The track surface of Northampton changed to shale in 2018. Past use as speedway was very brief, 1954-55 (in a junior league), and then 1966-67 as an unofficial club. Very basic facilities – no covered accommodation or seating. Hednesford Raceway has severe restrictions on race dates/times (only one meeting staged there in 2018). Additionally it is a tarmac track. Evidence: Appendix 5 – Letter from BriSCA Evidence: Appendix 22 – Letter from the BSCDA Evidence: Appendix 26 – Birmingham planning consent
Needs Assessment 3.2	There are 3 speedway stadiums with within a 60-minute driving catchment of Coventry Stadium, and 4 stock car stadiums with a 60-minute driving catchment.	The inaccuracy of the Table 3.2 result in a change to the conclusion. There are only 3 stock car stadiums, one of which is under threat itself, another which is heavily restricted on dates, and none of which can remotely approach the facilities and spectator capacity of Brandon. Additionally, the Campaign Group do not accept the premise of the 60-minute catchment. For Speedway, the stadium needs to relate to the catchment of the team (Coventry/Rugby) and in Stock Car Racing, for the alternative facility argument to bite then the facilities and capacity need to be comparable. None of the quoted 'alternatives' come close.

Needs	Relative provision of stock car and speedway facilities	This section refers to 'Relative Supply' and uses the existing 'Supply Analysis as it's basis.
Assessment	regionally is set out below.	The existing supply statistics are incorrect, therefore any conclusions are unfounded. For
3.4		example, table 3.3 indicates a total 30 speedway stadiums which, even prior to a debate
	Table 3.3 shows a table which divides the country into	over the respective locations, cannot be right as in 2018 there were in fact 27 stadiums
	regions, states (incorrectly) how many speedway	which staged domestic speedway plus one more (Cardiff) which staged the one-off
	stadiums are in each region and the population of each	British Grand Prix.
	region and uses this to calculate the Stadium per	It has been difficult for us to fully assess this table, given that the starting point for the
	Population.	list of stadiums is wrong.
		The source of their data is Speedway Plus website, which is not the official website of
		British Speedway (www.speedwaygb.co.uk), and its list of active stadiums includes
		training venues such as Lydd and Sittingbourne (Iwade) (the latter staging very
		occasional junior events on behalf of Kent) which are not in a position to stage senior racing. It is clearly also not updated regularly as Coventry is still shown as an active
		stadium.
		There were in fact 27 stadiums staging official domestic speedway events in 2018 – not
		the 30 shown in table 3.3 - a total which can be raised by one by the presence of Cardiff,
		although it should be noted this is for the one-off British Grand Prix with the stadium
		converted for speedway use.
		Our regional distribution of venues is thus:
		SOUTH-EAST: Eastbourne, Isle of Wight, Kent
		LONDON: None
		NORTH-WEST: Belle Vue, Workington
		EAST: King's Lynn, Ipswich, Lakeside (Arena-Essex), Peterborough, Mildenhall, Rye House
		WEST MIDLANDS: Wolverhampton, Birmingham, Stoke
		SOUTH-WEST: Poole, Somerset, Swindon, Plymouth
		YORKSHIRE/HUMBER: Sheffield, Scunthorpe
		EAST MIDLANDS: Leicester, Buxton
		NORTH-EAST: Newcastle, Redcar, Berwick
		WALES: Cardiff
		NORTHERN IRELAND: None
		SCOTLAND: Edinburgh, Glasgow

		 We cannot understand how the table provided by Framptons ends up with a total of 30 stadiums, and how the total number of Midlands venues is shown as eight (4+4) – when it is clear from the above factual information that the West Mids+East Mids total cannot be more than five and this is with the inclusion of Buxton, a stadium in no position to operate at a higher level than their current National League status. The flawed nature of the table provided is further underlined by the fact that the total number of Northern venues shown is six (2+2+2) whereas our list of stadiums clearly shows a total of nine, including the two Scottish venues. The Campaign Group have completed an analysis using factual information and this is shown in: Evidence: Appendix 30 – Campaign Group analysis of Speedway Stadiums per Population
Needs Assessment 3.4	Table 3.4 does the same thing for Stock Car stadiums	 This table suffers from similar deficiencies to the speedway equivalent. Most importantly, the West Midlands is falsely shown as having four stock car venues when it is clear that the total should be three. The table fails to take into account venues operating in Northern Ireland and Scotland. Whilst accepting that the majority of these venues could operate Formula 1 stock car racing, some with upgrades required to facilities, not all should be regarded as F1 stadiums. We have noted below (in bold) those which have actually run F1 in 2018. SOUTH-EAST: Aldershot, Eastbourne LONDON: None NORTH-WEST: Belle Vue EAST: King's Lynn, Mildenhall, Ipswich, Arena-Essex, Yarmouth WEST MIDLANDS: Birmingham, Stoke, Hednesford SOUTH-WEST: Bristol, Taunton, St Day YORKSHIRE & THE HUMBER: Sheffield EAST MIDLANDS: Buxton, Skegness, Northampton NORTH-EAST: Barford WALES: None NORTH-EAST: Barford WALES: None NORTH-EAST: Barford WALES: None NORTH-EAST: Cowdenbeath, Lochgelly, Crimond, Knockhill Several 'unlicensed' venues which also stage car racing have not been included in the above list – Trent Raceway being one of them. The Campaign Group have completed an analysis using factual information and this is shown in: Evidence: Appendix 31 – Campaign Group analysis of Stock Car Stadiums per Population

Needs	As suggested above, relative supply is only a useful indicator in	The corrected analysis shows a considerably different picture. With the closure of
Assessment	terms of benchmarking local provision alongside other similar	Brandon Stadium for Speedway, the West Midlands ranks fifth of the English regions as
3.6	areas. As can be seen from the table 3.3 above, Speedway	opposed to the claim of being fourth. None of the three remaining stadia approach the
	provision for the West Midlands region is relatively good	spectator capacity of Brandon Stadium.
	compared to other regions (in 4 th place in the region). With	
	regards to stock car provision in the West Midlands is the best	In relation to Stock Car Racing, far from being ranked at the top as claimed, the West
	compared to other regions (1 st). Therefore, residents in the	Midlands is fourth amongst English Regions and has poorer provision than both
	West Midlands regions have a relatively good access to	Northern Ireland and Scotland.
	speedway and stock car tracks.	
Needs	Furthermore, there is a range of alternative venues within easy	The position is not so generous as purported for the reasons pointed out, and in the case
Assessment	reach (0-60minutes drive) of Coventry as seen in stadium Tables	of speedway it is emphasized once more that an 'alternative' location for the Coventry
3.6	3.1 and 3.2	Bees speedway team outside the Coventry/Rugby area is unacceptable and has been
		proved not to work.
Needs	In summary:	
Assessment	 speedway provision for the West Midlands region is relatively 	See earlier analysis placing the provision in the West Midlands 5 th , although the
3.15	good compared to other regions (in 4th place in the region);	provision of ANY other facilities outside the Coventry/Rugby area is irrelevant to
		speedway as the team needs to be racing in the area.
	• stock car provision in the West Midlands is the best compared	Corrected analysis shows this in 4 th , with further availability issues, using the information
	to other regions (1st).	on actual stock car venues in the region. Perry Barr is not a stock car track!
	 therefore, residents in the West Midlands regions have a 	This is not correct. The provision both quantitatively and qualitatively is poor.
	relatively good access to speedway and stock car tracks.	
	 there is a range of alternative venues within easy reach (0-60 	This is patently not the case for speedway – and for stock car racing, none of the
	minutes' drive time)	'alternatives' approach the quality and capacity of Coventry as the national stadium of
		BriSCA F1 Stock Cars.
	 multiple uses of stadiums is beneficial to stadiums to ensure 	This ignores the fact that Brandon already WAS a viable multiple use venue.
	their long term viability. This suggests that an existing stadium	
	may welcome using any spare capacity they have to ensure the	
	long-term future of their stadiums and clubs.	The Campaign Group therefore considers this to be a very poor summary of the supply
		situation. It simply re-confirms that Brandon Estates made decisions concerning the
		site without due consideration of all the relevant factors. It provides no basis to justify
		the loss of the facility.

Needs Assessment 5.0 / 5.2 / 5.3	This section deals with 'Conclusions and Recommendations. Sections 5.2 and 5.3 repeat claims regarding the number of speedway and stock car stadiums and provision in the West Midlands is relatively good compared to other regions for speedway (fourth) and stock car (first)	As already stated, the erroneous inclusion of Perry Barr invalidates the authors' statistics. None of the alternatives provide facilities of a quality or capacity of Brandon Stadium. The speedway stadiums noted do not address the need for a Coventry team to be racing in the Coventry/Rugby area. The desk top search is fundamentally flawed. Provision within the West Midlands is unacceptable for speedway (due to the need for Coventry Bees to race in the Coventry/Rugby area) and poor for stock cars following the closure of Coventry.
Needs Assessment 5.4	Furthermore, the fact that Coventry Stadium has closed due to lack of viability suggest an oversupply of facilities in the area.	This is blatantly untrue! The stadium was viable for Speedway and Stock Car RacingEvidence: Appendix 1 – Chartered Accountants letterThe stadium was sold, not because it was unviable, but as previously stated, the forcedsale resulting from the scandalous actions of RBSEvidence: Appendix 21 – Letter from Avtar SandhuThe nonsensical nature of the 'oversupply' argument is clearly refuted with evidencefrom Birmingham and Wolverhampton Speedway confirming their own attendanceshave not risen as a result of the closure of Coventry.Evidence: Appendices 24/25 Letters from Birmingham and Wolverhampton's speedwaypromoters respectively.
Needs Assessment 5.6	Again, the fact that Coventry Stadium has closed due to lack of viability suggest an oversupply of facilities in the area and it has been evidenced in the Turley report that before the site was sold that the stadium was in a poor condition and required improvements in particular to be approved to operate by the relevant health and safety authorities. Its closure has not hindered the development of motorsports in the West Midlands area given the supply over this wider area.	Is the repetition of paragraph 5.4 simply an attempt to convince the reader that it is true, if the same thing is said more than once? This is simply not true and is not backed up by any evidence. Right up until the forced closure of the site by the applicant, the stadium held all appropriate Health and Safety Certificates. Additionally, if the stadium required improvements to be approved in order to operate BEFORE the site was sold, then how did it continue to operate AFTER the sale?
Needs Assessment 5.7	The Turley report summarises that there has been a general decline in the speedway and stock car sector with financial difficulties in the face of falling attendances and revenues the primary driver cited.	The Turley report is so poor as it is fundamentally flawed for numerous reasons discussed earlier in this document.

Needs	This assessment therefore concludes that under paragraph 97	The assessment does not provide any basis for these conclusions to be drawn. There are
Assessment	A) that the there is adequate stadium provision in the area and	basic errors, misrepresentations of facts and an apparent total lack of understanding of
5.11	the site can be released for development.	the nature of the sports as a whole and the significance of Brandon Stadium to them.
		Brandon Estates have had an extended opportunity to demonstrate their case and have failed in every respect.
		The only course of action is to reject their proposals for the redevelopment of Brandon Stadium.

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- 5) Letter from BriSCA in response to alternative stock car provision (Needs Assessment)
- 6) Letter from BriSCA confirming viability of Brandon urging rejection of the Planning Application
- 7) Coventry Telegraph article 10th May 2017 Police statement regarding Criminal Damage

7A) Coventry Telegraph article on 27th March related to James Crocker statement regarding the future of the stadium

- 8) Letter from Will Hunter (Hunterpac Ltd) regarding enquiries about purchase of the stadium
- 9) Letter from James Crocker to Gary Townsend (11th May 2017) regarding leasing the stadium
- 10) Letter from James Crocker to Gary Townsend (11th Jan 2018) regarding leasing the stadium
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CHARTERED

Wednesday, 7 February 2018

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Geoff Davis Save Coventry Speedway Forum

Dear Mr Davis

Coventry Racing Club Ltd

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 stockcars 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 (i.e. only speedway and stockcar racing conducted by the company) the company has made a profit.

Yours sincerely

N G Wilson MA(Oxon) FCA CF FRSA Director

TELEPHONE 01789 730456 FACSIMILE 01789 730457 E-MAIL NEIL@GUESTWILSON.CO.UK BUESTWILSON.CO.UK E-MAIL NEIL@GUESTWILSON.CO.UK

8 WOLVERTON ROAD SNITTERFIELD STRATFORD UPON AVON CV37 OHB

GUEST WILSON CHARTERED ACCOUNTANTS IS A TRADING NAME OF GUEST WILSON LIMITED, A COMPANY REGISTERED IN ENGLAND (NO. 3124048) WITH ITS REGISTERED OFFICE AT THE ABOVE ADDRESS. THE COMPANY IS REGISTERED TO CARRY ON AUDIT WORK BY THE INSTITUTE OF CHARTERED ACCOUNTANTS IN ENGLAND & WALES.



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above residential deve	our client, we advise yo dopment opportunity. In		About G	VA
the property comprises			Prope	erty search
 Site area extends to approximately 10.37 ha (25.62 acres) gross, 			What we do	
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offers are invited for the	Informal Tender, Uncondi freehold interest in the er ossession, No trade is bein	tire	-	act us rard to a colleague
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Friday 19 April 2013. Contact: Andrew Moss I: 0121 609 8398		te than		
Friday 19 April 2013. Contact: Andrew Moss I: 0121 609 8398 E: <u>andrew.moss@gva.c</u>		te than		
Offers should be submit Friday 19 April 2013. Contact: Andrew Moss T: 0121 609 8398 E: andrew.moss@gva.c Rachel Hill T: 0121 609 8004		te than		

For Sale

Our Ref: PJF/9189 (Please reply to Banbury office)



Appendix 3

Louise.Steele@framptons-planning.com

Mr Jeremy Heaver Coventry Racing Club Ltd 87 Bracebridge Street Newtown Birmingham B6 4PJ (By email and post)

7th November 2018

Dear Mr Heaver,

I write in respect to your letter dated 22nd October 2018.

With regards to your concerns regarding paragraph 1.15 of your letter dated 3rd October 2018, we apologise as there was an error in the instructions received and I confirm that this paragraph should have referred to mid-2016 negotiations with Coventry Speedway Ltd and not to Coventry Racing Club Ltd.

We apologise for any inconvenience this may have caused.

We have copied in the case officer for the planning application to able her to forward this letter to those previously consulted on the original letter.

If you have any queries, please contact me.

Kind regards

Filt.

Louise Steele Framptons

cc. Erica Buchanan, RBC

enquiries@framptons-planning.com www.framptons-planning.com

Oriel House, 42 North Bar, Banbury, Oxfordshire, OX16 0TH T: 01295 672310 F: 01295 275606

Aylesford House, 72 Clarendon Street, Learnington Spa, Warwickshire, CV32 4PE T: 01926 831144 Oxford – Area Office, 4 Staplehurst Office Centre, Weston on the Green, Bicester, Oxfordshire, OX25 3QU T: 01295 672310 From: Paul Dimoldenberg Sent: Thursday, November 3, 2016 5:06 PM To: undisclosed-recipients: Subject: Press Notice - Coventry Bees sign new Brandon Stadium lease

BRANDON ESTATES LTD

Press Release

3rd November 2016

Coventry Bees sign new Brandon Stadium lease

Coventry Bees have signed a new lease on Brandon Stadium, following discussions earlier this year coordinated by Rugby Borough Council.

The Coventry Bees speedway team had been facing their last season at the stadium after it had been sold for development. But after Cllr Michael Stokes, Leader of Rugby Borough Council, opened talks between the Bees and Agents acting for the new landowners, Brandon Estates Ltd, the Bees have signed a new lease to allow the team to continue competing next season while they search for a new long-term venue. Brandon Estates has also agreed to sponsor the Bees next season.

The new lease runs for one year from 1 January 2017 until October 2017, with the possibility of a further two years, subject to conditions. The lease would allow Coventry Bees and junior race meetings. Additional events would be subject to individual agreement.

Darren English, spokesman for the stadium owners, Brandon Estates Ltd, said:

"After concluding our discussions and negotiations we very pleased that the Bees will continue at Brandon until October 2017 with the possibility of a further two years, subject to the long-term redevelopment of the site being settled"

"This will give the Bees security for the next 12 months, and possibly longer, allowing the team more time to find an alternative venue. We are also delighted to be sponsoring the Bees next season."

"I would like to thank the Council for playing such a key role in these discussions and helping to broker an agreement that takes all parties forward in a positive and practical way."

Cllr Michael Stokes, Leader of Rugby Borough Council, said:

"It is clear that the situation the Bees and the other stadium users find themselves in is not ideal, but the lease that has been offered to them is a good compromise that will allow speedway and stock car racing to continue at Brandon for at least another year."

"After meeting fans groups earlier this year and hearing their concerns first hand, I am delighted to have been able to bring all of the interested parties together to allow an offer to be made."

Mick Horton of Coventry Speedway, said:

"We have signed the new lease to give the speedway team security for the next year at least, while we continue to investigate the options for the team's long-term future. We would like to thank the new owners for offering us the new lease and new sponsorship money, which will certainly help our finances over the next 12 months."

"We hope that all our fans will join me in thanking the Council and the new owners now that we will have another full season at Brandon Stadium in 2017."

ENDS

Contact Paul Dimoldenberg 020 7566 7960 and 07864 042 584

PAUL DIMOLDENBERG Chairman

D 020 7566 7960 M 07864 042 584

cid:image001.jpg@01D1F16A.9F3B0E10

20-24 Old Street London EC1V 9AB

T 020 7566 7979 F 020 7566 7970



Jeff Davies <jeffdavies170@gmail.com>

Tue, Dec 11, 2018 at 2:05 PM

Coventry Planning

STEVEN REES <stevenrees01@btinternet.com> Reply-To: STEVEN REES <stevenrees01@btinternet.com> To: Erica.buchanan@rugby.gov.uk Cc: Jeff Davies <jeffdavies170@gmail.com>, bscda@yahoo.co.uk

Dear Erica,

I write as Chairman of BriSCA [The British Stock Car Association] and Chair of ORCi [Oval Racing Council - governing body]

Since our initial correspondence with regards the application of Brandon Stadium, I would like to re iterate the historic significance of Coventry as a venue since 1954 which has hosted many iconic events across several decades enjoying a pivotal role in the sports development. Equally as identified in the significant volume of correspondence received on the forthcoming plans it underlines the many thousands of fans and drivesr who support the venue, both UK wide and Internationally.

Since it's loss in 2016 it has been and remains a 'much loved' home lost to our sport at a time when venues are Nationally being lost to housing redevelopments and our sport.

As Governing organisations, we re iterate our full support to participate in and see an eventual return of Coventry Stadium for closed circuit motor sport if indeed that becomes a reality in the future.

I note in more recent documentation, some mis representation of one or two factors with regard alternative 'availability' of venues in the region which could not provide suitable 'replacement's '

1) Perry Barr stadium could not stage stock car racing as the venue is not suitable, space being the predominant issue, we as a promotion were actually offered the venue by our landlords to look into and was unsuitable and for the reasons I understand have been explained in the letter provided by the Birmingham speedway promoter Laurence Rogers.

2) Leicester stadium has also been looked into in some detail by the departing Coventry promotion as a potential replacement and I again, I understand the current tenants have responded that is unsuitable for the reasons outlined in the letter from speedway promoter / leaseholder Marc Bates

3) Trent Raceway is not an actual stadium and does not conform to the governing bodies standards and currently operates oval racing under the '14 day rule'.

5) Coventry Racing Club staged just one meeting at Stoke in 2017, not four as claimed by the developers. The others were staged at Sheffield, Belle Vue and Kings Lynn. Underlining the commitment of the governing body to facilitate 'time' for a return of the venue, colleagues 'helped' out Coventry Racing Club

The 'Save Coventry' committee it has to be recorded, has done sterling work in maintaining a vigil and comment to ensure the voice of fans and drivers continues to be heard in a bid to attempt to 'protect' the stadiums heritage with an eventual objective of seeing Brandon return to full operation and the importance of it's position within our sport.

Kind regards,

Steve Rees Chairman BriSCA F1 & ORCi Ltd Gmail - Planning Application for Brandon Stadium

M Gmail

Jeff Davies <jeffdavies170@gmail.com>

Planning Application for Brandon Stadium

Mon, Feb 5, 2018 at 2:16 PM

Appendix 6

STEVEN REES <stevenrees01@btinternet.com>

Reply-To: STEVEN REES <stevenrees01@btintemet.com> To: "Erica.buchanan@rugby.gov.uk" <Erica.buchanan@rugby.gov.uk>, Jeff Davies <jeffdavies170@gmail.com>, "nharrhy@aol.com" <nharrhy@aol.com>

British Stock Car Association, BriSCA F1, c/o 12 Heyhouses Lane, Lytham St Annes, Lancashire FY8 3RT Tel: 01253 713 754

5th February 2018

Rugby Borough Council, Fao : Erica Buchanan

To whom it may concern,

We now understand a formal planning application has been submitted for the change of use of Coventry Stadium for redevelopment.

I write in capacity as Chairman of both the British Stock Car Association and Oval Racing Council International to express our disappointment and grave concern over the potential loss of the stadium to our sport and as a viable, well supported, popular amenity in the local .

Coventry Stadium has been central to BriSCA F1 Stock Car Racing and UK short circuit motor sport since 1954, indeed Brandon was one of the first venues to stage initially Speedway racing and then, continually, Stock Car Racing since it's origin in 1954 every consecutive year. Historically, it is the most successful motorsport venue in the UK and regularly hosted every major title in both sports calendars on a regular basis.

Such is the value of Coventry Stadium, BriSCA has facilitated and continues to support the operators, Coventry Racing Club, whilst every avenue is pursued to return racing to the area.

For clarification, Coventry Racing Club remain an active and valued promoter within BriSCA and in 2017 colleagues assisted in relocating fixtures elsewhere. For 2018 and a period beyond. BriSCA have agreed to effectively allow Coventry Racing Club to remain active members of our organization whilst temporarily freezing their license allowing further time for them to resolve their future whilst remaining fully involved in the sport's organization ongoing. As far as BriSCA is concerned, Coventry Racing Club has until it's closure always been a viable operation and BriSCA continues it's support to the organization to renew racing in the area for the benefit of the many thousands of race fans and drivers that support and value this iconic facility.

The potential plans for redevelopment of the stadium removes a vibrant and viable amenity that has for many decades and up to it's closure been hugely popular and a fundamental part of the Heritage of our sport. We also believe it to be a major asset for the area which is well supported, respected and well loved by the many thousands who support it annually. The venue not only attracts tremendous support from the area but enjoys substantive patronage from across Europe and beyond.

We sincerely hope you will consider it's intrinsic value as well as commercial in your deliberations, and more importantly based on its ongoing viability, the desire of the operators to continue it's function and operation ongoing.

Should you require any further clarification or further information, please do not hesitate to contact me further,

Yours Sincerely,

Steve Rees Chairman British Stock Car Association & ORCi Ltd

facebook.com/coventrytelegraph

Appendix 7 WEDNESDAY, MAY 10, 2017

By SIMON GILBERT **Chief Reporter** news@trinitymirror.com

A POLICE investigation into alleged criminal damage at Brandon Stadium has been dropped - potentially clearing the way for Coventry Bees to return to the speedway track.

Warwickshire Police has confirmed that the investigation, which started in December last year, will not be taken any further.

Police were called in after former stadium and Bees owner Avtar Sandhu removed £150,000 to £200,000 of fixtures and fittings he claims he owns - including floodlights, seats, track shale and fences.

Despite police action coming to an end, the Telegraph understands the new stadium owners, Brandon Estates, may still pursue civil action against Mr Sandhu.

A statement from police said: "Warwickshire Police has concluded its investigation into the allegations of theft and criminal damage at Brandon Stadium. This was a complex investigation, which required the review of a significant amount of material. One individual was spoken to on a voluntary basis but no further action will be taken.

"There is no evidence to suggest a criminal offence has taken place."

News that the police investigation is over could provide a valuable boost to campaigners working to get Coventry Bees on track after losing their home forced them to drop out of this league season.

Brandon Estates had previously insisted there would be no return to the venue while the police investigation was ongoing.

However, the possibility of a civil lawsuit could thwart efforts to bring the Bees home.



for Brandon Estates said: "Unfortunately, until the police investigation is completed, and any other litigation that might be taking place has been concluded, it is not clear what the future holds for Brandon Stadium."

Speaking to the Telegraph in April, Bees owner Mick Horton said he was hoping to get the Bees back on track after taking the team off the market.

He said: "It's well docu-In a statement issued mented that a deal for

in March, a spokesman Bees to race at Brandon wasn't signed. That's all water under the bridge.

"We're doing a lot of talking behind the scenes to see if there's any chance of getting the Bees back on track. We're keeping our options open.

"There's no deal on the table for Brandon but there are talks, which is encouraging.

"We're talking to Rugby Council. Our wish is to stay at Brandon - but we need everybody to pull together."

Warwickshire Police back of a long-running and complex dispute.

Bees' current owner Mick Horton had secured a head lease with new stadium owners Brandon Estates to race on for up contested. to three more years but also needed a deal with he would return the former Mr Sandhu's Coventry Racing Club, who were to continue running stock cars there and who laid claim to the assets.

According to the Bees that deal came too late and remained unsigned

- and Mr Horton handed became involved on the back the lease when he realised he would be unable to operate at the venue without undertaking repair work beyond his means, although the figures quoted have been

> Mr Sandhu had stated assets that were removed in time for the start of the season, but was unable to enter the stadium in January as Brandon Estates had reported their removal to the police.

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NEWS - IN YOUR AREA NUNEATON - WHAT'S ON - COVENTRY CITY FC WASPS RFC SPORT - COMMERCIAL FEATURES

COMMENT

RESPONSIBLY SOURCED

CoventryLive

NATURALLY MOISTURISING

It was hoped a short-term agreement to use Beaumont Park in Leicester would pacify speedway bosses but the BSPA said it had significant concerns.

However no end would appear to be in sight due to the continuing police investigation over the removal of the Brandon Stadium fixtures and fittings.

C READ MORE

SHARE

Coventry Bees insist the club 'can come back stronger'

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In a statement Brandon Estates' solicitors told the Telegraph: "Unfortunately, until the police investigation is completed, and any other litigation that might be taking place has been concluded, it is not clear what the future holds for Brandon Stadium. Hopefully, matters will become clearer towards the end of this year."

A spokesman for Warwickshire Police said: "Warwickshire Police are continuing to investigate the allegations of theft and criminal damage at Brandon Stadium.





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Note: Coventry Live is the elctronic version of the Coventry Telegraph. This is an extract from the article publiced on 27th March 2017

Nigel Harrhy

Feb 7 (2 days ago)

to me

Reply from Will Hunter

-----Original Message-----From: Will Hunter <<u>Will.Hunter@huntapac.co.uk</u>> To: Nigel Harrhy <<u>nharrhy@aol.com</u>> 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. <u>293 Blackgate Lane,</u> Tarleton, Holmes, Preston. PR4 6JJ.

Mob: 07980798251 Tel: 01772 280626

Web: www.huntapac.co.uk

UK Veg Grower of the Year 2015

From: Jim Crocker <<u>JCrocker@howell-solicitors.co.uk</u>> Date: 11 May 2017 at 16:56:53 BST To: "garrytownsend223@yahoo.co.uk" <<u>garrytownsend223@yahoo.co.uk</u>> Cc: Rhys Baker <<u>RBaker@howell-solicitors.co.uk</u>> 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

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

More legal action 'will not rule out' a return to AFTER POLICE DROP INVESTIGATION, CIVIL

PROCEEDINGS LAUNCHED AGAINST FORMER OWNER

By SIMON GILBERT

Chief Reporter mon.gilbert@trinitymirror.com

COVENTRY Bees have been given some hope that a return to Brandon speedway stadium could be possible by track owners Brandon Estates after a police investigation was dropped.

But Brandon Estates have confirmed civil action is being taken against former stadium owner Avtar Sandhu over claims fixtures and fittings were unlawfully removed by him from the stadium before he handed over the keys to Brandon Estates. Mr Sandhu maintains he legally owns the fixtures and fittings.

Mr Sandhu owns the CoventryStox stock car operation and Brandon Estates insist it would be "inappropriate" for the franchise to return to the site with civil action underway.

The stadium owners made clear the action would not rule out a return for Coventry Bees, but indicated this seemed unlikely in light of the cost of repairing the stadium and the fact Bees owner Mick Horton had lost his licence to run speedway.

Brandon Estates also pledged to make good on a commitment to sponsor the Bees if a solution which allowed the team to race could be found.

A spokesman for Brandon Estates said: "Although it appears that the police enquiries are being discontinued, civil action in the High Court will follow as it is the position of Brandon Estates that title to the fixtures and fittings in the Stadium belong to them.

"We can tell you that in the contract for and on completion of the sale of the stadium the corporate entity connected to a fixtures and fittings were not Stock Car Racing who might excluded.

is being considered against Mr dium. Horton.'

And on stock cars, the be considered at Brandon." spokesman said: "It would be inappropriate for any person or "Brandon Estates has received

THE BACKGROUND WARWICKSHIRE Police became

involved on the back of a long

Horton had secured a for up to three more Sandhu's Coventry Rac ing Club, who wanted to

and laid claim to the assets According to the Bees that deal came too late - and remained

be involved in the civil litiga-"It is fair to say that no action tion to return to Brandon Sta-

Stock Car Racing will not

The spokeman continued:

back the lease to Brandon Estates when he realised he ould be unable to operate at the venue without undertak

ing repair work beyond his means. The figures quoted have been con-

that were removed in time for the start of the season,

Surveyor's Report shows that the cost of putting the Stadium back into a working condition which satisfies would be circa £1million.

there have been quotes from way meetings."

campaign groups saying that the stadium could be restored for less. In any event, the cost is prohibitive.

"Brandon Estates, as the owners, are responsible for any breaches of health and safety regulations."

And on Bees specifically, the spokesman concluded: "As far as they are aware, Mr Horton (with whom Brandon Estates have no disagreement) has lost his licence to run speedway.

"Brandon Estates have done their very best to assist Mr Horton and speedway.

They offered a very substancompletely independent tial sponsorship deal which is which still on the table.

"Mr Horton's Solicitors are holding the first tranche of the sponsorship money pending Mr health and safety regulations Horton obtaining the restoration of his licence and a venue 'Brandon Estates know that from which to conduct SpeedWater rid THEME park open Merlin Entertainn

has reopened thr water rides close precautionary m ure following the of 11-year-old sch girl Evha Jannat

The Splash Ca ride at the family Drayton Manor t park in Staffords remains closed a



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dium in January as Brandon removal to the police
PRESS RELEASE 16th MAY 2017

Earlier this year, Coventry Racing Club was accused of criminal damage and theft following the removal of fixtures and fittings from Coventry Stadium.

The accusations were made by Howell and Company, solicitors acting for Brandon Estates and when they reported it to the police, they claimed the stadium was a 'crime scene'. They claimed the subsequent police investigation would take the rest of this year to investigate and that as the stadium was a 'crime scene', there was no prospect of either speedway or stock car racing being staged at the stadium this year.

The accusations resulted in immense damage to my family's reputation. In the period since the accusations were made, I have endured enormous criticism from fans of both sports, and knowing the accusations would not be proven, I have maintained a dignified silence. Earlier this week, I was contacted by the investigating force, Warwickshire Police, who advised me the case was being dropped and there was 'no case to answer'.

I and my team have been vindicated of any crime.

I went to extraordinary lengths to strike a deal which would have resulted in both speedway and stock cars continuing at Brandon in 2017 and beyond and despite agreeing a deal on three separate occasions, on each of those occasions, the other party involved failed to sign a contract.

I was left with no alternative but to remove the fixtures and fittings before we were required to vacate the stadium at the end of our period of lease. Having removed those fixtures and fittings, I still offered to return them and reinstall them, at my own cost, if an agreement could be reached. The offer was rejected and Brandon Estates chose instead, to go down the route of calling in the police. I am desperately disappointed, that despite my best efforts, we are in this situation with speedway and stock car fans deprived of enjoying their sports.

The anger and distress this has caused to myself and my family makes me want to take action against the false allegations but it is not good for Speedway or Stox to prolong this dispute. For the sake of speedway and stox I have decided to sit back at this time to see if solutions can be found to get both sports back on track.

I want to see a return of racing at Brandon Stadium for a period of time, whilst Brandon Estates pursue their planning application. I am prepared to work with them in bringing that about whilst simultaneously working with both Rugby and Coventry Councils to find suitable land and gain their support for a planning application that would result in a longer term replacement stadium.

I am committed to bringing both sports back to the Coventry / Rugby area and urge all parties involved to work together to achieve that goal.

Avtar Sandhu

Appendix 13



Gypsies visited the site for the first time on 6th June 2017, then again in July and for a third time in September. The two pictures above of the two main gates were taken on 13th September and clearly show the claims of additional security measures being installed, including additional security gates and trenches are a complete fabrication of the truth. The main gate did not even have a padlock on it and the concrete filled barrels had been put in place by local residents frustrated by inaction from the developers and desperate to prevent further gypsy incursions.



On 15th September 2017, Rugby Council served a warning notice on Brandon Estates which required them to clean up the site and make it secure to prevent further incursions. They failed to satisfy this notice and on 26th September 2017 were served with a Community Protection Notice (under the Anti-Social Behaviour Crime and Policing Act 2014). Their response to this was to dump two loads of earth at each of the main gates. The above pictures were taken on 4th October 2017.



The claims of "installation of security gates" (prior to the first break in!) were completely false. The two pictures above were taken on 3rd January 2018. The earth which had been dumped in front of the main gate had been removed (to allow access to staff carrying out an archaeology survey) and the additional security gate installed. The pictures show the newly installed inner security gate to be totally useless as it not (and is still not in January 2019) secured to the ground. It also shows the inexpensive, low grade padlock on the main gate itself.

Note - These photographs were taken on a digital camera and as such have the date taken incripted into the metadata of the file. The original files are available if authenticity needs to be proven.

From: James ansell jim988@hotmail.co.uk

Appendix 14

Subject: Re: Brandon

- Date: 5 Jul 2017, 10:22:52 pm
 - To: Jim Crocker JCrocker@howell-solicitors.co.uk
 - Cc: Lisa.Hayes@rugby.gov.uk, mjephcott.3@btinternet.com

Dear Mr Crocker

I am in receipt of your emails regarding the travellers on the site at Brandon. I agree with your statement regarding the lack of support from the authorities in dealing with this group of people who believe they are above the law, however this does not remove liability from your client in securing the site.

I was informed by the council after the last visit by the travellers that the site would be cleared by the current owners, this did not happen. Large amounts of human excrement and general waste remain on site and this is now being added to by the current travellers on site.

Your clients removed security due to the threats of violence towards them. In my opinion the security afforded by one person in a car is totally inadequate for a site of this size and value, as I am sure you are well aware after being threatened by these people in person.

There are currently 4 possible entrances to the site. The one on Gosset Lane is currently blocked with fallen trees. The remaining three entrances need to be made secure. If your client is intent on leaving the site unoccupied and derelict it is their responsibility to ensure total security to prevent any further illegal entrance. This could be achieved by digging trenches across the gateways on speedway lane and increasing the security on the centre gate utilising cctv and high security locks.

Can you please advise me what steps are being taken by your client to evict the current travellers and make the site secure. I have concerns that this may go on for some considerable time and as a local resident this is unacceptable. These concerns are well founded as the last time the travellers were here it was over two weeks before they moved on and they left of their own accord. It then took a further week before any attempt was made to secure the site.

As a side note I find your description of the local residents being "terrorised" inaccurate as to my knowledge you have not asked the local residents how they are being impacted. For your clarification this situation is inconvenient, a health and safety risk and I feel deeply disappointed that your client has

failed to adequately secure the site. I do not feel terrorised. Apologies if this sounds churlish I am sure you are merely expressing your concern for the local residents well being.

I acknowledge that you would like to highlight this situation as a failing of the local police and council however I would like to strongly reiterate, had your client taken the necessary steps to secure the site this unfortunate situation would not have arisen again.

Yours sincerely

James Ansell

From: Jim Crocker JCrocker@howell-solicitors.co.uk

Subject: Brandon

- Date: 6 Jul 2017, 12:09:06 pm
 - To: jim988@hotmail.co.uk
 - Cc: Lisa Hayes Lisa.Hayes@rugby.gov.uk, mjephcott.

3@btinternet.com, Rhys Baker RBaker@howell-solicitors.co.uk

DICTATED BY JAMES CROCKER BUT NOT SEEN BEFORE TRANSMISSION

Dear Mr Ansell

Thank you for your email 22:23hrs yesterday.

I think there are some areas upon which we will need to agree to disagree, but I can assure you that my clients are doing everything that they possibly can to secure this site.

The cost of putting a whole team of security personnel on site is prohibitive. If these gypsies were stopped by the Authorities from driving on public roads with untaxed and uninsured vehicles, there would be no risk of them breaking into the site. We have the rather absurd position whereby the local Police say that they have no evidence that the gypsies have broken into the site. However, on two occasions now, substantial locks have been broken at the time the gypsies entered the site.

Incidentally, I am surprised that you find my description of the local residents being terrorised as inaccurate. I know, and I assume you know, that the gypsies threatened violence on a local publican and also threatened to burn down his pub in the middle of the night. If that is not terrorising a local then I do not know what is. I am also aware of the children of the gypsies being seen trying to break into local residents houses. The same children also smeared excrement on the walls of local residents houses.

Plainly, you are one of the lucky residents who does not feel terrorised.

I also think, with great respect, that you are being overly optimistic in thinking that if the main entrances to the site are securely blocked, the gypsies will not find another way onto the site.

In any event, my clients will do what they can. If you have any queries in the future, please do not hesitate to email me.

Dear Mr Crocker,

We have been made aware travellers have gained access back onto the above site. I understand the Police may have already made the landowner aware of the situation.

Appendix 15

Following a site visit this morning, it was noted the pedestrian doorway, marked as 'VIP Entrance' was open and therefore enabling full access to the track, outbuildings and spectator boxes. In the interests of preventing further damage to the site I would strongly recommend that this door is secured as a priority.

Please advise what actions have been taken / are being taken to ensure the travellers are swiftly removed from the site.

I look forward to hearing from you.

Regards.

Lisa Hayes Environmental Health Officer Neighbourhood Services Rugby Borough Council Tel: 01788 533890 Email: lisa.hayes@rugby.gov.uk

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Thank you for your co-operation.

Rugby Borough Council

Appdedix 16

		Horton							
					Coventry Speedway Limited				
		3	0-Nov-12	30)-Nov-13	30)-Nov-14	30)-Nov-15
Fixed Assets									
Intangible Fixed Assets	*	£	150,000	£	100,000	£	50,000	£	-
Tangible Fixed Assets			2,250		1,687		1,125		20,912
Current Assets									
Stock			-		-		-		-
Debtors			-		8,250		18,946		10,876
Cash			6,042		6,826		6,124		30,588
		£	6,042	£	15,076	£	25,070	£	41,464
Creditors due within 1 year	**		(201,261)		(189,158)		(143,860)		(87,967)
Net current assets / (liabilities)		£	(195,219)	£	(174,082)	£	(118,790)	£	(46,503)
Total assets less current liabilities		£	(42,969)	£	(72,395)	£	(67,665)	£	(25,591)
Creditors due after 1 year			-		-		-		-
Total net assets / (laibilities)		£	(42,969)	£	(72,395)	£	(67,665)	£	(25,591)
Capital and reserves									
Called up share capital		£	1	£	1	£	1	£	1
Revaluation reserve			-		-		-		-
Profit and loss account			(42,970)		(72,396)		(67,666)		(25,592)
Shareholders' funds		£	(42,969)	£	(72,395)	£	(67,665)	£	(25,591)
Therefore Profit for the year:			(42,970)	£	(29,426)	£	4,730	£	42,074
merelore Front for the year.			(42,570)	L	(23,420)	L	4,730	L	72,074

* Intangible assets presumably related to the "goodwill" on acquisition of Coventry speedway. Charged to income statement at £50k per annum so as to write-off over 4 years.

** Secured debts included therein: £ (13	30,860) £ (50	0,860) £ (10,860) f	£ -
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Latest update for Coventry Speedway.

20th October

Despite the very best intentions and efforts to keep the Bees on track racing out of Leicester, it has proved to be disastrous.

We have suffered losses of over £40,000. This includes having to sell off the clubs Elite assets – 10 rider contracts to the value of £20,000 sold to the governing body BSPA (not Peterborough Speedway as rumoured).

It is painfully clear that trying to run our historic club away from Brandon/rugby area has been detrimental to the business. On top of this, the withholding of an asset (air fence) has not helped our cause.

To continue racing out of Leicester, we would need further investment/sponsorship of £45,000 just to remain in the bottom tier of Speedway. My family and my own business (Europress) has exhausted its funding and unless a commitment of funding comes forward within the next 6 weeks, the club will cease to run and be put on ice which in my opinion could be a point of no return.

Coventry Speedway needs to be racing in the Rugby / Coventry areas. Through no fault of Coventry Speedway, we have lost our home.

Mick Horton Coventry Speedway

Appendix 18A

Twitter: @live_coventry

4 COVENTRY TELEGRAPH MONDAY, SEPTEMBER 10, 2018

News

Cov Bees need £40,000 cash injection to race next season

By ENDA MULLEN Business Reporter enda mullen@reachnic.com

THE Coventry Bees speedway team £40,000 or more if it is to continue to race next season.

The team's financial situation was revealed by owner Mick Horton as he reflected on the difficulties of the Bees being based at Leicester rather than Brandon Stadium.

Brandon Stadium is no longer used for either speedway or stock car racing following a long-running dispute between owners Brandon Estates and former owner Avtar Sandhu.

The historic home of the Coventry Bees speedway team and the Covenstock car operation has tryStox hosted speedway events since 1928.

The row – which saw its fixtures and fittings removed – ultimately led to the Bees being kicked out of the top flight of British speedway in February 2017.

After a period when the Bees took part in challenge matches but no competitive racing, the team has

since returned to action in the National League at Leicester, two leagues below the top flight it used to compete in. Now Mr Horton has spoken of the

desperately needs a cash injection of difficulties of being based 30 miles away and the financial challenges the club faces.

In a statement on the Bees website he said: "It is no secret that we have really struggled with the crowd levels and sponsorship. "On present financials, we would

need investment or sponsorship of £40,000 to commit to racing next eason.

Mr Horton also said that he was open to offers to take over the club,

or help in running it. He added: "I have always said if anyone wants to help me or take over

from me, I would welcome it. I just want to keep the Bees racing." He also said he remained committed to the possibility of a return to Brandon Stadium or another site in

Coventry or Rugby areas. "We have enjoyed ourselves at Leicester and my thanks go to Dam-ien and Marc Bates and all their staff Leicester. for their kind help," he said.

"I truly believe if we can get to next season, things will improve

"We will never give up on our wish to go back to Brandon or a new home in Rugby/Coventry.

"I am in regular contact with Rugby Council who are trying their best to help."

He added: "In the meantime, if there is anyone out there who could help our cause, please get in touch with me asap.

"A commitment to race next sea son would have to be made at the end of the season

The flag is still flying for the Bees, long may it continue.

Jeff Davies from the Save Coventry Speedway campaign group, which is committed to getting the Bees back to Brandon Stadium, said the situation was not surprising. Mr Davies said: "We always sus-

ected it was going to be difficult at

"Firstly it is 30 miles away.

"Secondly, the Leicester venture was at the lowest level of speedway, the National League, whereas Coventry has a rich history of racing which stretches back 90 years.

'It was always likely it would not satisfy the Coventry public who were used to top flight racing.

To give Mr Horton some credit he has got through this season but there is clearly going to be a question mark over next year.

"It is tough to know what will happen next year but if he doesn't get investment then clearly Coventry Bees won't be racing anywhere."

Mr Davies said the situation would not affect the campaign group and what it is doing.

"We are fighting to get speedway and stock car racing back to the Coventry area, hopefully at Brandon and we will continue to fight that cause, regardless of whether Coventry Bees race next season or not," he said.

In the meantime uncertainty con-

Kenni Larsen riding for the Bees (left) and (above) Coventry Bees owner Mick Horton

tinues to surround the future of Brandon Stadium.

Brandon Estates has submitted a planning application to build up to 137 new homes on the site.

There have also been moves to include the stadium site, which is in the green belt, in the Rugby Local Plan

A revised version of the plan is out to public consultation at the moment and the Save Coventry Speedway group is in the process of meeting with Rugby Borough Council regarding its submissions.

A government inspector threw campaigners a lifeline in an interim report regarding the local plan when he said safeguards should be in place for sports facilities in the borough.

That could help safeguard Brandon Stadium, or ensure that if the site were developed plans would need to be in place for a new stadium elsewhere.



Dear Ms Buchanan

Please find below the response on behalf of the British Speedway Promoters' Association to the latest consultation regarding Brandon Stadium.

I hope you will understand we have delayed our response until after the completion of key meetings to establish the format and structure of British Speedway for the 2019 season.

We can confirm that the Coventry Bees will not be competing in the 2019 season at any level.

The formation of a National League team racing under the Bees name at Leicester this year was agreed by the Members for the 2018 season only, in an effort to keep the name of the club alive whilst the current issues at Brandon prevent them from racing in or close to their long established location. This was never intended to be a long-term solution, and we would therefore strongly contest any suggestion that the Bees racing at Leicester (or elsewhere in the Midlands), at whatever level, on a more permanent basis would be an acceptable outcome.

It is not for the Association to comment on individual club issues other than to say that track-sharing in our sport is very rarely successful commercially, as the majority of a speedway attendance comes from supporters of the home team, who are rarely willing to travel out of their area on a regular basis.

It is the position of the Association that every club should be given the opportunity to flourish, and it is abundantly clear that the history, and existing fan-base, of the Coventry Bees means the current position is wholly unsatisfactory.

We would also consider several statements elsewhere in the documents pertaining to Speedway racing are unhelpful and inaccurate. These are challenging times for many sports but the quality of our stadia are perfectly adequate for the events they are hosting, and the comment regarding a lack of FIM International meetings staged here simply cannot be backed up. In 2019 three of the biggest events outside of the Grand Prix series will be staged at Belle Vue (two) and Glasgow, in addition to the British Grand Prix which will be staged at the Principality Stadium Cardiff.

The conclusion reached in paragraph 5.5, stating that the industry will not be unduly harmed by the closure of the stadium, is reached without foundation and is one which we would totally dispute. The presence of other venues within 60 minutes driving distance is irrelevant as speedway supporters follow their local team.

In summary we feel the reports are poorly researched and there is no case whatsoever for Brandon Stadium being surplus to requirements. This is one of our most established and successful clubs and the current absence of the Coventry Bees from competition has caused distress to several thousand supporters and is a major blow for the industry as a whole.

Our position is that the Planning Application must be rejected and every effort should be made to restore Speedway to the area as quickly as possible.



😢 INDEPENDENT

NEWS POLITICS VOICES FINAL SAY SPORT CULTURE

VIDEO INDY/LIFE INDYBEST LONG READS AIDSFREE INDY100 VOUCHERS

So the bankers have got away with it. Again.

That's basically the takeaway from the decision by the Financial Conduct Authority (FCA) to take no action against Royal Bank of Scotland and its former executives over the activities of its global restructuring group, which dealt with troubled business borrowers and has faced accusations of pushing them into bankruptcy and stripping their assets.

RBS has rejected the most serious allegations, and the watchdog cleared it of acting dishonestly or without integrity from a legal standpoint.

Read more



over GRG scandal RBS shares have been sold off to widen housing inequality

City watchdog has no power to take action against RBS

economic justification for

taking a £2.1bn loss

unit. **RBS** share sale: No

impressed with the conduct of the Its conclusions following an

morning, the FCA made it quite clear that it has been left less than

But in a statement issued this

investigation into what went on there. and the impact upon RBS's small and medium-sized enterprise (SME)



customers, are damning.

The watchdog found a failure on the part of GRG and RBS to "recognise and manage conflicts of interest". It said the bank did not have "appropriate governance, policies, procedures and processes ... to ensure that a reasonable balance was struck between the interests of the bank and those of its SME customers".

The decisions that GRG made "had the potential to exacerbate ... customers' already difficult circumstances and to have a significant bearing on lives and livelihoods". It appeared not to "recognise the emotional stress" suffered by SME customers in difficult circumstances.

You might very well think after having read that and some of the other conclusions contained in its statement that it is saying something like "they were complete and utter bastards". Just "complete and utter bastards" who didn't act

Join Independent Minds for just £5.99 a month

Gmail - Loan which led to the stadium sale.



Jeff Davies <jeffdavies170@gmail.com>

Loan which led to the stadium sale.

Avtar Sandhu <Sandhu@greencyc.com> To: Jeff Davies <jeffdavies170@gmail.com> Fri, Jan 4, 2019 at 4:03 PM

Hi Jeff

The loan outstanding was £4,500,000. When RBS bank got into trouble they made every borrower repay the loan back or sold their property. We had very good relationship with the bank built for many years. They knew times were hard and will be very difficult to refinance since it was their fault and they also wasted more than 3 years with joint venture with us.

They asked me to sell the stadium.

That's what happened.

Avtar S Sandhu

Chairman and Director

Greencyc Ltd 87 - 89 Bracebridge Street Newtown Birmingham B6 4PJ

Phone: 0121 325 8500 Email: avtarsandhu@greencyc.com Website: www.greencyc.com [Quoted text hidden] Gmail - Coventry Planning

Appendix 22



Jeff Davies <jeffdavies170@gmail.com>

Coventry Planning

sophie clark <bscda@yahoo.co.uk> To: Erica Buchanan <erica.buchanan@rugby.gov.uk> Cc: Jeff Davies <jeffdavies170@gmail.com>, STEVEN REES <stevenrees01@btinternet.com> Wed, Dec 12, 2018 at 9:50 AM

Dear Erica,

I am writing to you on behalf of the BSCDA (British Stock Car Drivers Association), the BSCDA was founded in 1955 and is the oldest governing body for Stock Car Racing.

As per our correspondence dated 17th February 2018 we would like to confirm how important Coventry Stadium is within the world of Stock Car Racing, in particular BriSCA F1. After the loss of the Stadium the sport has felt the impact as Brandon is such a significant part of our sports heritage, the first Saturday of the month between April to November was a date in every driver and fans diary and as we have stated Coventry was simply the "Mecca" of the Stock Car world attracting fans from all over the UK, Europe, American and New Zealand, all of which attended on a regular basis.

After reading recent documents we would like to point out several statements that have been misinterpreted, especially regarding possible replacements.

Firstly Perry Barr Stadium simply is not a suitable facility for Stock Car Racing, the main reason being the space for participants and fans. This has been covered over the years and unfortunately it is not an option. The reasons have been explained in the letter provided by the Birmingham speedway promoter Laurence Rogers.

Over the past years Leicester Stadium has had dealings with Coventry Racing Club, however this was also not a viable option for many factors, the reasons of which were outlined in the letter from speedway promoter / leaseholder Marc Bates

Trent Raceway is not within the ORCi and is not a Stadium. They operate under the "14 day rule" so this is not a viable option either.

Hednesford Hills has major restrictions on usage, BriSCA F1 appear there once a year and have done for many seasons.

In 2017 Coventry Racing Club staged just one meeting at Stoke Stadium, not four as claimed by the developers. The others were staged at Owlerton Stadium Sheffield, Belle Vue Stadium and the Norfolk Arena at Kings Lynn. Permission was granted to Coventry Racing Club by BriSCA to give the promotion breathing space to continue in the uncertain times of Coventry Stadium.

Ian Bennett volunteered his time to write for the Coventry Racing Club programmes and was not a member of staff / management.

At this moment in time the 2019 BriSCA F1 calendar has 41 dates scheduled. Prior to Coventry Stadium closing the fixture list featured 50 plus dates.

Finally we would like to state on record the appreciation we have for the "Save Coventry Stadium" committee and everyone involved in their campaign. They have worked tirelessly since the closure of the Stadium ensuring their voice is heard and of course the thoughts of fans, drivers and riders. We fully support their campaign to ensure the stadium is not lost and the sports heritage is always at the forefront of their campaign. We look forward to the day where the gates will hopefully be re-opened and all our drivers back on track to entertain race fans.

Kind Regards,

Sophie Clark

BSCDA Secretary

BSCDA PO Box 3621 Uttoxeter ST14 9BR Tel : 07961 820 884

www.bscda.com

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COVENTRY RACING

Promoter /Chief Executive:	A Sanchu
Joint Promoter:	J. Heaver
Admin:	M. Dariel
Meetings he a unexi regulations, and eq	wr D, Brsca

BriSCA Steward: Starter: Lap Scorer: Transponder Record Commentator:

	Steve Abbott
	Matthew Goring / Nik Styles
	Dave Hamar / Steph Valentin
er:	Nik Eastwood
	Gary Osbourne

TRACK STAFF

Clerk of the Course: Race Manager: Chief F1 Scrutineer: Meeting Co-Ordinator: Sophie Clark Pit Marshalls:

Simon Bennion / Carol Hall **Baz Watson** Andy Carr / Dave Riley Mike Bottomley / Graham Garner / Gary Jones

COVENTRY STADIUM OFFICIAL PHOTOGRAPHERS

Man Gersyned (MG) • Pitt Taly + T • Anne Grane was San Sterrag (SS) • Vitter (Marst (T) • Anne Grane was San Sterrag (SS) • Vitter (Marst (T) • Anna y Anne was)

Coventry Stox would like to thank everyone at Stoke Stadium and the Startrax Promotion for all their help with tonight's event.

FLAGS

Green Yellow (held static) conclusion active related point and Black - exclusion of an entrance an drawn Yellow (waved) - Echepter active indexed and the Mannen

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Programme Contributer Ian Bennett is NOT a member of the 'Coventry Stox Management' team as Framptons state but merely a stock car fan who writes notes in various programmes around the country.

In addition, there is clearly a (highlighted) note which states 'Opinions expressed are not necessarily those of Coventry Racing Club Ltd'.

Birmingham Brummies Speedway





Dear Ms Buchanan

I have been made aware of the latest documents regarding the planning application on Brandon Stadium.

In my capacity as co-promoter of Birmingham Speedway (Perry Barr Stadium) I wish to address several matters of inaccuracy.

I should first state that I have been involved in speedway administration for many years at a number of clubs, including several in the Midlands, and I spent a five-year spell as Assistant Team Manager at Coventry from 2012-16.

Referring to the Needs Assessment and the tables presented on page 11, the inference that Perry Barr Stadium has a stock car track (3.1 and 3.2) and stages stock car racing (3.2 and 3.3) is completely false. Perry Barr does not, and could not, stage stock car racing.

The stadium and circuit would need numerous changes to become acceptable for stock cars; there is insufficient access for the vehicles and equipment required by the competitors; and approval would not be granted on noise grounds due to the built-up location (speedway itself fought a long and successful battle for permanent approval, which was finally secured in 2010).

Page 14, section 3.14 suggests multiple uses of stadiums in the case of spare capacity. As far as availability is concerned, we have a good relationship with our landlords but are limited to a maximum of one speedway event per week, staged almost entirely on Wednesday evenings, in order to fit in with a busy schedule of greyhound racing and to meet our planning permission requirements. We also have a limit of 30 events per season, and there is no realistic possibility of us being able to also accommodate a Coventry team in addition to our own activities.

Page 22, Key Issues, refers to an over-supply of speedway facilities, with 5.5 stating that the industry will not be unduly harmed by the closure of Coventry Stadium.

I dispute this notion as one of the prime revenue generators from speedway is the presence on the fixture list of local derbies. However, because speedway supporters only tend to follow their own club, the closure of one venue does not mean those supporters will automatically move elsewhere. This has already been seen following the closure of Cradley Heath in 1996, and my understanding is that none of the other local venues have 'benefited' from the closure of Brandon with an influx of Coventry

Birmingham Speedway Company Ltd Newhaven Workshops, Unit 9 Beach Close, Newhaven, East Sussex, BN9 0BY. supporters. Conversely, the more speedway facilities in a particular region will always make for a more successful industry for all concerned.

5.7 states there has been a general decline in speedway attendances, along with financial difficulties. I can only speak for my own club, but we are pleased to report an increase in attendances this year, largely due to our hard work in the local area and a healthy rise in the number of youngsters supporting us. I am sure there are other clubs like ourselves, and clearly others who are in a less successful period, but this is the nature of sport and these 'conclusions' seem very generalised and based on very little actual evidence.

From my time at Coventry I am fully aware of the passion which exists for the sport and the large attendances it regularly attracted, with many of those people lost to speedway as the move to Leicester has clearly been commercially unsuccessful. Coventry is one of our sport's most important venues and the way in which it was closed is particularly distasteful – not to mention the damage that has occurred there since.

I speak mainly for speedway as I am not involved in the stock car sector, but if these documents are a bid to prove that alternative provisions to Coventry for both sports already exist, I feel they do not make a successful case and should be viewed with great caution.

Yours sincerely

LAURENCE ROGERS Co-promoter, Birmingham Speedway To All Interested Parties Concerning planning application at Brandon Stadium

We have seen Speedway and Stock Car Needs Assessment documents forwarded to you recently concerning development and would like to make the following comments on the information implied within these documents

Wolverhampton Speedway has operated successfully since the mid 1980's at the Monmore Green Stadium Wolverhampton WV2 2JJ staging Speedway racing on Monday evenings

There is no spare capacity for additional speedway events within the stadium with stadium owners Ladbrokes staging Greyhound Racing on six days a week. This also precludes any suggestion of Stock Car racing taking place as indeed do the circuit dimensions which are not compatible with the needs of Stock Car racing.

Since the closure of Brandon Stadium and the subsequent loss of Coventry Bees Speedway Club we have not seen any notable influx of Coventry Speedway Supporters and in fact our turnover has been reduced by the loss of around three "derby" matches against Coventry which regularly recorded our highest attendances of the season

If there is any further information you require please make contact with the undersigned

Regards Chris Van Straaten

Promoter Wolverhampton Speedway Birmingham City Council Planning Management

PO Box 28, Birmingham B1 1TU



DECISION DOCUMENT

Appendix 26

APPLICATION NUMBER: 2011/06036/PA

TOWN AND COUNTRY PLANNING ACT 1990

AGENT (if used)

APPLICANT

Mr A E Mole R & D Aggregates Ltd 12 Lisle Avenue Kidderminster Worcs DY11 7DL

BIRMINGHAM CITY COUNCIL GRANT PLANNING PERMISSION SUBJECT TO CONDITIONS FOR THE FOLLOWING DEVELOPMENT IN ACCORDANCE WITH THE PLANS AND APPLICATION AS NUMBERED ABOVE:

Application to allow the variation of conditions 12 & 13 attached to planning approval 2011/00099/PA until the 31st December 2012 in order to also permit speedway races on Sunday 11th March 2012 with races to occur on that date from 17:00 until 2100 hours.

at

Perry Barr Stadium, Aldridge Road, Perry Barr, Birmingham, B42 2ET

Reason(s) for Approval

Birmingham City Council grants planning permission for the development hereby approved subject to the conditions listed. The reason why permission is granted is because the development would comply with policies 3.8 and 3.10 of the adopted UDP (2005).

Conditions that affect this development or use

 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or reenacting that Order with or without modification), the premises/building(s)/site shall be used for motor cycle speedway racing and for no other purpose apart from greyhound racing as approved under Application E/C/02092/30 including any other purpose in Class D2 of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument amending, revoking and/or re enacting that Order with or without modification. Reason: In order to define the permission in accordance with Paragraphs 3.8 and 3.10 of the Birmingham UDP 2005.
Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and

Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound shall be at least equivalent to the capacity of the tank plus 10%. If there is multiple tankage, the compound shall be at least equivalent to the capacity of the largest tank, vessel or the combined capacity of interconnected tanks or vessels plus 10%. All filling points, associated pipework, vents, gauges and sight glasses must be located within the bund or have separate secondary containment. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework shall be located above ground and protected from accidental damage. All filling points and tank/vessel overflow pipe outlets shall be detailed to discharge downwards into the bund. Reason: To prevent pollution of the water environment in accordance with Paragraphs 3.71-3.76 of the

Birmingham UDP 2005, Sustainable Management of Urban Rivers and Floodplains SPD and PPS25.

Appendix 27

------ Forwarded message ------From: Marc Bates <<u>marcbates@pbhsutilities.co.uk</u>> Date: Thu, Oct 25, 2018 at 12:23 PM Subject: Re: Battle for Brandon To: Jeff Davies <<u>jeffdavies170@gmail.com</u>> Cc: Damien Bates <<u>Damienbates@pbhsutilities.co.uk</u>>

Jeff

We did look into the viability of running stock cars at Leicester but due to planning issues with local council they would not grant us the planning consent and also the costs associated with the fence been installed and lack of area for pits and parking made it a total non starter

There is no way it would be commercial viable to turn Leicester into a venue that could accommodate Stock Cars

Thanks Marc



Brafield

Very basic No teracing (grass banks) No grandstand or seating No covered areas Plenty of competitor parking / pit area

Stoke

Plenty of space for competitor transporters / cars Covered terracing on one straight Grass banking elsewhere No seating

Trent Raceway

A mud track, in a field No facilities whatsoever IS NOT and NEVER COULD BE a Stox venue



Competitor parking



Appendix 28







Brandon

Grandstand seating Viewing from panoramic windows in bars and restaurant 5 permanent food outlets Concrete terracing (much of which is covered)

Diasabled viewing area

Viewing from complete perimeter

Extensive car parking

Extensive competitor / pits area Capacity 12,500

Perry Barr

No grandstand seating Bar and restaurant Terracing on one straight only Limited car parking Extremely limited competitor parking (totally unsuitable for Stox) IS NOT and COULD NOT BE a Stox stadium

Beaumont Park Leicester

Grandstand is scafolding

Covererd terracing on back straight only, hardcore on bends Car parking 1/4 mile away and in shopping centre Extremely limited competitor parking (totally unsuitable for Stox) IS NOT and COULD NOT BE a Stox stadium



Spectator parking

Competitor parking



F1 Stock Cars

Purpose built cars costing up to £30k to build

The chassis and bumpers are race engineering high grade box steel (it's a contact sport!)

The roll cage is a six post design and very strong to protect the driver in the event of a roll over

The body panels are aluminium

Engines are Big Block Cheverolet V8 engines realising 740 bhp

Gearboxes have just two forward speeds (one for manouvering, the other for racing) and a reverse gear

Wheels are specially fabricated to withstand abnormal loads and vary in width depending on which corner of the car they are fitted Tyres are specially made for BriSCA by Goodyear





Stock Car Transporters

Almost all of the drivers transport their cars in huge vehicles similar to those in the above pictures. The roof spoilers are removed from the cars and the cars driven into the transporters, sometimes with two cars in each vehicle.

This is why the pits / paddock areas have to be extensive (like Brandon's), as there is often 70 or 80 cars racing at each event.

One of the many reasons why Brandon was effectively he 'National Stock Car Stadium' is because it had the largest pits / paddock area in the country, consistently enabling the highest number of drivers, with typically 150 cars competing.

The need to house these big transporters is one of the key reasons stadiums like Perry Barr and Leicester could never stage Stock Cars - there simply is no room for the competitors.

In contrast, speedway riders transport their bikes in Transit sized vans and two teams of 7 riders require only the space for 14 vans (picture right)



Appendix 29



Jeff Davies <jeffdavies170@gmail.com>

Wimbledon Speedway

David Rowe <rowedavid@hotmail.co.uk> To: jeff davies <jeffdavies170@gmail.com>, David Carter <rollingstart@yahoo.com> Sun, Oct 21, 2018 at 9:21 AM

Excellent information straight from the horse's mouth regarding Wimbledon.

Incidentally if you look at the information Frampton's have provided, it's essentially a re-write of the Wikipedia entry on Wimbledon Stadium, and explains why they think it stopped staging car racing in 2008.

From: perkin ian Sent: Sunday, October 21, 2018 10:02 AM To: rowedavid@hotmail.co.uk Subject: Wimbledon Speedway

Hi David

Seth sent me your e-mail and asked me to fill in the details about what happened at Wimbledon Speedway that brought about the closure at the end of 2005 when we were more than willing to continue leasing the stadium from the GRA but were told that their had been a Board Decision taken to bring speedway to an end.

Our company Wimbledon Speedway PLC was formed in May of 2002 to rescue the failed attempt by Steve Ribbons and Dave Croucher to reintroduce speedway into Plough Lane. We agreed with the GRA a one year lease on the stadium, put in a new track and had a successful season financially which allowed us to agree with the GRA a further three year lease on the stadium for speedway events which secured our future up to the end of 2005. Wimbledon wasn't a cheap stadium in which to run as the GRA was charging us rent of £1500 a meeting on Wednesday nights and more if we had a Sunday fixture, which at the time the BSPA told me was the highest rent being paid by any speedway club in the UK, even more than Poole and Wolverhampton who were then considered to be the most commercially successful clubs in the country. However, we were happy just to be running speedway successfully at one of speedway's historic venues and for myself and the other directors it was probably the best thing we had ever done and wanted to continue promoting speedway for as long as we could there.

Unfortunately, things changed mid-way through the 2005 speedway season when the GRA was bought out by Risk Capital Partners, whose Chairman was Luke Johnson, someone coincidentally who is in the news at the moment over alleged financial fraud and mismanagement at another of his companies Valerie Patisserie. When we had our annual near end of season meeting with the Wimbledon Stadium General Manager Mick Hardy (now at Belle Vue Greyhound Stadium) and thought we would agree a new lease for hopefully a five year agreement to run speedway at Plough Lane, we were told that a Board decision had been taken to stop speedway at Plough Lane and that the decision was final. We were given no explanation about why that decision had been taken and told that it was irreversible, I did say that if it was the money we would be prepared to pay an even higher rent, but was told in what I took to be a joke said in very poor taste, that this was irrelevant to their decision, unless we could raise at least £100,000 rent per meeting in the future and pay them £2.5 million for holding a 25 race season in the stadium.

What we found out later from three other organisations that rented other parts of the stadium was that they had also been given notice to quit the stadium. The first was a local haulage firm that paid the stadium to use parts of the stadium car park, particularly overnight to park part of their fleet of vehicles. The second was a motor-cycle training school who used the car park during the day, to off road train motor-cyclists to pass their driving tests and the third was the ending of the Bookmaker's Afternoon Greyhound Services Ltd daytime greyhound meetings. So in a very short period of time the new owners of the GRA had substantially reduced both the activities and commercial income coming into the stadium, which was then followed by a period of closing down and boarding up, bit by bit the facilities of the stadium accompanied with claims that various activities in the stadium were no longer commercially viable. (Look familiar from a Coventry perspective?).

08/01/2019

Gmail - Wimbledon Speedway

It is true that during the run down period of the stadium before complete demolition, that the Stock Cars were allowed to continue while the speedway was not, but in my view this was because the BSPA require speedways to have a lease or ownership of the tracks at which they operate to try to avoid mid-season closures as far as possible. The Stock Car Company at Plough Lane had no lease with the stadium as they ran single events on a week to week basis and so the GRA could end their activity with just a week or a months notice with no further liability to the Stock Car Company.

Closing down stadiums is not an easy business, but when you look at the millions these sites can realise from housing developments it is not surprising that the developers are prepared to play a long game and create over a number of years so that the local planning authorities are faced with either new housing developments for which there is a need or derelict stadiums that blight the landscape. It is a shame that the developers are allowed to get away with destroying sites like Coventry and Wimbledon as they are irreplaceable and once gone are gone for ever .

Best of luck with your attempts to keep Brandon Stadium from going the same way as Wimbledon and all the others that have already been destroyed.

Kind regards

Appendix 30

Region	Stadiums*	Mid year Population Estimate 2017**	Stadium Per Population
South East	3	9,080,825	1 per 3,026,942
London	0	8,825,001	0
North West	2	7,258,627	1 per 3,629,313
East	6	6,168,432	1 per 1,028,027
West Midlands	3	5,860,706	1 per 1,953,569
South West	4	5,559,316	1 per 1,389,829
Yorkshire & the Humber	2	5,450,130	1 per 2,725,065
East Midlands	2	4,771,666	1 per 2,385.833
North East	3	2,644,727	1 per 881576
Wales	1	3,125,200	1 per 3,125,200
NI	0	1,870,800	0
Scotland	2	5,424,800	1 per 2,727,400
U.K.	28	66,040,229	1 per 2,358,580

Region	Stadiums*	Mid year Population Estimate 2017**	Stadium Per Population
London	0	8,825,001	0
South East	2	9,080,825	1 per 4,540,412
North West	1	7,258,627	1 per 7,258,627
East	5	6,168,432	1 per 1,233,686
West Midlands	3	5,860,706	1 per 1,953,569
South West	3	5,559,316	1 per 1,853,105
Yorkshire & the Humber	1	5,450,130	1 per 5,450,130
East Midlands	3	4,771,666	1 per 1,590.555
North East	1	2,644,727	1 per 2,644,727
Wales	0	3,125,200	0
Northern Ireland	4	1,870,800	1 per 467,700
Scotland	4	5,424,800	1 per 1,356,200
U.K.	27	66,040,229	1 per 2,445,934