

Land at Coventry Stadium, Rugby Road, Coventry, CV8 3GJ

Summary Proof of Evidence of Neil Allen, Director, Sports Planning Consultants

Local Planning Authority Reference: R18/0186

Planning Inspectorate Reference: APP/E3715/W/23/332013

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Introduction

1. My name is Neil Allen. I am a Director at Sports Planning Consultants (SPC), which was formed in June 2022. SPC were formed by Neil Allen and Carolyn Wilkinson in June 2022 having previously worked for Tetra Tech Planning (WYG) for 4-years, following the strategic acquisition of Neil Allen Associates (naa) in May 2018 by WYG. I hold a BA (Hons) degree in Leisure Studies, Recreation and the Environment from Leeds Polytechnic (Carnegie College)
2. The Proof of Evidence addresses the Council's case in respect of defending its decision to refuse planning application reference R18/0186, for the development of Coventry Stadium, Rugby Road, Coventry.
3. The proof seeks to address the key issues raised by the Inspector in relation to:
 - Whether the stadium is surplus to requirements having regard to national and local planning policies
 - Whether it is financially viable to reinstate the speedway stadium
 - Whether there is identified need for the alternative sports provision proposed
 - Whether the benefits of the alternative sports provision outweigh the loss of the former speedway use.
4. It should be noted that the Rule 6 Party will also provide evidence on the above issues, particularly in relation to trends and will provide more detail in respect of the issue of viability. This proof provides an overview of the trends and viability issues.

Surplus to requirements

5. The key national planning policy test in relation to the question of whether the stadium is surplus to requirements is National Planning Policy Framework (NPPF) (CD8.1) paragraph 99, which states that:
6. *'Paragraph 99 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*
 - a) *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;*
 - b) *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*

c) *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*'

7. Sport England published the methodology for how NPPF compliant needs assessment work should be undertaken; the *Assessing Needs and Opportunities Guide (ANOG)(CD 15.1.4)*. This represents the 'how to do' needs assessments for indoor and outdoor sport in England and represent Sport England's response to paras 97 and 99 of the NPPF.
8. In line with the NPPF, needs assessment work should therefore use the ANOG framework to illustrate how the proposals meet NPPF policy. ANOG looks at *quantity, quality, accessibility and availability* of provision.
9. The Independent Review in 2019 used this framework to test the evidence and concluded that a clear case could not be made that the stadium was *surplus*, using the ANOG tests, this was not contested at the time. Indeed, since the independent review was concluded in 2019 and the planning application determined in October 2022 Brandon Estates did not seek to argue the stadium was *surplus*.
10. The overriding policy position requires that any development promoters must prove exception 99 a). I have not seen any updated needs assessment using the ANOG tests, which proves this, or addresses other potential land uses. No updated analysis appears to have been undertaken.
11. The focus of the Appellant's case is on viability, which I would argue is not relevant and certainly not proven, and trends, which I believe are overstated and certainly not to the determinant of need as stated.
12. In terms of need, Coventry Stadium is not *surplus* in terms of land use, the conclusions reached in 2019 remain valid but the position has worsened. The Appellant has not presented evidence in respect of need or proved exception to paragraph 99 a) as required by policy or met local policy requirements, specifically Policy LF1/H2 of the Neighbourhood Development Plan (CD8.3) and Policy HS4 of the Local Plan (CD8.2).
13. Tracks and clubs are under threat due to land tenure issues as opposed to demand or viability. The sport needs more places to play not fewer in order to *protect and enhance* the sport.
14. KKP state they have been unable to provide a true picture in terms of trends. The Rule 6 Party will provide a detailed rebuttal of the trends set out in the Appellant's case.

15. In terms of trends, whilst the sport is not at the height of the 70's, this is the same for many sports, but speedway is far from '*on its knees*' as asserted by the Appellant and indeed previously by me. It is acknowledged that the sport is in a different place from its heyday in the 70's, but as are most sports. Indeed, the pace of change across the sporting landscape has never been more volatile and the challenges varied, but speedway is responding. Consultation I have subsequently had with the sport has indeed made it clear that speedway is in a more stable position as of 2023, with several positive crucial indicators.
16. Five of the top 7 riders in the world are currently racing in Britain. Two years ago Britain were world champions. Phil Morris has been taken on as Chief Executive of the Premiership League to further grow the sport and commercial appeal. Indeed, the sport has a profile on Eurosport and on an international basis Warner Brothers have committed to £100m worth of investment in the sport, supporting the Grand Prix Circuit and the global development of the sport. This is currently in year 2 of a 10-year arrangement.
17. In the volatile sporting landscape speedway remains a professional sport with 3 functioning leagues, all of which have sponsors, despite closure new tracks have also opened at Workington and re-opened at Oxford, resulting in new teams and the strengthening of the league structure.
18. What is evident is that there are positive trends in the sport and crucially, although in our view somewhat conflated with need by the Appellant, viability works. There is a clear realistic prospect of re-opening the site on a modest phased basis. This will be set out in detail by the Rule 6 Party.

Financial viability

19. Previous Independent Review in 2019 was never scoped to assess viability per se, KKP acknowledge the difficulty of untangling the viability issues from 2019. The Appellant's focus on Arena Essex is no longer relevant.
20. The premise of the Appellant's case in respect of viability is not what is planned for Coventry Stadium. In similar vein the National Speedway Stadium, Manchester model is not applicable to Coventry or the re-opening plans at Coventry Stadium.
21. Oxford, Workington and Bradford represent the models, which will be replicated at the

Coventry Stadium. A modest re-opening on a phased basis, supported by an events programme, built up over time, including the establishment of Coventry Bees, can deliver a viable re-instatement.

Need for alternative provision

22. Key partners agree that whilst the provision of any 3G Pitch would not be un-welcome, and one 3G is probably still required in Rugby (CD8.13), Brandon is not a priority or suitable location. Brandon and the proposal put forward is not supported as a priority in terms of strategic need. It is not supported as such by any of the key partners and is not a sound or robust strategic proposition. It represents a speculative proposal.
23. The lack of population, club infra-structure and the proposed standalone nature of the 3G pitch is a concern expressed by all consultees. Whether the facility would be sustainable given other existing and proposed pitches coming on stream is also questioned and indeed openly acknowledged by KKP as a key risk. With no anchor club, the business plan operates at the margins and any of the proposed other 3G pitches coming on stream would impact negatively and threaten viability.

Benefits outweighing the loss

24. Brandon puts forward a single isolated 3G pitch, with no anchor club, does not have grass pitch provision alongside to form a hub and is not a multi-sport offering. Whilst it would be used and will have some benefit it is of little or no strategic significance in comparison to a strategically important stadium provision.
25. A 3G pitch at Coventry Stadium would have no unique offering or significance. There will be some benefits of the 3G and some usage but this will be limited compared to the loss of an iconic stadium and the end of speedway in the West Midlands.
26. In my view, and supported by the evidence, replacing Coventry Stadium with an unremarkable 3G pitch, is comparable to replacing Wembley Stadium with a children's Go-Kart track.