

SAVE COVENTRY SPEEDWAY & STOX CAMPAIGN GROUP

Response to wyg Independent Consultant Report
Related to Coventry Stadium

29th October 2019

NOTE:

Our observations are ordered to correspond with the numbering structure of the independent review conducted by wyg.

Headings and sub-headings relate to that report's structure.

Items in italics are extracts from the report.

Dear Erica

We now present our response to the independent review into Coventry Stadium, Brandon, as submitted by wyg consultants.

Fundamentally, the report has categorically concurred with our own assertions that the developers have failed to comply with The National Planning Policy Framework (NPPF) in their application, in that the provisions of paragraph 97 have not been met. The report makes several references to this point, and on that basis we cannot see any argument for planning permission to be granted for the existing planning application.

We are concerned that the report appears to suggest that alternative sports provision under paragraph 97c) might be regarded as an appropriate consideration, and we wish to highlight and comment on this and several other points raised by the report.

We are also concerned that a consultation response does not appear to have been requested from the respective governing bodies of speedway and stock car racing, and would respectfully request that this oversight is addressed.

1.0 INTRODUCTION

We are surprised that the report does not include a cover, details of circumstances leading to it being required, authorship and sign-off details – but we are satisfied with much of the introductory content.

The former leader of Rugby Council Michael Stokes informed more than 300 people attending a public meeting in November 2018 that a consultant was to be commissioned to review claims by the developers and counter-claims by the Campaign Group.

A key message is that the report actually focuses solely on “sporting issues”, which is a little surprising as there are numerous other discrepancies between the submissions of the two parties including, for example, the factual evidence supplied by ourselves regarding the developers’ security policy on acquisition of the stadium.

The report also stresses that there are *“issues for Rugby Council to take on board and balance in their wider assessment of the future of the site...”*. This must surely include Green Belt designation and the fact that the site is not, and never has been, allocated as part of the Local Plan, and that the retention of the site as a venue for motorsports is supported by the recently ‘made’ Neighbourhood Plan.

2.0 CONTEXT

Sport England’s (SE) view of Stock Car racing, i.e. it not being a sport by that organisation, is not strictly relevant since many branches of motorsport are not

recognised by the MSA. SE do not require sports to possess a single governing body (Rugby Union and Rugby League are examples) and in some cases they do recognise sports that do not have recognised governing bodies. Stock Car racing brought extensive participation numbers (at many events c150 competitors) to Brandon, as well as high crowds, and therefore contributed much to the successful running of the venue. Therefore, matters of ongoing need etc are just as important for Stock Car racing as they are for Speedway. For SE, wyg or any other organisation to suggest this is not the case would indeed be perverse.

3.0 ANOG ASSESSMENT (NEED)

The opening paragraph states that there is “*no evidence of the SNA being purposely deceptive.*” We respect the author’s right to his opinion, but we would state strongly that if the SNA is not purposely deceptive, it is an extremely poor piece of work. We have supplied, with evidence, details of numerous untruths and inaccuracies within the SNA – and what is most troubling is that many of these untruths were also included within the initial planning application, and subsequently repeated nine months later.

It is also important to recall that a key paragraph relating to stadium ownership discussions in 2016 was withdrawn under threat of legal action from the former owners. We believe both the initial planning application and the SNA were written with a view to taking advantage of the understandable lack of full knowledge from the Planning Officer and Members of the Planning Committee, and not expecting such detailed factual responses as come-back.

The author states that the SNA being undertaken in retrospect, following the closure of the site and after the initial planning application, is “*not strictly correct*” in terms of process, and we would in fact argue that it is totally unsatisfactory because, as the author quite rightly observes, the work has been undertaken to “support a particular narrative.” The conclusions were already decided before the work was done.

We also believe this undermines the approach later in the report to consider paragraph 97c because if the developers had acted appropriately in the application of national policy, this suggestion would not have arisen.

Quantity

The report correctly notes the SNA’s somewhat arbitrary audit of alternative motorsports venues suffered from several inaccuracies, and rather generously argues that this makes the quantitative claims “*less robust.*” It also clearly confirms that such ‘alternative’ facilities are not ‘like for like.’

Quality

The report correctly states that Brandon was “*one of 13*” UK venues accredited to host BriSCA F1 racing but should really have referred to it as the most important –

although it does go on to explain the significance of the venue for both speedway and stock car racing.

“Given Brandon’s specification and scale, the alternatives put forward in the SNA are not ‘fit for purpose’ and fall significantly short of providing the same qualitative experience as delivered at Brandon for motorsports” is a strong statement and one with which we wholeheartedly concur.

It is especially noteworthy that the report confirms that the stadium was “fit for purpose” at the point of closure, whereas the SNA and planning application are both written to give the impression that the site was disused, had already closed, and had required extensive investment at the time of closure in order to continue being operational. The most damning indictment of the planning documentation comes in the statement that *“There were therefore no clear qualitative drivers for closing the stadium...”* which totally goes against the information submitted by the developers.

Availability

The paragraph concerning the disastrous re-location of Coventry Bees to Leicester Speedway correctly concludes that this arrangement was not “like-for-like” given that it was for a move into the bottom division of the sport, and was made with no long-term guarantees. It should also be stressed once more that the developers made a payment to the speedway promoter to facilitate this move, in order for them to be able to make their assertion that alternative speedway provision had been met.

We must clarify again that four stock car events were not transferred to Stoke in the 2017 season. Only one event was transferred to Stoke. The three others took place further afield at Sheffield, Belle Vue and King’s Lynn.

We would also take issue with the following statement:

“It is however also acknowledged that the sport does evolve in-line with supply. For example, the 7 BriSCA events were not re-allocated as the sport chose to run with a less congested fixture list, so loss of events is absorbed by the sport.”

Alternatively, the events not being re-allocated could be read as leaving a gap in the fixture list until such time as Coventry could return.

Demand

“The broad programme at the end of the final season at Brandon consisted of 10 BriSCA F1 events with around 60 cars competing.”

This is not correct. A stock car meeting at Coventry included many more participants from other formulae, giving spectators constant on-track entertainment and many more races than the standard F1 format. Records show that 152 competitors / cars took part in the final meeting in 2016, which was typical of all events staged at Brandon. In addition to the F1 events mentioned, a further seven events were promoted by Startrax at the venue

Summary

The summary clearly concludes that arguments of Coventry Stadium being “surplus” are not satisfactory. In fact, remarkably, they have failed against all four ANOG criteria. The report also correctly notes that the significance of the stadium has been totally overlooked in the SNA.

“Teams and events have been lost with the closure of Coventry Stadium motorsports are a minority sport in terms of participation, who’s impact on health and physical activity is limited and less universal than other activities. The sport does adapt and evolves and has done in the case of Coventry Stadium.”

This paragraph does not appear to make full sense and it rather looks as if some words have been lost in the early stages. Whatever is the case, the benefits to health/physical activity from participation in the sports should not be underestimated.

The fact that the sports could be considered as ‘minority’ sports actually should be seen as an additional virtue. In terms of the number of active participants the racetrack compares favourably with other sports facilities. On top of this the spectator dimension and that attraction of major events into Rugby adds further layers of significance.

4.0 VIABILITY

The Campaign Group have not had sight of the Financial Assessment in 2017, but whilst it may well have been “*extremely thorough*” we strongly suspect that once again it will have been produced in order to reach a pre-determined conclusion. The author notes himself that clarity surrounding the application of the stadium and the ultimate viability is clouded – presumably because the former owners would not supply the information. However, it is hard to accept that this is “*through no fault of the applicant*” because it surely reflects poorly on their due diligence and tunnel vision at the time of the sale process.

Given that the “*clarity surrounding the operation of the stadium and the ultimate viability is still clouded*” it was surely unprofessional and misleading for a leading representative of Framptons to categorically state to the media, on several occasions, that the stadium had closed because it was unviable.

It should be noted too, that evidence submitted to Rugby Council and to the report’s author, in the form of an email from the previous owner, explained the circumstances surrounding the sale of the site, and quite clearly those circumstances were not in any way related to viability.

“The applicant claims there are numerous indicators that the Stadium was no longer viable, from the lack of any interest in the site as a going concern to the failure of operators to take up the offer of leases.” We stress again that the site was never marketed in the sporting sector, which was extraordinary given its designation. It

was only ever marketed with ‘vacant possession.’ Additionally, the existing stock car operator was NOT offered a lease, with the intention having been to run one further season of speedway-only, which would then have ‘proved’ that the site was unviable, as both sports were needed in order for it to operate. The paragraph of the SNA alleging that discussions were ongoing with Coventry Racing Club for a lease for 2017 was removed, and a formal letter of apology was sent following the threat of legal action, as such discussions did not take place.

5.0 ALTERNATIVE PROVISION

“Clearly the delivery of any new facility will not be easy but on the basis that the current Stadium cannot be deemed surplus and re-opening Brandon is unlikely to be deliverable or viable...” We are concerned the author appears to be writing off Brandon purely on the basis of its ownership. It is still the best venue for the sports to take place, and even in its current position almost certainly offers the quickest solution to a resolution and the return of the sports. In the absence of an alternative identified site Brandon remains the most suitable site, no matter how uncomfortable a position this presents for Brandon Estates.

“Whilst venues are closing across the country these are generally where there is limited local support, proven quality and operational issues and where re-provision plans have often been put in place.” The majority of closures are in fact down to aggressive land-owners and not a lack of support... and unfortunately re-provision plans are very rarely put in place to a satisfactory level. Pressures to close car racing facilities in Stoke and Birmingham are also contrary to the wishes of the respective governing bodies, the promoting bodies and users.

“An alternative provision Strategy would require developers to accept the principle of meeting paragraph 97b) and all parties commit to explore this route.” We deal with this further in section 6 but would stress that should this be the preferred solution, no redevelopment of the present site should be permitted until a new facility is secured and delivered.

6.0 CONCLUSION AND WAY FORWARD

Presumably for completeness, the author makes reference to the possibility of the developers switching their focus to section 97c) and alternative sport and recreation provision, the benefits of which clearly outweigh the current or former use.

We dispute this as a perverse interpretation of the protection afforded to sports facilities by the NPPF which would effectively ‘normalise’ the unreasonable behaviour of Brandon Estates in ‘engineering’ the closure and then facilitating the deterioration of the stadium. We note this approach has also been adopted by wyg elsewhere (Arena Essex and Birmingham Wheels Park) to justify the loss of those sports facilities.

We must state categorically that should this route be taken by the developers, this would be totally unacceptable to speedway or stock car communities. There is no justification that a provision such as a tennis court, cycle route or sports pitch could

possibly replace one of the UK's best-loved and successful motorsports venues. Had this ever been considered as a means of complying with the NPPF (paragraph 97c), the applicant would have pursued this from the outset rather than attempting, unsuccessfully, to convince Rugby Planning officers and the Planning Committee, that the stadium was not viable and surplus to requirements. It should be viewed as a last desperate attempt to comply with the guidelines and dismissed as such.

Way Forward

"The current policy position, meeting paragraph 97a) is not supportable. Re-opening the stadium would be a significant challenge and may ultimately be undeliverable." There is not sufficient evidence in the report to come to that conclusion. The only evidence suggesting it would be undeliverable comes from reports commissioned by the developers themselves, obviously to their own advantage.

"If the principles set out are agreed it is recommended that SCS are involved in any discussions to meet NPPF paragraph 97b) with the applicant. Analysis of the learning from new stadium openings and their viability will be an important consideration." We do believe that a discussion would be beneficial, with 97b) an important part of this, and we feel that after three years of impasse it could bring things forward for everyone's benefit. However, this does of course require the support of all parties. With this in mind, we contacted Brandon Estates (via Framptons) on Wednesday October 9, and received a reply from Louise Steele (Framptons) on Wednesday October 16, stating: *"Thank you for the email and apologies for not getting back to you earlier. I am waiting for instructions from my client and hope to get back to you in the next few days."*

As of October 29, we still await further correspondence from Ms Steele.

We also believe Rugby Council should take a proactive role in urging the developers to alter their stance, or this saga will continue to be a matter of local anger and embarrassment, potentially for years to come.

As a Campaign Group we will not rest until both speedway and stock car racing are restored to the area enabling future generations to enjoy exciting family sports.