

APPEAL REFERENCE: APP/E3715/W/23/3322013
Rebuttal proof of evidence
on behalf of the Save Coventry Speedway & Stox Campaign Group



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Proof of Evidence by Clarke A Osborne
Rebuttal Proof of Evidence

by David Carter

on behalf of:

SAVE COVENTRY SPEEDWAY & STOX
CAMPAIGN GROUP



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by

David Carter BSc MSc MRTPI

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/R4 DC

Date: 5 September 2023

Proof of Evidence by Mr Clark Osborne

Rebuttal Proof of Evidence by David Carter

1. The purpose of this proof is to rebut points made on behalf of the appellant.

Mr Clark Osborne's Executive Summary

2. Mr Osborne indicates in para 4 of the Executive Summary and para 1.5 that he has consulted with speedway and stock car promoters without specifying with whom and which venues they operate(d) from and when. Are these discussions limited to Terry Russell and Craig Robinson? It is understood that Terry Russell was last named as a promoter of Swindon in 2010 although retained ownership beyond then. Swindon have not raced since 2019 and no longer have a seat at the Promoters table. Craig Robinson is not, and never has been, a promoter of BriSCA F1 Stock Cars and is not part of the ORCi.

3. Mr Osborne refers in para 8 of his Executive Summary to the likely application of environmental/noise restrictions that would be applied at a redeveloped Coventry Stadium. However, he fails to acknowledge the established use of Coventry Stadium and its unrestricted use 24/7. While redevelopment of the Grandstand could give an opportunity to regularise the activity this does not prevent reopening without the need for planning permission.

4. CO's conclusion in para 9 is not supported either SCS's assessment of likely reinstatement costs to re-establish racing. The West Midlands Mayor has expressed his support for the stadium to be reopened and has indicated that gap funding could be available.

Main body

5. In paragraph 1.1 Mr Osborn confirms he has no prior operational experience with Coventry Stadium.

6. Para 2.1 states that the primary use is to be speedway racing. This is incorrect. Speedway and stock car racing operated for 62 years and this is the basis of efforts to reopen the stadium.

7. Para 2.2, Go Karts used to operate on the infield of the oval track, this being the reason it was tarmaced. There is no intention to operate any motorsport activity in the current main car park.

8. Para 2.3, stock car racing takes place on both shale and tarmac surfaces. It is incorrect to say they are 'best promoted' on tarmac tracks. Many drivers run two cars, one for each surface.

9. Para 2.5, it should be noted that Swindon did not operate with acoustic barriers, this requirement only came into effect with its redevelopment and, crucially, the new housing development has been constructed far closer to the stadium than the existing houses are at Brandon.

10. Para 2.8. Is the reference to Premier League speedway a reference to Poole Speedway? The current top league, which became the Premiership (not Premier League) in 2017. Poole competed in that league for many years, before electing to join the Championship in 2020 prior to Covid.

11. Para 3.1, again mentions greyhound racing and the design specification that includes many items that are already in place but in need of refurbishment. Acoustic fencing and anything specifically required for greyhounds (see para 3.5) are not required.

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12. Para 3.4, a tarmac track is not required. BriSCA F1's run on shale at Coventry.
13. Para 3.6, SCS notes the estimated capital costs identified for Mr Osborn's future options (CD15.5.50). The estimates provided by SCS in its evidence stand and, it is noted there are a number of areas where the appellants estimates would be disputed.
14. Para 3.8, SCS note the options put forward by the appellants. None of the options correspond directly with SCS proposals for the site. In particular, there is no intention to install a go-kart track, or any other noisy or intrusive use into the main car park. Within the stadium itself, greyhound racing will not be featured under future plans and both speedway and stock cars would share the same existing shale track. There are no plans to provide a tarmac stock car track.
15. Para 3.14, first bullet, The structural report prepared for the appellant indicates significant structural issues. It stops short of saying demolition is necessarily required. Notwithstanding this, I accept that demolition might prove to be necessary.
16. Second bullet. It is correct that a new structure would require planning permission but there is no reason why this should not be forthcoming assuming, in accordance with NPPF para 149, that it remains within the scale and mass of the existing.
17. Sixth bullet. It is unclear why Mr Osborne suggests that the terracing on the bends cannot be restored. Terracing at Oxford was restored inexpensively after 15 years of not being used.
18. Seventh bullet. It is unclear why Mr Osborne mentions a new racetrack: it is already there.
19. Para 4.3, the statement "Speedway racing is not possible or safe in wet weather" is actually untrue and is dependent upon the actual weather conditions and the condition of the circuit. The 2023 British Final at Belle Vue was held in wet conditions.
20. Para 4.6, this is incorrect, there are 19 operational speedway tracks – 7 Premier, 9 Championship + Kent, Mildenhall, and Northside (Workington).
21. Para 4.7, Again this is incorrect, the Speedway Control Bureau set the rules.
22. Para 4.8, This is incorrect, there are 4 directors (2 from each league) who oversee the sport, and Phil Morris is CEO of the Premiership.
- 23 Para 5.2, Most UK stock car racing promotions are operated under the Oval Racing Council International (ORCi). BriSCA F1 stock car racing is affiliated to the ORCi. The National Stock Car Association has fewer affiliated venues, none in the Midlands.
24. Para 5.7. Venue charges for BriSCA F1 and ORCi events generally tend to be higher, say £3K per meeting, significantly more for major events.
25. Para 5.11, this is correct for many meetings but such events can attract 150 racecars (say 4 people per racecar) which can bring in significant numbers of people, let alone paying spectators, in addition.
26. Para 5.12, stock car racing attendances have been steady for many years. Major events for BriSCA F1 stock cars and some other events such as Bangers) can attract very large audiences.

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27. The table at 5.13 contains many inaccuracies as well as omissions:
Hednesford is a tarmac track,
Mildenhall and Northampton are both shale tracks.

Other missing tracks include Bristol (Mendips), Crimond* (tarmac) and club racing at Warton (tarmac), Grimley (tarmac) and Scunthorpe (Shale).

ORCi affiliated tracks are also to be found in N. Ireland, Eire, The Netherlands and Belgium emphasising the international nature of stock car racing.

BriSCA F1s race at Bradford, Buxton (missing, tarmac), Cowdenbeath*, Hednesford, Lochgelly* (missing, tarmac), Ipswich, Kings Lynn (missing, shale), Mildenhall, Northampton, Sheffield and Skegness.

NB: *Tracks in Scotland.

28. Section 6, there is little to say, as it is not the intention to run greyhounds at Coventry.

29. Para 6.15, greyhounds is increasingly attended by few spectators.

30. Para 6.16 – Wolverhampton Speedway announced in their meeting programme on 28 August 2023 that it will close on 24 October 2023, but efforts continue to find an alternative site for a new stadium.

31. Section 7, Go Karting within the car park area does not feature as part of the SCS plans.

32. Para 8.2, while this might be the case for greyhound racing, which I understand is Mr Osborne's main area of expertise, it is certainly not true for speedway (for example, the success of Oxford and Workington) and stock car racing. Coventry Stadium has the added benefit arising from its central location and very large resident population in the West Midlands Metropolitan area.

33. Para 8.4, planning permission is not required to restart racing.

34. Para 8.5, Warren Hunter has offered to buy the site and has the resources to see through the restoration of racing.

35. Para 8.6, support can come in many forms. See Andy Street The West Midlands Mayor's letter.

36. Para 8.9, Mr Osborne, along with Terry Russell and others, are Founder Directors of Swindon Motorsports Limited which was established after closing Swindon Speedway. Mr Osborne is listed on the website as a member of their 'Professional Team' and DPP Planning listed as a 'Partner'

37. Their website (<https://swindonmotorsports.co.uk/>) states:

"Our mission is to locate, acquire, and obtain planning permission to operate a new motorsports arena to accommodate speedway and car racing, with an expandable capacity of up to 5,000 spectators. The new multi-motorsport showground will need to be within a 45-minute drive of Swindon centre."

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38. They are proposing to create a new motorsports arena to feature speedway and car racing - the very two sports which were staged at Brandon.

39. They refer to the possibility of other sports being accommodated in the proposed stadium such as Go-Karts and including training, practice and experience sessions.

40. Go-Kart racing was staged at Brandon for some years (which is why the infield, originally a grass surface, was tarmaced). Training, practice and experience sessions were also featured at Brandon, usually on Saturday mornings after Friday speedway meetings as the air fence was still in position.

41. All of this was possible because existing permissions allow 7 days a week operation of the site.

42. Mr Osborne's view is that Speedway Racing has a declining market and rising costs, an outlook of further decline and closures, casting doubt on the very future of the sport itself, yet speedway racing is at the front and centre of their own proposal and website.

43. If the Swindon proposals are genuine one, has to question why that team is seeking undermine efforts to restore racing at Coventry Stadium?

44. Para 8.10, the assertions are incorrect.