

CORE DOCUMENT LIST



DATE	REV 21 – 15 January 2024
SITE	COVENTRY STADIUM, RUGBY ROAD, COVENTRY, CV8 3GP
APPEAL REF	APP/E3715/W/23/3322013

CORE DOCUMENTS SUMMARY	
CD01	ORIGINAL APPLICATION SUBMISSION (2018)
CD02	REVISED APPLICATION PLANS AND DOCUMENTS (2021)
CD03	NEW PLANS AND DOCUMENTS SUBMITTED WITH THE APPEAL
CD04	LISTS OF PLANS AND DOCUMENTS
CD05	LPA DECISION NOTICE (R18/0186) 16 TH NOVEMBER 2022
CD06	LPA OFFICER'S REPORT (R18/0186) 27 TH OCTOBER 2022
CD07	PLANNING INSPECTORATE EIA SCREENING OPINION 24 TH JULY 2023
CD08	RELEVANT PLANNING POLICY DOCUMENTS AND GUIDANCE
CD09	STATUTORY CONSULTEE RESPONSES RECEIVED
CD10	OTHER CONSULTATION RESPONSES RECEIVED
CD11	APPELLANT'S STATEMENT OF CASE
CD12	COUNCIL'S STATEMENT OF CASE
CD13	RULE 6 STATEMENT OF CASE AND SUPPORTING DOCUMENTS
CD14	STATEMENTS OF COMMON GROUND
CD15	OTHER RELEVANT DOCUMENTS
CD16	PROOFS OF EVIDENCE
CD17	SECTION 106
CD18	DOCUMENTS SUBMITTED DURING THE INQUIRY

Key	
	Denotes plans and documents that have been superseded

CORE DOCUMENT REFERENCE	PLAN/ DOCUMENT TITLE	PLAN/ DOCUMENT REFERENCE	AUTHOR
CD01 - ORIGINAL APPLICATION SUBMISSION (2018)			
1.1	Application Form	Dated 12 th February 2018	Framptons
1.2	Site Boundary Plan	9000 Rev B	Barton Willmore
1.3	Constraints and Opportunities Plan	9101 Rev. D	Barton Willmore
1.4	Illustrative Masterplan	9401 Rev. C	Barton Willmore
1.5	Land Use Parameter Plan	9600 Rev. B	Barton Willmore
1.6	Building Heights Parameter Plan	9601 Rev. C	Barton Willmore

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1.7	Comparative Coverage Plan	9901 Rev. B	Barton Willmore
1.8	Planning Statement	PF/9189 (January 2018)	Framptons
1.9	Design and Access Statement	Date 12.01.2018 Status Final Rev E	Barton Willmore
1.10	Statement of Community Involvement	PF/9189 (January 2018)	Framptons
1.11	Sustainability and Energy Statement	INVZ3001 (December 2017)	Turley
1.12	Landscape and Visual Assessment	Date 10.01.2018 Status Final Rev C	Barton Willmore
1.13	Noise Assessment	AC103800-1R1	REC
1.14	Ecological Appraisal	2014-03(08) Rev A	Eco Location
1.15	Reptile Survey Report	2014-03(08) Rev A (13th October 2017)	Eco Location
1.16	Bat Report	2014-03(08) Rev B 13 th October 2017	Eco Location
1.17	Bat Hibernation Check	2014-03(08) (30th September 2016)	Eco Location
1.18	Biodiversity Impact Assessment calculation	2017-01(06) (5th October 2017)	Eco Location
1.19	Transport Assessment (inc Draft Travel Plan)	SP/TM 16115-01 (December 2017)	David Tucker Associates
1.20	Arboricultural Assessment	December 2017	FPCR
1.21	Archaeological Evaluation	December 2017	Headland Archaeology
1.22	Archaeological Desk Based Assessment	00200A	Archaeology Collective
1.23	Written Scheme of Investigation for a programme of archaeological work	V.02 20/09/2017	Headland Archaeology
1.24	Air Quality Assessment	AQ103803R3	REC
1.25	Site Investigation	C5887 (October 2014)	Sirlus
1.26	Flood Risk Assessment Part 1	INV109/FRA December 2017	ASC
1.27	Flood Risk Assessment Part 2	INV109/FRA December 2017	ASC
1.28	Foul Sewage & Utilities Assessment	INV109/FS&UA (October 2017)	ASC
1.29	Financial Assessment Non-Technical Summary	November 2017	Turley
1.30	Speedway and Stockcar Needs Assessment	PF/9189	Framptons
1.31	Coventry Stox Programme	November 2017	Coventry Stox
CD02 –REVISED APPLICATION PLANS AND DOCUMENTS (2021)			
2.1	Illustrative Landscape Masterplan	27510 001 I	Barton Willmore

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2.2	Site Layout	343A08 101 G	Malcom Payne Group
2.3	Road Hierarchy Plan	343A08_102	Malcom Payne Group
2.4	Highways Adoptability Plan	343A08_103	Malcom Payne Group
2.5	Area of Development Plan	343A08_104	Malcom Payne Group
2.6	3G Sports Pitch & Car Park Landscape Concept	27510 BL_L_SK-003 E	Barton Wilmore
2.7	Illustrative Landscape Masterplan	27510 001 K	Barton Wilmore
2.8	Combined House Types	343A08_000	Malcom Payne Group
2.9	Site Layout	343A08_101_C	Malcom Payne Group
2.10	Road Hierarchy Plan	343A08_102_B	Malcom Payne Group
2.11	Highways Adoptability Plan	343A08_103_B	Malcom Payne Group
2.12	Area of Development Plan	343A08_104_B	Malcom Payne Group
2.13	Barwick-Brick	343A08_110	Malcom Payne Group
2.14	Beaufort-Brick	343A08_111	Malcom Payne Group
2.15	Beaufort-Render	343A08_112	Malcom Payne Group
2.16	Carlton-Brick	343A08_113	Malcom Payne Group
2.17	Carlton-Render	343A08_114	Malcom Payne Group
2.18	Cofton-Brick	343A08_115	Malcom Payne Group
2.19	Cofton-Render	343A08_116	Malcom Payne Group
2.20	Crawford-Brick	343A08_117_A	Malcom Payne Group
2.21	Crawford-Render	343A08_118_A	Malcom Payne Group
2.22	Freemont-Brick	343A08_119	Malcom Payne Group
2.23	Freemont-Render	343A08_120	Malcom Payne Group
2.24	Montague-Brick	343A08_121	Malcom Payne Group
2.25	Montague-Render	343A08_122	Malcom Payne Group

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2.26	Olton-Brick	343A08_123	Malcom Payne Group
2.27	Olton-Render	343A08_124	Malcom Payne Group
2.28	Ravenhurst-Brick	343A08_125	Malcom Payne Group
2.29	Ravenhurst-Render	343A08_126	Malcom Payne Group
2.30	Tansley-Brick	343A08_127	Malcom Payne Group
2.31	Tansley-Render	343A08_128	Malcom Payne Group
2.32	Garage-Brick	343A08_129	Malcom Payne Group
2.33	Streetscenes	343A08_140	Malcom Payne Group
2.34	Character Area Elevations	343A08_141	Malcom Payne Group
2.35	3G Sports Pitch & Car Park Landscape Concept	BR-L-SK003 Rev H	Barton Willmore
2.36	Revised Application Forms and Certificate	12/07/2021	DPP
2.37	Design and Access Statement	27510 DAS (July 2021) 05 Final LR	Barton Willmore
2.38	Landscape and Visual Assessment	27510 LVIA A03 Date 07.07.2021	Barton Willmore
2.39	Bat Report	2020-01(08) 2 nd July 2021	Eco Location
2.40	Biodiversity Impact Assessment Calculator	2020-01(08) 27 th June 2022	Eco Location
2.41	Biodiversity Impact Assessment Calculator	22 nd August 2022 916BIA_rev1_	Eco Location
2.42	Great Crested Newt Survey Letter	2020-01(08) 1 st July 2022	Eco Location
2.43	BIA Habitat Sketch	916	Eco Location
2.44	Reptile Assessment	2020-01(08) Rev B 9 th October 2020	Eco Location
2.45	Ecological Appraisal	2020-01(08) Rev A 5 th July 2021	Eco Location
2.46	Addendum to Ecological Impact Assessment	2020-01(08) 21.10.2021	Eco Location
2.47	Designer's Response to Stage 1 RSA of Proposed Internal Site Layout	16115-13	
2.48	Tree Survey	8135 AA_B	FPCR
2.49	Tree Survey and AIA	8135AA (July 2021)	FPCR
2.50	Transport Assessment Addendum	SP/TM 16115-12 (July 2021)	David Tucker Associates
2.51	Flood Risk Assessment	INV109/2021/FRA	ASC

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2.52	Foul Sewage & Utilities Assessment	INV109/FS&UA (October 2017)	ASC
2.53	Surface Water Drainage Strategy Plan	INV109/101/P	ASC
2.54	Planning Statement	R001	DPP
2.55	Letter of Support	595572	Sky Blues in the Community
2.56	Noise Assessment Addendum	AC107085-1r0 (1 st July 2021)	REC
2.57	Viability Assessment	July 2021	Turley
2.58	Speedway Viability Appraisal	December 2020	KKP
2.59	3G Artificial Grass Pitch Feasibility Study	May 2021	KKP
2.60	Viability Addendum Letter - Coventry Stadium, Brandon	(February 2022)	CBRE
Additional Revised Plans			
2.61	Road Hierarchy Plan	343A08_102 Rev E	Malcom Payne Group
2.62	Highways Adoptability Plan	343A08_103 Rev E	Malcom Payne Group
2.63	Area of Development Plan	343A08_104 Rev E	Malcom Payne Group
2.64	3G Sports Pitch & Car Park Landscape Concept	27510 BL_L_SK-003 Rev H	Barton Wilmore
2.65	Olton-Brick	343A08_123B	Malcom Payne Group
2.66	Olton-Render	343A08_124B	Malcom Payne Group
2.67	Ravenhurst-Brick	343A08_125B	Malcom Payne Group
2.68	Ravenhurst-Render	343A08_126B	Malcom Payne Group
2.69	Tansley-Brick	343A08_127B	Malcom Payne Group
2.70	Tansley-Render	343A08_128B	Malcom Payne Group
2.71	Streetscenes	343A08_140A	Malcom Payne Group
2.72	Character Area Elevations	343A08_141A	Malcom Payne Group
2.73	Freemont-Brick	343A08_119B	Malcom Payne Group
2.74	Freemont-Render	343A08_120B	Malcom Payne Group

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CD03 – NEW PLANS AND DOCUMENTS SUBMITTED WITH THE APPEAL			
3.1	3G Feasibility Study	July 2023	KKP
3.2	Speedway Viability Review	April 2023	KKP
3.3	Metric 4.0 Calculation Tool	916 1145	Eco Location
3.4	Biodiversity Impact Assessment	2020-01(08) 2 nd May 2023	Eco Location
3.5	Brandon Landscape Scheme	1145 Rev 0	Eco location
3.6	Economic Benefits Statement	/	/
3.7	Coventry Stadium Infographic	LF66288-01	Lichfields
3.8	Coventry Stadium Infographic Calculations	EBI[2]	Lichfields
CD04 – LISTS OF PLANS AND DOCUMENTS			
4.1	List of all plans and documents submitted with the original application		
4.2	List of all plans and documents which did not form part of the original application		
4.3	List of all plans and documents upon which the LPA made its decision		
4.4	List of all plans and documents not previously seen by the LPA		
CD05 – LPA DECISION NOTICE (R18/0186) DATED 16TH NOVEMBER 2022			
CD06 – LPA OFFICER’S REPORT (R18/0186) DATED 27TH OCTOBER 2022			
CD07 – PLANNING INSPECTORATE EIA SCREENING OPINION DATED 24TH JULY 2023			
CD08 – RELEVANT PLANNING POLICY DOCUMENTS, EVIDENCE BASE AND GUIDANCE			
8.1	NPPF July 2021	NPPF 2021	Ministry of Housing, Communities and Local Government
8.2	Rugby Council Local Plan	Adopted June 2019	RBC
8.3	Brandon and Bretford Neighbourhood Plan	Adopted January 2019	RBC
8.4	Updated Assessment of Housing Need: Coventry – Warwickshire HMA, September 2015	September 2015	WDC
8.5	Housing Land Supply Position Statement (2022-27)	Housing_Land_Supply_Statement_2022_2027	RBC
8.6	Landscape Assessment of the Borough of Rugby – Sensitivity and Condition Study (2006)	April 2006	WCC
8.7	WCC Landscape Sensitivity Study (2016)	May 2016	WCC

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8.8	RBC Strategic Housing Land Availability Assessment (SHLAA)	December 2015	RBC
8.9	WDC Joint Green Belt Study	June 2015	WDC
8.10	Strategic Housing Land Availability Assessment (SHLAA) Appendices	a) SHLAA_Appendix_5___Site_Conclusions_part_1 b) SHLAA_Appendix_6___SHLAA_RAG_Assessment c) SHLAA_Appendix_7___Excluded_Sites_Table___Suitability_and_Availability	RBC
8.11	Rugby Borough Council, Authority Monitoring Report 2021-2022	Authority_Monitoring_Report_2021_2022	RBC
8.12	National Planning Policy Framework, including superseded versions from 2012 onwards	NPPF 2012	Communities and Local Government
8.13	Open Space, Playing Pitch and Sports Facilities Study 2015 – Part 3 Playing Pitch Strategy.	November 2015.	RBC/Nortoft
8.14	Town and Country Planning Act 1990	/	N/A
8.15	The Town and Country Planning (General Permitted Development) (England) Order 2015	2015 No. 596	N/A
8.16	National Planning Practice Guidance (NPPG)	https://www.gov.uk/government/collections/planning-practice-guidance	N/A
8.17	Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA)	November 2022	Iceni
CD09 – STATUTORY CONSULTEE RESPONSES RECEIVED			
9.1	Highways Response	21.03.18	N/A
9.2	Highways Response	27.06.2018	N/A
9.3	Highways Response	18.10.2018	N/A
9.4	Highways Response	5.08.21	N/A
9.5	Highways Response	18.01.22	N/A
9.6	Highways Response – RSA Review	12.07.2022	N/A
9.7	Highways Final Response	12.09.2022	N/A
9.8	LLFA	27.02.18	N/A

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9.9	LLFA	3.08.21	N/A
9.10	LLFA	6.06.22	N/A
9.11	Natural England Response	19.02.18	N/A
9.12	Natural England	August 2021	N/A
9.13	Severn Trent Response	6.04.18	N/A
9.14	Environment Agency	26.02.18	N/A
9.15	Environment Agency	26.07.2021	N/A
9.16	Archaeology	13.08.20	N/A
9.17	Archaeology	01.03.2018	N/A
9.18	CCG Health Response	20.10.22	N/A
9.19	Ecology Response	27.08.21	N/A
9.20	Ecology Response	1.03.22	N/A
9.21	Ecology Response	28.07.22	N/A
9.22	Ecology Response	06.03.2018	N/A
9.23	Housing Response	26.02.18	N/A
9.24	Housing Response	August 2021	N/A
9.25	Landscape and Arboricultural Response	27.02.18	N/A
9.26	Policy Response	3.12.21	N/A
9.27	Landscape and Arboricultural Response	06.08.21	N/A
9.28	Landscape and Arboricultural Response	12.08.21	N/A
9.29	Landscape and Arboricultural Response	12.10.21	N/A
9.30	Warwickshire Police	July 2021	N/A
9.31	Sport England	20.10.22	N/A
9.32	Sport England	August 2021	N/A
9.33	Sport England	27.04.18	N/A
9.34	Sports England	05.02.2018	N/A
9.35	Warwickshire Wildlife Trust Response	13.02.18	N/A
9.36	Warwickshire Fire and Rescue Authority	22.03.18	N/A
9.37	Warwickshire Fire and Rescue Authority	27.07.21	N/A
9.38	WCC Public Rights of Way (and attachments)	1 March 2018	N/A
9.39	WCC Public Rights of Way	August 2021	N/A
9.40	Binley Woods Parish Council	18.02.2018	N/A
9.41	Binley Woods Parish Council	31.07.2021	N/A

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9.42	Brandon and Bretford Parish Council (and attachment)	February 2018	N/A
9.43	Wolston Parish Council	06.08.2021	N/A
9.44	Wolston Parish Council	05.03.2018	N/A
9.45	Environmental Health	19.10.22	N/A
9.46	Environmental Health	March 2018	N/A
CD10 – OTHER CONSULTATION RESPONSES			
10.1	Auto-Cycle Union (ACU)	10.08.2021	N/A
10.2	The British Stock Car Association (BriSCA) and Oval Racing Council (ORCi)	11.12.2018	N/A
10.3	The British Stock Car Association (BriSCA) and Oval Racing Council (ORCi)	10.08.2021	N/A
10.4	British Stock Car Association, BriSCA F1	05.02.2018	N/A
10.5	Sky Blues in the Community	29.07.2021	N/A
10.6	British Speedway Promoters Association	14.12.2018	N/A
10.7	British Speedway Promoters Ltd	06.08.2021	N/A
10.8	British Stock Car Drivers Association	11.08.2021	N/A
10.9	British Stock Car Drivers Association (Formula One)	17.02.2018	N/A
10.10	British Stock Car Drivers Association	12.12.2018	N/A
10.11	Speedway Control Bureau	26.02.2018	N/A
10.12	Speedway Control Bureau	09.08.2021	N/A
10.13	Wolston Leisure and Community Centre Response	10.08.2021	N/A
10.14	Save Coventry Speedway and Stox Campaign Group	13.12.2018	N/A
10.15	Save Coventry Speedway and Stox Campaign Group	10.12.2018	N/A
10.16	Save Coventry Speedway and Stox Campaign Group Briefing Papers to Planning Committee	October 2022	N/A
10.17	Save Coventry Speedway and Stox Campaign Group response to planning notice of 23rd Sept 2022	/	N/A

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10.18	Save Coventry Speedway and Stox Campaign Group Summary of Errors and Untruths	09.01.2019	N/A
10.19	Save Coventry Speedway and Stox Campaign Group 2018 Objection	/	N/A
10.20	Save Coventry Speedway & Stox Response August 2021	Save Coventry Speedway & Stox Response	SCS and Stox
CD11 – APPELLANT’S STATEMENT OF CASE			
CD12 – COUNCIL’S STATEMENT OF CASE			
12.1	RBC Questionnaire	31/05/2023	RBC
CD13 – RULE 6 STATEMENT OF CASE AND SUPPORTING DOCUMENTS			
CD14 – STATEMENTS OF COMMON GROUND			
14.1	Appellant RBC SoCG	SoCG0001.3992CA/V4	RBC/DPP
14.2	Appellant SCS SoCG	SoCG0001.3992CA/V1	SCS/DPP
14.3	Updated Condition 5		RBC
14.4	Updated Schedule of Conditions	13.10.2023	RBC/DPP
CD15 – OTHER RELEVANT DOCUMENTS			
15.1 Sport Related Documents			
15.1.1	FA’s National Football Facilities Strategy (2018-28)	May 2018	FA
15.1.2	Coventry Stadium Brandon – Independent Review	September 2019	WYG
15.1.3	Letter to RBC from Framptons regarding alternative provision for sports use	LS/mb/PF/9189	Framptons
15.1.4	Sport England Assessing Needs and Opportunities Guide (ANOG)	July 2014	Sport England
15.1.5	Oxford Stadium Statement	25.07.2023	Oxford Stadium
15.1.6	Transcript of Matt Ford Video	27.06.2023	N/A
15.1.7	Thurrock Council Resolution - 25 th January 2023 Council – Motion 3 Minutes	25.01.2023	Thurrock Council
15.1.8	SCS&S Campaign Group Response to WYG Independent Review	29.10.2019	SCS&S
15.2 Rugby Borough Council Documents			
15.2.1	Rugby Housing Strategy (2022 to 2024)	March 2022	RBC

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15.2.2	Rugby Borough Council Corporate Strategy (2021 to 2024)	/	RBC
15.2.3	Housing Needs Supplementary Planning Document	2021	RBC
15.2.4	RBC Landscape Sensitivity Study	2016	RBC
15.3 Rugby Local Plan Examination			
15.3.1	Letter from the Inspector Mr M Hayden following the Local Plan Stage 2 Hearings	INS13_Letter_from_the_Inspector_to_the_Council_following_the_stage_two_hearings	Mike Hayden (Inspector)
15.3.2	Representations by the Save Brandon Stadium Campaign Group on the Draft Main Modifications to the Rugby Local Plan	MM Representations Final	Save Brandon Stadium Campaign Group
15.3.3	Rugby Borough Local Plan, Inspectors Report	PINS/E3715/429/5	Mike Hayden (Inspector)
15.3.4	Binley Woods Village Boundary Amendment.	LP_02.11_Binley_Woods_Changes_	RBC
15.3.5	Save Brandon Stadium Supporters Group – Representations to the RBC Publication Draft Local Plan	Rugby Local Plan Representation 18-02-16	SCS
15.3.6	Save Brandon Stadium Supporters Group – Representations to the RBC Publication Draft Local Plan - Accompanying Letter	Rugby Local Plan Representation 31-10-16	SCS
15.3.7	Save Brandon Stadium Supporters Group – Representations to the RBC Emerging Local Plan - The Preferred Option	Rugby Local Plan Reps 31-10-16	SCS
15.4 Neighbourhood Plan Documents			
15.4.1	Brandon And Bretford Neighbourhood Development Plan Brandon And Bretford Neighbourhood Development Plan To 2031, Submission To Parish Council	Brandon_and_Bretford_Neighbourhood_Development_Plan__March_2018_	RBC

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15.4.2	Examiners Report to the Brandon and Bretford Neighbourhood Plan	Report_of_the_Independent_Examination 20th December 2018	Andrew Matheson (Independent Examiner)
15.5 Other Documents			
15.5.1	Brandon Hall Hotel Public Exhibition Display Boards	Framptons Display Boards October 2017	Framptons
15.5.2	Alternative Display Boards at a parallel exhibition	SCS Brandon Hall Exhibition Boards 2017	SCS and Stox
15.5.3	Response to the Needs Assessment Document submitted by Louise Steele of Framptons (on behalf of Brandon Estates).	6.11.2018	SCS and Stox
15.5.4	Note of Save Brandon Stadium Public Meeting	23.07.15	SCS
15.5.5	Attendance at Save Brandon Public Meeting	Attendance 23.07.15	N/A
15.5.6	Note of Save Coventry Speedway Public Meeting	Save Coventry Speedway 26 May 2016 Note of Meeting	SCS
15.5.7	Emails from Framptons declining invitations from the Campaign Group to attend public meetings	/	N/A
15.5.8	Presentation made to Public Meeting	Public Meeting 6th November 2018 Final Version	SCS
15.5.9	Letter from SCS Campaign to Councillor Stokes	30.07.15	SCS
15.5.10	Latter from SCS Campaign to Councillor Stokes	31.08.15	SCS
15.5.11	Email exchange with Rob Black at RBC regarding potential planning application to be submitted at Brandon Stadium	/	SCS
15.5.12	Expressions of Business Support for restoration of Brandon Stadium	Business Support	N/A
15.5.13	Register Of Tradesmen / Women Who Have Volunteered To Give Their Time And Skills To Rebuild Brandon Stadium	Tradesmen and Women Register	N/A
15.5.14	Email exchange between Warren Hunter and Jon Burgwin/ John Downer (Investin/ Brandon Estates	Email exchange proof of offer - redacted	N/A

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	showing proof of offer to purchase Brandon Stadium, Proof of offer to buy Brandon Stadium and response		
15.5.15	Notes Related to Meeting Between Brandon Estates and SCS Campaign Group	Feedback to Rugby Council re Meeting of 12th March 2020 Final version	N/A
15.5.16	Bus Timetable	/	N/A
15.5.17	Mitchell v Secretary of State for the Environment and Another, (1995) 69 P&CR 60	/	N/A
15.5.18	CC Construction Limited v Secretary for the Environment and Carrick District Council, (1995) 69 P&CR 51	/	N/A
15.5.19	R v Tower of Hamlets CC	/	N/A
15.5.20	Laying the Foundations: A Housing Strategy for England	November 2011	HM Government
15.5.21	Housing White Paper: Fixing our Broken Housing Market	2017	Department for Communities and Local Government
15.5.22	House of Commons Debate	October 2013	N/A
15.5.23	Building the Homes We Need	April 2014	KPMG
15.5.24	Former Secretary of State for Housing, Communities and Local Government Speech to Local Government Association Conference	July 2017	N/A
15.5.25	Former Prime Minister's Speech	15 November 2017	N/A
15.5.26	Former Secretary of State for Housing, Communities and Local Government Speech on the Housing Market	16 November 2017	N/A
15.5.27	NHF – People in Housing Need	September 2020	National Housing Federation

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15.5.28	Coming Home – Tackling the Housing Crisis Together	February 2021	N/A
15.5.29	The Centre for Social Justice: Exposing the Hidden Housing Crisis	November 2021	CSJ
15.5.30	Falling Short: Housing Benefit and the Rising Cost of Renting in England	June 2023	Crisis/ Zoopla
15.5.31	Secretary of State for Levelling Up, Housing and Communities’ Speech to the Local Government Association Annual Conference	4 July 2023	N/A
15.5.32	“Bleak Houses: Tackling the Crisis of Family Homelessness in England”	August 2019	Children’s Commissioner
15.5.33	“Denied the Right to a Safe Home – Exposing the Housing Emergency”	May 2021	Shelter
15.5.34	“Unlocking Social Housing: How to fix the rules that are holding back building”	April 2022	Shelter
15.5.35	Appeal – Land to the west of Langton Road, Norton	July 2016	The Planning Inspectorate
15.5.36	Appeal – Land off Aviation Lane, Burton-upon-Trent	October 2020	The Planning Inspectorate
15.5.37	Appeal Decision: Roundhouse Farm, Land off Bullens Green Lane, Colney Heath	June 2021	The Planning Inspectorate
15.5.38	Appeal Decision: Land at Maitland Lodge, Southend Road, Billericay	November 2022	The Planning Inspectorate
15.5.39	Appeal Decision: Land North of Kennel Lane, Billericay	December 2022	The Planning Inspectorate
15.5.40	Appeal Decision: Land between Lodge Lane and Burtons Lane, Little Chalfont, Buckinghamshire	March 2023	The Planning Inspectorate
15.5.41	Secretary of State Decision: Pulley Lane, Droitwich Spa	July 2014	Department for Communities and Local Government

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15.5.42	Appeal Decision: Land east of Park Lane, Coalpit Heath, South Gloucestershire	September 2018	The Planning Inspectorate
15.5.43	Appeal Decision: Oxford Brookes University, Wheatley Campus	April 2020	Ministry of Housing, Communities and Local Government
15.5.44	Appeal Scheme Site Appraisal Photos (ASAP)	00212 LN-LP	N/A
15.5.45	Appeal Site Context Photographs (ASCP)	00212 LN-LP	N/A
15.5.46	National Landscape Character – NCA 96: Dunsmore and Feldon (2013)	/	Natural England
15.5.47	Warwickshire Landscape Guidelines	1993	Warwickshire County Council/ Countryside Commission
15.5.48	Landscape Assessment of the Borough of Rugby – Sensitivity and Condition Study	April 2006	Warwickshire County Council
15.5.49	Executive Costing Report		N/A
15.5.50	Brandon Stadium – Estimated Redevelopment and Start Up Capital Costs	230820 Estimated Redevelopment and Start Up Capital Costs	N/A
15.5.51	Brandon Speedway Proposed Plan – Option 1	02-100_Brandon Speedway Proposed Plan - Option 1	FDG
15.5.52	Brandon Speedway Proposed Plan – Option 2	02-101_Brandon Speedway Proposed Plan - Option 2	FDG
15.5.53	Brandon Speedway Proposed Plan – Option 3	02-102_Brandon Speedway Proposed Plan - Option 3	FDG
15.5.54	Brandon Speedway Proposed Plan – Option 4	02-103_Brandon Speedway Proposed Plan - Option 4	FDG
15.5.55	Brandon Speedway Proposed Plan – Option 5	02-104_Brandon Speedway Proposed Plan - Option 5	FDG
15.5.56	Speedway Operations Data	230606-Ref 15.5.56 - Speedway Operations Data - Revenues	N/A
15.5.57	Speedway national operating profit and loss data	230820-5.57 Speedway notional operating profit and loss data	N/A
15.5.58	R (University Hospitals of Leicester NHS Trust) v Harborough District Council EWHC 263	/	/

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15.5.59	R (Worcs Acute Hosp NHST) v MHDC & ors [2023] EWHC 1995	/	/
CD16 – PROOFS OF EVIDENCE			
16.1 Rugby Borough Council			
16.1.1	Proof of Evidence of Gary Stephen’s MRTPI on Behalf of Rugby Brough Council	Planning Evidence	RBC
16.1.2	Proof of Evidence of Neil Allen, Direct, Sports Planning Consultants	Sporting Evidence	RBC
16.1.3	Summary Proof of Evidence of Neil Allen, Direct, Sports Planning Consultants	Sporting Evidence	RBC
16.2 Rule 6 Party – Save Coventry Speedway and Stox Campaign Group			
16.2.1	Proof of Evidence – Planning by David Carter	Planning Evidence	SCS&S
16.2.2	Proof of Evidence – Green Belt by David Carter	Green Belt	SCS&S
16.2.3	Proof of Evidence – Sports Issues by David Carter	Sports Issues	SCS&S
16.2.4	William Warren Hunter Proof	Prospective Site Purchaser	/
16.2.5	Cecil Matthew Ford Proof	Speedway Promotion	/
16.2.6	David Carter Rebuttal of Appellant Planning Proof of Evidence (Gareth Hooper)		SCS&S
16.2.7	David Carter Rebuttal of Appellant Affordable Housing Proof of Evidence (James Stacey)		SCS&S
16.2.8	David Carter Rebuttal of Landscape, Visual and Green Belt Proof of Evidence (Matthew Chard)		SCS&S
16.2.9	William Warren Hunter Rebuttal		/
16.2.10	Cecil Matthew Ford Rebuttal		/
16.2.11	David Carter Rebuttal of Clarke A Osborne Proof of Evidence		SCS&S
16.3 Appellant			
16.3.1	Gareth Hooper (Planning)	POE0001	DPP
16.3.2	Clarke Osbourne (Speedway – Commercial)	230822-R003	Gaming International

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16.3.3	James Stacey (Affordable Housing)	M23/0310-01.RPT	Tetlow King
16.3.4	John Eady (3G Feasibility)	/	KKP
16.3.5	Matthew Chard (Landscape, Visual and Greenbelt matters)	333100212/A5/PoELVGB	Stantec
16.3.6	Rebuttal Affordable Housing Proof of Evidence of James Stacey	/	Tetlow King
16.4 National Sporting Bodies			
16.4.1	Statement of Steven Rees on behalf of the Governing Bodies of UK Stock Car Racing	/	/
16.4.2	Philip Morris Proof of Evidence	Chief Executive Officer of the British Speedway Premiership	/
16.4.3	Appendix PM1 to CD16.4.2	/	/
CD17 – SECTION 106			
17.1	Draft Section 106 Agreement	/	/
17.2	WCC CIL Compliance Statement	/	WCC
17.3	RBC CIL Compliance Statement	/	RBC
CD18 – DOCUMENTS SUBMITTED DURING THE INQUIRY			
18.1	Appellant Opening Submissions	/	APPELLANT
18.2	RBC Opening Submissions	/	RBC
18.3	SCS (Rule 6) Opening Submissions	/	SCS&S
18.4	SCS Planning Application Link (R22/0071)	/	/
18.5	RBC Affordable Housing Statement	September 2023	RBC
18.6	Witness Statement of Daniel Gilks (NHS UHCW)	/	/
18.7	NHS UHCW Contribution Spreadsheet	/	/
18.8	NHS Speaking Note	/	/
18.9	Mark Sexton Thurrock Hammers Proof of Evidence 24 Sept 2023	/	/
18.10	Appendix MS1 to CD18.9	/	/
18.11	The FA Guide to 3G Football Turf Pitch Design Principles and Layouts	/	/

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18.12	Timeline of the Local Plan and Brandon and Bretford Neighbourhood Plan	/	/
18.13	RBC Updated Evidence Statement – 5 October 2023	/	RBC
18.14	Witness Statement of Ella Casey MRTPI on behalf of Rugby Borough Council	6 November 2023	RBC
18.15	Planning Obligation Legal Submission on behalf of the Local Planning Authority	20 November 2023	RBC
18.16	Second Witness Statement of Daniel Gilks	/	/
18.17	Legal Submissions on behalf of University Hospitals and Warwickshire NHS Trust	/	/
18.18	Spring Lane – Appeal Decision (APP/T3725/A/14/2221858)	10 March 2015	/
18.19	Developers’ Guide to Contributions for Education and Early Years Provision - Warwickshire	/	/
18.20	Appellant Response to Questions at Inquiry	/	APPELLANT
18.21	SCS Distances to Football Clubs		SCS&S
18.22	3G Pitch Delivery Note	/	RBC
18.23	NHS Trust Closing Submissions	/	NHS Trust
18.24	Hallam Land Management v SoS & Eastleigh Borough Council	Attachment to 18.23	NHS Trust
18.25	NHS Population Growth Spreadsheet	Attachment to 18.23	NHS Trust
18.26	SCS Closing Submissions	/	SCS&S
18.27	LPA Closing Submissions	/	RBC
18.28	Appellant Closing Submissions	/	Appellant
18.29	LPA NPPF Note	/	RBC
18.30	Appellant NPPF Note	/	Appellant
18.31	SCS NPPF Note	/	SCS&S