

| | <p align="center"><u>Objection by Rockleaze Rangers Football Club</u> To Town or Village Green Application at Stoke Lodge Parkland</p> | <p align="center"><u>Response by Save Stoke Lodge Parkland</u> To the arguments raised in the TVG objection submitted by Rockleaze Rangers Football Club</p> |
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| 1 | <p>As one of the major users of Stoke Lodge Playing Fields, the Executive Committee of Rockleaze Rangers Football Club would like to inform you of the club's point of view regarding the site and its future. This is prompted (i) by concern regarding the long term future of the site for sport (ii) by a desire for an improvement in the facilities at Stoke Lodge and (iii) in response to some inaccurate and misleading statements made by certain organisations and groups involved in the debate on the future of Stoke Lodge.</p> | <p>This objection should be rejected as it fails to challenge any of the qualifying criteria required by the legislation covering the registration of a Town or Village Green as presented for consideration in the Application submitted in March 2011, vols 1, 2 & 3.</p> <p>Please see Application vol 1 evidence item 24, an extract from the inspectors report from the registration as a Town or Village Green of Land at Ashton Vale Fields, Bristol. The whole document is relevant to the legislation but para 15 is of particular relevance to our argument in this paragraph:</p> <p>15. It is important to note that a section 15 application can only succeed if (or to the extent that) the land the subject of the application is proved to satisfy the criteria set out in section 15(2), 15(3) or 15(4). Conversely, if those criteria are met, the application must be granted. No regard can be had to considerations of the desirability of the land's being registered as a green on the one hand, or of its being developed or put to other uses on the other hand. All such considerations are wholly irrelevant to the statutory question which the registration authority has to decide, namely whether the land (or any part of it) is land which satisfies the specified criteria for registrability.</p> <p>Furthermore:</p> <ol style="list-style-type: none"> 1. There is no threat to the ongoing "<i>long term futures of the site for sport</i>" as the Town or Village Green is intended to protect status quo of both current levels of Formal Sport by the education user and sports clubs alongside the informal sports use and general recreation by the community 2. There is no threat to general maintenance and upkeep improvements but any improvement including future development of the site to increase or intensify Formal Sporting use would be prevented The Formal Sporting capacity of Stoke Lodge is already at its maximum with regard to number of pitches on the available grassed areas, coupled with the time taken for grass pitches to recover after each playing session 3. We cannot comment on the alleged "<i>inaccurate and misleading statements</i>" as they are not specified <p>It would appear from this objection that Rockleaze Rangers somehow consider that the local Community and the Town or Village Green Application want to change the</p> |

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| 1 cont | | <p>way Formal Sport is currently undertaken at present. That assumption or misunderstanding is completely wrong.</p> <p>See Contents of Application in particular the covering letter <i>“As part of this application it is intended that sporting use by Cotham School and local clubs should continue on the current basis with the current level of facilities,”</i></p> <p>Whilst we consider the objection has no merit whatsoever, we will answer the points raised below to show how they are of no consequence to the legislation for qualifying criteria and should be discounted when considering the Application.</p> |
| 2 | <p>To provide some background, we are a successful local football club formed in 1976 with approximately 450 players, made up of</p> <ul style="list-style-type: none"> • 350 juniors in teams from U6 to U18 • 100 seniors in 5 teams <p>The club also has approximately 60 registered coaches and helpers.</p> | <p>This is of no bearing on the Town or Village Green Application.</p> |
| 3 | <p>The club gained FA Charter Development Club Status in August 2007 and was awarded GFA (Gloucestershire Football Association) Development Club of the Season for season 2007-08. Following this award, the club was entered into regional and national awards and was voted 2008 Development Club of the Year for the whole South West (an area from Cornwall to Wiltshire).</p> | <p>This is of no bearing on the Town or Village Green Application; but does show that Stoke Lodge in its current form and shared usage has not proved an impediment to Rockleaze Rangers.</p> |
| 4 | <p>The club objective is to provide football opportunities for all age groups for the local community.</p> | <p>Noted; but our understanding is that membership of Rockleaze Rangers is certainly not restricted <i>“to the local community”</i>.</p> |
| 5 | <ul style="list-style-type: none"> • At junior level, the objective is to provide football and social facilities in an enjoyable and supportive environment. In particular, we look to encourage participation in, and enjoyment of, football and to improve the fitness and skills of all players. | <p>Noted; but the Town or Village Green Application does not pose any threat to the status quo of both current levels of Formal Sport by the education user and sports clubs alongside the informal sports use and general recreation use by the Community.</p> |
| 6 | <ul style="list-style-type: none"> • At senior level, the objective is to enable the 1st team to compete at the highest possible level, whilst also providing playing opportunities to as many players as possible via the other senior teams. Underpinning this policy is a drive to involve ex-junior club players once they have reached 16 years old, and provide them with a vehicle to continue playing football. | <p>Noted; but the Town or Village Green Application does not pose any threat to the status quo of both current levels of Formal Sport by the education user and sports clubs alongside the informal sports use and general recreation use by the Community.</p> |
| 7 | <p>The vast majority of our members live locally, and are associated with the local primary and senior schools in the area as either students or parents.</p> | <p>Noted</p> |

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| <p>8</p> | <p>We have been based at Coombe Dingle since 2003, but the growth of the club has meant we have been using playing facilities at Stoke Lodge for the last six seasons. Currently</p> <ul style="list-style-type: none"> • our junior groups from U8 to U10 use Stoke Lodge for Saturday morning training sessions/matches between September and May. • junior teams at U12, U13, U15 and U18 use Stoke Lodge for Sunday morning and afternoon matches between September and May. • senior teams use Stoke Lodge for Saturday afternoon matches between September and May. • groups also use Stoke Lodge for summer pre-season training sessions and friendly matches. | <ol style="list-style-type: none"> 1. Whilst Rockleaze Rangers have 6 years use of Stoke Lodge, the Community have enjoyed 64 years of free and open use which they have happily shared, and wish to retain the status quo of both current levels of Formal Sport by the education user and Sports clubs alongside the informal sports use and general recreation use by the community 2. The Town or Village Green Application poses no threat to the existing “<i>Junior groups and teams</i>” usage of Stoke Lodge 3. The Town or Village Green Application poses no threat to the existing “<i>Senior teams</i>” usage of Stoke Lodge 4. The Town or Village Green Application poses no threat to the existing “<i>pre season training sessions and friendly matches</i>” usage of Stoke Lodge |
| <p>9</p> | <p>The success of the club has been meant that we continue to attract more and more local players. In order to provide them with playing opportunities, we have been forced to source pitches outside our local area. In each of the last 5 seasons we have had at least 2 junior groups playing in Bedminster Down and/or North Somerset. This season, our U14 and U16 teams play at Failand, which is not ideal.</p> | <ol style="list-style-type: none"> 1. The Formal Sporting capacity of Stoke Lodge is already at its maximum with regard to number of pitches on the available grassed areas, coupled with the time taken for grass pitches to recover after each playing session. See evidence Section 16 (plan of existing pitches) 2. Any required increased capacity will have to be found away from Stoke Lodge, as is currently the case |
| <p>10</p> | <p>The minutes of a meeting on 19/10/2011 of the local Neighbourhood Partnership (see http://www.bristolpartnership.org/neighbourhood-partnerships/henleaze-stoke-bishop-westbury-on-trym) stated</p> <ul style="list-style-type: none"> • ‘...There are NO play facilities in Stoke Bishop, but an abundance of sport facilities ...’ • ‘... It was pointed out that at the moment Stoke Lodge is 100% SPORT facilities and we do not need any more. ...’. <p>We would counter these 2 comments by asking, ‘If there is such an abundance of local sports facilities, why do our U14 and U16s have to play in North Somerset?’</p> | <ol style="list-style-type: none"> 1. It would appear that Rockleaze Rangers have confused the Town or Village Green Application with the ongoing discussions regarding the implementation of Children’s Play Facilities which are totally separate issues and the land currently proposed for the Children’s Play Facilities is not included in the Town or Village Green Application and is therefore not relevant. See Application vol 1 section 4 (<i>notes of explanation</i>) 2. The meeting referred to here by Rockleaze Rangers was to discuss the Children’s Play Facilities not the Town or Village Green 3. However in support of the minutes: With regard to bullet point one please see Application vol 1 section 18 Bristol City Council Area Green Spaces Plan, page 26 “<i>There are large areas outside the children’s play standard across Stoke Bishop – which has no children’s play facilities.....There may be an opportunity to provide a new play area at Stoke Lodge but.....</i>” 4. With regard to bullet point two the Community were pointing out that at present 100% of the available grassland is used to provide the maximum number of pitches that can practically be achieved, See evidence Section 16 (plan of existing pitches) 5. With regard to the closing paragraph the need for Rockleaze Rangers to find additional space is because Stoke Lodge has reached its maximum number of grass pitches on the available grassed areas 6. It is interesting to note that Coombe Dingle Sports Centre is not offering additional space to Rockleaze Rangers |

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| 11 | <p>The availability of local pitches is vital for our club, and Stoke Lodge is a key component of this. The site is clearly an important part of the Playing Fields Strategy for Bristol as it was identified as such in the current published strategy document and it appears that this has been reinforced by the fact that Bristol City Council has granted a 125 year lease to Cotham School for sport. Any move that secures the future of the site for sport is vital from our perspective. However, we are concerned that moves to designate the site as a Town/Village Green jeopardises this commitment to sport, and as such the Executive Committee of Rockleaze Rangers Football Club opposes the application for Town/Village Green status for Stoke Lodge.</p> | <ol style="list-style-type: none"> 1. The Town or Village Green poses no threat to the status quo of both current levels of Formal Sport by the education user and sports clubs alongside the informal sports use and general recreation use by the community 2. Town or Village Green registration does “<i>secure the future for sport</i>” and enshrines it in law which is better than the current status, together with ongoing shared use by the community for informal sport and general recreation 3. Given 1 & 2 above we cannot see that this objection has any sustainable grounds |
| 12 | <p>On a more strategic and long-term basis, the Executive Committee of the Club has stated for several years that the infrastructure at Stoke Lodge is poor and may even lead to issues with the Leagues in which we play and with the FA with regard to club development. The current problems from our perspective are:</p> | <p>Future possible development aspirations are not a reason to prevent the registration of land as a Town or Village Green.</p> |
| 13 | <p>1. Changing Rooms - It is difficult to find any benefit that the changing rooms provide. The vast majority of our users are unwilling to use them, as they are unfit for purpose, asbestos ridden and often vandalised. They are quite frankly, a disgrace and would seem to be unsuitable for a city like Bristol which professes to hold sport in high regard.</p> | <ol style="list-style-type: none"> 1. We agree that the current Changing Rooms are not fit for purpose. See Application vol 1 section 2 (covering letter) and section 4 (notes of explanation) 2. Town or Village Green registration would not prevent refurbishment of the current facilities incorporating materials that are more vandal resistant 3. Alternatively new Changing Facilities could be built (subject to planning permission) on the site of the old barns within the Adult Learning Centre on the edge of the land included in the Town or Village Green Application; or on part of the Land set aside for the Children’s Play Facilities as previously described in the Application at section 4 (notes of explanation) |
| 14 | <p>2. Parking and Access - This is always a problem for our members, and must cause severe inconvenience to local residents at peak times, especially those living in West and South Dene. More worrying however, is the danger to children crossing the various roads around the site. We get many complaints from worried parents and have worked closely with the University, acting as managers of the site, to try and mitigate against the need to lead teams of children across roads and have also tried to stop our parents, and those of the opposition, parking across driveways and in areas that might cause a serious incident. Will it take a death or serious injury before this issue is addressed and an accessible on-site car park is investigated?</p> | <ol style="list-style-type: none"> 1. We find this part of the objection really perverse 2. On one hand they are making the case that they need more playing surface for sport 3. And on the other hand they are now requesting “<i>on site</i>” parking 4. This will require a reduction in playing surface and hence sporting capacity 5. Or the felling of protected trees 6. To be replaced with expanses of tarmac 7. None of which will be acceptable to the local Community 8. If Coombe Dingle Sports Centre customers require additional parking then Coombe Dingle should make arrangements to provide it at Coombe Dingle. 9. The issue of local traffic congestion could be significantly improved by more responsible parking by the home and away teams (or their parents) 10. This can be achieved by: <ol style="list-style-type: none"> a. Better communication to teams by Coombe Dingle Sports Centre on the custom and practice to be adopted when using Stoke Lodge b. Make more use of on-site parking at Coombe Dingle Sports Centre c. Make better use of the on-site parking at the Adult Learning Centre d. Coombe Dingle Sports Centre to employ “traffic monitors” (as they used to do) to make sure any remaining road parking is done courteously e. Coombe Dingle Sports Centre to advise the Police of any parking that |

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| 14 cont | | <p>contravenes the highway code i.e. Coombe Dingle take responsibility for any problem that they are creating by letting out the pitches and taking a fee</p> <p>None of the issues raised in the objection and the response in this paragraph has any relevance to the Town or Village Green legislation qualifying criteria, particularly bearing in mind that the Formal Sport use does not form part of the Application.</p> |
| 15 | <p>3. Pitches - The pitches are 'tired', for want of a better phrase. Whilst they are playable, they seem to be of mediocre quality, despite the best efforts of the ground staff. This is due to</p> <ul style="list-style-type: none"> • the historic nature of the site • the lack of drainage • the lack of services to the site which would enable pitches to be repaired to good order. <p>Resolving these issues with the pitches would allow us to offer more opportunities to play in a safe environment.</p> | <ol style="list-style-type: none"> 1. Tired pitches are a maintenance issue and should be referred to the School and their ground works sub-contractor for possible remedial action. 2. We note that the pitches are playable 3. Some would say the pitches are more than satisfactory 4. We cannot change the historic nature of the site i.e. its condition, its gradient and the rock substrate that it sits upon 5. We acknowledge that due to the nature and topography of the field that rain water does collect on the bottom pitch. This does not pose a safety issue because teams should not play on waterlogged pitches and does not impact on the Town or Village Green Application 6. We are unclear what services are currently unavailable but by definition they do not exist and would therefore come under the heading of future development and would not be permitted if the registration was granted <p>None of the issues raised in the objection and the response in this paragraph has any relevance to the Town or Village Green legislation qualifying criteria, particularly bearing in mind that the Formal Sport use does not form part of the Application.</p> |
| 16 | <p>4. Dog Mess - For some time now, the club has had an issue with the amount of dog mess on the playing surfaces at Stoke Lodge. This has been reported to the managers of the site on a number of occasions, but the general opinion within the club is that the problem seems to be getting worse. We strongly believe that measures need to be taken by the site owners to counteract this unpleasant and potentially hazardous situation which we must assume is perpetrated by some of the less considerate members of the local community. We have seen statements from members of local pressure groups that they 'rarely observe dog faeces' on sports pitches at Stoke Lodge. Our response is that they are not looking very hard or very often! Given the open nature of the site, we are not sure how the sports pitches at Stoke Lodge can be completely protected from dog mess but we would welcome any initiatives that would help to minimise this problem</p> | <ol style="list-style-type: none"> 1. We agree that the issue of dog fouling is distasteful and all dog walkers should be encouraged to pick up and remove dog mess 2. We agree that it is worthy goal for all that the Playing Fields are safe and the risks are minimised 3. We agree that the Landowner and the tenant have a responsibility to minimise this issue 4. However, we consider that the issue of dog fouling is being exaggerated here by Rockleaze Rangers. In any case it would be usual practice for a club to: <ol style="list-style-type: none"> a) inspect all pitches prior to use as part of the normal Health & Safety process b) remove any mess or debris 5. Stoke Lodge is recognised as one of the cleanest facilities on an open space with unfettered access i.e. is not a fenced and sterile environment. It should be noted that: <ol style="list-style-type: none"> a) a Health & Safety risk assessment process (inspections) is always considered necessary and is undertaken at Coombe Dingle Sports Centre |

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| <p>16 cont</p> | <p>even though it is an example of a sterile environment achieved by a fully fenced facility with restricted access and a strict (and enforced) policy of no dog walkers</p> <p>b) not all faeces found on pitches comes from dogs. It is also deposited by cats and the various wild animals such as foxes and rats that are known to be present at Stoke Lodge, all of which can be carriers of a <i>Toxocara</i> parasite or other roundworm</p> <p>c) the recorded cases of <i>Toxocara canis</i> contracted on a sports pitch in the UK are minimal. See evidence item 15 pages 6 & 8 i.e. with the majority of these cases being contracted by toddlers in the home or garden</p> <p>d) whilst contact with dog faeces is undoubtedly unpleasant, the Health & Safety risk, subject to proper inspection and management, is already minimised and therefore any additional response should be proportional to this situation</p> <p>e) the vast majority of dog walkers already pick up their dog waste. See statements in evidence listed in para 16 of the response to BCC objections. Also reference to the litter picking undertaken by the community including dog walkers following sporting use</p> <p>6. It is not clear how much dog faeces is left behind by dogs brought by visiting spectators of which there are many every week</p> <p>7. Save Stoke Lodge Parkland (The Applicant) is attempting to raise money for the provision of the first dog bin. Please note that:</p> <p>a) There are currently no dog waste bins (or indeed general waste bins) on Stoke Lodge Parkland despite all the years of visiting teams and their parents/spectators. Interestingly other Sports facilities with open access such as the Downs and Blaise Castle do have dog waste bins provided.</p> <p>b) We suggest that the next step in further reducing the issue of dog mess is the provision of waste bins with use of the existing enforcement officers to monitor the use of them. See Evidence item 15 page 6 "<i>One of the most effective ways of tackling the fouling problem is with dog wardens....</i>"</p> <p>3. Furthermore "dog-walking" has previously been found to be a "<i>lawful pastime</i>". See <i>R v Oxfordshire County Council ex parte Sunningwell Parish Council</i>.</p> <p>None of the issues raised in the objection and the response in this paragraph has any relevance to the Town or Village Green legislation qualifying criteria.</p> |
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| 17 | <p>In summary, Rockleaze Rangers Football Club;</p> <ul style="list-style-type: none">• opposes the application for Town/Village Green status for Stoke Lodge Playing Fields.• in the medium/long term, urges that improvements are made to the infrastructure and day to day operations of Stoke Lodge in order that it becomes a suitable and safe facility for local community sport and the club would be happy to provide suitable help in moving things forward. | <p>We contend that the responses above have demonstrated that the objector has failed to make a sustainable case, supported by evidence, and should be rejected as it fails to challenge any of the qualifying criteria required by the legislation covering the registration of a Town or Village Green as presented for consideration in the Application submitted in March 2011, vols 1, 2 & 3.</p> <p>There are no clear stated grounds for the objection that relate to the relevant Section 15 qualifying criteria under the Act.</p> <p>We also contend that we have shown that:</p> <ol style="list-style-type: none">1. Aspirational changes in use are not grounds for objecting to an Application for registration as a Town or Village Green, see para 2 above2. Formal Sporting Use will continue in its current format3. The Community enjoys and welcomes the ongoing Formal Sporting use by Cotham School and the Local Sporting Clubs4. The arguments put forward by Rockleaze Rangers Football Club are either<ol style="list-style-type: none">a. irrelevant to this caseb. no evidence to show that the community have acted contrary to the provisions of “as of right” usec. actually helpful to the Applicationd. relevant issues have been shown to have been satisfied by the Applicant <p>We therefore request that this objection on behalf of Rockleaze Rangers Football Club be dismissed and the Application judged on the merits of the Application alone.</p> |
| 18 | <p>Best Regards</p> <p>Ian Loudon Rockleaze Rangers Secretary on behalf of Rockleaze Rangers Executive Committee</p> | |