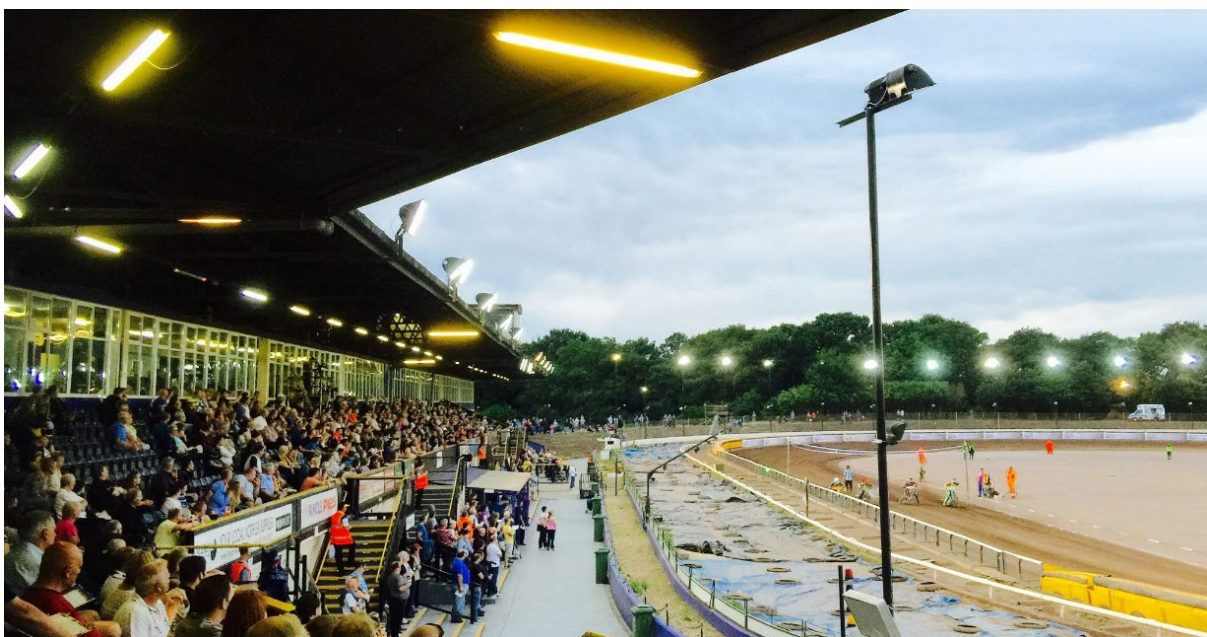




STATEMENT OF CASE

On behalf of:

**SAVE COVENTRY SPEEDWAY & STOX
CAMPAIGN GROUP**



STATEMENT OF CASE

On behalf of:

SAVE COVENTRY SPEEDWAY & STOX CAMPAIGN GROUP

Site Address:

COVENTRY STADIUM, RUGBY ROAD, COVENTRY CV8 3GP

Appeal Proposal:

DEMOLITION OF EXISTING BUILDINGS AND OUTLINE PLANNING APPLICATION (WITH MATTERS OF ACCESS, LAYOUT, SCALE, AND APPEARANCE INCLUDED) FOR RESIDENTIAL DEVELOPMENT (USE CLASS C3) INCLUDING MEANS OF ACCESS INTO THE SITE FROM THE RUGBY ROAD, PROVISION OF OPEN SPACE AND ASSOCIATED INFRASTRUCTURE AND PROVISION OF SPORTS PITCH, ERECTION OF PAVILION AND FORMATION OF ASSOCIATED CAR PARK

Appeal Ref: APP/E3715/W/23/3322013

Planning Application Ref: R18/0186

Document Ref: SCS/SOC

Date: 28 June 2023

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1. Introduction

The Save Coventry Speedway & Stox Campaign Group (SCS).

The Save Coventry Speedway & Stox Campaign Group (SCS, formerly known as the Save Brandon Stadium Supporters Group) was initially formed in late 2014 in response to proposals to demolish Brandon Stadium and build housing on the site. The Campaign Group brings together supporters of both Speedway and Stock Car Racing as well as representatives drawn from the local community.

The initial objective of the campaign was to ensure that Brandon Stadium should be protected from development but, following the eviction of the sports at the end of 2016, to campaign to restore the stadium and once again to see the venue staging events of local, national and international significance. Brandon Stadium has a long and rich sporting heritage playing a vital part in the lives of many thousands of people, occupying a key role in both Speedway and Stock Car Racing with the latter regarding the venue as 'The Wembley Stadium' of the sport.

There is a continuing need for the venue and the forced closure of the stadium has left a big gap in the racing calendar for both Speedway and Stock Car Racing.

SCS' evidence will cover the matters set out in sections 2 to 9.

2. Background

The History of Brandon Stadium

The History of Brandon Stadium for both Speedway & Stock Car racing with reference to other activities at the site including Greyhound Racing. The purpose will be to ensure that the Inquiry is fully appraised of the importance of the venue to both sports and its heritage and status of the events held.

Speedway and Stock Car Racing in the United Kingdom

Speedway and Stock Car Racing in the UK. This will include an analysis of other venues including those lost to both sports.

The importance of Coventry Stadium

Why Brandon remains so important in the context of its strategically important central location, its rural location and established use for motorsports 24/7.

3. Planning Policy

The Development Plan

The Rugby Local Plan and Brandon & Bretford Neighbourhood Plan. This will include analysis of policies relevant to determination of the Appeal and how those policies were developed, including support for the protection of sport and recreation facilities.

National Planning Policy and Guidance

National Planning Policy as set out in the various iterations of the National Planning Policy Framework (NPPF).

Other Material Considerations

Referred to as necessary and appropriate, such as Supplementary Planning Documents.

4. The Emergence of the current owner's proposals

The emergence of the current owner's proposals at Brandon from their inception in 2014, including public consultation responses and the current state of the site including the reasons for this.

5. SCS Masterplan

SCS proposals to reopen Brandon Stadium, including an (as yet undetermined) planning application (Ref: R22/0071) covering some of the elements of the proposed masterplan. While SCS continue to oppose the current owner's proposals, in parallel, the Group is continuing to develop its proposals to restore the stadium including ongoing discussions with prospective purchasers, partners and contractors. This work includes discussions to cover not only potential acquisition and phased restoration but also ongoing operation of the venue as a viable, going concern.

6. SCS Case

While Rugby Borough Council rejected the proposals on a single reason for refusal SCS submits that the Appeal should consider other matters including Character and Appearance which would bring in other matters affecting the principle of development including development strategy and Green Belt.

7. SCS Case against the Appeal Proposal

SCS Case against the Appeal proposal will refer to:

- * That established planning policy operating locally and nationally clearly and demonstrably challenges the principle of Appeal proposal including its impact on Green Belt.
- * That there remains a continuing need for the sports activities to be re-established. The site would be viable on an ongoing basis. The venue provides opportunities both for participation in both elite and participatory sports as well as providing one of the most important motorsport venues for spectators of local, regional, national and international significance.
- * That the current state of the venue is a direct consequence of the eviction of sports activities, for which there was and remains a continuing need and, the current owner's failure to secure the site. Had the current owner not evicted the Speedway and Stock Car Racing in 2016, then both sports would have continued over the past 6 seasons providing very significant economic and social benefits and the stadium would not be in its current badly vandalised state.
- * The proposed 3G sports pitch proposed by the appellant can in no way be construed as an adequate or necessary alternative replacement for the proposed demolition of Brandon Stadium.
- * There is no pressing housing need and no requirement for the scale of housing on the Appeal site to be brought forward: the tilted balance does not apply. Development on the appeal site would also undermine the delivery of housing allocated in accordance with the development strategy set out in the Rugby Local Plan.
- * While it can be argued that parts of the site are previously developed, the nature of the existing activities were confirmed as Green Belt when it was designated and remain as

uses regarded as appropriate within the Green Belt. The Appeal proposals would amount to a very significant intensification of built development on the site leading to large scale urbanisation within the countryside.

- * The application of the planning balance including its relationship to the economic, social and environmental aspects of sustainable development.

8. Matters not in dispute

SCS will identify those matters where it does not challenge the case set out by the Appellant, informed by the Statement of Common Ground between the Council and the Appellant (this has yet to be agreed). It is likely this will include matters such as access, effects on ecology.

9. Updated evidence

It is noted that the Appellant has updated some of the background reports supporting the application and SCS will deal with any issues raised by these updates in its evidence.

10. Witnesses

Witnesses. SCS will participate in the Public Inquiry. The number of witnesses has to be determined and will be informed by the main issues which are yet to be confirmed. These witnesses will cover all of the matters mentioned above.

11. Documents

SCS requests that all of the documentation it has submitted to Rugby Borough Council, and all other responses on Planning Application Ref: R18/0186 and related material should be made available to the Inspector. At the time of writing this Statement of Case all of this documentation was not available online. The additional documents are listed Appendix 1. Electronic copies of these documents will be made available as Inquiry documents.

SCS' evidence will draw on that documentation, reserving the right to update where necessary as well as drawing, as appropriate on the documentation identified by the Appellant and the Council.

12. The Public Inquiry

SCS requests that the Inquiry proceedings should be broadcast live and made available subsequently online reflecting the very high level of public interest in the case.

APPENDIX 1: Additional Documentation

Document title:	Date:
Strategic Housing Land Availability Assessment (SHLAA), In particular, Appendix 5 Site Conclusions Part 1	December 2015. Updates published 2016 and 2017.
West Midlands Joint Green Belt Review Study Stage 1 Final Report	June 2015
Letter from the Inspector Mr M Hayden following the Local Plan Stage 2 Hearings	16th May 2018
Brandon Stadium – Representations by the Save Brandon Stadium Campaign Group on the Draft Main Modifications to the Rugby Local Plan	2 October 2018
Rugby Borough Local Plan, Inspectors Report,	27 March 2019
Binley Woods Village Boundary Amendment. New Open Space Designation, Green Belt Release and Proposed Housing Allocation	July 2017
Letter to RBC from Framptons regarding alternative provision for sports use	2 October 2018
Brandon And Bretford Neighbourhood Development Plan Brandon And Bretford Neighbourhood Development Plan To 2031, Submission To Parish Council	06-Dec-17 – Update 16-Mar-18
Brandon Hall Hotel Public Exhibition Display Boards, Framptons	October 2017
Alternative Display Boards at a parallel exhibition organised by the Coventry Speedway & Stox Campaign Group	October 2017
Objections Submitted On Revised Planning Application Ref. R18/0186 By The Save Coventry Speedway And Stox Campaign Group	18th August 2021
Save Coventry Speedway & Stox Campaign Group, Response to the Needs Assessment Document submitted by Louise Steele of Framptons (on behalf of Brandon Estates). This document was submitted to Rugby Borough Council on 6 November 2018	3 October 2018.
5 Year Housing Land, Supply Position, Statement 2022-2027, Rugby Borough Council	
Rugby Borough Council, Authority Monitoring Report 2021-2022, Rugby Borough Council	
National Planning Policy Framework, including superseded versions from 2012 onwards	

Note of Save Brandon Stadium Public Meeting held 23 July 2015	23 July 2015
Attendance at Save Brandon Public Meeting, 23 July 2015	23 July 2015
Note of Save Coventry Speedway Public Meeting held 26 May 2016	26 May 2016
Emails from Framptons declining invitations from the Campaign Group to attend public meetings	20 July 2015 and 18 May 2016
Presentation made to Public Meeting held 6 November 2018	18 November 2018
Letter from Save Coventry Speedway Campaign to Councillor Stokes	30 July 2015
Latter from Save Coventry Speedway Campaign to Councillor Stokes	31 August 2015
Email exchange with Rob Black at Rugby Borough Council regarding potential planning application to be submitted at Brandon Stadium	December 2015
Save Brandon Stadium Supporters Group – Representations to the Rugby Borough Council Publication Draft Local Plan - including appendices setting out Brandon Stadium History and Oxford Stadium Conservation Area Appraisal	October 2016
Save Brandon Stadium Supporters Group – Representations to the Rugby Borough Council Publication Draft Local Plan - Accompanying Letter	31 October 2016
Save Brandon Stadium Supporters Group – Representations to the Rugby Borough Emerging Local Plan - The Preferred Option	December 2015
Expressions of Business Support for restoration of Brandon Stadium	Various
Register Of Tradesmen / Women Who Have Volunteered To Give Their Time And Skills To Rebuild Brandon Stadium	Not dated
Email exchange between Warren Hunter and Jon Burgwin/ John Downer (Investin/ Brandon Estates showing proof of offer to purchase Brandon Stadium, Proof of offer to buy Brandon Stadium and response	Various
Notes Related to Meeting on 12 TH March 2020 Between Brandon Estates and Save Coventry Speedway Campaign Group	12 March 2020