

Stoke Lodge Parkland, Bristol, BS9 1BN - Town or Village Green Application		
	Response by Cotham School on 25.07.13 to The Inspectors Report and Recommendation dated 22 05.13	Comments by Save Stoke Lodge Parkland Issued on 31.07.13
1	(re) Application by Mr David Meyer to register Stoke Lodge as a village green	No comment.
2	Thank you for the opportunity to comment on your draft report concerning the application to register Stoke Lodge as a village green.	No comment.
3	We have carefully reviewed your report and have a number of significant comments to make that are attached as Appendix 1.	<p>We contend that this letter from Cotham school and appendix 1&2 contain many inaccuracies and misleading assertions based on an emotional response to the Inspector's report / recommendation with little or no regard to the qualifying criteria contained within the Commons Act 2006.</p> <p>It is apparent that the author of the Cotham response has not read or understood the prescribed reading list attached to the Inspector's Report as an annex on page 24.</p> <p>We have set out our comments below:-</p>
4	In submitting these comments to you we feel that we should remind you that Stoke Lodge is vested with Cotham School on a 125 year lease for playing field use.	The Community have used the site 'as of right for lawful sports and pastimes' since 1947. The 125 year lease is a consequence of applying for and achieving academy status, all of which was done after the Town or Village Green Application was submitted i.e. BCC and Cotham were fully aware of the TVG application when they signed the lease. We value the school sports use and the formal sports users and are more than happy to continue to share in the current harmonious manner as per Redcar case which remains as the authoritative case on use 'as of right' as it is a decision of the Supreme Court.
5	We, along with a number of users booked through the University on our behalf, use the playing fields virtually every day throughout the year.	We seek to maintain the current status quo i.e. we are happy to continue to share in the current harmonious manner as per Redcar case. We consider the claim that Cotham and formal sports users use the Parkland 'virtually every day throughout the year' to be a gross exaggeration as

		evidenced by the survey of use contained in the Application dated 4 th March 2011 appendix XV, evidence tab 19 and as witnessed by the Community.
6	We have attached Cotham School usage information at Appendix 2.	<p>Not relevant to the TVG application as it records purported use post Application.</p> <p>Also we do not recognise or accept the purported use.</p> <p>Cotham should confirm if this usage schedule includes use of University of Bristol Sports Centre at Coombe Dingle (the Booking agent - located 300 yards from Stoke Lodge Parkland which we know is used by Cotham).</p> <p>The schedule does not clarify whether the purported use is for one pitch or twelve pitches (or pitches at Coombe Dingle).</p> <p>The schedule includes usage on 21st February 2013; this was the date of the Inspector's site inspection.</p> <p>We note that purported school use is almost exclusively in the morning and rarely extends beyond 10.30 am.</p> <p>But as stated above all these data is not relevant to the TVG application as the list shows purported usage post-application.</p>
7	By definition when sport is being played the community cannot have access to the land.	We contend that this is a gross misrepresentation of the facts. ' <i>By definition</i> ': the current situation is that the Community and the school and Formal sports users do share the land harmoniously as per the Redcar Case and have done so since 1947. We seek to maintain this status quo.
8	This suggests to us that the underlying assumptions of your report are flawed. Local people cannot picnic, play informal games or even walk on land that is used for sports activities.	Typically for school use no more than 1 or 2 pitches out of the 12 available have been seen to be used on any one day. The unused pitches together with the considerable percentage of land not set aside as playing surface together with the land not leased to Cotham i.e. the wooded area are still available for Community use as of right for lawful sports and pastimes. This is a demonstration of the ongoing shared and harmonious use as per

		the Redcar case which is the situation that has existed since 1947.
9	If the village green application is confirmed it is highly likely that Cotham School will be forced to find an alternative facility, although we are not sure there is one and hence our use of Stoke Lodge.	We do not understand why Cotham school will only be satisfied with Community exclusion, except by payment of a fee, which would be the antithesis of informal use as of right.
10	In your report you make some sweeping assumptions about Cotham School; we have previously advised in our letter of autumn 2011 that we are an inner city school, with more the 44% black and minority ethnic pupils, 15% deprived (as measured by those in receipt of free school meals) and it is vital that we provide better sports facilities. We cannot provide for all our sports activities on site and hence several years ago we took over Stoke Lodge. Our school is now 20% larger and our sports needs have increased. We are planning to improve the facilities at Stoke Lodge; designation as a village green would render that impossible. We would be keen to carry out improvements in conjunction with the University and be willing to work with the proposers of the village green; we have not been in a position to lead this since becoming the 125 year leaseholder of Stoke Lodge due to this application hanging over us.	<p>The Community is more than happy to continue to share with the School and Formal sports users as the Community has done since 1947 for lawful sports and pastimes as of right. Without this approach Local children and other residents would be deprived of free access to informal green space. Additionally this would take account of the local authority's policy of providing open space within 400m of front doors and the need for green space for all residents, the benefits of which are now supported by much research as referred to in several the witnesses statements in our application.</p> <p>We seek to maintain the status quo to ensure that the Community including the thousands of children in the locality retain access as of right to enjoy lawful sports and pastimes on the last open green space in the locality during both term time and school holidays.</p> <p>Future development aspirations are not a relevant reason to object to a Town or Village Green application.</p> <p>Bristol City Council and Cotham school negotiated and signed the lease with the knowledge that the TVG application was in place.</p>
11	Mr Meyer appears to be an individual not backed by a formal organisation, how can it be that one individual can be allowed to make an application that could fetter young people's sporting education and wider community sport? At times in the report we feel you have given the views of Mr Meyer undue weight. Interestingly the chronology in the report shows that the application was triggered by the City Council's proposal at the end of 2009 to undertake major refurbishment at Stoke Lodge, subject to funds being available. This caused Mr Meyer to gather together an informal group to submit the	<p>This is incorrect. David <u>Mayer</u> was democratically elected as Chairman of 'Save Stoke Lodge Parkland' a properly constituted Community group with over 400 active members. Community support for the Town or Village Green application is much wider. As Chairman he is the delegated signatory on behalf of the Committee and the Community.</p> <p>We seek Registration as a Town or Village Green to maintain the status quo and ensure that the Community can continue to share the Parkland in a harmonious way as of right for lawful sports and pastimes.</p>

	village green application.	The consultation document referred to by Cotham was in fact a plan to exclude the Community by erecting fencing to the perimeter of the Parkland to prevent any future Town or Village Green Application. This response by BCC officers was as a result of the Redcar case findings.
12	You are aware the Government has recently published through its Department of Environment, Food and Rural Affairs, Interim Guidance to Commons Registration Authorities on Section 15C of the Commons Act 2006 which recognises that it is now inappropriate to allow individuals or organisations to seek to register Village Greens where there are wider community, planning or development interests that could be undermined by any village green registration; this is clearly the case at Stoke Lodge. To designate it as a village green will freeze out the education and community sports activities. We suggest that you should apply some weight to this changing context in assessing this application.	This change in legislation is not relevant to this application. We contend that Registration as a Town or Village Green will not <i>'freeze out the education and community sports activities.'</i> It will ensure that the status quo is retained with use being shared by Cotham school, the Formal sports users who pay to use the pitches and the Community which uses the land as of right for lawful sports and pastimes as per the Redcar case.
13	There has been much conversation about signs. With hindsight Cotham School should have put fresh signs up when we took the site over and certainly when we became an Academy but there were old signs and we relied on those. We are however concerned that you do not fully acknowledge the school's activities and interest in this site. We object that you chose not to hold an inquiry and that we were not given the opportunity to explain our position to you. We have no evidence of having been invited to a site visit either.	It is a matter of fact that Cotham did not install new signs therefore this point is not relevant. Furthermore, Bristol City Council as first objector <u>acting on behalf of all the objectors</u> (including Cotham) has confirmed in their response dated 21 st December 2012 that:- <i>'While there is no dispute regarding the existence of the signs and the fact that a number of people saw the signs, the Council do not wish to incur expenses involved in a non-statutory enquiry. While the Council remains of the view that its previous submissions in respect of the signs hold good, it is not felt that this issue on its own would be determinative of the issue in relation to the question as to whether the land will be capable of registration as a town or village green. Therefore, to this end the submissions with regard to the signs are withdrawn. The question of orientation of the third sign will therefore no longer be in issue.'</i> Additionally, Bristol City Council as first objector <u>acting on behalf of all the objectors</u> (included Cotham) has confirmed in their response dated 21 st December 2012 their agreement that a non statutory inquiry was not

		<p>required:- <i>'The inspector has indicated at paragraph 11 (of the Inspectors Directions dated 27th November 2012) that a sensible way forward would be for the parties to submit such further submission on the law as to whether the use was as of right as they think fit, an accompanied site inspection be carried out, a report be prepared with a recommendation to the City Council as registration authority, and an opportunity is given to the parties to make representation on the report and recommendation before the matter is determined by the registration authority. I confirm on behalf of the first objector and the 3 other objectors that the proposed course is acceptable.'</i></p> <p>This accusation of lack of opportunity to attend the site inspection is untrue. Tom Dunsdon of the Registration Authority wrote to the Applicant and all 4 objectors by e-mail on 8th February 2013 confirming the date, time and meeting place. A copy of the e-mail is attached as appendix 1.</p>
14	<p>Further, we are concerned that you do not understand Bristol City Council's Local Plan, and the spirit and intention of Policy LE1, which aims to protect and enhance sports and recreation facilities in the City. We have suggested amended text to your report; our comments are attached at Appendix 1. There are two significant examples of sports sites promoted by the City Council that were upgraded for education and community use including drainage works, re-orientation of pitches, setting out jogging routes, dog walks and children's play areas. These are at Imperial Park, Knowle and the Orchard School (when it was Monks Park School). These were both mixed use recreation schemes including improved playing fields, play areas, dog walking routes and significant landscaping. This is the kind of project we envisage at Stoke Lodge, but the designation as a village green would render that impossible.</p>	<p>Future development aspirations are not relevant to this Application and cannot be used as grounds for objection to a Town or Village Green Application.</p>
15	<p>We hope that you will give this letter and our detailed comments serious attention and now hold an inquiry into this case. We would be keen to work with you, the City Council, and the other stakeholders to find a solution to the future use of Stoke Lodge, to avoid the site becoming a village green and the site effectively frozen from future</p>	<p>In stark contrast we agree with the Inspector's Instructions dated 27th November 2012 and his Report / Recommendation dated 22nd May 2013.</p> <p>We do not agree that registration as a Town or Village Green would impact negatively on future sports use.</p>

	sports use for ever. Many young people's future would be negatively affected if you continue to recommend that this village green application be allowed.	
16	Yours sincerely Malcolm Willis Headteacher	Sandra Fryer Vice Chair of Governors Chair of Finance, Property and General Purposes
17	Appendix 1	
18	Comments on Stoke Lodge legal advice report from Philip Petchy, Barrister.	Apologies to Mr Petchey for the misspelling of his name by Cotham School!
19	Para 2. On 7 March 2011 Cotham School, as a City Council controlled school, was using the education playing fields at Stoke Lodge	Not disputed and nothing turns on this matter of fact. What is important is that at this point in time Cotham was under the control of the Local Authority. Cotham had not applied to be an Academy or entered into the 125 year lease.
20	Para 2, Cotham School was not consulted on whether we wished to have the matter dealt with at an Inquiry. We should have been consulted by the Village Green Registration Officer at the Council.	Please refer to paragraph 13 above. Cotham School should raise this issue with Bristol City Council as landowner and first objector who claim to have been given written authority by Cotham to speak on their behalf. Mr Petchey did challenge Ms R Johnson from BCC at the site inspection to confirm that she was authorised to speak on behalf of all the objectors and she gave a categorical assurance that she had written authority from all the objectors. This was witnessed by all in attendance including David Mayer and Tom Dunsdon. The points recorded in the Inspector's Report / Recommendation certainly reflect the facts as confirmed by Bristol City Council as landowner and first

		objector on behalf of all the objectors.
21	<p>Para 3. in this para which bit of the City Council are we talking about?</p> <p>We are not aware that the Council does, and Cotham certainly does not accept that ` the site was used forlawful sports and pastimes....that it has been by the inhabitants of a neighbourhood within a locality...</p> <p>The site is a sports ground used by people playing sports,</p> <p>Cotham has been using the site, but is neither within that locality nor are some of the sports users and university students</p>	<p>Bristol City Council as first objector has confirmed in their response dated 12th September 2012 that:-</p> <p><i>' The first objector agrees with the inspector that it is accepted that the land has been used for lawful sports and pastimes that the use has been for a period of twenty years or more and has been by the inhabitants of a neighbourhood within a locality.'</i></p> <p>Cotham are confusing Community use as of right with their own and Formal sports use.</p>
22	<p>Para 6 Reference here to not pursuing any oral evidence? Cotham was not given the opportunity to make any comment</p>	<p>We contend that this is an inaccurate statement. Please refer to paragraph 13 above.</p>
23	<p>Para 7, this para says barrister felt no need for inquiry yet earlier it said City Council wanted to save the cost, which is the truth?</p>	<p>Both.</p>
24	<p>Para. 8. Ref February 2012 site visit. Cotham School was not invited to this site meeting.</p>	<p>Please refer to paragraph 13 above.</p>
25	<p>Para 9 refers to `the site` we need to understand if there is a plan? Para 10 suggests there is...this should be attached to the report. Cotham has not seen said plan.</p> <p>It is of note than in the case of other village green applications the process has led to a variation and reduction in size of the village green. This may be a point that Cotham and the other objectors might be prepared to negotiate with the applicant.</p>	<p>There is a plan. It is part of the Application.</p> <p>Not relevant to this Application.</p>
26	<p>Para 10 Refers to `the south western part of the site being left out to `facilitate provision of new changing rooms and play</p>	<p>This is the basis of the Application submitted in March 2011.</p> <p>The area in question is detailed in the plan included in the Application.</p>

	equipment' ...on whose advice was this site excluded? Cotham School was not consulted.....it is not the site where Cotham's changing facility is and indeed we think it would be the wrong place to have a changing facility.	The area in question is the land listed in the 125 year lease that Cotham must give up and return to BCC when requested by BCC.
27	Para 12, 13.....clearly Cotham was happy with the old signs, even after Cotham became an Academy and a long lease holder of the site....we believed this site to be our playing field and operated accordingly	Please refer to paragraph 13 above.
28	Para 14. The site is laid out for Cotham School and other users....we are broadly happy with your analysis of the type of facilities we have on the site. However, you should have included the sports changing facilities to the rear of the site.	Nothing turns on this.
29	We are very concerned that you have significantly under-represented the site use by Cotham School. Cotham uses the site almost every day. This amounts to, at a very minimum, 156 hours per week. This is significantly more than 5 hours per week quoted. Further information is attached in Appendix 2. Stoke Lodge is used by the school weekly throughout the school term with the exception of term 2 (Nov – Xmas), and frequently throughout the year for extracurricular fixtures. If the school was able to improve the pitches and the pavilion, the usage would significantly increase, saving a significant amount of public funds which are currently paid for alternative sporting facilities.	Use by Cotham School and/or Formal Sports users that book and pay to use a pitch post the Town or Village Green Application is not relevant to the Application. Whilst use post Application is not relevant we cannot reconcile the claimed 156 hours use per week by the school as this would represent in excess of 30 hours per day Monday to Friday. This is clearly wrong and a gross exaggeration.
30	We wish to clarify your understanding and the information contained in footnote 6. This is misleading and neither based on fact, nor indeed any consultation with Cotham School.	Nothing turns on this as current use by Cotham is not relevant to the Application.
31	Cotham School has used Stoke Lodge Playing Fields for curricular and extracurricular Physical Education since 2000. The Stoke	The land, Stoke Lodge Parkland, has been used by the Community, as of right, since 1947 for lawful sports and pastimes.

	<p>Lodge Playing Fields were gifted to the school, from the City Council, as part of the statutory arrangements for the delivery of secondary education in the City of Bristol; at that time the school was given exclusive use of Stoke Lodge Playing fields. The playing fields have, since that time, been used daily, during term time, for curricular and extra-curricular sporting activities. Cotham School has limited outdoor space on the school site. Prior to 2000 Cotham School used playing fields located at Kellaway Avenue for off-site sporting provision, the land at Kellaway Avenue was deemed unsuitable, and the school therefore moved to Stoke Lodge. Without appropriate off-site playing fields the school would be unable to provide the statutory level of Physical Education.</p>	<p>The land has not been gifted to Cotham; it remains the property of Bristol City Council.</p> <p>Cotham has never had exclusive use of the land.</p> <p>Should the land be registered as a Town or Village Green there is no reason why Cotham cannot continue to use the land as playing fields on a shared basis with the Community as per the existing arrangements and as per Redcar.</p> <p>We repeat - Should the land be registered as a Town or Village Green there is no reason why Cotham cannot continue to use the land as playing fields on a shared basis with the Community as per the existing arrangements and as per Redcar.</p>
32	<p>Cotham School is located in North Central Bristol, the school is expanding, following an agreement with the Local Authority, the school increased intake in to Year 7 from 189 to 216 students starting in September 2011, in September 2015 the school will be at full capacity with 1080 students in Years 7 – 11 and a further 450 students in the Post 16 Centre. The playing fields and changing facilities need to be improved to support existing and planned expansion of sports use. The management of the site and the free use of the playing fields by (unauthorised) dog walkers and the resultant fouling of the land is a health and safety risk that the school plans to address as part of its planned improvements.</p>	<p>Future anticipated expansion of school numbers is not relevant to the Application.</p> <p>One of the benefits of Town or Village Green Registration is that BCC will be required to provide dog bins and the Community will be able to enforce Dog-warden activity something neither the school nor BCC nor UoB Coombe Dingle have done to date.</p>
33	<p>Cont re para 14. There is a lack of clarity as to how community use is managed. Please amend to read</p> <p>'Community use is managed on behalf of Cotham School by</p>	<p>Community use here refers to Formal Sports users who book and pay to use the pitches and indeed these events are managed by UoB Coombe Dingle Sports Centre. This use does not form part of the Town or Village Green Application.</p>

	the University	<p>However, and importantly, Community use as of right for lawful sports and pastimes is not 'managed' and this shared use is the basis of the Town or Village Green Application.</p> <p>Therefore this proposed amendment is not acceptable.</p>
34	<p>Re footnote 7. It is inappropriate to rely on the evidence from Mr Meyer, he does not represent the school's interests. The facts should have been sought from the school as long lease holder and from the University who manage it on our behalf.</p> <p>It is correct to say that the site is essentially laid out to its entirety with pitches for organised sports...</p> <p>The suggestion that...the site... ' is used by the school to a comparatively limited extent' is wrong and misleading.'</p> <p>The tone of this footnote is partial</p> <p>The footnote is correct in its reference to community and University use this all adds up to use through most of the week.....</p>	<p>This schedule was initially provided by Simon Hinks. I.e. the representative of UoB Coombe Dingle Sports Centre. Perhaps Cotham should consider removing this comment.</p> <p>The important fact is that this use is shared with Community use as of right for legitimate sports and pastimes as per Redcar. See paragraph 8 above.</p>
35	Paras 15 – 19 is insecure since I believe some of Stoke Lodge was sold for development	Nothing turns on this.
36	Para 19. There is a sum of £102.491 held as S106 funding for play facilities at Stoke Lodge, this is from sale and development of land on Parrys Lane. There are further funds potentially available from sale of education land across the City which may be allocated to sports improvement at Stoke Lodge.	<p>Nothing turns on this as future development plans are not relevant to the Application.</p> <p>The land designated for the Play facilities is not included in the Town or Village Green Application.</p>
37	Para 21. On 1 August 2006, the school entered into a management and maintenance agreement with the Coombe Dingle Sports	Nothing turns on this.

	Trust. This agreement was renewed annually and became a Transfer of Control agreement on 1 August 2009. Since Cotham was granted a 125 year lease on the land (September 2011) no agreement has been signed. This is the subject of on-going discussion to establish a new partnership with the University/ Coombe Dingle Sports Trust for the provision of enhanced sports facilities at Stoke Lodge.	Future development aspirations are not relevant grounds to object to a Town or Village Green Application.
38	Para 22. This refers to the Ideas and Options paper published by the City Council. This is the point where we believe the barrister needs to have cognisance of the new government Guidance on Village Greens, viz, DEFRA, Interim Guidance to Commons Registration Authorities on Section 15 C of the Commons Act 2006, and to suggest that this was 'a trigger event...that would not now allow the City Council to accept and consider the application for a village green since planning and development issues were being considered for the site...in order to support its long term sustainability.	We agree with the Inspector's interpretation of the Ideas and Options paper which supports the Application.
39	Para 23....the barrister surely cannot 'think'.... it either is or is not true...Cotham took a 125 year lease as a result of becoming an Academy this lease was signed 01 September 2011	Nothing turns on this.
40	Para 24 The Local Plan, its content and intention are clearly not understood by Mr Petchey. The Bristol Local Plan was indeed accompanied by a Local Plan Policy Map which indicates this site for sports use i.e. LE1. This is the first and key leisure policy of the plan. Policy LE1 is a saved policy that is now essentially part of what was the Core Strategy and is now the new emerging Local Plan.	We consider the Inspector's interpretation to be correct with regard to the Stoke Lodge Parkland site.

<p>Policy LE1 states</p> <p>'Development resulting in the unacceptable loss of playing fields and recreational open space will not be permitted unless:-</p> <ul style="list-style-type: none">(i) Loss of land/property forms part of a larger scheme for the development of recreational open space serving the needs of the local community; or(ii) Compensatory open space of an equivalent community benefit is to be provided in the same locality(iii) In the case of the partial development of an existing site, those facilities are accommodated and /or enhanced by such proposals <p>Implementation: through public and private partnerships and initiatives and the development control process.</p> <p>It is somewhat surprising the barrister relies on Mr Meyer's interpretation since Mr Meyer clearly has a biased point of view. The Barrister clearly misunderstands that Policy LE1 is about sports and recreational, useable, open space, not amenity area, parks or other forms of informal open space which are dealt with by other policies in the Local Plan/Local Development Framework. Policy LE1 is talking about protecting sports and recreational facilities whilst also being prepared to improve and enhance facilities. In the policy the word "development" really means 'enabling enhanced sport and recreational activity'. This is also sometimes used to bring parts of playing fields up to higher standard and enable some housing development to pay for the improvements. Cotham School has not envisaged this use on the site.</p>	<p>Registration will not lead to loss of playing area.</p> <p>Registration will maintain Stoke Lodge Parkland as open green space in perpetuity.</p> <p>Future development aspirations are not relevant to the Town or Village Green Application.</p>
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41	<p>Paras 25 to 27. These are misleading but could also be presented in a very positive light, rather than the negative slant taken in this report set out here.</p> <p>That the Council was proposing to improve the sports and community hub at Stoke Lodge to enable better quality sports facilities which would be available to Cotham School, the University and community users.</p> <p>This project was in its gestation. It is not unusual for community consultation meetings to experience 'strength of feeling' but as the project progresses the wider community concerns can be considered and responded to. It is perfectly reasonable to consider that all concerns could be responded to in a well-designed scheme.</p> <p>It is unclear whether these are formal notes of a meeting, Clearly the Executive Member was not at the meeting.</p>	<p>These are the facts however they are presented.</p> <p>The main objective of the Consultation document was to exclude free public access by fencing the perimeter to prevent any future Town or Village Green Application.</p> <p>This is speculation and therefore not relevant.</p> <p>This was a formal BCC NP meeting with minutes prepared by BCC. The Executive member Cllr Campion Smith was in attendance and was specifically asked to confirm her vote by the Chairman Cllr G Gollop, which she did confirm was in favour of the resolution. Copies of the minutes are available.</p>
42	<p>The law</p> <p>There are many case studies that can be referred to and the outcomes various. Whichever are chosen they should be selected in a balanced/ non biased way, which this whole report is not.</p> <p>We would also point to the following cases where the barrister did not agree to the village green designation. We note that there have been cases where the barrister investigating a case, in noting sport use was clearly not compatible with open community use, has accepted the designation as sport grounds</p>	<p>The issue of law that we need to concentrate on is the qualifying criteria contained within the Commons Act 2006.</p> <p>There is an abundance of case law all dealing with whether or not an application does meet the qualifying criteria or not because there is no discretion. If the criteria are met the land must be registered.</p> <p>We contend that Mr Petchey's Report is balanced and is not biased.</p> <p>We refer to the Redcar case which remains as the authoritative case on use 'as of right' as it is a decision of the Supreme Court.</p>

	We are grateful to the City Council for reviewing Mr Petchy's report from a legal point of view and we make no further comment on this section.	Nothing turns on this.
43	Appendix 2	
44	<i>This Appendix comprises a list of purported usage dates and times from September 2012 to July 2013.</i>	<p>This Appendix is not relevant to the TVG application as it records purported use post Application.</p> <p>Also we do not recognise or accept the purported use.</p> <p>Cotham should confirm whether this usage schedule includes use of University of Bristol Sports Centre at Coombe Dingle (the Booking agent - located 300 yards from Stoke Lodge Parkland which we know is used by Cotham).</p> <p>The schedule does not clarify if the purported use is for one pitch or twelve pitches (or pitches at Coombe Dingle).</p> <p>The schedule includes usage on 21st February 2013; this was the date of the Inspector's site inspection.</p> <p>We note that purported school use is exclusively in the morning and rarely extends beyond 1 hour per day. The minimal use by Cotham is therefore self evident from the schedule.</p> <p>But as stated above all these data are not relevant to the TVG application as the list shows purported use post application and does not reflect use by Cotham pre Application.</p>