

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



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**Landscape, Visual and Green Belt Matters by Matthew D  
Chard**

**Rebuttal Proof of Evidence**

**by David Carter**

**on behalf of:**

**SAVE COVENTRY SPEEDWAY & STOX  
CAMPAIGN GROUP**



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**by**

**David Carter BSc MSc MRTPI**

**on behalf of:**

**SAVE COVENTRY SPEEDWAY & STOX CAMPAIGN GROUP**

**Site Address:**

**COVENTRY STADIUM, RUGBY ROAD, COVENTRY CV8 3GP**

**Appeal Proposal:**

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

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

**Application Ref: R18/0186**

**Document Ref: SCS/R3 DC**

**Date: 5 September 2023**

**Web: [savecoventryspeedway.com](http://savecoventryspeedway.com)**

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**Proof of Evidence on Landscape, Visual and Green Belt Matters by Matthew D Chard**

**Rebuttal Proof of Evidence by David Carter**

1. There are a number of issues arising from Mr Chard's proof of evidence.
2. Mr Chard regards the whole site as previously developed land (PDL).
3. The appeal site is in two distinct parts, those areas contained within the security fencing that forms the core part of the stadium complex, including extensive pit areas to the north and south with a gravel surface. However, the majority of the site forms the main car park. This was subject to a much lower level of security and it was possible to walk onto the site. This part of the appeal site certainly includes parts that could not be described as Previously Developed Land (PDL), the most obvious being the swathe of woodland along the northern boundary. Some parts of the car park had been covered by loose stone to provide easier use for car parking at events held during inclement weather. Given the passage of time since the closure of the stadium, the car park area is naturally regenerating.
4. Mr Chard states that the appeal site is not in open countryside. The core area of the stadium clearly includes some substantial buildings and other 3D structures such as the terraces. However, it also includes open areas such as the speedway track, greyhound track and pit areas. The main car park, however, is open. The whole of the appeal site is defined in the development plan as part of the countryside within the defined rural area.
5. Notwithstanding the description of the whole or parts of the site as PDL or brownfield, the critical issue is the effect of the proposed development on the openness of Green Belt. This is a matter I cover in my main proof but there some points about site coverage, the footprint and height of buildings and the perception of the impact on openness, where considerable differences in views are apparent. There are also significant differences in view in respect of the relationship to the settlement pattern.
6. At Para 6.3.5, Mr Chard states that he does not consider the site to be open in the context of NPPF para 149(g) but then goes on in para 7.4.4 to state that the appeal scheme would improve the sense of openness. It is difficult to see how both points can co-exist.
7. Para 7.4.6 suggests there will be a reduction in the developable area, whereas the appellants own evidence recognises that the area covered by new development would exceed the existing (See for example, Mr Hooper's Proof of Evidence, Table 6.1 which states that 5.495 ha of the appeal site will be open space implying the rest of the site would form the developed area).
8. Para 8.3.4 refers to the site coverage plan (included at p56 of Mr Chard's proof) but fails to recognise that analysis was prepared for the initial planning application, not its revision. The positioning of the proposed development has changed.
9. Para 8.3.6 is incorrect as the appeal scheme would result in an increase in the site coverage of built developed area, as well as an increase in the footprint of buildings. CD3.5 shows the footprint of the new housing and 3D pitch as 4.59 ha which exceeds the area of 4.35ha on p56 of Mr Chards proof.

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10. My assessment of the developed area of the stadium, in Figure 1 of my main proof, is that the coverage of the stadium, excluding the pit areas is 2.9 ha. I exclude the pit areas as these were areas used for the parking of race transporters and comprise open areas with a gravel surface. The area covered by the appeal proposal is shown by Figure 2 in my main proof which overlays the proposed site layout on my Figure 1. Around one-third of the new dwellings plus the 3G pitch and pavilion would be developed in the current main car parking area. Taken together these represent a very significant increase in site coverage.

11. It would also appear that the footprint of the new buildings (new dwellings, garages and the sports pavilion) would exceed that of the existing buildings within the stadium (grandstand, storage buildings, covered terrace and other buildings). The height of the grandstand and storage buildings exceed that of the proposed new dwellings, but the other existing buildings are lower in height.

12. Para 8.3.9 refers to the restricted visual openness of the site but, fails to recognise that views into and across the site will be opened-up through breaking the existing hedgerow and tree line along Rugby Road, including three mature Oaks. It is important to stress that the boundary features are seen as the most important contribution that the appeal site makes to the area known as Dunsmore Parklands.

13. I appreciate that in other respects it is possible to mitigate the impact of the appeal scheme, but in respect of this point, this is not possible. The effect of the new access will be to cut through the sensitive boundary. The inevitable result would be to create views of the new housing development and suburbanisation of the site. The new development would be easily visible to anyone travelling along Rugby Road, in both directions.

14. The importance of the boundaries to this part of the landscape is picked up by Mr Chard in his summary of the background documentation (in particular, sections 3.3 and 3.4), with specific characteristics appertaining to the appeal site being reproduced in para 3.3.5. These include:

- “• *Middle distance views enclosed by woodland edges.*
- *Belts of mature trees associated with estateland...*
- *Mature hedgerow and roadside oaks.*”

15. The extract from the SHLAA assessment quoted in Mr Chard's para 3.5.7 expressed states, “*The row of properties on the Rugby Road appears to be a standalone group and read as much a part of Binley Woods as Brandon. In order to retain this separation the mature trees along Rugby Road should be retained and strengthened and any development should be significantly set back from the Rugby Road.*” (My emphasis). In other words, the one specific recommendation regarding landscape protection has been set aside.

16. The 'opening up' of the site means the viewer would have much clearer sight of the new housing than would otherwise be the case. The landscape drawing (CD2.7) appears to underplay the likely extent and visual impact of the new opening. The new dwellings would be constructed considerably closer to the Rugby Road frontage than the existing stadium buildings. While the closest dwellings might be lower in height than the existing grandstand, their proximity will make them appear more visually intrusive, and prevent or reduce longer distance views over those parts of the site that remain free of buildings. With the current setting back of the stadium buildings, existing views into

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the site are consistent with its countryside location. The appeal proposal would lead to a marked change to the rural character and appearance of the area.

17. Para 8.3.13 mistakenly suggests that the proposed 3G pitch would form part of 6.79 ha of Green and Blue infrastructure. The artificial, fenced and floodlit 3G pitch could not be described as green infrastructure. This point conflicts again with Mr Hooper's evidence, referred to above.

18. This paragraph also suggests that significant areas would remain in the Green Belt, yet claims, that the long-term boundary of the site would be formed, for example, by its boundary with Speedway Lane. This is illogical for the reasons set out in my main proof.

19. At Para 9.1.4, Mr Chard suggests that the existing structures on the site lack in human interest. This comment is insensitive. It belies the fact that large numbers of people enjoyed events at the stadium over many decades and the overwhelming public response, including residents who live locally, object to the proposed housing redevelopment. The buildings might well be utilitarian in appearance but that does not determine their value or function.