

SAVE COVENTRY SPEEDWAY & STOX CAMPAIGN GROUP

Response to the Needs Assessment document submitted  
by Louise Steele of Framptons (on behalf of Brandon  
Estates) on 3rd October 2018

This document was submitted to Rugby Borough Council  
on 6th November

Dear Erica

We now present our response to the latest documents submitted by Framptons, relating to their Needs Assessment on Brandon Stadium and the associated covering letter.

We must point out immediately that, as a Campaign Group, we have not widely publicised the material prior to the consultation deadline, as we feel the public have already spoken in their response to the initial application, and to do so again would lead to duplication of work at your office.

Rather, in a situation where much of the material submitted on behalf of the developers is based on assumption, lack of knowledge and misinformation, we have backed up our own response with actual evidence from several other interested parties.

It is important to stress that the case being dealt with is over the speculative purchase of what was, and still would be, a perfectly viable sports stadium within the Green Belt, and which has never appeared as part of the Local Plan. This was followed by a carefully executed closure plan which forced out the leaseholders, and then presented the illusion that the site was 'disused' and should now be released in order to build houses and make profit.

Should these tactics be deemed acceptable, it would put every sports stadium in the country at the risk of developers. In a Rugby context, would it be acceptable for the owners of Rugby School, or of a local Leisure Centre, to close them down simply because the land could realise a higher value as a housing estate? No facility in the country would be safe.

The latest documents have been produced almost as a last resort in order to justify the failings contained within the original planning application. This has been necessary because due diligence was clearly not completed in 2013 when it should have been clear that the stadium was operating as a perfectly viable sports venue for which there was a continuing need.

Worse still, in trying to demonstrate that they have an understanding of the sports via the latest documents, the authors on behalf of the applicants have actually shown a complete lack of understanding of the sports as a whole – and, crucially, of the significance and role played by Brandon Stadium in these sports.

Much of the 'evidence' quoted is lifted directly from Wikipedia, which whilst often a useful information tool, can never be regarded as an official source, and this has led to numerous errors, omissions and plain untruths in the documents.

It is remarkable that in creating a report which frequently contains phraseology such as “it has not been possible to ascertain”, “it appears”, “it could be the case”, the authors appear to have made no effort to contact the sports’ authorities, or those who are in situ at the ‘possible’ alternative venues they quote. Or maybe they know what the answers would be?

We have scrutinised the documents in detail, and along with our own comments we include actual evidence and submissions received directly from those representing the examples quoted.

In almost every case, the information provided by the authors on behalf of the developers is found to be false.

The clear conclusions which can be drawn from our submission are:

- No suitable alternative provision has been made for the re-location of Coventry Speedway, with the 2018 National League project at Leicester proving to be “disastrous” in the words of the promoter;
- There are no other speedway stadiums in the area which could satisfactorily house the Coventry Bees speedway team, and therefore the clear demand for speedway from the Coventry/Rugby public has not been satisfied;
- There is a clear ongoing need for the Coventry Bees speedway team to be racing in the Coventry/Rugby area;
- Whilst other stock car stadiums do exist, none of them come remotely up to the standards enjoyed at Brandon, nor do they serve people in the Coventry/Rugby area, nor are they capable of staging major events to the level of Brandon;
- Many of these other stadiums also have their own specific issues which preclude any attempts to replicate the previous staging of events at Brandon. Perry Barr, quoted as an alternative, is not a stock car track, which invalidates several conclusions in the documents;
- There is a clear ongoing need for stock car racing to take place in the Coventry/Rugby area;
- Of those other stadiums which do exist, the ranking of the West Midlands in comparison to other areas is flawed, and the total number of venues quoted for both sports is inaccurate, leading directly to incorrect conclusions;
- Issues of ‘demand analysis’ also fail to recognise the importance of speedway and stock car racing as spectator sports;
- Contrary to the conclusions in the report, both speedway and stock car industries – which form part of the automotive industry, and indeed, the local economy around Brandon, have been unduly harmed by the closure of the stadium.

We also continue to strongly dispute the false assertion that Brandon Stadium closed due to lack of viability. Our response to the Turley report underlines how this submission was riddled with its own inaccuracies, many of which have been carried forward into this latest Needs Assessment.

We urge you to read our submission in detail, paying particular regard to the actual evidence submitted rather than two documents built around assumptions and, misinformation, and which have clearly worked back from the required conclusion in an attempt to build a case leading back to the requirements quoted from NPPF (paragraph 96/97).

#### DOCUMENTS ENCLOSED

Appendix 1: Our response to covering letter signed by Louise Steele, Framptons.

Appendix 2: Evidence from Coventry Speedway promoter Mick Horton concerning his move to Leicester in 2018.

Appendix 3: Evidence from Birmingham Speedway promoter Laurence Rogers concerning Perry Barr not being a stock car venue as well as response to several other assertions in the planning material.

Appendix 4: Evidence from Wolverhampton Speedway promoter Chris Van Straaten confirming his club has not enjoyed additional revenue – quite the reverse – following the closure of Coventry.

Appendix 5: Evidence from Leicester Speedway promoter Marc Bates confirming that Beaumont Park Stadium is unsuitable for Stock Car racing.

Appendix 6: Our response to the Speedway and Stock Car Needs Assessment submitted by Framptons.

Appendix 7: Evidence from the former Wimbledon Speedway Chairman Ian Perkin describing an accurate version of events at Plough Lane in 2005, contrary to that presented in 2.35-2.39.

**APPENDIX 2  
SAVE COVENTRY SPEEDWAY & STOCK CAR GROUP RESPONSE  
TO FRAMPTONS COVERING LETTER**

Our Ref: LS/mb/PF/9189  
(Please reply to Banbury office)

Louise.steele@framptons-planning.com

Mrs Erica Buchanan  
Planning Department  
Rugby Borough Council  
Town Hall  
Evreux Way  
Rugby  
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CV21 2RR

3 October 2018

Dear Erica

**TOWN AND COUNTRY PLANNING ACT 1990 LAND AT COVENTRY STADIUM, BRANDON APPLICATION REF. R18/0186**

On behalf of Brandon Estates Ltd, please find below a response to your query regarding the EIP Inspector's comment in his letter dated 16 May 2018 relating to alternative provision, in particular in relation to stock car racing.

In our telephone conversation you stated that we had satisfactorily demonstrated that there was alternative provision for the previous speedway use on the site but that you required details regarding possible alternative provision for the previous stockcar use on the site.

The Campaign Group strongly contests the statement that there is alternative provision for the previous speedway use on the site.

The previous speedway use on the site was for the Coventry Bees club racing at the top level of the sport (in addition to major events as required). It served the Coventry/Rugby audience. The 'alternative' does not serve the Coventry/Rugby public in any way as it is 30 miles away, and is for speedway in the lowest league. It is the equivalent of Manchester United being re-located to Crewe and playing in the bottom tier of league football.

The lack of success of the move to Leicester in 2018 proves the point we have illustrated all along: the Coventry Bees team must race in Coventry/Rugby.

The outrageous claim was made in the January planning application that the Bees had moved to a venue which was "better suited to its use as a speedway stadium for a number of reasons including its accessibility..." From the point of view of a Coventry team racing there, the factual position has been proved that it is not, and never was, a viable alternative (see letter from speedway promoter, Appendix 2)

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## 1.0 ALTERNATIVE PROVISION FOR STOCK CAR RACING

1.1 With regards to the alternative provision for stock car racing, it is considered it would be helpful to set out some background relating to stock car racing.

### **UK Stock Cars**

1.2 There are two principal competitions within UK professional stock car racing: the World Championship and the National Points Championship; and both are recognised by the British Stock Car Association (BriSCA). The premier competition is the World Championship which is held in September every year at one of the UK host tracks. The final racing grid is determined by a series of UK qualifying rounds and two semi-finals. The UK finalists are joined by qualifying stock car drivers from the Netherlands and invited drivers from similar international motorsports. The winner of the championship is crowned with a gold roof to race with the following season.

1.3 The main season-long competition within UK professional stock car racing is known as the National Points Championship. Points are recorded for registered BriSCA F1 Drivers across every race within every meeting. A driver's monthly score determines their grade and therefore their starting position within the grid. Drivers are therefore promoted and demoted through the grades within a season.

1.4 At the end of the season the 12 highest scoring drivers progress to the National Points Championship (Phase 2) which consist of a Championship race termed 'a Shootout.' The winner of the Shootout wins a silver roof for the next year of racing.

### ***Governance & Promotion***

1.5 In the UK, the sport is managed by British Stock Car Association (BriSCA) which consists of a board of 6 permanent promoters, one of which acts as Chairman. BriSCA collaborates with the British Stock Car Drivers Association (BSDCA) to form the BriSCA Management Board (BMB) which acts as the governing body for the sport.

**It should be noted that the Coventry promotion was a prominent part of that board. Their absence now means the board is down to five members.**

1.6 All venues that stage BriSCA F1 Racing have to be licensed by and meet the requirements of BriSCA. All drivers wishing to race at a BriSCA Formula One licensed meeting have to be registered in advance by the BSDCA, acting as agents for BriSCA, in order to comply with insurance arrangements. BriSCA provides annual updates to regulations relating to car and track specifications, race procedures and all other aspects of the sport.

## Stock Car Racing

- 1.7 Stock Car racing was brought to the UK in 1954, with the first race being held at New Cross Stadium in London and with a first meeting being held at Coventry Stadium that same year. The form of racing quickly gained popularity.
- 1.8 BriSCA F1 racing began at Coventry Stadium in 1958 and ran the first Saturday of every month April-November until 2016. In 1960 the BriSCA F1 World Championship was first held at the stadium; and since then it has hosted a number of championship events as follows:
- World Championship - 1960, 1964, 1968, 1971, 1974, 1977, 1980, 1983, 1986, 1989, 1993, 1996, 1998, 1999, 2000, 2002, 2003, 2004, 2006, 2010, 2014
  - British Championship - 1961, 1965, 1969, 1992, 1995, 1996, 1998, 1999, 2001, 2002, 2008, 2012
  - Grand National Championship - 1973, 1998, 2006, 2011
  - Trust Fund - 1981, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011
  - World of Shale Championship - 2011, 2012, 2013

Coventry also staged the World Championship Final in 2016 (attracting a crowd of circa 11,000) which for some reason has been omitted from this list.

This list of Major Events staged at Brandon simply re-enforce the points already made regarding the significance of Coventry as effectively being the national stock car stadium. Even in seasons where Coventry themselves were not allocated the World Final, there were occasions when other promoters chose to use Coventry as the staging venue on their behalf, rather than their own regular venues. The whole document fails to recognise the significance of Coventry, and whilst providing a list of other venues, has not assessed the ability of those venues to perform at a similar level to Coventry.

- 1.9 The promotion of BriSCA F1 racing was historically undertaken by the Ochiltree family until the sale of the stadium and promotional rights Coventry Stadium Limited in 2003.
- 1.10 Stock car racing was promoted by Mr Avtar Sandhu, director of Coventry Stadium Limited under the name Coventry Stox, via way of a lease granted to Coventry Racing Club Limited, until the end of the 2016 racing season (as facilitated by the 2016 lease).

### Events following Acquisition in 2015 at Coventry Stadium

- 1.11 Ultimately the stadium ceased operations in November 2016 and has remained closed since.

The stadium was closed due to Brandon Estates' refusal to extend the lease as they were unwilling for Stock Car racing to continue. It is known that as early as October 2016, the speedway promoter was aware that Stock Car racing would not be permitted.

1.12 Prior to the acquisition it is understood that the applicant had reached agreement with the former vendor to extinguish the existing lease to Coventry Racing Club Limited, which otherwise ran to February 2023. The lease between Coventry Racing Club Limited and Coventry Dogs Limited was also extinguished – the latter business having been dissolved.

Our understanding of what was a complex position is that the former vendor was expecting to have a new site operational by the time of closure of Brandon.

#### ***Coventry Racing Club Limited***

1.13 The applicant, as landlord, agreed a new lease with Coventry Racing Club Limited which ran from 8 September 2015 to 31 December 2016. This was set at a reduced rent of £10,000 per annum (compared to £30,000 per annum within the previous extinguished lease) and payable on a monthly basis.

1.14 This lease enabled Coventry Racing Club Limited, as tenant, to continue to utilise the subject site and premises for the purpose of stock car/bangers track events over the 2016 season uninterrupted by the acquisition of the subject premises by the applicant.

It also enabled speedway to continue, due to the fact that Coventry Racing Club then sub-let the stadium to Coventry Speedway, and it therefore meant all motorsport was able to continue as normal.

1.15 In mid-2016 negotiations between the applicant and Coventry Racing Club Limited ensued with respect to agreeing a new lease for 2017 onwards.

As already noted, Coventry Racing Club totally refute the assertion that they were ever given the opportunity to agree a lease for 2017 onwards.

1.16 However, due to the financial difficulties faced by Coventry Stadium Limited (and Coventry Racing Club Limited), which had ultimately led to the sale of the subject site, the applicant was legally advised not to grant a further lease to Coventry Racing Club Limited. There was considered a high risk that the terms of any subsequent lease would be breached.

Financial difficulties were not being faced by Coventry Stadium itself – the sale process was precipitated due to short-term financial issues involving the owner, with Coventry Stadium one of his many businesses. Coventry Racing Club had been operating at the stadium since 2003 with no issues, so why would there suddenly be a risk of a lease being breached? It is clear that had a lease been granted, the stadium would have continued to trade viably, thus weakening the argument for redevelopment.



1.17 Instead, Coventry Racing Club Limited confirmed the intention to move stock car racing to alternative venues from 2017 onwards. As Coventry Racing Club Limited is the licence holder for stock car racing across a 30-mile radius from Coventry Stadium, this would prevent licenced stock car racing from being held at Coventry Stadium.

This is not an accurate account of the events of 2016. In fact, right up until January 2017 and having removed their assets from the stadium, Coventry Racing Club publicly stated on several occasions that they wanted to run Stock Car racing at Brandon in 2017, and would be prepared to re-instate the stadium should a lease be discussed and agreed.

Councillor Stokes was involved in discussions between Coventry Racing Club and Coventry Speedway, the last of which were in late-November 2016, aimed at agreeing a deal between the two parties, and these were reported as being successful. However, the applicant's decision to pursue police action against Coventry Racing Club, later dropped, also had the effect of closing the stadium and ensuring no racing in 2017 and beyond.

1.18 During 2017 the Coventry Stox held their events at Stoke stadium and shared the facilities.

This is not correct. Coventry Stox held ONE event at Stoke in 2017. The others were held at Sheffield, King's Lynn and Belle Vue. A normal quota for a Coventry Stox season would be 8-9 Formula 1 meetings; however there were not sufficient opportunities within the fixture list and availability of venues to operate every month.

However, their Programme from Saturday 4th November 2017, which is written by the club's management (and former operators of Coventry Stadium) confirms that the Coventry Stox will freeze their promotion for the next 1 to 2 seasons – placing doubt on the ability of the club to trade on a financially viable basis – even when sharing facilities.

The whole point of this is that in sharing facilities elsewhere, they would not be running at Brandon, where they had previously enjoyed the benefits of the biggest crowds in the country, catering income etc, as a viable operation. Leasing venues elsewhere would never lead to the same revenue, with the distances involved being Stoke (63 miles), Sheffield (90 miles), King's Lynn (101 miles) and Belle Vue (105 miles). Meetings at those venues are all viable ventures, albeit not attracting the same driver turn-out or attendance level, but for Coventry renting those venues would never achieve the return they could expect at their own Coventry/Rugby venue.

1.19 Specifically, on page 20, the management confirm that the Coventry Stox have struggled to trade viably in 2017:

*“...it’s unlikely that the Coventry Stox team will be touring the ‘first Saturday of the month’ dates in 2018. The dates used this year haven’t been very well supported by fans and drivers alike – why I don’t really know but that’s how things are. It has been quite difficult to turn a decent profit and unfortunately running next year can’t be justified. I can totally understand this but it doesn’t make it any easier.”*

The management confirm no such thing. The article referred to in page 20 of the programme is written by an infrequent contributor who is not a member of the Coventry Stox management, and would not be in a position to fully understand their business position or all of the issues involved. It is noted on page 2 of the programme that *‘opinions expressed in this programme by contributors are not necessarily those of Coventry Racing Club Ltd.’*

1.20 Furthermore, on page 20 the Programme refers to whether the management consider there is a future in operating stock car or speedway events at Coventry Stadium. It concludes: *“There is some really good people working very hard to get the place back and running but realistically this isn’t going to happen – it simply isn’t viable.”*

Our previous comment regarding this being written by a contributor also applies here; but we would also add that the quote has been very selectively used, because it is immediately followed by: *‘We really should focus all of our efforts into getting the local council to help find a new site for Speedway and Stock Cars’* which clearly shows the contributor believes the sports should continue to operate in the Coventry/Rugby area.

1.21 A copy of the quoted programme is attached.

#### **ALTERNATIVE VENUES FOR STOCK CAR RACING**

1.22 Based on review of the BriSCA fixture list there were approximately 10 UK stadiums that held BriSCA F1 racing in 2017. Each stadium holds a varying number of meetings and fixtures throughout the season.

Correct, up-to-date information is that in 2018 there were 13 UK stadiums which held BriSCA F1 racing. These were: Belle Vue, King’s Lynn, Skegness, Stoke, Mildenhall, Hednesford, Sheffield, Buxton, Cowdenbeath, Lochgelly, Ipswich, Northampton and Birmingham Wheels.

There is no principal national stadium for the sport.

The principal stadium WAS Coventry – which is clearly demonstrated by the list of Major Events staged there, as noted in 1.8. Coventry has staged 22 World Finals since 1960, a ratio of roughly once every three years, despite there currently being 13 operational stadia. Operators of those other stadia therefore chose to rent Coventry on several occasions if they were successful in their bids for a Major Event.

The major championship events are held at varying stadiums determined through a bidding process undertaken by each stadium's Stock Car promoter. It is therefore possible for a stadium to have more than one stock car promoter.

The majority of stadiums quoted above are unsuitable for the hosting of Major Events. Several require temporary grandstands, and extra catering and toilet facilities to be brought in, to even approach the standard of Coventry. The beauty of Coventry is that this was all available on-site, 24 hours a day, 7 days a week. The attendance for this year's World Final (at Skegness) was around 50% of the Coventry event in 2016.

1.23 Also of note, in order to share the operational costs it is common that stock car race grounds are used for other sports including speedway and greyhound racing. The use of these stadiums could help sustain the sport and provide additional revenue for other stadiums.

This suggests that the closing down of Coventry somehow improves other stadiums, which is patently nonsense. From a speedway perspective, evidence provided by the Birmingham and Wolverhampton promotions (Appendix 3 and Appendix 4) totally contradicts this.

1.24 We have therefore undertaken a review of stadiums within 70 miles of the site which could accommodate stock car racing. 70 miles has been chosen as this is the distance that the stockcar fans were travelling to at Stoke Stadium. This is as set out below:

#### **Stoke Stadium, Loomer Road, Chesterton, ST5 74B**

- **Approximate Distance from Coventry Stadium site:** 70 miles
- **Is it suitable for stock car racing:** Does currently host BriSCA F1 and therefore is suitable
- **Other Comments:** During 2017 the Coventry Stox held their events at Stoke stadium and shared the facilities but as stated above their Programme from Saturday 4th November 2017, which is written by the club's management (and former operators of Coventry Stadium) confirms that the Coventry Stox will freeze their promotion for the next 1 to 2 seasons.

As noted above, Coventry Stox staged just one event at Stoke in 2017. Very basic facilities, covering part of the home straight only, and no seating.

**Perry Barr Stadium, Aldridge Road, Birmingham B42 2ET**

- **Distance from Coventry Stadium site:** 28 miles
- **Is it suitable for stock car racing:** The stadium is not currently listed in the Brisca F1 list of venues but is running similar types of uses.
- **Other Comments:** The New Perry Bar Stadium has an extensive history since it was opened in 1929 and originally built for Birchfield Harriers (athletics club) who left in 1977. It is now used by the GRA for greyhound racing and is also home to the Birmingham Brummies Speedway team.

This stadium is totally unsuitable for Stock Car racing, and the submission from the Birmingham Speedway co-promoter (Appendix 3) confirms this point. Perry Barr does not operate “similar types of uses” to stock car racing. It runs speedway and greyhound racing only.

**Beamont Park, Leicester, LE4 1DZ**

- **Distance from Coventry Stadium site:** 27 miles
- **Is it suitable for stock car racing:** The stadium is not currently listed in the Brisca F1 list of venues but is running similar types of uses.
- **Other Comments:** The stadium is used by the Leicester Lions speedway team. In November 2017 it was announced in the Coventry Telegraph that the Coventry Bees had reached an agreement with the Leicester Lion speedway team to share facilities at the Leicester Speedway from 2018. As such the Coventry Bees have been racing at the Leicester Speedway Stadium, a stadium located approximately 27 miles away of the site which is better suited to its use as a speedway stadium for a number of reasons including its accessibility and the character of surrounding uses. It could be that the stadium could be used for stock car racing as well.

We can confirm that this stadium could not be used for stock car racing. In fact, three previous parties (including Coventry Stox) have looked into the feasibility of doing so, and come to the conclusion that it would not be possible. There is insufficient access and parking for the large transportation vehicles associated with the sport, and the circuit itself would require extensive modifications which the speedway owners are not prepared to make. Please see Appendix 5 with evidence from the Leicester Speedway promoter. It is also incorrect to state that the stadium is running “similar types of uses” to F1 stock cars – it is used for motorcycle and occasional sidecar racing only.

**Birmingham Wheels Raceway, Adderley Road South, B8 1AD**

- **Distance from Coventry Stadium site:** 26
- **Is it suitable for stock car racing:** Does currently host BriSCA F1 and therefore is suitable
- **Other Comments:** Adjacent to other sporting facilities including a go kart track. The track is a 330 metres tarmac service. Other facilities on site include: pit access; terraces, permanent food outlets and permanent toilet blocks.

Birmingham Wheels is itself under threat and therefore cannot be regarded as a suitable alternative. It is also a tarmac track, whereas Coventry is shale, which is another of the reasons why Coventry is a special venue.

**Northampton, Northampton International Raceway, Barfield on the Green, NN7 2BA**

- **Distance from Coventry Stadium site:** 40 miles
- **Is it suitable for stock car racing:** Does currently host BriSCA F1 and therefore is suitable
- **Other Comments:** Northampton International Raceway hosts Stock Car, Hot Rod and Banger Racing on some Saturday evenings, Sunday afternoons and Bank Holiday Mondays. The tarmac track is 396 metres. Other facilities on site include: pit access; terraces, permanent food outlets, licensed bars, and permanent toilet blocks.

One of the sport's original stadiums, but it only has very basic facilities, for example no covered accommodation, or seating or even concrete terracing for spectators, meaning it cannot be regarded as a serious alternative to Coventry. For information, it has now become a shale track.

**Hednesford Hills Raceway, Hednesford, Cannock**

- **Distance from Coventry Stadium site:** 42 miles
- **Is it suitable for stock car racing:** Does currently host BriSCA F1 and therefore is suitable
- **Other Comments:** The circuit is a major venue for a number of National Hot Rods, BriSCA Formula 1 Stock Cars, BriSCA F2 and Banger racing. The tarmac surface is 420 metres. Other facilities on site include: Pit Access; terraces, permanent food outlets, licensed bars, and permanent toilet blocks.

This is unsuitable as a replacement for Coventry, as there are severe restrictions on race dates/times. Racing is only permitted on Sunday and Bank Holiday afternoons, with one Saturday (per year) permitted to early evening as part of a weekend, and one Sunday permitted to evening in order to conclude with fireworks. As with Birmingham Wheels, it is a tarmac track and therefore cannot replace Coventry.

### Trent Raceway, Burton-on-Trent

- **Distance from Coventry Stadium site:** 45 miles
- **Is it suitable for stock car racing:** Is used for stock car racing but does not appear to be for BriSCA F1
- **Other Comments:** Trent Raceway is a dirt track that caters for all of your motorsport preferences, ranging from non-contact super classes such as super saloons and superstox classes, stock cars, front and rear wheel drive classes, to the Rookiebangers and Full Contact Banger classes. The track also caters for a novice class. Facilities include full toilet and catering facilities with covered seating areas.

Trent Raceway is a 'pirate' dirt track. It has no terracing, no cover and no grandstands – effectively, events take place in a field.

From the Coventry Stox programme supplied, it is interesting to note the comment on page 5 from Steve Abbott, the BriSCA steward, who states regarding Trent: *'The club based there run a regular series of dates at their track for their domestic formulas, but is it up to F1 standards? I think not. A great deal of work would need to take place before any F1 meetings could be staged there, and the Trent Raceway club would have to forego some of their own dates to accommodate the stock cars as well as having to amend their current planning permission.'*

1.25 It is considered therefore that there is possibility of alternative provision at several sites within 70 miles of the site.

The evidence above confirms that there is no suitable alternative stock car provision at any sites within 70 miles of Brandon, or beyond. The authors themselves are unconvinced, due to the usage of the word "possibility"!

## 2.0 CONCLUSION

2.1 As set out above there clearly are alternative locations and possible alternative sites where stockcar racing could be held.

This has clearly been proved to be false. The authors' position has switched in the space of one paragraph from *"there is possibility of alternative provision"* to *"there clearly are alternative locations..."* !

As noted in our planning application submission the stock car operators have either lost their license or as set out in the evidence as part of the planning application submission have not been able to operate viably.

The stock car operators froze their license after their four events staged elsewhere in 2017, but were always able to operate viably at Brandon. Their business position when operating at other venues is entirely their own prerogative.

2.2 The Framework promotes a presumption in favour of sustainable development to ensure positive economic growth and promoting rather than stifling development. The proposed development represents sustainable housing development.

Clearly building houses is an important part of the economy, but in this case the argument is being made that closing down the most important and iconic speedway/stock car stadium in the country is a matter of no economic significance. This is completely wrong.

2.3 The site will be able to deliver much needed housing in an accessible location to facilities in Binley Woods and Brandon, including affordable provision (in an area of housing need) for the Borough in the near future in the context of the challenging housing target.

The Local Plan makes provision for all of the housing which is required in the area, and Brandon Stadium does not appear on the Local Plan and is located within the Green Belt. Housing targets can be met elsewhere.

2.4 The provision of new market housing, and the provision of new affordable housing – for those people who have a housing need is a material consideration. These are real people whose voices are rarely heard within the planning process, whose lives are affected daily by the inadequacy of housing accommodation to meet their domestic needs.

This sanctimonious paragraph totally ignores the facts that:

- a) the 'real people' quoted will be catered for as part of the Local Plan;
- b) the real people associated with speedway, stock car racing, and local residents – a total running into tens of thousands – have already spoken. They have given their responses via consultations with both the developers (following Exhibitions both in 2014 and 2017) and the Council, following the submission of the planning application, as well as in local media surveys. The response has been overwhelmingly against the development, and in support of the stadium returning to its proper use as a motorsport venue.

This paragraph also contradicts Brandon Estates' previous representations on the emerging Local Plan, which suggested the stadium should be developed for housing instead of other sites proposed by the Council in the plan – thus meaning no extra housing would be built, but merely shifting house-building from one site to another. This would therefore not have benefited the 'real people' who have suddenly been brought into the argument.

2.5 The proposals on the site will make use of previously developed land. It will complement the existing residential community and provide new public open space and will improve the quality of the surrounding environment.

We dispute the notion of 'previously developed land.' Only the footprint of grandstands and outbuildings can be regarded as brownfield, which occupy only a small proportion of the site area. Sports facilities and car parks are frequently found in Green Belt and would not be regarded as brownfield.

2.6 The site is located within a sustainable location, close to a range of services and facilities in Binley Woods with good connections to public transport modes.

Local consultation has already raised significant concerns over services and facilities available in Binley Woods were this housing development to take place.

### Speedway

Notably regarding speedway, you recently noted that it had been reported to you that the Coventry Bees Speedway team was having performance success at Leicester and you queried whether Leicester could accommodate the Bees if they went up a League. It is noted that the Leicester team (Leicester Lions) is in a higher league than the Bees, this suggests Leicester facilities can accommodate the Bees if they are promoted.

We would respectfully query why Framptons are being asked questions relating to the administration of speedway, and would suggest that the speedway authorities (or indeed ourselves) would be better able to provide far more accurate answers.

In this particular case, the answer again demonstrates the lack of speedway understanding prevalent throughout the reports, unless of course they are a deliberate attempt to mislead.

We can confirm that in speedway, clubs do not get promoted (or relegated) based on performance success (or failure). A club will always operate at the level it believes provides the best opportunity for business strength and stability, and their results on-track would generally be the last consideration when assessing a possible move up or down.

It should also be noted that in January 2017 a provisional arrangement was made for the Bees to use the Leicester stadium, racing in the top league. This was eventually scrapped by the authorities due to their very sensible concerns that it would not generate sufficient attendances to guarantee completing the season, bearing in mind running costs, competitor wages etc, are substantially higher when operating above the National League.

This notwithstanding, the arrangement with Leicester at that time was for 6-8 'home' matches only as Leicester were unwilling to 'share' facilities with a club in the same league for an extended period, for the obvious reason that it could have a severely detrimental effect on their business should the Bees team be performing better than the Leicester team. It could never be a long-term arrangement.

Finally, evidence is provided (from the Coventry promoter) in Appendix 2 that the Coventry team racing at Leicester has been so unsuccessful that it would be highly unlikely to continue in 2019. (This, in fact, may be impossible whatever the circumstances, as the Leicester club has confirmed in the media in October 2018 that they themselves may well choose to operate their own National League team in 2019.) He concludes that the Coventry team must race in the Coventry/Rugby area. This has always been the case, and the only way in which to serve the Coventry/Rugby public.

I trust this if of help, if you have any queries, please contact Louise Steele at Framptons.

Yours sincerely



Louise Steele





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# COVENTRY SPEEDWAY

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APPENDIX 2

Latest update for Coventry Speedway.

20<sup>th</sup> October

Despite the very best intentions and efforts to keep the Bees on track racing out of Leicester, it has proved to be disastrous.

We have suffered losses of over £40,000. This includes having to sell off the clubs Elite assets – 10 rider contracts to the value of £20,000 sold to the governing body BSPA (not Peterborough Speedway as rumoured).

It is painfully clear that trying to run our historic club away from Brandon/rugby area has been detrimental to the business. On top of this, the withholding of an asset (air fence) has not helped our cause.

To continue racing out of Leicester, we would need further investment/sponsorship of £45,000 just to remain in the bottom tier of Speedway. My family and my own business (Europress) has exhausted its funding and unless a commitment of funding comes forward within the next 6 weeks, the club will cease to run and be put on ice which in my opinion could be a point of no return.

Coventry Speedway needs to be racing in the Rugby / Coventry areas. Through no fault of Coventry Speedway, we have lost our home.

Mick Horton  
Coventry Speedway



# Birmingham Brummies Speedway



Dear Ms Buchanan

I have been made aware of the latest documents regarding the planning application on Brandon Stadium.

In my capacity as co-promoter of Birmingham Speedway (Perry Barr Stadium) I wish to address several matters of inaccuracy.

I should first state that I have been involved in speedway administration for many years at a number of clubs, including several in the Midlands, and I spent a five-year spell as Assistant Team Manager at Coventry from 2012-16.

Referring to the Needs Assessment and the tables presented on page 11, the inference that Perry Barr Stadium has a stock car track (3.1 and 3.2) and stages stock car racing (3.2 and 3.3) is completely false. Perry Barr does not, and could not, stage stock car racing.

The stadium and circuit would need numerous changes to become acceptable for stock cars; there is insufficient access for the vehicles and equipment required by the competitors; and approval would not be granted on noise grounds due to the built-up location (speedway itself fought a long and successful battle for permanent approval, which was finally secured in 2010).

Page 14, section 3.14 suggests multiple uses of stadiums in the case of spare capacity. As far as availability is concerned, we have a good relationship with our landlords but are limited to a maximum of one speedway event per week, staged almost entirely on Wednesday evenings, in order to fit in with a busy schedule of greyhound racing and to meet our planning permission requirements. We also have a limit of 30 events per season, and there is no realistic possibility of us being able to also accommodate a Coventry team in addition to our own activities.

Page 22, Key Issues, refers to an over-supply of speedway facilities, with 5.5 stating that the industry will not be unduly harmed by the closure of Coventry Stadium.

I dispute this notion as one of the prime revenue generators from speedway is the presence on the fixture list of local derbies. However, because speedway supporters only tend to follow their own club, the closure of one venue does not mean those supporters will automatically move elsewhere. This has already been seen following the closure of Cradley Heath in 1996, and my understanding is that none of the other local venues have 'benefited' from the closure of Brandon with an influx of Coventry

supporters. Conversely, the more speedway facilities in a particular region will always make for a more successful industry for all concerned.

5.7 states there has been a general decline in speedway attendances, along with financial difficulties. I can only speak for my own club, but we are pleased to report an increase in attendances this year, largely due to our hard work in the local area and a healthy rise in the number of youngsters supporting us. I am sure there are other clubs like ourselves, and clearly others who are in a less successful period, but this is the nature of sport and these 'conclusions' seem very generalised and based on very little actual evidence.

From my time at Coventry I am fully aware of the passion which exists for the sport and the large attendances it regularly attracted, with many of those people lost to speedway as the move to Leicester has clearly been commercially unsuccessful. Coventry is one of our sport's most important venues and the way in which it was closed is particularly distasteful – not to mention the damage that has occurred there since.

I speak mainly for speedway as I am not involved in the stock car sector, but if these documents are a bid to prove that alternative provisions to Coventry for both sports already exist, I feel they do not make a successful case and should be viewed with great caution.

Yours sincerely

LAURENCE ROGERS  
Co-promoter, Birmingham Speedway

## APPENDIX 4 – WOLVERHAMPTON SPEEDWAY

To All Interested Parties  
Concerning planning application at Brandon Stadium

We have seen Speedway and Stock Car Needs Assessment documents forwarded to you recently concerning development and would like to make the following comments on the information implied within these documents

Wolverhampton Speedway has operated successfully since the mid 1980's at the Monmore Green Stadium Wolverhampton WV2 2JJ staging Speedway racing on Monday evenings

There is no spare capacity for additional speedway events within the stadium with stadium owners Ladbrokes staging Greyhound Racing on six days a week.

This also precludes any suggestion of Stock Car racing taking place as indeed do the circuit dimensions which are not compatible with the needs of Stock Car racing.

Since the closure of Brandon Stadium and the subsequent loss of Coventry Bees Speedway Club we have not seen any notable influx of Coventry Speedway Supporters and in fact our turnover has been reduced by the loss of around three "derby" matches against Coventry which regularly recorded our highest attendances of the season

If there is any further information you require please make contact with the undersigned

Regards  
Chris Van Straaten

Promoter  
Wolverhampton Speedway

## APPENDIX 5 – LEICESTER SPEEDWAY

----- Forwarded message -----

From: **Marc Bates** <[marcbates@pbhsutilities.co.uk](mailto:marcbates@pbhsutilities.co.uk)>

Date: Thu, Oct 25, 2018 at 12:23 PM

Subject: Re: Battle for Brandon

To: Jeff Davies <[jeffdavies170@gmail.com](mailto:jeffdavies170@gmail.com)>

Cc: Damien Bates <[Damienbates@pbhsutilities.co.uk](mailto:Damienbates@pbhsutilities.co.uk)>

Jeff

We did look into the viability of running stock cars at Leicester but due to planning issues with local council they would not grant us the planning consent and also the costs associated with the fence been installed and lack of area for pits and parking made it a total non starter

There is no way it would be commercial viable to turn Leicester into a venue that could accommodate Stock Cars

Thanks  
Marc



**COMMENTS INCLUDED FROM SAVE COVENTRY SPEEDWAY &  
STOCK CAR CAMPAIGN GROUP**

**SPEEDWAY AND STOCK CAR NEEDS ASSESSMENT  
TO ACCOMPANY AN OUTLINE PLANNING APPLICATION FOR**

**DEMOLITION OF EXISTING BUILDINGS AND OUTLINE PLANNING APPLICATION  
FOR RESIDENTIAL DEVELOPMENT OF UP TO 137 DWELLINGS (USE CLASS C3)  
INCLUDING MEANS OF ACCESS INTO THE SITE FROM THE RUGBY ROAD  
(NOT INTERNAL ROADS), NEW OPEN SPACE AND ASSOCIATED  
INFRASTRUCTURE. ALL OTHER MATTERS RELATING TO APPEARANCE,  
LANDSCAPE, LAYOUT AND SCALE RESERVED.**

**AT COVENTRY STADIUM, RUGBY ROAD,  
BRANDON**

**ON BEHALF OF  
BRANDON ESTATES LIMITED**

**OCTOBER 2018  
OUR REF: PF/9189**

## **Contents**

Section 1	Introduction	3
Section 2	Strategic Context and Consultation	6
Section 3	Supply Analysis	11
Section 4	Demand Analysis	16
Section 5	Conclusions and Recommendations	22

## **Appendices**

Appendix 1	Dominant Market Segment by Population
Appendix 2	Percentage of Population Participating on Motor Sport

## 1.0 INTRODUCTION

1.1 Framptons have submitted a planning application for residential development at the Coventry Stadium.

1.2 This statement is a needs assessment for speedway and stock car racing and should be read in conjunction with the Financial Statement and Financial Statement NTS prepared by Turley as part of the planning application submission ('the Turley Assessment').

Attention is drawn to the Save Brandon Stadium Campaign Group's (SBSCG) detailed critique of this document as part of our initial submissions to the planning application. We have shown the report is riddled with inaccuracies and untruths.

1.3 This report supports the planning application submission and seeks to make the case that Coventry Stadium is surplus to requirements in line with National Planning Policy (NPPF).

It should be noted that this assessment has only been carried out at a very late stage. It was NOT carried out as part of the preparatory work to inform the redevelopment proposals: it is hardly surprising in this respect that it comes to the conclusions set out. SBSCG consider the approach by Brandon Estates and their advisors in this regard is unacceptable.

### Planning Policy Context

1.4 The assessment has been produced in line with the National Planning Policy Guidance (NPPF) 2018, which requires that (Paragraph 96, page 28):

*'.....planning policies are based upon robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.'*

1.5 Furthermore Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- An assessment has been undertaken which has already clearly shown the open space, buildings or land to be surplus to requirements; or
- 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
- The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Neither the planning application nor subsequent documentation satisfactorily addresses any of these issues. The land is clearly not surplus to requirements; an equivalent or better provision has not been provided; and the development is not for alternative sports provision.



1.6 Sport England published two new methodologies in 2013 for how NPPF compliant needs assessment work should be undertaken:

- The Assessing Needs and Opportunities Guide (ANOG)
- The Playing Pitch Strategy methodology (PPS)

1.7 The ANOG methodology is used to assess the need for outdoor / indoor / built facility provision (not including pitch sports) and has therefore been used for this assessment.

The SBSCG would wish to highlight several parts of the advice in the ANOG:

- \* *"The planning system plays a key role in achieving this and as such Sport England aims to ensure positive planning for sport based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To help achieve this aim Sport England's planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future." (from para 1, page 4)*
- \* *"Sport and recreation plays a fundamental part in peoples' lives. The provision of the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need, leading through to a strategy for sports facilities, will provide a clear understanding of what is required in an area, direction as to how this can be provided and the evidence to influence, seek and make informed sports development and investment decisions." (page 10)*
- \* *"Sport plays a fundamental role in contributing towards a healthy nation. Many of the leading causes of ill health in today's society such as coronary heart disease, cancer and type two diabetes could be reduced if people were to become more active and increase their overall levels of physical activity. Sport and recreation can provide this opportunity." (page 10)*
- \* *"Developers - Undertaking the approach set out in this guide will help an applicant understand the needs in an area to inform and shape development proposals .... " (page 12)*

1.8 Essentially these methodologies form the new 'how to do' needs assessments for indoor / outdoor sport and pitch sports in England and represent Sport England's response to the NPPF.

1.9 Rugby Borough Council has a Sport Facilities and Playing Pitch Strategy (2011) and Open Space, Playing Pitch and Sport Facilities Study (2015) neither of which includes speedway or stock car racing in its scope.

- 1.10 Speedway and stock car racing does not however operate on the basis of Council boundaries. It has been assumed that the primary catchment area for speedway and stock car racing is a 60-minute driving catchment is a reasonable travel time to a stadium. There are no confirmed drive times for speedway or stock car racing and the 60-minute driving catchment is an assumption only based on the fact that speedway racing for the Coventry Bees is currently held in Leicester an approximately 35-45 minute drive from Coventry Stadium and stock car racing for Coventry Stox was most recently held at Stoke Stadium an approximate 1.25 – 1.35 drive from the stadium. Therefore, in undertaking an analysis of need it is more relevant to consider catchment areas as opposed to local authority boundaries.

The SBSCG considers the 60-minute travel time to be unsuitable for both sports but particularly for the assessment of Speedway.

The Group considers that any facility accommodating the Coventry or Brandon Bees by definition has to be located very close to the existing stadium. The experience of a third-tier Coventry Bees team being based in Leicester has not worked. The support base is not prepared to travel on a regular basis. (See letter from Coventry promoter Mick Horton, Appendix 2.)

A similar experience was felt by Coventry City Football Club when they played a season at Sixfields Stadium in Northampton when they lost access to the Ricoh Arena. Supporters could not, or would not, travel, and crowds dropped to circa 1,000-2,000. Back at the Ricoh Arena since September 2014, crowds are now regularly back over 10,000.

Speedway is primarily a team-based sport, and the teams must be based in their respective areas.

Possibly the most significant point completely missed in this assessment is the role played by Brandon Stadium in both sports. In stock car racing it was regarded as the 'Wembley Stadium' of the sport. Its central location close to national transport networks, and the quality of facilities meant that the stadium has hosted more of the sports major events than any other stadium in the history of the sport. In speedway it also regularly hosted major national and International events. Suggested alternatives are either incorrect, or unsuitable as replacements (see later in report).

- 1.11 Sport England has a statutory responsibility for planning applications involving sports provision. The needs assessment therefore considers supply and demand, consultation and utilises Sport England planning tools in arriving at the assessment.

Attention is drawn to the issues raised by Sport England in May 2018 regarding this planning application, expressing "a number of concerns" with the Viability Statement (Turley report), noting comments received from the governing bodies of speedway and stock car racing regarding the importance of the stadium and the viability of Coventry Racing Club, and underlining the point that a number of interested bodies approached the applicant to lease the venue for sports use, only to be rapidly rebuffed on the basis that stock car racing would never be considered.

- 1.12 This assessment therefore sets out the case (under paragraph 97 (A) of the NPPF) that the site is surplus and there is adequate speedway and stock car provision in the area.

The SBSCG considers this assessment to be very poor, and the conclusion set out by Framptons here is simply inevitable in order to tick the box for their abject failure to follow Government policy - in both forcing the closure of the stadium against the background of strong and continuing need, and bringing forward redevelopment proposals in attempt to line pockets with no consideration of the sporting and social implications of their actions. In no way do the proposals meet the requirements of paragraph 97 of the NPPF. If the planning system has any integrity it MUST ensure that these redevelopment proposals are doomed to failure.

#### Assessing Needs and Opportunities Guide - ANOG

- 1.13 Assessing Needs and Opportunities Guide (ANOG) has been developed by Sport England and sets out an approach to undertaking needs assessment for sport and recreation facilities, in order to be compliant with the NPPF. The approach adopted to develop this needs assessment has utilised the process set out in the ANOG guide.

*".. in order to be compliant with the NPPF."* The SBSCG wish to stress that the requirement for compliance with the NPPF means that redevelopment proposals should fall. It should not be seen as a 'tick box'.

- 1.14 The first element of ANOG seeks to tailor the approach to reflect the geographical and sporting nature of the local area. In this context, as set out, the assessment looks at catchment areas around Coventry Stadium as opposed to Council boundaries.

For Speedway, the catchment area is to serve the surrounding areas (Coventry and Rugby) for the purposes of providing a venue for top-league competitive speedway as part of national leagues. Moving outside the Coventry/Rugby area is simply unacceptable, as the events of 2018 have proved. It also serves a national/international role in providing a high capacity venue to accommodate national and international level events.

In relation to Stock Car Racing the venue served the whole of the UK market through its central location and functioning as the national stadium. It has hosted more national and international events than any other venue, either closed or still operating. Since it closed there is no alternative stadium able to take on this mantle.

- 1.15 ANOG also stresses the need to consider strategic issues. The work has therefore considered the strategic context and stock car and speedway participation profiles across the area, looked at supply and demand of stock car and speedway facilities in terms of quantity, quality, access and availability, and utilised Sport England planning tools to develop the needs assessment evidence base and subsequent conclusions.

## Coventry Stadium

1.16 As set out in the previously submitted Turley Assessment, the subject premises comprises a disused greyhound racing and speedway / stock car motor racing circuit together with grandstand, which provided visitor viewing and dining facilities, ancillary buildings and a substantial area of car parking (part-gravel and part hardstanding).

The stadium is disused purely and simply because Brandon Estates terminated the sporting activities. The Turley report contains many inaccuracies and untruths.

1.17 Prior to the closure and substantial damage, the subject premises previously operated as the Coventry (or Brandon) Stadium ('the Stadium'). The speedway track had a length of 300m and was surrounded by the greyhound track which was 400m in length.

The damage to the stadium has been caused as a direct result of the failure of Brandon Estates to provide adequate security on the site, and their failure to comply with a Community Protection Notice served upon them by Rugby Borough Council, which ultimately had to be settled in court.

1.18 The track was surrounded by viewing platforms on each site. The open grandstand provided part covered standing accommodation, toilet facilities and a bar. The main grandstand provided seating areas, a covered dining area and toilets.

1.19 Other buildings on site included storage areas, dog kennels, a shop, laundry room, offices and first aid room. Various smaller buildings housed a score board and food outlets.

1.20 A large car park fronts the stadium consisting of gravel and tarmacked areas. The site is presently secured by barriers and gates.

1.21 The subject site and premises are not currently operational and have not been in operation since late 2016.

The site has not been operating since November 2016 because of the actions by Brandon Estates to extinguish use by both sports. Several parties were prepared to operate the site for its proper use as a sports venue, but were not given the opportunity to discuss it.

1.22 Before closure the subject premises functioned as a motorsport stadium with associated supporting facilities including restaurant and leisure space. The lawful use class remains Sui Generis.

### Recent Planning Activity

1.23 In 2004 a masterplan for the redevelopment of the stadium was established by the owners which set out four phases of development as follows:

Phase 1: Implement dog racing infrastructure to raise the track to International Dog Racing Standards and provide a 230-seat restaurant.

Phase 2: Provision of a conference facility

Phase 3: Facilitation of a 250 stall Sunday Market within the car park

Phase 4: Construction of a sports club

1.24 Review of the planning records available on the Council's website confirms that numerous permissions were sought for the improvement of the stadium facilities in line with the redevelopment plan. These include three applications for hosting a regular market within the car parking area (R95/0874/6592/P; R03/0677/6592/P; R07/1268/PLN); three applications relating to the extension of the restaurant area (R04/5228/6592/B; R04/5675/6592/B; R4/6031/6592/B); and two applications for the development of a mixed-use restaurant, retail and conference space (R04/0822/06592/OP; R04/1252/6592/P). The majority of applications were refused and the remainder were withdrawn. This demonstrates that there were various attempts in the past to make the stadium use more viable however the various uses proposed do not appear to have been acceptable in planning terms.

Interestingly this section does not mention the current planning application, which was put together without any consideration of the need to consider the need for the sports accommodated at the venue.

### Structure

1.25 The remainder of the report is set out as follows:

- Section 2: Strategic Context and Consultation
- Section 3: Supply Analysis
- Section 4: Demand Analysis
- Section 5: Conclusions and Recommendations

## 2.0 STRATEGIC CONTEXT AND CONSULTATION

2.1 ANOG states that all needs assessment work should ultimately seek to reflect and support the delivery of the relevant planning, sport and strategic policy priorities. The requirement for the needs assessment work to be compliant with the policy framework is therefore critically important. There needs to be a 'golden thread' to demonstrate how facility priorities or development proposals connect and contribute to the relevant policy framework. Needs assessment and ultimately planning decisions should not therefore be viewed in isolation.

### Historical Context

2.2 Coventry Stadium was opened in 1928 and was first used for speedway racing.

2.3 It was historically owned and operated by the Sanderson family (as the majority owners) and Charles Ochiltree (who had a minority share). On acquisition of the Lythalls Lane Stadium, within Coventry, and the Leicester Stadium, the owners formed Midland Sports and Stadia Ltd which operated all three grounds.

2.4 Coventry Stadium has historically hosted a variety of motorsports including midget car racing. The stadium briefly closed during the Second World War and was operated as a workshop by aircraft companies.

2.5 The stadium was sold to Mr Avtar Sandhu in 2003, along with the promotional rights to hold speedway and stock car racing events at the venue.

2.6 In its recent history the stadium became known for holding speedway racing, stock car/bangers and, until February 2014, greyhound racing – following which the GBGB revoked the stadium's license for holding greyhound racing events. The Coventry Telegraph article dated 27 February 2014 confirms that:

*"The governing body cited the financial performance of the venue as the reason for stripping the track of its licence, pointing to the company's accounts which showed a loss of over £511,000 during the past two financial years.*

*In a letter to organisers, seen by the Telegraph, the GBGB said: "The fact you indicated you were closing does mean you relinquish your GBGB licence.*

*"Your proposal to try and rectify this by announcing that you now intend to remain open subject to financial intervention by other parties is not acceptable.*

*"The regulatory process cannot work and revolve around the uncertainty generated within the industry by your own actions."*

Although greyhound racing is of course not materially relevant to the issue being considered, as Brandon Stadium was a motorsport venue first and foremost – and the SBSCG are not campaigning for greyhounds to return – it should be noted that these are selective quotes from a newspaper article concerning the end of greyhound racing, which do not make it clear that Coventry Racing Club were not running the sport as their own entity at the time. The actual circumstances were that the sport was in fact leased out from 2012 – exactly as speedway had been – but the leaseholder elected to pull out due to uncertainty caused by the sale of the stadium. New sponsorship was secured which could have allowed greyhound racing to continue (under the same leaseholder) following that announcement, but this was not permitted by the authorities, as quoted above. We have never disputed the fact that greyhound racing at Brandon Stadium, under whichever ownership umbrella, was loss-making, but this did not affect the overall viability of the stadium. (See letter from Guest Wilson Chartered Accountants as part of our original planning application representations.)

2.7 The Stadium was then sold to Investin Brandon Ltd in 2015 and transferred to Brandon Estates Ltd.

### **Speedway**

2.8 Speedway racing was held at Coventry Stadium from 28th September 1928 (to closure), since the inaugural meeting of the former Coventry City Speedway team, only ceasing during the stadium's use as a workshop in the Second World War.

### **Coventry Bees**

2.9 Following its closure during the Second World War, the stadium reopened on 1st May 1948. The Coventry Bees speedway team was also formed within this year and raced at Coventry Stadium until 2016.

2.10 The promotion of speedway at the stadium, and management of the Coventry Bees, was undertaken by Charles Ochiltree until his death in 1998 when promoting duties passed to his son. Promotion rights and the ownership of the Coventry Bees transferred to Mr Avtar Sandhu in 2003 following his purchase of the stadium. The Coventry Bees and promotional rights for speedway racing were subsequently acquired by local business man Michael Horton in September 2011.

For completeness and accuracy it should be recorded that Michael Horton is not a local businessman. He lives and works in Peterborough, some 70 miles away, and having acquired the speedway rights in late-2011, attended the stadium only on the days in which he staged events.

2.11 Since the Coventry Bees formation, they have won 28 championship titles as follows:

- Elite League Champions – 2005, 2007, 2010
- British League Champions - 1968, 1978, 1979, 1987, 1988 (The British League was the forerunner to the Elite League)
- Elite League Knockout Cup Winners - 2006, 2007 • British League Knockout Cup Winners – 1967
- National League Division Two Champions – 1953
- League Cup - 1981, 1985, 1987
- Elite League Pairs Championship - 2008, 2010
- Midland Cup - 1952, 1960, 1966, 1969, 1971, 1976, 1977, 1978, 1979, 1981, 1982

### Stock Car Racing

2.12 Stock Car racing was brought to the UK in 1954, with the first race being held at New Cross Stadium in London and with a first meeting being held at Coventry Stadium that same year. The form of racing quickly gained popularity.

2.13 BriSCA F1 racing began at Coventry Stadium in 1958 and ran the first Saturday of every month April-November until 2016. In 1960 the BriSCA F1 World Championship was first held at the stadium; and since then it has hosted a number of championship events as follows:

- World Championship - 1960, 1964, 1968, 1971, 1974, 1977, 1980, 1983, 1986, 1989, 1993, 1996, 1998, 1999, 2000, 2002, 2003, 2004, 2006, 2010, 2014
- British Championship - 1961, 1965, 1969, 1992, 1995, 1996, 1998, 1999, 2001, 2002, 2008, 2012
- Grand National Championship - 1973, 1998, 2006, 2011
- Trust Fund - 1981, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011
- World of Shale Championship - 2011, 2012, 2013

It is confirmed once more, as was also omitted in the letter from Louise Steele, that Coventry also staged the World Championship Final in 2016, attracting a crowd of circa 11,000.

2.14 The promotion of BriSCA F1 racing was historically undertaken by the Ochiltree family until the sale of the stadium and promotional rights to Coventry Stadium Limited in 2003. Stock car racing was promoted by Mr Avtar Sandhu, director of Coventry Stadium Limited under the name Coventry Stox, via way of a lease granted to Coventry Racing Club Limited, until the end of the 2016 racing season.



2.15 In the UK, the sport is managed by British Stock Car Association (BriSCA) which consists of a board of 6 permanent promoters, one of which acts as Chairman. BriSCA collaborates with the British Stock Car Drivers Association (BSDCA) to form the BriSCA Management Board (BMB) which acts as the governing body for the sport.

The promoters of Coventry Stox are no longer permanent members of BriSCA.

2.16 All venues that stage BriSCA F1 Racing have to be licensed by and meet the requirements of BriSCA. All drivers wishing to race at a BriSCA Formula One licensed meeting have to be registered in advance by the BSCDA, acting as agents for BriSCA, in order to comply with insurance arrangements. BriSCA provides annual updates to regulations relating to car and track specifications, race procedures and all other aspects of the sport.

### Greyhound Racing

It is submitted that this entire section is hardly relevant to a discussion over needs assessment of Brandon Stadium. We have never suggested the venue should return or be retained as a greyhound stadium. However, in correction to section 2.21, there is no deliberate consolidation of resources at any other venue to facilitate greyhound and speedway venues in a bid to optimise revenues. All speedway/stock car venues which operate at greyhound venues are forced to lease those stadiums from the greyhound-owing landlords, typically the GRA/StadiaUK/Ladbroke's etc, and are severely restricted in their race-day availability as a result.

2.17 The first greyhound racing meeting at Coventry Stadium took place on 19 September 1978 and facilities included a restaurant, a modern computerised tote and bars.

2.18

A history of closures and reopening of greyhound racing followed until Coventry Dogs Limited, which held a lease granting rights to hold racing events at the stadium, had its license revoked by the GBGB in February 2014 due to incurring significant financial losses over consecutive years. The company was subsequently dissolved in December 2015.

This statement is inconsistent with 2.6 which states that it was the stadium had its greyhound license revoked, rather than the company which was operating there.

2.19 It is understood that independent racing events were held during 2014 and 2015, albeit further details have not been made available.

2.20 Ultimately the stadium ceased operations in November 2016 and has remained closed since.

2.21 In short, the changes in the sport (led by declining patronage) have rendered the volume of stadium operations as financially unviable, which has led to a consolidation in a smaller number of venues (including greater propensity for multiple teams and events to share venues to seek to cover costs and optimise revenues).

2.22 Also, of note, in order to share the operational costs, it is common that stock car race grounds are used for other sports including speedway and greyhound racing. The use of these stadiums could help sustain the sport and provide additional revenue for other stadiums in danger of closing.

2.23 As the greyhound use on the site finished over 4 years ago, greyhound need is not considered further in this report.

...although a greyhound-only stadium is one of two examples of stadia closures cited from section 2.33 .

## Trends

### UK Speedway

2.24 The National Speedway Stadium was opened in 2016 in Gorton, Manchester, and serves as the national purpose-built speedway stadium. It is home to the Belle Vue Aces speedway team.

2.25 Historically major speedway events in the UK were held at Wembley Stadium, although since 2001 Cardiff's Millennium Stadium has hosted a yearly British Grand Prix which now attracts crowds of between 40,000 and 45,000. Prior to the Millennium Stadium, the Grand Prix was held in Hackney, Bradford and Coventry in the mid to late 1990s.

Wembley is no longer capable of accommodating speedway having been substantially rebuilt in 2000. It was only previously used for those occasions when the UK staged a World Final, save for a brief spell of league racing in 1970-71 which could not be continued due to the venue's need to stage other (non-speedway) events. It staged its final speedway event in 1981. The London Stadium at Hackney only staged speedway for two years, 1995-96 and has closed, and Bradford only accommodates Rugby League having closed to speedway in 1997.

2.26 Stadia used for Premiership and Championship speedway divisions have capacities ranging from 1,000 up to 6,000 and, in order to meet operational costs, most grounds are also used for other sports, in particular stock car racing and greyhound racing.

The capacity at Brandon gives it the capability to hold events with large crowds, up to circa 12,000. No other permanent speedway/stock car stadium comes close to this capacity – including the National Speedway Stadium at Belle Vue, even with the addition of temporary grandstands.

2.27 The quality of speedway stadia in the UK is generally poor, which a major reason for the limited number of FIM international events other than the British Grand Prix which are hosted in the UK.

This statement is a misrepresentation of both the relative quality of UK speedway stadia, and the standing of the UK in terms of staging FIM international events. The quality of speedway stadia in the UK does not match that of new, all-seater football stadia, but for the purpose of outdoor motorsport, all are acceptable and compare favorably with European equivalent venues, with the exception of modern Council-funded stadia in Poland. The UK stages a significant number of major FIM events in addition to the British Grand Prix – notably: Either a round or the Final of the World Cup (now Speedway of Nations) every year since 2002, staged most recently at King’s Lynn and Belle Vue; The Grand Prix Challenge – staged at Coventry in 2009 and Poole in 2013, as well as World Championship qualifying rounds; Several rounds of the World Under-21 Championship, both Individual and team, with events taking place at Berwick, Belle Vue, Leicester and Glasgow, as well as Finals held at Coventry (2012) and King’s Lynn (2016). Only Poland – again, due to the large number of new, council-backed stadia, consistently holds more major FIM events than the UK.

2.28 Up to date information relating to speedway attendances for either domestic or international events is difficult to obtain on a reliable and consistent basis, with no figures published by the ACU, BSPA and SCB.

2.29 Based on engagement with operators, it is understood that average attendances for the Premiership vary from less than 1,000 up to 2,500 per event, although major meetings and the end of season play offs can attract ‘one off’ crowds of up to 5,000.

This statement is not substantially disputed; however it should also be noted that the four Bank Holiday periods during the racing season all provide speedway clubs with substantially increased attendances. The loss of Coventry from speedway’s top league over the last two seasons has unquestionably been a major blow for the sport, as Bees supporters were known to travel to away fixtures in large numbers, but have not transferred their patronage elsewhere with no team to follow (see Appendixes 3 and 4). Their presence in the National Development League in 2018 has put them at a level of racing far adrift from their historic position in the sport, and this understandably has presented little interest for supporters.

## UK Stock Cars

### Stadia & Attendance

2.30 Based on review of the BriSCA fixture list there were approximately 10 UK stadiums that held BriSCAF1 racing in 2017. Each stadium holds a varying number of meetings and fixtures throughout the season. There is no principal national stadium for the sport. The major championship events are held at varying stadiums determined through a bidding process undertaken by each stadium's Stock Car promoter.

The 2018 F1 Fixture list includes events at 13 different venues. None of these can perform the role of national stadium following the closure of Brandon Stadium. This is no doubt this has had a significant and detrimental impact on the sport. The 'Coventry' fixtures remained unfulfilled and the monthly social get-togethers for race-teams and supporters from across the UK (and beyond) were been lost, with no suitable replacement.

2.31 There are over 60 stadiums which have ceased to hold BriSCA F1 racing due to decline in popularity, stadium closure and failure to meet track standards.

Stock Car Racing has been held at many venues over the years but closures have been commonplace, especially in urban settings. A critical point has been reached where scope to find alternative venues is now very limited, which means that existing sites need to be carefully protected wherever feasible. Brandon Stadium is a case in point.

2.32 In order to share the operational costs, it is common that stock car race grounds are used for other sports including speedway and greyhound racing.

Stock Car Racing can attract large crowds on a regular basis. At Brandon it has, in effect, cross-subsidised the speedway for many years. The sport essentially travels around the country, whereas speedway is a team sport. Speedway alone could not sustain Brandon Stadium. Brandon Estates were aware of this when they constructed a position where they would not have permitted Stock Car Racing to have taken place in 2017.

### Decline of Greyhound, Speedway & Stock Car Stadia

2.33 The challenges and general decline in the sector has led to a substantial number of closures of stadia nationally, with financial difficulties in the face of falling attendances and revenues of the primary driver cited.

2.34 Several recent notable examples are summarised.

We note that 'several' in this case appears to be limited to 'two' – one of which is not remotely relevant to the case being discussed here, and the other relates to a speedway closure from 2005 for very different reasons to those suggested here.

### Wimbledon Stadium, Plough Lane, Wimbledon

2.35 Wimbledon Stadium opened on 19 May 1928. It operated as a greyhound racing track and also hosted motor racing events. The stadium closed in March 2017.

2.35 Until 2005 the stadium hosted speedway events and, for circa 50 years, was home to the Wimbledon Dons speedway team (now defunct). It is understood that the team disbanded due to financial difficulties, which were exacerbated by an inability to meet the increased rental cost within lease terms proposed by the stadium's owners.

Attention is drawn to the evidence of Mr Ian Perkin, Chairman of Wimbledon Speedway PLC between 2002-2005 (Appendix 7) who presents a very different account of events at Plough Lane to the one described here. Specifically it confirms that the assertion here that Wimbledon disbanded due to financial difficulties is false.

2.36 The stadium also hosted stock car and other small circuit motor racing events from 1962 until circa 2008. Motor racing events were promoted by Speedworth International and included Superstox, Stock Cars, Hot Rods and Bangers. The stadium hosted its own stock car racing teams for short periods in 1966 (London Sparrows) and 1971–72 (Canaries/Dons).

Stock car racing in fact continued right through until closure in 2017, and did not cease in 2008 as stated here.

2.37 In 2007 the stadium was acquired by Galliard Homes Limited following it being put up for sale by the former owners. A joint planning application made by Galliard Homes and AFC Wimbledon to build 600 apartments on the site and a new 11,000 seater football stadium, which will be the new home of AFC Wimbledon football club.

This is a critical point. The redevelopment of Wimbledon involved the site hosting alternative sports facilities. We do not like the removal of motorsport, but it does make it compliant with the national planning policy, unlike this Brandon Estates application.

2.39 In December 2015 the London Borough of Merton granted planning permission.

### Hall Green Stadium, York Road, Hall Green, Birmingham

Hall Green Stadium accommodated Greyhound Racing only. Its loss, therefore, is not particularly relevant to the consideration of Brandon Stadium. It is surprising that the example has even been quoted given that 2.23 states *“greyhound need is not considered further in this report.”*

- 2.40 The Hall Green Stadium was opened on 24 August 1927 and was Birmingham’s first greyhound track. The stadium closed in July 2017.
- 2.41 Hall Green Stadium was sold by the National Asset Management Agency (parent company of the Greyhound Racing Association – ‘GRA’) to Euro Property Investments Limited in 2014. A lease agreement was retained to permit the continued operation of the stadium.
- 2.42 In February 2016 the owners confirmed that the stadium was to be closed down following discussions with the GRA. The GRA had confirmed that there was no longer enough market demand for two dog tracks in Birmingham. In a meeting held with Birmingham City Council (BCC), the GRA stipulated that they wished to invest in and focus on ensuring the continuing viable operation of greyhound racing at Perry Barr Stadium, which is located approximately 8 miles north of Hall Green Stadium.

### 3.0 SUPPLY ANALYSIS

- 3.1 The supply of speedway and stock car facilities and tracks is based on a desk top search of facilities.

Unfortunately, this search has not produced wholly accurate results, with the result that the stated conclusions are not based on facts and should be disregarded.

- 3.2 The following speedway and stock car facilities are identified within a 60-minute driving catchment of Coventry Stadium.

**Table 3.1 Speedway Stadium**

<b>Site Name</b>	<b>Range (in minutes)</b>	<b>Ownership/ Management</b>	<b>Year Built</b>	<b>Local Authority</b>	<b>Other/ Comments</b>
Beaumont Park, 1 the Lions, Leicester	30	Commercial	2011 (track)	Leicester City Council	Can use stadium every day. No restrictions on use.
Perry Barr Stadium, Birmingham	45	Commercial	1929	Birmingham City Council	Speedway shale track 292m. Also stock car and dog track.
Ladbroke Stadium, Monmore Green, Wolverhampton	60	Commercial	1928	Wolverhampton City Council	Speedway Track is 264m. Also, dog track.

**Table 3.2 Stock Car Stadium**

Site Name	Range (in minutes)	Ownership/Management	Year Built	Local Authority	Other/Comments
Perry Barr Stadium, Aldridge Road, Birmingham B42 2ET	45	Commercial	1929	Birmingham City Council	Speedway Stock Car and dog track
Birmingham Wheels Raceway, Adderley Road South, B8 1AD	48	Commercial		Birmingham City Council	330m tarmac service. Also a kart circuit. Past use as speedway.
Northampton, Northampton International Raceway, Barfield on the Green, NN7 2BA	48	Commercial	1949	South Northamptonshire District Council	The tarmac track is 396m. Past use as speedway.
Hednesford Hills Raceway, Hednesford, Cannock	60	Commercial	1954	Cannock Chase District Council	



The following points must be noted:

1. Most importantly, Perry Barr is not a stock car track. Please see the evidence in Appendix 3 for confirmation. While the venue held several events in the 1950s it simply does not have sufficient land to provide pit space. Also, there is no permission in-place to allow for car racing and it is highly unlikely this would be granted given the proximity of existing and proposed new housing, and the limited speedway race-dates due to the requirements of greyhound racing (increased following the closure of Hall Green).
2. The Birmingham Wheels venue (very brief past use as speedway in 1985/86) is itself under threat of redevelopment, and is a tarmac track.
3. The track surface of Northampton changed to shale in 2018. Past use as speedway was very brief, 1954-55 (in a junior league), and then 1966-67 as an unofficial club. Very basic facilities – no covered accommodation or seating.
4. Hednesford Raceway has severe restrictions on race dates/times. Please see Appendix 1 (covering letter) for full details. Additionally it is a tarmac track.

3.2 There are 3 speedway stadiums with within a 60-minute driving catchment of Coventry Stadium, and 4 stock car stadiums with a 60-minute driving catchment.

The inaccuracy of the above tables result in a change to the conclusion. There are only 3 stock car stadiums, one of which is under threat itself, another which is heavily restricted on dates, and none of which can remotely approach the facilities and spectator capacity of Brandon.  
 Additionally, the SBSCG do not accept the premise of the 60-minute catchment. For Speedway, the stadium needs to relate to the catchment of the team (Coventry/Rugby) and in Stock Car Racing, for the alternative facility argument to bite then the facilities and capacity need to be comparable. None of the quoted 'alternatives' come close.

### Relative supply

3.4 Relative provision of stock car and speedway facilities regionally is set out below.

3.5 It should be emphasised that this assessment only comprises existing supply; relative provision of stock car and speedway stadiums is a useful indicator of the volume of provision available to prospective patron but is only a benchmark against which to judge supply. This section makes no comments at this stage on the local (or wider) demand for such stadiums, which is dealt with later within this assessment.

The existing supply statistics are incorrect, therefore any conclusions are unfounded. For example, table 3.3 indicates a total 30 speedway stadiums which, even prior to a debate over the respective locations, cannot be right as in 2018 there were in fact 27 stadiums which staged domestic speedway plus one more (Cardiff) which staged the one-off British Grand Prix.

**Table 3.3  
Speedway Stadiums**

Region	Stadiums*	Mid year Population Estimate 2017**	Stadium Per Population
South East	5	9,080,825	1 per 1,816,165
London	0	8,825,001	0
North West	2	7,258,627	1 per 3,629,313
East	6	6,168,432	1 per 1,028,027
<b>West Midlands</b>	<b>4</b>	<b>5,860,706</b>	<b>1 per 1,465,176</b>
South West	5	5,559,316	1 per 1,111,863
Yorkshire & the Humber	2	5,450,130	1 per 2,725,065
East Midlands	4	4,771,666	1 per 1,192,916
North East	2	2,644,727	1 per 1,322,363

**\*\*taken from Statista (2018) (The Statistics Portal, Mid-year Population Estimate 2017 by Region \*List of stadiums taken from the Speedway Plus website**

It has been difficult for us to fully assess this table, given that the starting point for the list of stadiums is wrong.

The Speedway Plus website is not the official website of British Speedway ([www.speedwaygb.co.uk](http://www.speedwaygb.co.uk)), and its list of active stadiums includes training venues such as Lydd and Sittingbourne (Iwade) (the latter staging very occasional junior events on behalf of Kent) which are not in a position to stage senior racing. It is clearly also not updated regularly as Coventry is still shown as an active stadium. There were in fact 27 stadiums staging official domestic speedway events in 2018 – not the 30 shown in table 3.3 - a total which can be raised by one by the presence of Cardiff, although it should be noted this is for the one-off British Grand Prix with the stadium converted for speedway use.

Our regional distribution of venues is thus:

**SOUTH-EAST:** Eastbourne, Isle of Wight, Kent

**LONDON:** None

**NORTH-WEST:** Belle Vue, Workington

**EAST:** King’s Lynn, Ipswich, Lakeside (Arena-Essex), Peterborough, Mildenhall, Rye House

**WEST MIDLANDS:** Wolverhampton, Birmingham, Stoke

**SOUTH-WEST:** Poole, Somerset, Swindon, Plymouth

**YORKSHIRE/HUMBER:** Sheffield, Scunthorpe

**EAST MIDLANDS:** Leicester, Buxton

**NORTH-EAST:** Newcastle, Redcar, Berwick

**WALES:** Cardiff

**NORTHERN IRELAND:** None

**SCOTLAND:** Edinburgh, Glasgow

We cannot understand how the table provided by Framptons ends up with a total of 30 stadiums, and how the total number of Midlands venues is shown as eight (4+4) – when it is clear from the above factual information that the West Mids+East Mids total cannot be more than five... and this is with the inclusion of Buxton, a stadium in no position to operate at a higher level than their current National League status.

The flawed nature of the table provided is further underlined by the fact that the total number of Northern venues shown is six (2+2+2) whereas our list of stadiums clearly shows a total of nine, including the two Scottish venues.

Below is our interpretation of the position:

<b>Region</b>	<b>Stadiums*</b>	<b>Mid year Population Estimate 2017**</b>	<b>Stadium Per Population</b>
South East	3	9,080,825	1 per 3,026,942
London	0	8,825,001	0
North West	2	7,258,627	1 per 3,629,313
East	6	6,168,432	1 per 1,028,027
<b>West Midlands</b>	<b>3</b>	<b>5,860,706</b>	<b>1 per 1,953,569</b>
South West	4	5,559,316	1 per 1,389,829
Yorkshire & the Humber	2	5,450,130	1 per 2,725,065
East Midlands	2	4,771,666	1 per 2,385.833
North East	3	2,644,727	1 per 881576
Wales	1	3,125,200	1 per 3,125,200
NI	0	1,870,800	0
Scotland	2	5,424,800	1 per 2,727,400
U.K.	28	66,040,229	1 per 2,358,580

**Table 3.4**

**Stock Car Stadiums\***

Region	Stadiums*	Mid year Population Estimate 2017**	Stadium Per Population
South East	2	9,080,825	1 per 4,540,412
London	0	8,825,001	0
North West	1	7,258,627	1 per 7,258,627
East	4	6,168,432	1 per 1,542,108
<b>West Midlands</b>	<b>4</b>	<b>5,860,706</b>	<b>1 per 1,465,176</b>
South West	3	5,559,316	1 per 1,853,105
Yorkshire & the Humber	1	5,450,130	1 per 5,450,130
East Midlands	3	4,771,666	1 per 1,590.555
North East	1	2,644,727	1 per 2,644,727

\*Brisca F1 stock car stadiums taken from the Brisca F1 and F2, V8 Hotstox and Spedeworth Incarace fixture list.

\*\*taken from Statista (2018) (The Statistics Portal, Mid-year Population Estimate 2017 by Region

This table suffers from similar deficiencies to the speedway equivalent. Most importantly, the West Midlands is falsely shown as having four stock car venues when it is clear that the total should be three. The table fails to take into account venues operating in Northern Ireland and Scotland. Whilst accepting that the majority of these venues could operate Formula 1 stock car racing, some with upgrades required to facilities, not all should be regarded as F1 stadiums. We have noted below (in bold) those which have actually run F1 in 2018.

SOUTH-EAST: Aldershot, Eastbourne  
 LONDON: None  
 NORTH-WEST: **Belle Vue**  
 EAST: **King's Lynn, Mildenhall, Ipswich**, Arena-Essex, Yarmouth  
 WEST MIDLANDS: **Birmingham, Stoke, Hednesford**  
 SOUTH-WEST: Bristol, Taunton, St Day  
 YORKSHIRE & THE HUMBER: **Sheffield**  
 EAST MIDLANDS: **Buxton, Skegness, Northampton**  
 NORTH-EAST: Barford WALES: None  
 NORTHERN IRELAND: Tullyroan, Aghadowey, Ballymena, Nutts Corner  
 SCOTLAND: **Cowdenbeath, Lochgelly**, Crimond, Knockhill

Several 'unlicensed' venues which also stage car racing have not been included in the above list – Trent Raceway being one of them.

Region	Stadiums*	Mid year Population Estimate 2017**	Stadium Per Population
London	0	8,825,001	0
South East	2	9,080,825	1 per 4,540,412
North West	1	7,258,627	1 per 7,258,627
East	5	6,168,432	1 per 1,233,686
<b>West Midlands</b>	<b>3</b>	<b>5,860,706</b>	<b>1 per 1,953,569</b>
South West	3	5,559,316	1 per 1,853,105
Yorkshire & the Humber	1	5,450,130	1 per 5,450,130
East Midlands	3	4,771,666	1 per 1,590.555
North East	1	2,644,727	1 per 2,644,727
Wales	0	3,125,200	0
Northern Ireland	4	1,870,800	1 per 467,700
Scotland	4	5,424,800	1 per 1,356,200
U.K.	27	66,040,229	1 per 2,445,934

### Overview of quantity

3.6 As suggested above, relative supply is only a useful indicator in terms of benchmarking local provision alongside other similar areas. As can be seen from the table 3.3 above, Speedway provision for the West Midlands region is relatively good compared to other regions (in 4<sup>th</sup> place in the region). With regards to stock car provision in the West Midlands is the best compared to other regions (1<sup>st</sup>). Therefore, residents in the West Midlands regions have a relatively good access to speedway and stock car tracks.

The corrected analysis shows a considerably different picture. With the closure of Brandon Stadium for Speedway, the West Midlands ranks fifth of the English regions. None of the three remaining stadia approach the spectator capacity of Brandon Stadium.

In relation to Stock Car Racing, far from being ranked at the top the West Midlands is fourth amongst English Regions and has poorer provision than both Northern Ireland and Scotland.

3.7 Furthermore, there is a range of alternative venues within easy reach (0-60minutes drive) of Coventry as seen in stadium Tables 3.1 and 3.2.

The position is not so generous as purported for the reasons pointed out, and in the case of speedway it is emphasized once more that an 'alternative' location for the Coventry Bees speedway team outside the Coventry/Rugby area is unacceptable and has been proved not to work (see previous Appendices.)

### Quality

3.8 When assessing quality, it is necessary to review both condition and fitness for purpose.

3.9 Data on age/refurbishment can be used to inform quality, but in the case of speedway and stock car racing this is not a valid proxy, and in any case details of refurbishment are either not collected or publicly available.

3.10 As stated in the Turley Assessment, and predicated on detailed condition analysis conducted by an RICS qualified Chartered Surveying firm, the Coventry Stadium is in poor state of disrepair, which would presently preclude operations without very significant investment in extensive remedial works.

The works required are solely as a result of security failures by Brandon Estates. The quality of a venue also needs to take other matters into account including the facilities for spectators, sponsors, competitors and so on. Other venues listed as 'alternatives' all fall significantly short of Brandon on all of these counts.

### Accessibility

3.11 Given the amount and distribution of various types of facilities, all residents within Rugby could access at least one facility within a 1-hour drive time by car. It is noted that many of the spectators would drive to the stadium particularly as races were held at weekend and in the evening i.e. at time when public transport such as accessibility by bus would be more limited.

This fails to recognise the importance of Brandon Stadium nationally and internationally. None of the alternatives offer comparative facilities and capacity. Hednesford Raceway, as an example, has significant limitations on race dates. Birmingham Wheels Raceway is not a comparable venue, as it has no Grandstand Seating or covered terracing.

### Availability

3.12 Availability needs to consider the following (see ANOG):

- how much existing stadium are actually used, how full they are

Brandon was more intensively used and better attended by participants and spectators than any of the 'alternative' existing stadia.

- how much they could be used

Previous levels of usage would be restored if Brandon Estates permitted reopening – in fact they would almost certainly increase due to the publicity of recent years.

- what scope is there for increasing their availability

This depends on Brandon Estates, who have steadfastly refused to discuss the matter of the availability of Brandon to carry out its existing functions! Notably, as a long-established stadium Brandon is able to operate 24/7, meaning that in planning terms it in fact has much higher availability than almost all other venues.

3.13 These are in turn influenced by a number of factors, including:

- the management and ownership e.g. whether facilities are public, private or education based
- a programming and sports development policy e.g. is availability given over to specific sports, initiatives and range of activities at certain times. Some facilities may be programmed only for specific sports, users or activities
- the cost of use e.g. a high cost may result in a facility having very little use
- patterns of use e.g. a popular facility that is always full, a facility that is heavily used but only for a limited period across the week, is the nature of use changing over time?
- hours of use e.g. opening times available for public use, this will be linked to the programming policies above
- facility design e.g. the physical design and layout of a facility may limit or prevent use by specific users.

3.14 It has not been possible to ascertain the precise availability of all stadiums in the area. No detailed data on availability has been researched because of the commercial nature of such information. However, it does appear that multiple uses of stadiums is beneficial to stadiums to ensure their long term viability. This suggests that a stadium may welcome using any spare capacity they have to help ensure the long-term future of their stadiums and clubs.

Brandon Stadium was a stadium used for multiple purposes and, subject to planning permission, there is scope for further uses. Regarding precise availability of all stadiums in the area, described here as “not possible to ascertain” please refer to Appendices 3 and 4 for direct information from other promoters/venues concerned.

3.15 In summary:

- speedway provision for the West Midlands region is relatively good compared to other regions (in 4<sup>th</sup> place in the region); See earlier analysis placing the provision in the West Midlands 5<sup>th</sup>, although the provision of ANY other facilities outside the Coventry/Rugby area is irrelevant to speedway as the team needs to be racing in the area.
- stock car provision in the West Midlands is the best compared to other regions (1<sup>st</sup>). Corrected analysis shows this in 4<sup>th</sup>, with further availability issues, using the information on actual stock car venues in the region. Perry Barr is not a stock car track!
- therefore, residents in the West Midlands regions have a relatively good access to speedway and stock car tracks. This is not correct. The provision both quantitatively and qualitatively is poor.
- there is a range of alternative venues within easy reach (0-60 minutes’ drive time). This is patently not the case for speedway – and for stock car racing, none of the ‘alternatives’ approach the quality and capacity of Coventry as the national stadium of BriSCA F1 Stock Cars.
- multiple uses of stadiums is beneficial to stadiums to ensure their long term viability. This suggests that an existing stadium may welcome using any spare capacity they have to ensure the long-term future of their stadiums and clubs. This ignores the fact that Brandon already WAS a viable multiple use venue.

The SBSCG therefore considers this to be a very poor summary of the supply situation. It simply re-confirms that Brandon Estates made decisions concerning the site without due consideration of all the relevant factors. It provides no basis to justify the loss of the facility.



## 4.0 DEMAND ANALYSIS

4.1 To understand future needs ANOG considers it is also important to consider demand, which is explored in this section.

4.2 Demand for any sport including speedway and stock car racing is affected by a number of factors:

- The characteristics of the local area and the propensity of the population to take part in the sport
- The changing demographics and latent demand
- Initiatives by the governing bodies, to promote additional participation

The SBSCG considers the following analysis to be very sketchy and unreliable. The facts are that Brandon Stadium was a very successful facility for both Speedway and Stock Car Racing from both participatory and spectating perspectives.

In respect of Stock Car Racing the usage had intensified considerably with seven additional dates added to the traditional eight first Saturday of every month. This increased substantially the number of race classes competing at Coventry Stadium. The pit areas were full at all 15 meetings providing participatory motorsport for around 150 drivers at each event. Over a season this amounts to around 2,250 active participants including several race classes offering opportunities for young people (<16 years old).

The rationale for the choice of the 30km catchment is unclear as this varies from the regional approach in the consideration of supply. If the motorsport participation rate within 30km of 2,675 within a population of 1,114,911 (excluding latent potential) is factored up to the regional population then this suggests c14,000 people who participate in motorsport in the West Midlands Region.

### Population

4.3 The following information was derived from the Rugby Borough Council 'Authority Monitoring Report', December, 2015. It only refers to the Borough area itself – additional research is required to estimate the situation in the wider Coventry Stadium catchment, we have therefore looked at RBC's population as a guide:

- The Borough's overall population remained steady between 1980-2001 but between 2001-2011 the population increased significantly by 14.8% (Nomis, 2015).

- The rise in population was largely due to people migrating into the area and more single parent families, but also as a result of increased birth rate and people living longer.
- The projected population increase between 2010 and 2035 is expected to be 30%, which would bring the population to in excess of 130,000.
- Across Warwickshire as a whole, the highest rates of projected population growth are in the groups aged 65 and over. The eldest age group (those aged 85 and over) is projected to increase by over 190% by 2035. It is noted that population growth is forecast to be driven by an increase in the elderly population, rather than younger cohorts, which traditionally are greater users of sports facilities and have greater disposable incomes to spend on attending events.
- The average household size within the Borough of Rugby is 2.4 persons. The number of households has risen faster than the population, which is partly due to over a quarter (28.1%) of Rugby's households being occupied by a single person.
- The 2011 Census shows that around 12% of Rugby Borough's residents were born outside the UK. 5.9% being from Europe, 1.9% Africa, 2.6% Asia, and 1.2% from the Rest of the World. In terms of ethnicity, nearly 16% of Rugby's population belong to groups other than White British. These include Asian Indian (3.1%), Black African (1.0%), White Irish (1%), Asian Other (1%) and White Other (5.2%) groups.
- Rugby's average household incomes are however higher than that for the West Midlands region and also above national levels.
- In the Indices of Multiple Deprivation 2015, Rugby is ranked 240 out of 326 Local Authorities (no.1 being most deprived, 326 the least). At a county level, the Indices show that Warwickshire is ranked 124th out of 152 upper tier authorities in England meaning that it is amongst the 20% least deprived areas in England.

### **Population Projections**

4.4 Rugby's projected population increase between 2010 and 2035 is expected to be 30%, which would bring the population to in excess of 130,000.

4.5 The projected increase in population of 30% (albeit trend projected and despite the longtime span) suggests that demand for sport facilities in general will increase.

### **Market segments (MS)**

4.6 As part of its research work, Sport England has developed 19 market segments within the overall adult population to help understand the nation's attitudes towards sport and its motivation for taking part (or not). It is based on the Active People's Survey, DCMS's 'Taking Part' Survey and Mosaic data from Experian.

4.7 Sport England’s methodology has been used as no other published research been undertaken for speedway or stock car use and there is no other known methodology. There is however limitations to the Sport England methodology as it relates to participants rather than spectators.

The authors accept “limitations” to the Sport England methodology as it relates to participants rather than spectators.

This confirms why, although the analysis in terms of assessing age ranges, social sectors etc, contains plenty of statistics, tables, bar charts etc, it has little relevance to the overall issue in question.

Both sports are attractive spectator sports. The issue of participation cannot be brought into the equation in quite the same way in which we would consider the loss, for example, of tennis courts or a local gymnasium. Speedway riders are generally young, fit, highly trained athletes who also have supreme motorcycle racing ability. It seems fairly obvious that the general public would not venture onto a 500cc motorbike with no brakes in the same way that they would book a badminton court. However, they do enjoy watching them race!

It should be noted that Brandon also provided speedway training schools, as well as housing the successful Rugby Rider Training School business, helping to put safe motorcyclists onto our roads.

Car racing has a wider range of participants (see 4.2), but even in the case of stock cars, drivers would build up to the level of racing in major events such as are staged in front of the paying public at Coventry, by working their way through lower or junior formulae. A conclusion that Brandon is not required because of a lack of participants for either sport is fundamentally flawed.

4.8 In terms of current participation in sport, it is possible to highlight the characteristics of the local population within a 30km (18 mile) catchment of Coventry Stadium site. The illustrations below all demonstrate the five main market segments in the 30 km area are as follows:

- Philip – known as a ‘comfortable midlife male’. Philip can be considered a ‘sporty’ segment, with above average levels of sports participation. Half of this segment has done no sport in the past four weeks, compared with the average of 60% of all adults. The proportion of this segment playing sport at least once a week is 11 percentage points above the national average, and almost a fifth have undertaken three sessions of sport a week, compared with a national average of 15%.
- Tim – known as a ‘settling down male’. Tim is an active type that takes part in sport on a regular basis: almost two thirds take part in sport at least once a week, compared with 40% of all adults. 27% of this segment does three 30-minute sessions of moderate intensity sport per week, compared to 15% of all adults. Only 37% have done no sport in the past month.
- Elsie and Arnold – ‘Retirement Home Singles’ Elsie & Arnold have very low participation in sport 82% have done no sport in the past four weeks, compared with the average of 60% of all adults. 17% have participated in sport at least once a week, which is consistent with other segments of that age (the average of

segments 17 to 19 is 12%). A very small proportion have undertaken three sessions of sport a week (5%), compared with 11% of the over 66 age group.

- Roger and Joy – ‘early retirement couples’. Roger & Joy have below average levels of sports participation. 66% of this segment have done no sport in the past four weeks, compared with 60% of all adults. 38% have participated in sport at least once a week, which is consistent with other segments of the same age. 10% have undertaken three sessions of sport a week, compared with a national average of 15%.
- Elaine – ‘Empty Nest Career Ladies’ - Elaine has average levels of sports participation. 62% of this segment have done no sport in the past four weeks, compared with the average of 60% of all adults. 43% have participated in sport at least once a week, which is higher than the national average. 12% have undertaken three sessions of sport a week, compared with a national average of 15%.

#### Image 4.1 Dominant Market Segment by Population

Please refer to Appendix 1

#### Image 4.2 Population of all Segments within Catchment Area

Segment	Catchment Pop.	LA Pop.	CSP Pop.	Rgn Pop.	Nat Pop.	Catchment	LA %	CSP %	Rgn %	Nat %
Ben	51792	3478	39905	172331	1989287	4.6	4.9	4.9	4.1	4.9
Jamie	53125	2627	39578	224031	2162891	4.8	3.7	4.8	5.3	5.4
Chloe	47425	3292	38093	158994	1896625	4.3	4.6	4.7	3.8	4.7
Leanne	42044	2124	30591	178578	1711607	3.8	3	3.7	4.3	4.3
Helena	48258	3246	38493	170239	1829866	4.3	4.6	4.7	4.1	4.5
Tim	96711	7237	72968	312880	3554150	8.7	10.2	8.9	7.4	8.8
Alison	47255	3703	33062	143215	1766560	4.2	5.2	4	3.4	4.4
Jackie	59470	3580	39549	200719	1965002	5.3	5.1	4.8	4.8	4.9
Kev	63438	2833	44083	293686	2386568	5.7	4	5.4	7	5.9
Paula	40672	1635	27007	195439	1507276	3.6	2.3	3.3	4.7	3.7
Philip	108372	7253	77927	363846	3480166	9.7	10.2	9.5	8.7	8.6
Elaine	71537	4965	54794	250831	2444113	6.4	7	6.7	6	6.1
Roger & Joy	78742	6362	57984	271389	2723835	7.1	9	7.1	6.5	6.8
Brenda	54141	2435	36862	247196	1976776	4.9	3.4	4.5	5.9	4.9
Terry	41871	2028	29153	194265	1484513	3.8	2.9	3.6	4.6	3.7
Norma	21711	978	15198	101707	854962	1.9	1.4	1.9	2.4	2.1
Ralph & Phyllis	43605	3472	39198	160573	1700496	3.9	4.9	4.8	3.8	4.2
Frank	50386	3731	36132	183961	1612960	4.5	5.3	4.4	4.4	4
Elsie & Arnold	94356	5904	67401	377460	3206387	8.5	8.3	8.2	9	8
Total	1114911	70883	817978	4201340	40254040	100	100	99.9	100.2	99.9

#### Participation in Motorsports

4.9 In terms of people within the catchment area who participate in motorsports, the percentage of population participating in the 30 km catchment in motorsports (including go karting, motor racing, motorcycling, rallying and speedway) is 0.1 – 1.0% and this is spread evenly across the

whole area. This compares for example to The MS data for the catchment area estimates that total participation in motorsports is 2675 adult participants.

#### **Image 4.3 Percentage of Population Participating on Motor Sport**

Please refer to Appendix 2

- 4.10 Sport England have not researched the participation for speedway or stock car racing individually but as a group under the header 'motorsports' which as stated above includes go karting, motor racing, motorcycling, rallying and speedway. In the catchment area, the participant levels for motorsports are the same as other 'sport groups' researched by Sport England including: martial arts/combat sports; other water sports (excluding swimming, sailing, angling); rollersports; and winter sports— all 0.1 to 1.0 %. Notably the participation for the keep fit and gym group is 5.1 – 10%.
- 4.11 The data confirms that the major participants are Tim, Philip, Kev (pub league team mates), Jamie (sports team lads) and Ben (competitive male) who in total comprise nearly 77.8% of the total motorsports participants in the area. The data for the 30 km catchment estimates that total participation in motorsports is 2675 adults.
- 4.12 It must be noted that this analysis reflects participation rather than people attending the stadiums to watch events.

#### **Image 4.4 Population within Catchment Area Participating in: Motor Sports**

Population within catchment area participating in: Motor sports (including go karting, motor racing, motorcycling) 

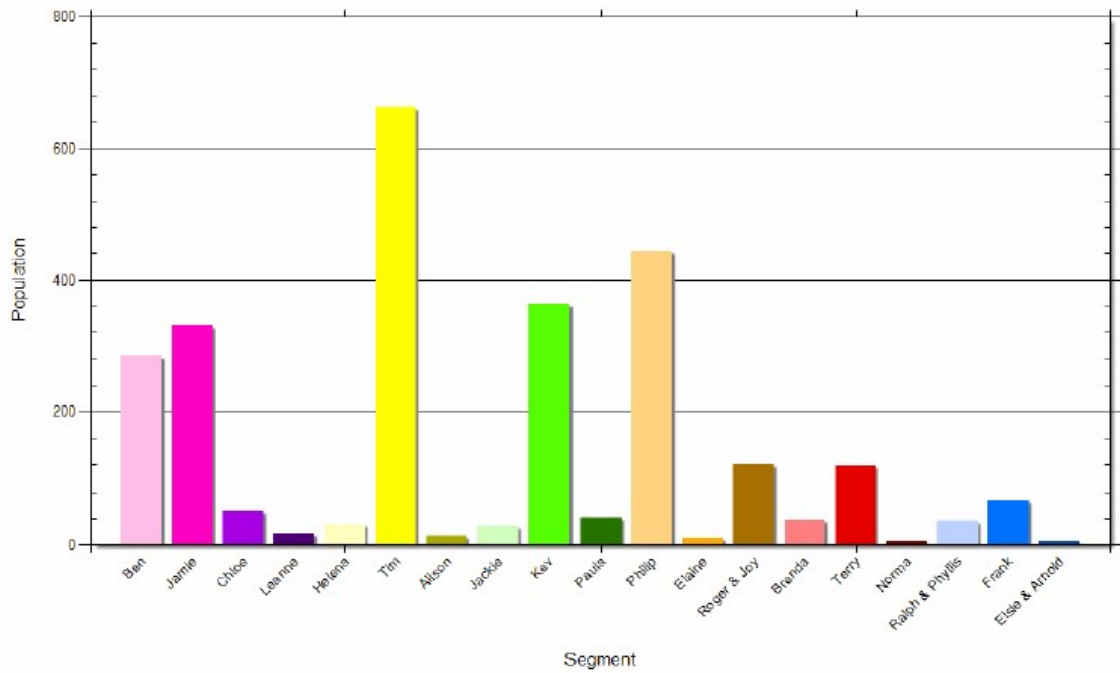


Image 4.5 Population within Catchment Area Participating in: Motor Sports

Segment	Catchment Pop.	LA Pop.	CSP Pop.	Rgn Pop.	Nat Pop.	Catchment	LA %	CSP %	Rgn %	Nat %
Ben	51792	3478	39905	172331	1989287	4.6	4.9	4.9	4.1	4.9
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Elaine	71537	4965	54794	250831	2444113	6.4	7	6.7	6	6.1
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Total	1114911	70883	817978	4201340	40254040	100	100	99.9	100.2	99.9

### Summary of market segmentation

4.13 The five main market segments in the Coventry Stadium catchment are Tim, Philip, Roger and Joy; Elsie and Arnold and Elaine. Two of whom are the highest participants in motorsports nationally (Tim and Philip).

4.14 In terms of people within the catchment who (it is estimated by MS) do motorsport, the data confirms that the major participants are indeed the main segments set out above, Tim, Philip, Roger, Kev, Jamie and Frank who in total comprise nearly 77.8% of the total motorsports participants in the area. The MS data for the catchment estimates that total participation in motorsports is about 2675 adults of a population of 1,114,911 (population of all chosen segments in the catchment area), i.e. 0.24 %.

### Latent and future demand

4.15 With regards to latent demand, potential demand for motorsports confirms that is broadly the same group that currently participate that they would like to participate more (Philip, Tim, Jamie, Ben and Kevin) totaling about 1479 potential participants, although these figures should be qualified as they represent a theoretical representation of latent demand for motorsports

4.16 Although the future population projections are too long term, are based only on Rugby itself and do not take into account future housing growth, the local area is anticipated to grow considerably in the future.

4.17 However, for the purposes of the study it may be necessary to conclude that in accordance with the existing character of the area, likely population change demand could be reduced as population growth is being driven by older age cohort who are less likely to be motorsports participants, but that a specific target is not appropriate and an end date not identified. There could result in some reduction in demand but this is not quantified.

### Summary

4.18 In summary, it can be concluded that participation in motorsports in the catchment area is low and latent and future demand is likely to be low. This reflects the general decline in interest in speedway and stock car racing.

With respect, the SBSCG considers this conclusion (assumed to be read as “low”) is highly speculative and self-fulfilling. ‘Demand’ has inevitably declined following Brandon Estates’ decision to eject Speedway and Stock Car Racing from Brandon Stadium. It is patently clear that a need for Brandon Stadium existed and continues to exist. Accordingly, national planning policy should kick-in and the redevelopment of Brandon Estates should be rejected. Redevelopment of the stadium should only be considered subject to the provision of an appropriate replacement facility, funded by the developers of the existing site.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 ANOG sets out the need for the supply and demand assessment to be brought together and the key issues arising analysed.

### Key Issues

#### Supply of speedway and stock car racing facilities in the Coventry Stadium catchment area?

5.2 There are 3 speedway stadiums with within a 60-minute driving catchment of Coventry Stadium, and 4 stock car stadiums with a 60-minute driving catchment.

There are in fact 3 stock car stadiums. The erroneous inclusion of Perry Barr invalidates the authors’ statistics. None of the alternatives provide facilities of a quality or capacity of Brandon Stadium. The speedway stadiums noted do not address the need for a Coventry team to be racing in the Coventry/Rugby area.



5.3 Speedway provision for the West Midlands region is relatively good compared to other regions (in 4<sup>th</sup> place in the region). With regards to stock car provision in the West Midlands is the best compared to other regions (1<sup>st</sup>). Therefore, residents in the West Midlands regions have a relatively good access to speedway and stock car tracks.

This is incorrect due to the flawed desk top search. Provision within the West Midlands is unacceptable for speedway (due to the need for Coventry Bees to race in the Coventry/Rugby area) and poor for stock cars following the closure of Coventry.

5.4 Furthermore, the fact that Coventry Stadium has closed due to lack of viability suggest an oversupply of facilities in the area.

This is blatantly wrong! The stadium was viable for Speedway and Stock Car Racing (and the best-supported in the area) as evidenced in our statements on the planning application and the Turley Report. Brandon Stadium did not close due to lack of viability. It closed because Brandon Estates closed it, at a time when several parties wanted to operate there. The nonsensical nature of the 'oversupply' argument is dealt with in Appendices 3 and 4 with evidence from Birmingham and Wolverhampton Speedway confirming their own attendances have not risen as a result of the closure of Coventry.

Attention is further drawn to the evidence supplied by Guest Wilson Chartered Accountants as part of representations to the initial planning documentation. It clearly states:  
*"In the years when greyhound racing was run [2009-2011] the company made considerable losses. In all other years (ie. only speedway and stock car racing conducted by the company) the company has made a profit."*  
This is therefore a total contradiction of the assertion that the stadium closed due to lack of viability.

#### **Is there a strategic or local justification for allowing Coventry Stadium to close?**

5.5 In view of the above, the industry will not be unduly harmed by closure of the stadium, and that there exists opportunities for provision to be consolidated at other stadia within the 60 minute catchment.

This is not correct. There is evidence that both Speedway and Stock Car Racing have been 'wounded' by the closure of Brandon Stadium. Please see evidence in Appendices from Birmingham, Wolverhampton and Leicester Speedway stating that such 'consolidation' cannot take place.

On this basis speedway and stock car racing remains accessible to spectators (many people travel this far to watch football etc), and participants. The relocation of both speedway and stock cars to hold events at nearby stadia has been agreed and undertaken, which would not have been the case if it could not secure participants or garner reasonable support.

The relocations have not been a success and will not continue (just four Stock Car events took place at alternative venues in 2017, and none in 2018). The relocation of Coventry Bees to Leicester has been a failure (evidence in Appendices from promoter Mick Horton) and is not expected to be repeated in 2019. It should also be noted that the closure of Coventry has resulted in significant reductions to:

- a) the number of Formula 1 meetings held over the course of the season, and
- b) the relative percentage of Formula 1 events held in the West Midlands, which has fallen significantly.

In 2016, 51 meetings were held, 17 of which took place in the West Midlands – a total of 33 per cent. However, in 2018 the total number of meetings was down to 42, of which just eight (19 per cent) were held in the West Midlands. Clearly therefore a relocation of events has not taken place, and the industry has suffered as a result.

5.6 Again, the fact that Coventry Stadium has closed due to lack of viability suggest an oversupply of facilities in the area

Is the repetition of paragraph 5.4 simply an attempt to convince the reader that it is true, if the same thing is said more than once?

and it has been evidenced in the Turley report that before the site was sold that the stadium was in a poor condition and required improvements in particular to be approved to operate by the relevant health and safety authorities. Its closure has not hindered the development of motorsports in the West Midlands area given the supply over this wider area.

This is simply not true and is not backed up by any evidence. Additionally, if the stadium required improvements to be approved in order to operate BEFORE the site was sold, then how did it continue to operate AFTER the sale?

5.7 The Turley report summarises that there has been a general decline in the speedway and stock car sector with financial difficulties in the face of falling attendances and revenues the primary driver cited.

If stadiums close, is it surprising that attendances decline? This statement is nonsense. Please see our full response to the Turley Report.

### Is quality of facilities an issue in the Coventry Stadium catchment area?

5.8 As stated above there is an adequate standard of provision within the catchment, particularly given that other stadiums have been approved to operate by the relevant health and safety authorities (which Coventry Stadium has not) and that operations from other stadiums currently hold licencing rights for these sporting events (which for various reasons Coventry Stadium no longer does).

Speedway cannot be successfully farmed out to another venue located away from Coventry/Rugby. The alternative venues cannot provide the facilities as an alternative for Stock Car Racing.  
Additionally, Brandon Stadium always had appropriate H&S approval during its operation, and these requirements would obviously be met should it be re-opened. The reason why licencing rights are not currently held by Coventry is because Brandon Estates closed the stadium! Governing bodies of both sports would undoubtedly welcome a return to Brandon Stadium should it become available.

### Is the provision of stadium facilities sufficient to meet future demand arising from housing development and additional population?

5.9 It is not considered that the unmet or latent demand is great enough to suggest that the provision of stadium facilities is not sufficient.

Existing provision following the closure of Coventry is inadequate for both sports.

### Conclusions

5.10 This report sets out a needs assessment which is proportionate and clearly illustrates using the ANOG methodology that there is sufficient quantity, accessibility and availability of provision of stadia both now and in the future in the Coventry Stadium catchment.

5.11 This assessment therefore concludes that under paragraph 97 A) that the there is adequate stadium provision in the area and the site can be released for development.

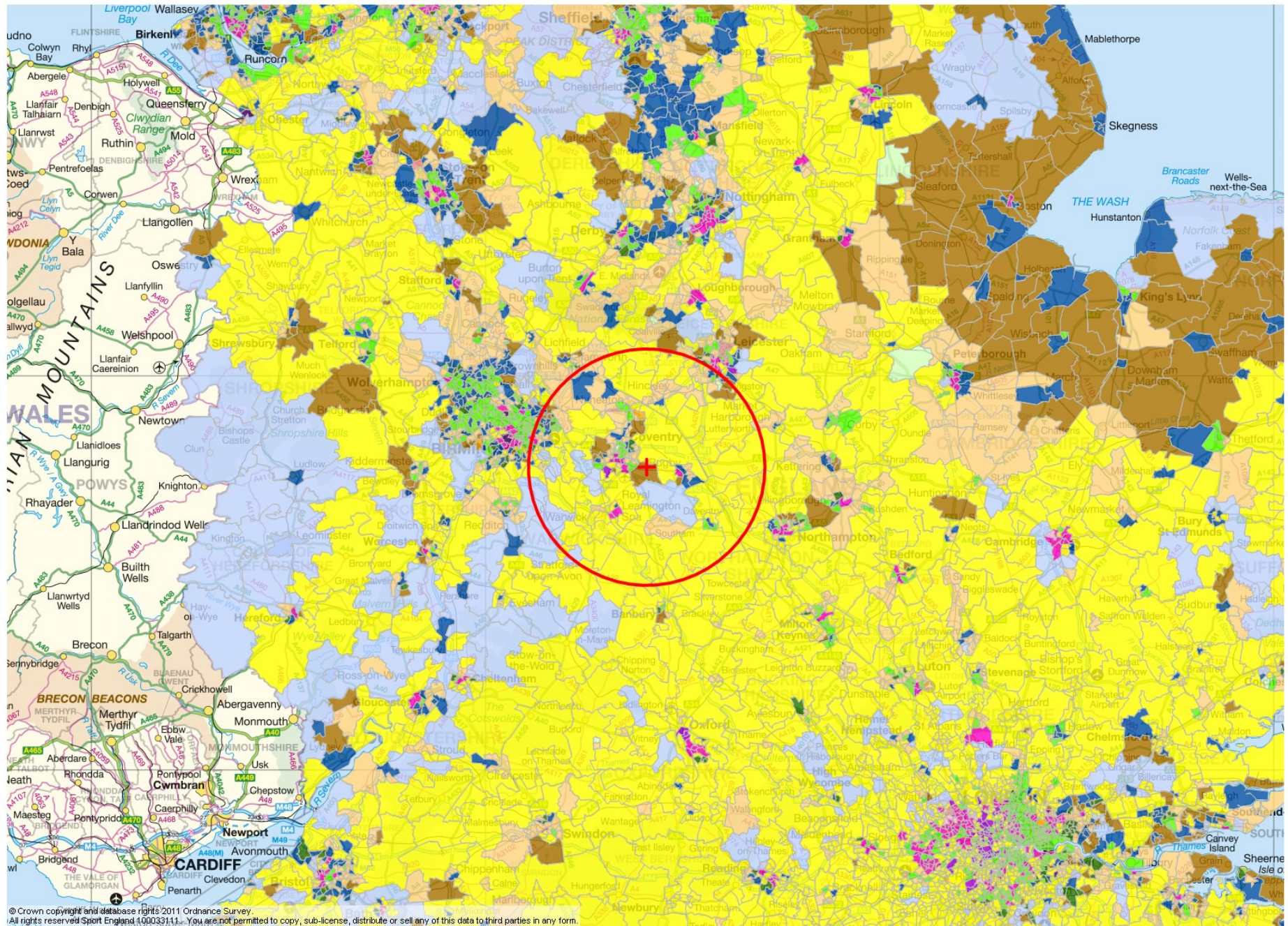
The assessment does not provide any basis for these conclusions to be drawn. There are basic errors, misrepresentations of facts and an apparent total lack of understanding of the nature of the sports as a whole and the significance of Brandon Stadium to them.  
Brandon Estates have had an extended opportunity to demonstrate their case and have failed miserably.  
The only course of action is to reject their proposals for the redevelopment of Brandon Stadium.

## **Appendix 1**

# Dominant market segment by population

Catchment area:  
within 30 km of CV8 3GJ

- Ben - 1
  - Jamie - 2
  - Chloe - 3
  - Leanne - 4
  - Helena - 5
  - Tim - 6
  - Alison - 7
  - Jackie - 8
  - Key - 9
  - Paula - 10
  - Philip - 11
  - Elaine - 12
  - Roger & Joy - 13
  - Brenda - 14
  - Terry - 15
  - Norma - 16
  - Ralph & Phyllis - 17
  - Frank - 18
  - Elsie & Arnold - 19
- Catchment area
- Middle Super Output Areas



## Appendix 2

# Percentage of population participating in: Motor sports (including go karting, motor racing, motorcycling)

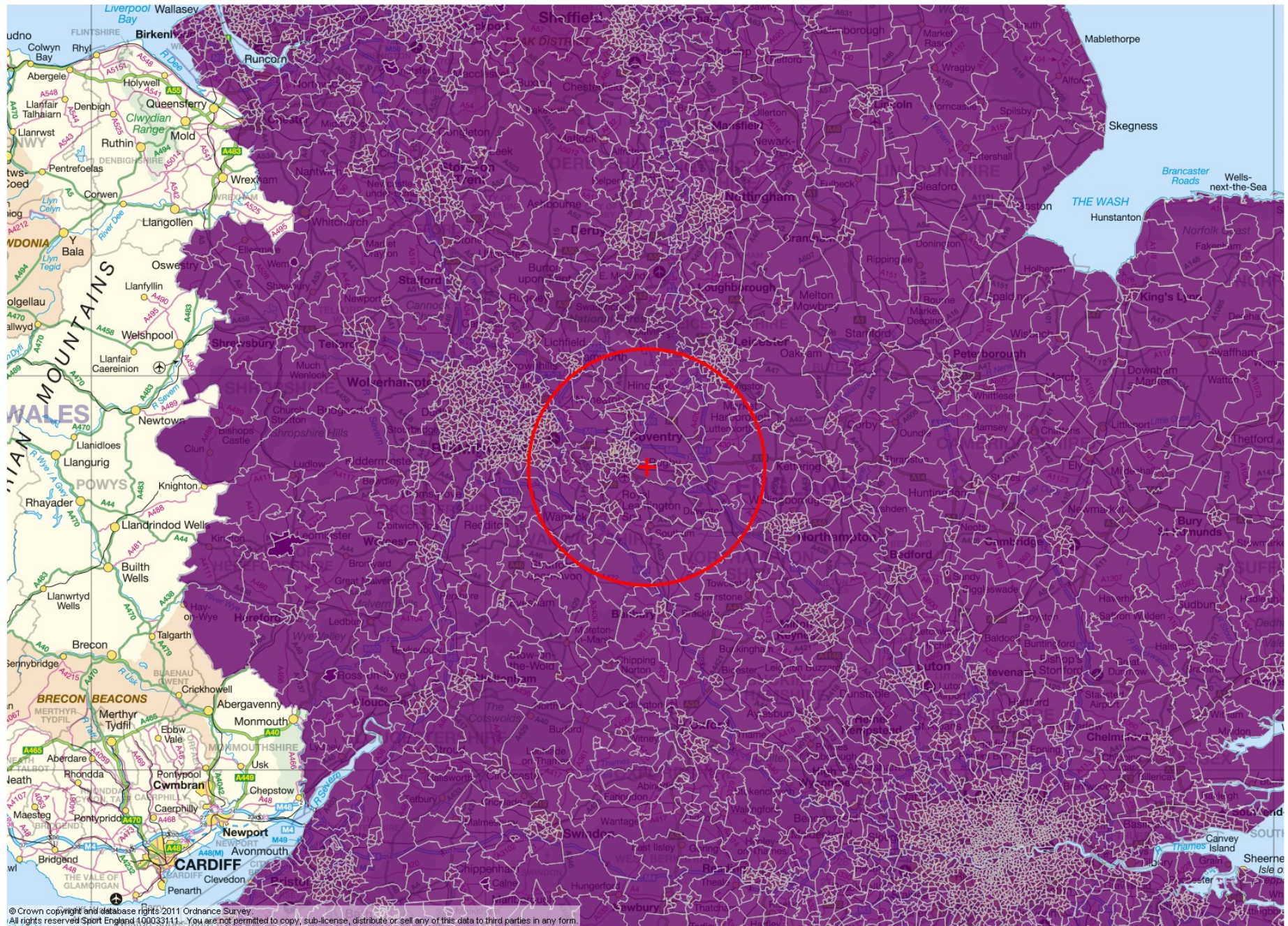


Catchment area:  
within 30 km of CV8 3GJ

Percentage colour key:

- 80.1 - 100.0
- 40.1 - 80.0
- 20.1 - 40.0
- 10.1 - 20.0
- 5.1 - 10.0
- 2.1 - 5.0
- 1.1 - 2.0
- 0.1 - 1.0
- 0

- Catchment area
- Middle Super Output Areas



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## APPENDIX 7 – WIMBLEDON SPEEDWAY

Hi David

Seth sent me your e-mail and asked me to fill in the details about what happened at Wimbledon Speedway that brought about the closure at the end of 2005 when we were more than willing to continue leasing the stadium from the GRA but were told that their had been a Board Decision taken to bring speedway to an end.

Our company Wimbledon Speedway PLC was formed in May of 2002 to rescue the failed attempt by Steve Ribbons and Dave Croucher to reintroduce speedway into Plough Lane. We agreed with the GRA a one year lease on the stadium, put in a new track and had a successful season financially which allowed us to agree with the GRA a further three year lease on the stadium for speedway events which secured our future up to the end of 2005. Wimbledon wasn't a cheap stadium in which to run as the GRA was charging us rent of £1500 a meeting on Wednesday nights and more if we had a Sunday fixture, which at the time the BSPA told me was the highest rent being paid by any speedway club in the UK, even more than Poole and Wolverhampton who were then considered to be the most commercially successful clubs in the country. However, we were happy just to be running speedway successfully at one of speedway's historic venues and for myself and the other directors it was probably the best thing we had ever done and wanted to continue promoting speedway for as long as we could there.

Unfortunately, things changed mid-way through the 2005 speedway season when the GRA was bought out by Risk Capital Partners, whose Chairman was Luke Johnson, someone coincidentally who is in the news at the moment over alleged financial fraud and mismanagement at another of his companies Valerie Patisserie. When we had our annual near end of season meeting with the Wimbledon Stadium General Manager Mick Hardy (now at Belle Vue Greyhound Stadium) and thought we would agree a new lease for hopefully a five year agreement to run speedway at Plough Lane, we were told that a Board decision had been taken to stop speedway at Plough Lane and that the decision was final. We were given no explanation about why that decision had been taken and told that it was irreversible, I did say that if it was the money we would be prepared to pay an even higher rent, but was told in what I took to be a joke said in very poor taste, that this was irrelevant to their decision, unless we could raise at least £100,000 rent per meeting in the future and pay them £2.5 million for holding a 25 race season in the stadium.

What we found out later from three other organisations that rented other parts of the stadium was that they had also been given notice to quit the stadium. The first was a local haulage firm that paid the stadium to use parts of the stadium car park, particularly overnight to park part of their fleet of vehicles. The second was a motorcycle training school who used the car park during the day, to off road train motorcyclists to pass their driving tests and the third was the ending of the Bookmaker's Afternoon Greyhound Services Ltd daytime greyhound meetings. So in a very short period of time the new owners of the GRA had substantially reduced both the activities and commercial income coming into the stadium, which was then followed by a period of closing down and boarding up, bit by bit the facilities of the



stadium accompanied with claims that various activities in the stadium were no longer commercially viable. (Look familiar from a Coventry perspective?).

It is true that during the run down period of the stadium before complete demolition, that the Stock Cars were allowed to continue while the speedway was not, but in my view this was because the BSPA require speedways to have a lease or ownership of the tracks at which they operate to try to avoid mid-season closures as far as possible. The Stock Car Company at Plough Lane had no lease with the stadium as they ran single events on a week to week basis and so the GRA could end their activity with just a week or a months notice with no further liability to the Stock Car Company.

Closing down stadiums is not an easy business, but when you look at the millions these sites can realise from housing developments it is not surprising that the developers are prepared to play a long game and create over a number of years so that the local planning authorities are faced with either new housing developments for which there is a need or derelict stadiums that blight the landscape. It is a shame that the developers are allowed to get away with destroying sites like Coventry and Wimbledon as they are irreplaceable and once gone are gone for ever .

Best of luck with your attempts to keep Brandon Stadium from going the same way as Wimbledon and all the others that have already been destroyed.

Kind regards

Ian