Stoke Lodge Parkland – TVG Application – Applicants bundle				
Paginated Page Number Index				
	File 1			
Tab	<u>Description</u>	from	to	
0	Front Sheet(s)	1	1	
1	Contents List	2	2	
2	Covering letter	3	13	
3	Applicants submission dated 3 rd May 2016	14	73	
4	Applicants Statement of Case dated 3 rd May 2016	74	90	
	Name of Statement providers			
	NB this is not the order that we will call our witnesses. (TBA later)			
5	Nicholas Evans	91	101	
6	Peter Hobbs	102	109	
7	Reginald Korky Davey	110	117	
8	David Powles	118	126	
9	Colin O'Connor	127	134	
10	Graham Wright	135	144	
11	David Baker	145	152	
12	Alan Preece	153	162	
13	Jonathan Wyatt	163	172	
14	Andrew Shaw	173	180	
15	Martin Bennett	181	188	
16	Michael Shinner	189	197	
17	John Goulandris	198	206	
18	Stephanie French	207	214	
19	Malcolm Davies	215	223	
20	Sharon Parsons	224	233	
21	Gabrielle (Gay) Huggins	234	242	
22	Susan Mayer	243	255	
23	William Hayes	256	265	
24	Alexandra Macara	266	277	
25	Fiona Evans	278	288	
26	Stewart Mason	289	299	
27	Bryan McKenna	300	309	
28	Christopher Anderson	310	319	
29				
30				
31				

Stoke Lodge Parkland - TVG Application - Applicants bundle **Paginated Page Number Index** File 2 Tab **Description** from to **Front Sheet** Contents list of additional evidence 3rd May 2016 Save Stoke Lodge Parkland AGM 10th March 2016 – Chairman's Report **Save Stoke Lodge Parkland - Constitution** Summary of key clauses from the BCC Cabinet Briefing Note 20.04.10 Conveyance docs for purchase of Stoke Lodge by Bristol City Council Bristol City Council - sale of education and sports land Wellington Hill playing fields, Horfield, Bristol Bristol City Council - Green Spaces sell off 2012 Dept for Education - News Statement dated 8th August 2012 Education Act 1996 c56 section 543 clause 4A Cotham Academy Home site - Google plan Access to Natural Green Space Standards report 2008 Moorside fields, Lancaster, TVG Application recommendation Cotham Academy, Articles of Association Cotham Academy, Governor's Meeting Minutes dated February 2014 Cotham Academy, Governor's Meeting Minutes dated February 2015 An extract from the "the Bristolian" News magazine Photograph of the "sign" adjacent to the Adult Learning Centre Photograph of the "sign" at Kellaway Avenue playing fields lan Woodward e-mail re "sign" adjacent to the Adult Learning Centre Susan Comer witness statement on behalf of objectors dated 20.01.15 BCC new sign then and now 03.12.13 S Comer Report - History of Stoke Lodge Statement from Mr Bob Hoskins 01.08.13 **Statement from Tony Havens** Bristol City Council - Notice of TVG Application 27.07.11 Stoke Lodge Parkland – 3 off Tree Preservation Orders Ariel view of pitches and running track Cotham Anti-TVG Petition web page 06.12.15

Stoke Lodge Parkland - TVG Application - Applicants bundle **Paginated Page Number Index** File 3 Tab **Description** from to Front sheet **Contents list Covering letter Application Form 44** Statutory declaration plus Plans with notes of explanation Supplementary arguments in support of Section 15 qualifying criteria Locality / Neighbourhood map Justification Notice to landowner and other interested parties Save Stoke Lodge Parkland - Constitution Briefing Note to Bristol City Council Cabinet 22nd April 2010 **Biddulph Architects plans** Key clause from the Briefing Note that summarise true intent Stoke Bishop Open Forum minutes 25th August 2010 BCC Neighbourhood Partnership minutes 15th September 2010 Section 106Statement and letter of confirmation Photographs of Notices / Signs FAQ sheet issued by BCC CYPS officer Liz Peddle Area Green Spaces Plan + Bristol Parks Forum letter 26th July 2010 Survey of use in August 2010 Extract from Bristol City Council 2008 Ward Profile for Stoke Bishop **Extract from letters of objection to Bristol City Council** Petition undertaken by Spar General store Picnic attendees 22nd August 2010 Extract from Aston Gate Judgement – The legislative framework

Stoke Lodge Parkland - TVG Application - Applicants bundle **Paginated Page Number Index** File 4 Tab Name of Statement providers from to Front sheet(s) Macara, Sir Alexander Carter, Dr Sheila Barbara Alpass, T Henry Cockcroft Parsons, Sharon Elizabeth Shinner, Michael **Evans, Judith Margaret** Mason, Stewart William Preece, Sheila Margaret Powles, Mr D J and Mrs PR Preece, Alan William (Professor) Goss, AR Carter, Oonah Mary Hilyer, John David Richardson, Paul E C Hayes, William Parsons, Jennifer Parsons, John Richard Davies, Malcolm Worrall, Celia **Evans, Ewart Harold Lyle** Singleton, lan James Wright, Julie Grace Wright, Graham William Andlaw, R J Dr Barnes, Catherine Barnes, Andrew Nicholas, Morrison Hollyman, John Page, Gaynor Huggins, Gabrielle Rosalie Harris, Stacey Rose, Nicholas Henry

Fi Tab	Paginated Page Number Index ile 5 Name of Statement providers		
	-	from	to
0 Fro	ont sheet(s)	1	3
1 Dik	bb, Sarah	4	12
2 Ac	kland, James Bryant	13	19
3 Cro	ook, Lorna Louise	20	27
4 Nic	cholas, Graham	28	34
5 Ha	yes, Susan	35	41
6 Wi	ndows, Jeremy Fredrick Guy	42	49
7 Wr	right, Ann	50	56
8 Lev	vinson, Thomas G D	57	63
9 Jer	nkins, Christopher	64	70
10 Po	pe, Alfred George	71	77
11 Ric	chardson, Sally A	78	84
12 Sm	nith, Phillip	85	91
13 No	orth, Patricia	92	98
14 Ha	II, Richard	99	105
15 Ba	nsall, Irmgard K M	106	113
16 Bro	ooks, Michael	114	119
17 Els	son, Christopher John	120	127
18 Mc	Kenna, Bryan John	128	135
19 Mc	Kenna, Ben James	136	143
20 Co	ockerham, Polly-Anna	144	154
21 Po	wlesland, Rachel	155	163
22 Alp	pass, Mary	164	171
23 Ma	ayer, Susan Jane	172	180
24			
25			
26			
27			
28			
29			
30			
31			

Stoke Lodge Parkland – TVG Application – Applicants bundle					
	Paginated Page Number Index				
	File 6				
Tab	<u>Description</u>	from	to		
0	Front sheet(s)	1	2		
1	Contents list	3	3		
2	Covering letter for response # 1	4	6		
3	Response to Bristol City Council dated 30 th January 2012	7	31		
4	Response to Cotham School dated 30 th January 2012	32	38		
5	Response to Coombe Dingle Sports Centre dated 30 th January 2012	39	46		
6	Response to Rockleaze Rangers Football Club dated 30 th January 2012	47	53		
7	Minutes of BCC Neighbourhood Partnership mtg 15 th September 2010	54	65		
8	Additional Community Statements relating to access "as of right"	66	155		
9	Bristol City Council retained Policy L01	156	172		
10	4 th sign regarding access to the Parkland via the Adult Learning Centre	173	173		
11	Extract from R(Lewis) v Redcar and Cleveland Borough Council and others: High Court ruing:- (2008) EWHC 1813 (admin) paras 9-23	174	179		
12	Key clauses from Bristol City Council Briefing Note 22 nd April 2010	180	181		
13	Letter to Annie Hudson from Cllr Claire Campion-Smith, Executive member with Cabinet responsibility for CYPS (Education)	182	182		
14	Extract from Ashton TVG Application – Inspector's report	183	191		
15	Dog Fouling and the Law	192	203		
16	Plan of existing pitch layout	204	204		
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
		1			

<<10>>

Stoke Lodge Parkland – TVG Application – Applicants bundle					
	Paginated Page Number Index				
	File 7				
Tab	<u>Description</u>	from	to		
	Response to UoB – Coombe Dingle Sports Centre 31 st March 2012				
	response to GOB - Goombe Dingle Oports Gentre 91 March 2012				
0	Front sheet(s) and covering letter for response # 2	1	3		
1	Contents list	4	4		
2	Response # 2 dated 31 st March 2012	5	24		
3	Previous response to Bristol City Council dated 30 th January 2012	25	49		
4	Previous response to UoB–Coombe Dingle Sports Centre 30 th Jan 2012	50	57		
5	Photographs of access points to Stoke Lodge Parkland	58	62		
6	Application form 44, section 7, Justification	63	63		
7	Bristol City Council – Cabinet Briefing Note dated 22 nd April 2010	64	86		
8	Key clauses from the Bristol City Council Briefing Note 22 nd April 2010	87	87		
9	125 year lease between BCC and Cotham School 31st August 2011	88	128		
10	Minutes from Neighbourhood Partnership mtg 15 th September 2010	129	140		
11	The Clifton and Durdham Downs (Bristol) Act 1861	141	150		
12	Background to the Anglo Saxon "Ancient Mound" adj to Ebenezer Lane	151	152		
	Decrease to Decklose Decrease Freshall Olich 24 St March 2040				
	Response to Rockleaze Rangers Football Club 31 st March 2012				
0	Front sheet(s) and covering letter	153	155		
1	Contents list	156	156		
2	Response to Rockleaze Rangers FC dated 31 st March 2012	157	165		
3	Previous response to Rockleaze Rangers FC dated 30 th January 2012	166	172		
4	Pitch layout plan prepared by Bristol City Council	173	173		
5	Application form 44, section 7 - Justification	174	174		
6	Bristol City Council - Cabinet Briefing Note dated 22 nd April 2010	175	197		
7	Key clauses from the Bristol City Council Briefing Note 22 nd April 2010	198	198		
8	Application covering letter dated 4 th March 2011	199	201		
9	Application – Evidence item 5, iii) – Without permission, paragraph 3	202	202		
10	Extract from previous response to BCC paragraph 16	203	203		
11	Extract from previous response to UoB CDSC paragraphs 8 & 9	204	204		
<u> </u>					

<<11>>

Stoke Lodge Parkland – TVG Application – Applicants bundle					
	Paginated Page Number Index				
	File 8				
Tab	<u>Description</u>	from	to		
	Response # 3, dated 5 th October 2012				
0	Front sheet(s)	1	1		
1	Covering Letter	2	2		
2	Response to Bristol City Council dated 5 th October 2012	3	31		
	Response # 4, dated 31 st January 2013				
0	Front sheet(s) and covering letter	32	33		
1	Contents list	34	34		
2	Response to Bristol City Council dated 31 st January 2013	35	55		
3	Response to Mudford Road Report	56	123		
4	Applicant's Legal Statement	124	134		
	Response # 5, dated 31 st July 2013				
	Front sheet(s)	135	135		
	Response to Cotham Academy dated 22 nd July 2013	136	149		
	Response # 6, dated 26 th August 2013				
0	Front sheet(s)	150	150		
1	Response to Bristol City Council dated 26 th August 2013	151	177		
2	Clarification of SE Boundary	178	178		
3	Ordnance Survey Plan	179	179		
4	Red Line SE Boundary	180	180		
			-		
	Response # 7 dated 16 th December 2013				
0	Front sheet(s)	181	181		
1	Response to statement made by Mel Sperring	182	191		
2	Response to statement made by Ross Burnham	192	201		
3	Response to statement made by Simon Hinks	202	216		
4	Response to statement made by Bob Hoskins	217	230		

<<12>>

Stoke Lodge Parkland – TVG Application – Applicants bundle					
	Paginated Page Number Index				
	File 9				
Tab	<u>Description</u>	from	to		
	Response # 8, dated 15 th June 2015				
0a	Front sheet	1	1		
0b	Covering letter	2	2		
0c	Response dated 15 th June 2015 to Cotham object'n dated 28 th April 2015	3	32		
0d	Response dated 15 th June 2015 to Cotham object'n dated 4 th March 2015	33	63		
0e	Response dated 15 th June 2015 to BCC objection dated 28 th April 2015	64	98		
1	Newhaven Supreme Court Judgement dated 25th February 2015	99	147		
2	Extract from BCC Statistical Profile 2014	148	148		
3	DoE – Advice on the protection of school playing fields and public land	149	176		
4	Analysis of land marked out as pitches	177	177		
5	125 year lease between BCC and Cotham School 31st August 2011	178	218		
6	Cotham Academy, Child protection & safeguarding policy	219	228		
7	Cotham Academy, Health and Safety policy	229	262		
8	Charlotte Leslie MP letter dated 30 th July 2010	263	264		
	Response # 9 dated 10 th July 2015				
	Front sheet(s)	265	265		
	Response to Cotham Academy dated 10 th July 2015	266	272		
	Applicant's List of unresolved issues dated 28th January 2016				
	Front sheet(s)	273	273		
	List of Unresolved issues dated 28 th January 2015	274	277		
	•				

Paginated Page Number Index File 10	Stoke Lodge Parkland – TVG Application – Applicants bundle			
Tab Description From to		Paginated Page Number Index		
0 Front sheet(s) 1 1 1 Inspector's Draft Directions dated 20 th August 2012 2 8 2 Inspector's Directions dated 27 th November 2012 9 11 3 Inspector's Report (and recommendation) dated 22 nd May 2013 12 35 4 Inspector's Further Directions dated 11 th September 2013 36 41 5 Inspector's Further Directions dated 30 th January 2014 42 44 6 Inspector's Further Directions dated 26 th March 2014 45 45 7 Inspector's Further Directions dated 5 th November 2015 46 46 8 Inspector's Further Directions dated 3 th November 2015 54 56 11 Applicant's letter dated 17 th September 2012 57 58 12 Applicant's letter dated 48 th December 2012 59 59 13 Applicant's letter dated 12 th June 2013 60 63 14 Applicant's letter dated 12 th December 2015 68 68 15 Applicant's letter dated 18 th December 2015 69 69		File 10		
Inspector's Draft Directions dated 20 th August 2012 Inspector's Directions dated 27 th November 2012 Inspector's Report (and recommendation) dated 22 nd May 2013 Inspector's Further Directions dated 11 th September 2013 Inspector's Further Directions dated 30 th January 2014 Inspector's Further Directions dated 26 th March 2014 Inspector's Further Directions dated 26 th March 2014 Inspector's Further Directions dated 6 th March 2015 Inspector's Further Directions dated 5 th November 2015 Inspector's Further Directions dated 3 rd March 2016 Applicant's letter dated 17 th September 2012 Applicant's letter dated 11 th March 2013 Applicant's letter dated 11 th March 2013 Applicant's letter dated 12 th June 2013 Applicant's letter dated 13 th February 2014 Applicant's letter dated 18 th December 2015 Applicant's letter dated 24 th December 2015 Applicant's letter dated 24 th December 2015 Applicant's letter dated 24 th December 2015	Tab	<u>Description</u>	from	to
Inspector's Directions dated 27 th November 2012 9 11 Inspector's Report (and recommendation) dated 22 nd May 2013 12 35 Inspector's Further Directions dated 11 th September 2013 36 41 Inspector's Further Directions dated 30 th January 2014 42 44 Inspector's Further Directions dated 26 th March 2014 45 45 Inspector's Further Directions dated 6 th March 2015 46 46 Inspector's Further Directions dated 5 th November 2015 47 53 Inspector's Further Directions dated 3 rd March 2016 54 56 Applicant's letter dated 17 th September 2012 57 58 Applicant's letter dated 11 th March 2013 60 63 Applicant's letter dated 12 th June 2013 64 64 Applicant's letter dated 13 th February 2014 65 67 Applicant's letter dated 18 th December 2015 68 68 Applicant's letter dated 24 th December 2015 69 69	0	Front sheet(s)	1	1
Inspector's Report (and recommendation) dated 22 nd May 2013 Inspector's Further Directions dated 11 th September 2013 Inspector's Further Directions dated 30 th January 2014 Inspector's Further Directions dated 26 th March 2014 Inspector's Further Directions dated 6 th March 2015 Inspector's Further Directions dated 6 th March 2015 Inspector's Further Directions dated 5 th November 2015 Inspector's Further Directions dated 3 rd March 2016 Applicant's letter dated 17 th September 2012 Applicant's letter dated 8 th December 2012 Applicant's letter dated 11 th March 2013 Applicant's letter dated 12 th June 2013 Applicant's letter dated 12 th June 2013 Applicant's letter dated 13 th February 2014 Applicant's letter dated 18 th December 2015 Applicant's letter dated 24 th December 2015 Applicant's letter dated 24 th December 2015 Applicant's letter dated 24 th December 2015	1	Inspector's Draft Directions dated 20 th August 2012	2	8
Inspector's Further Directions dated 11 th September 2013 36 41 Inspector's Further Directions dated 30 th January 2014 42 44 Inspector's Further Directions dated 26 th March 2014 45 45 Inspector's Further Directions dated 6 th March 2015 46 46 Inspector's Further Directions dated 5 th November 2015 47 53 Inspector's Further Directions dated 3 rd March 2016 54 56 Applicant's letter dated 17 th September 2012 57 58 Applicant's letter dated 11 th March 2013 60 63 Applicant's letter dated 12 th June 2013 64 64 Applicant's letter dated 13 th February 2014 65 67 Applicant's letter dated 18 th December 2015 68 68 Applicant's letter dated 24 th December 2015 69 69	2	Inspector's Directions dated 27 th November 2012	9	11
Inspector's Further Directions dated 30 th January 2014 Inspector's Further Directions dated 26 th March 2014 Inspector's Further Directions dated 6 th March 2015 Inspector's Further Directions dated 5 th November 2015 Inspector's Further Directions dated 3 rd March 2016 Inspector's Further Directions dated 3 rd March 2016 Applicant's letter dated 17 th September 2012 Applicant's letter dated 8 th December 2012 Applicant's letter dated 11 th March 2013 Applicant's letter dated 12 th June 2013 Applicant's letter dated 13 th February 2014 Applicant's letter dated 13 th February 2014 Applicant's letter dated 18 th December 2015 Applicant's letter dated 24 th December 2015 Applicant's letter dated 24 th December 2015	3	Inspector's Report (and recommendation) dated 22 nd May 2013	12	35
6 Inspector's Further Directions dated 26 th March 2014 45 45 7 Inspector's Further Directions dated 6 th March 2015 46 46 8 Inspector's Further Directions dated 5 th November 2015 47 53 9 Inspector's Further Directions dated 3 rd March 2016 54 56 11 Applicant's letter dated 17 th September 2012 57 58 12 Applicant's letter dated 8 th December 2012 59 59 13 Applicant's letter dated 11 th March 2013 60 63 14 Applicant's letter dated 12 th June 2013 64 64 15 Applicant's letter dated 13 th February 2014 65 67 16 Applicant's letter dated 18 th December 2015 68 68 17 Applicant's letter dated 24 th December 2015 69 69	4	Inspector's Further Directions dated 11 th September 2013	36	41
7 Inspector's Further Directions dated 6 th March 2015 46 46 8 Inspector's Further Directions dated 5 th November 2015 47 53 9 Inspector's Further Directions dated 3 rd March 2016 54 56 11 Applicant's letter dated 17 th September 2012 57 58 12 Applicant's letter dated 8 th December 2012 59 59 13 Applicant's letter dated 11 th March 2013 60 63 14 Applicant's letter dated 12 th June 2013 64 64 15 Applicant's letter dated 13 th February 2014 65 67 16 Applicant's letter dated 18 th December 2015 68 68 17 Applicant's letter dated 24 th December 2015 69 69	5	Inspector's Further Directions dated 30 th January 2014	42	44
Inspector's Further Directions dated 5 th November 2015 47 53 Inspector's Further Directions dated 3 rd March 2016 54 56 Applicant's letter dated 17 th September 2012 57 58 Applicant's letter dated 8 th December 2012 59 59 Applicant's letter dated 11 th March 2013 60 63 Applicant's letter dated 12 th June 2013 64 64 Applicant's letter dated 13 th February 2014 65 67 Applicant's letter dated 18 th December 2015 68 68 Applicant's letter dated 24 th December 2015 69 69	6	Inspector's Further Directions dated 26 th March 2014	45	45
9 Inspector's Further Directions dated 3 rd March 2016 11 Applicant's letter dated 17 th September 2012 12 Applicant's letter dated 8 th December 2012 13 Applicant's letter dated 11 th March 2013 14 Applicant's letter dated 12 th June 2013 15 Applicant's letter dated 13 th February 2014 16 Applicant's letter dated 18 th December 2015 17 Applicant's letter dated 24 th December 2015 18 69 69	7	•	46	46
11 Applicant's letter dated 17 th September 2012 57 58 12 Applicant's letter dated 8 th December 2012 59 59 13 Applicant's letter dated 11 th March 2013 60 63 14 Applicant's letter dated 12 th June 2013 64 64 15 Applicant's letter dated 13 th February 2014 65 67 16 Applicant's letter dated 18 th December 2015 68 68 17 Applicant's letter dated 24 th December 2015 69	8	Inspector's Further Directions dated 5 th November 2015	47	53
12 Applicant's letter dated 8 th December 2012 13 Applicant's letter dated 11 th March 2013 14 Applicant's letter dated 12 th June 2013 15 Applicant's letter dated 13 th February 2014 16 Applicant's letter dated 18 th December 2015 17 Applicant's letter dated 24 th December 2015 18 69 69	9	Inspector's Further Directions dated 3 rd March 2016	54	56
12 Applicant's letter dated 8 th December 2012 13 Applicant's letter dated 11 th March 2013 14 Applicant's letter dated 12 th June 2013 15 Applicant's letter dated 13 th February 2014 16 Applicant's letter dated 18 th December 2015 17 Applicant's letter dated 24 th December 2015 18 69 69				
13 Applicant's letter dated 11 th March 2013 60 63 14 Applicant's letter dated 12 th June 2013 64 64 15 Applicant's letter dated 13 th February 2014 65 67 16 Applicant's letter dated 18 th December 2015 68 68 17 Applicant's letter dated 24 th December 2015 69	11	Applicant's letter dated 17 th September 2012	57	58
14Applicant's letter dated 12th June 2013646415Applicant's letter dated 13th February 2014656716Applicant's letter dated 18th December 2015686817Applicant's letter dated 24th December 20156969	12	Applicant's letter dated 8 th December 2012	59	59
15 Applicant's letter dated 13 th February 2014 65 67 16 Applicant's letter dated 18 th December 2015 68 68 17 Applicant's letter dated 24 th December 2015 69	13	Applicant's letter dated 11 th March 2013	60	63
16Applicant's letter dated 18th December 2015686817Applicant's letter dated 24th December 20156969	14	Applicant's letter dated 12 th June 2013	64	64
17 Applicant's letter dated 24 th December 2015 69 69	15	Applicant's letter dated 13 th February 2014	65	67
	16	Applicant's letter dated 18 th December 2015	68	68
18 Applicant's letter dated 15 th February 2016 70 81	17	Applicant's letter dated 24 th December 2015	69	69
	18	Applicant's letter dated 15 th February 2016	70	81