

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

Coventry Stadium, Rugby Road, Coventry, CV8 3GJ

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

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

1. I am a shareholder and Managing Director of Huntapac Produce Limited, having been a director of the company for 26 years. I am also a former stock car driver and make this statement to oppose the Appeal and as part of my efforts to return motorsport to Coventry Stadium. The facts to which I refer are within my own knowledge unless otherwise stated in which case I believe them to be true. There is produced to me an appendix WH1 to which I will refer by page number.
2. As a former stock car driver I have competed many times at Coventry Stadium and believe it to be the 'Wembley' of stock car tracks. I have three sons. All but my youngest son have raced at Coventry. We have all won races at Coventry Stadium. My youngest son will race in Formula 1 in next year when he is 16 years old and eligible to race in F1. My objective is to ensure that he too can compete and win a race at Coventry Stadium. I want to see this important heritage asset retained and motorsport restored to Coventry Stadium.
3. Before I had any knowledge of Save Coventry Speedway & Stox Campaign I visited Coventry Stadium with Alastair Burgwin, a representative of the current owner, on 20 May 2020. I am aware from that visit that the Grandstand has been damaged by vandalism and fire. Motorsport can be restored, however, without using the Grandstand. Its condition does not affect my plans.
4. On 21 March 2017 I enquired about buying Coventry Stadium (p. 1). I submitted two years trading accounts as requested by the Appellant. The reply implied that the Appellant valued the Stadium on a residential development basis rather than existing use (p. 3). I did not think that to be appropriate.
5. On 20 May 2020 I visited Coventry Stadium with Alastair Burgwin, a representative of the Appellant when I was able to see the damage caused by fire and vandalism.
6. On 27 May 2020 I made an offer to buy Coventry Stadium to restore it for motorsport use. In the reply it was confirmed that my offer was being considered. There has been no further response.

7. I still wish to acquire Coventry Stadium and believe that I have access to the means to be able to do so.
8. My company's last accounts filed with the Registrar of Companies declare a turnover of £51.8 million and total shareholders funds of £19.98 million.
9. Reinstatement of Speedway and Stock Car racing would be on the basis of spectators being restricted to the terracing on the first and second bends, the 'back straight' terracing and the third and fourth bends and I believe the arrangements proposed would enable up to approximately 6,000 people to attend motorsport meetings.
10. I refer to a schedule of reinstatement works (p. 5) with an estimate of the capital cost of reinstating Speedway and Stock Car racing at Coventry. This puts the estimate for reinstating racing in the short term, without use of the Grandstand, at a total cost of approximately £736,575 including a 15% contingency, some of which is likely to be covered by sponsorship. I believe the works proposed and the costs estimated to be realistic and am happy to include them in my plans and budgets. I have access to the funds required.
11. If restored for motorsport use there will be three separate businesses as is normal; ownership of Coventry Stadium, the Stock Car promotion and the Speedway promotion. The Stadium owner will rent the Stadium to the Stock Car and Speedway promoters and generate revenue from rent and food and drink sales. This is a successful model which is applied elsewhere.
12. I do not intend to promote Speedway. I am aware that the Poole Speedway promoter Matt Ford has expressed an interest in running the Speedway team at Coventry. I am aware of Mr Ford's track record and success. I would be willing to rent the Stadium to Mr Ford at a fair rent to allow him to run Speedway if motorsport is restored. Terms can be agreed and the necessary licensing arrangements concluded with the sport's National Governing Body.
13. I have the necessary business experience to complete the acquisition of Coventry Stadium and the restoration of motorsport. My intention is to be involved in the Stadium ownership and management. If agreement can be concluded I will be happy to join forces with others in a joint venture or consortium to repair or replace the stands etc. I have met and am aware of the interest of John Whalley, Managing Director of Nationwide Windows and Doors Limited and will be happy to consider that possibility with him.
14. I also intend to put in place the necessary legal and constitutional arrangements to ensure that Coventry Stadium is preserved for motorsport use and protected from the risk of any future speculative development.

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Appendix WH1

From: Warren Hunter
Sent: 21 March 2017 11:25
To: 'deborah.clamp@investinplc.com' <deborah.clamp@investinplc.com>
Cc: 'Antony Harrison (harrisonath@aol.com)' <harrisonath@aol.com>
Subject: Brandon Stadium

Dear Deborah,

I hope you are well?

I'm am contacting you regarding your earlier conversation with Antony Harrison and our interest in the purchase of Brandon Stadium. Below I have noted my personal and business background and our financial standing since 2014.

I have also listed some questions in order to get a better understanding of the property.

Business Background:- I am the Managing Director of 'Huntapac', a family run business established in 1942. We grow, pack and distribute vegetables and salads to a large number of the major retailers in the country, we have grown to be one of the largest employers in the west of Lancashire with an annual turnover of £43 million which is due to grow by a further £8 million next year due to additional business we have won with Co-Op, Nisa and Waitrose. My son Will, Operations Director is also heavily involved in the business races in the BRISCA Formula 1's, hence our link to Brandon stadium. If you need any further information on Huntapac I have pasted a link to our website <http://www.huntapac.co.uk/>

Financial Information:- As mentioned above we have had a static turnover of around £40-£43 million for 4/5 years now, with profits at a strong level for industry standards. If you need any further detail on our financial standings I would be more than happy to pass your contact information onto our Finance Director for further detailing. For initial reading I have attached a copy of our 2015 & 2016 filed audits.

If you need anything else please don't hesitate to contact me, I have listed some questions below if you wouldn't mind coming back to me in due course:

- *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?*
- *Is there any restrictions on Brandon Stadium?*

I hope this email finds you well and following further conversations I think it would make sense to meet up to discuss the possible purchase further. Speak soon,

Kind Regards.

Warren Hunter

Managing Director

Huntapac Produce Ltd.
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Our Ref: JC/DR

Your Ref:

Date: 21 March 2017

Warren Hunter Esq
Managing Director
Huntapac Produce Ltd
293 Blackgate Lane
Tarleton, Holmes
Preston PR4 6JJ

BY EMAIL: WWH@huntapac.co.uk

Dear Mr Hunter

We are the UK Lawyers for Brandon Estates Ltd and they have passed to us a copy of your email 11:25hrs today.

Thank you very much indeed for the background to your business. That is most useful.

Our clients are a Property Development Company who have expended a large sum of money on the site of the Brandon Stadium.

Our clients had also offered the previous operator of the Speedway/Coventry Bees very substantial sponsorship. However, for reasons unconnected to my clients, Coventry Bees were unable to take up the Lease which was on offer from 3 January 2017 as was the sponsorship offered.

Our clients are now in the process of finalising a planning application for housing for the entire site.

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 to assess a value for the site. Our clients will carefully consider any offer that you make.

Partners

Bruce M. Jobling James T. Crocker (Managing) Roland C. Gibbins# Peter A. Burden*+
Dr Laura Brampton

Senior Associate

Mason Qureshi LL.B (hons)

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I think it is extremely unlikely that our clients would consider leasing all or part of the site. Certainly, we would advise them against doing so in view of the history of previous Leases.

If you have any queries on the above, please do not hesitate to contact us. We will be more than happy to receive communications by email at the address shown.

Yours sincerely


James Crocker
Managing Partner
Howell & Co

James Crocker (Managing Partner) – Lawyer Monthly’s UK Criminal Law & Litigation Lawyer of the Year 2016

Item	Comments	Costs	Source
Habitable portable building for office / security base		£ 25,000	Steve Rees
Make good perimeter fencing		£ 2,000	Steve Rees
Clear the site of loose material / asbestos and dispose of waste	to be support by Richard Clews of Clews Recycling and Northeast Demolition	£ 10,000	Steve Rees
Cordon off the grandstand with heavy duty boarding		£ 8,500	Quote
Replace the Armco Barrier, Safety Fence and Air Fence	to be sponsored by West Midlands Golf Club	£ 100,000	Steve Rees
Repair dog track retaining walls		£ 2,000	Estimate
Restore surface of race track		£ 20,000	Steve Rees
Purchase track grading equipment	Blade & 'magic wheel'. Tractor & JCB to be sponsored by Steve Smith	£ 15,000	Steve Rees
Restore terracing on 3 sides of stadium	Based on Oxford Stadium cost	£ 5,000	Steve Rees
Build new referees box		£ 8,000	Steve Rees
Restore changing rooms and showers		£ 10,000	Steve Rees
Restore medical room		£ 5,000	Steve Rees
Restore speedway pits		£ 5,000	Steve Rees
New race starting mechanism		£ 2,000	Steve Rees
Reinstate back straight toilets and catering outlet		£ 20,000	Steve Rees
Reinstate electrical supply, cabling, new LED floodlights, track warning lights	Based on Oxford Stadium costs	£ 300,000	David Lestrade
Install generator and coupling	to be sponsored John Whalley	£ 78,000	Keith Chapman
	Based on Keith Chapman advice		
PA/speakers?		£ 10,000	Estimate
Reinstate water supply		£ 15,000	Estimate
Contingency @15%		£ 96,075	
Total		£ 736,575	