<<5>>

Ste	Stoke Lodge Parkland – TVG Application – Applicants bundle					
	Paginated Page Number Index					
	File 1					
Tab	Description	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						

<<6>>

Stoke Lodge Parkland – TVG Application – Applicants bundle						
	Paginated Page Number Index					
	File 2					
Tab	Description	from	to			
0	Front Sheet	1	1			
1	Contents list of additional evidence 3 rd May 2016	2	2			
2	Save Stoke Lodge Parkland AGM 10 th March 2016 – Chairman's Report	3	10			
3	Save Stoke Lodge Parkland - Constitution	11	14			
4	Summary of key clauses from the BCC Cabinet Briefing Note 20.04.10	15	15			
5	Conveyance docs for purchase of Stoke Lodge by Bristol City Council	16	28			
6	Bristol City Council – sale of education and sports land	29	39			
7	Wellington Hill playing fields, Horfield, Bristol	40	100			
8	Bristol City Council – Green Spaces sell off 2012	101	114			
9	Dept for Education - News Statement dated 8 th August 2012	115	115			
10	Education Act 1996 c56 section 543 clause 4A	116	117			
11	Cotham Academy Home site – Google plan	118	118			
12	Access to Natural Green Space Standards report 2008	119	126			
13	Moorside fields, Lancaster, TVG Application recommendation	127	153			
14	Cotham Academy, Articles of Association	154	198			
15	Cotham Academy, Governor's Meeting Minutes dated February 2014	199	203			
16	Cotham Academy, Governor's Meeting Minutes dated February 2015	204	209			
17	An extract from the "the Bristolian" News magazine	210	211			
18	Photograph of the "sign" adjacent to the Adult Learning Centre	212	212			
19	Photograph of the "sign" at Kellaway Avenue playing fields	213	215			
20	Ian Woodward e-mail re "sign" adjacent to the Adult Learning Centre	216	217			
21	Susan Comer witness statement on behalf of objectors dated 20.01.15	218	225			
22	BCC new sign then and now 03.12.13	226	226			
23	S Comer Report – History of Stoke Lodge	227	233			
24	Statement from Mr Bob Hoskins 01.08.13	234	236			
25	Statement from Tony Havens	237	238			
26	Bristol City Council – Notice of TVG Application 27.07.11	239	239			
27	Stoke Lodge Parkland – 3 off Tree Preservation Orders	240	242			
28	Ariel view of pitches and running track	243	244			
29	Cotham Anti-TVG Petition web page 06.12.15	245	245			
30						
31						

<<7>>

Sto	Stoke Lodge Parkland – TVG Application – Applicants bundle				
	Paginated Page Number Index				
	File 3				
Tab	Description	from	to		
0	Front sheet	1	2		
1	Contents list	3	3		
2	Covering letter	4	6		
3	Application Form 44	7	13		
4	Statutory declaration plus Plans with notes of explanation	14	22		
5	Supplementary arguments in support of Section 15 qualifying criteria	23	28		
6	Locality / Neighbourhood map	29	33		
7	Justification	34	35		
8	Notice to landowner and other interested parties	36	39		
9	Save Stoke Lodge Parkland - Constitution	40	45		
10	Briefing Note to Bristol City Council Cabinet 22 nd April 2010	46	69		
11	Biddulph Architects plans	70	72		
12	Key clause from the Briefing Note that summarise true intent	73	74		
13	Stoke Bishop Open Forum minutes 25 th August 2010	75	77		
14	BCC Neighbourhood Partnership minutes 15 th September 2010	78	83		
15	Section 106Statement and letter of confirmation	84	86		
16	Photographs of Notices / Signs	87	92		
17	FAQ sheet issued by BCC CYPS officer Liz Peddle	93	97		
18	Area Green Spaces Plan + Bristol Parks Forum letter 26 th July 2010	98	111		
19	Survey of use in August 2010	112	120		
20	Extract from Bristol City Council 2008 Ward Profile for Stoke Bishop	121	122		
21	Extract from letters of objection to Bristol City Council	123	137		
22	Petition undertaken by Spar General store	138	181		
23	Picnic attendees 22 nd August 2010	182	198		
24	Extract from Aston Gate Judgement – The legislative framework	199	208		
25					
26					
27					
28					
29					
30					
31					

Stoke Lodge Parkland – TVG Application – Applicants bundle						
	Paginated Page Number Index					
	File 4					
Tab	Name of Statement providers	from	to			
0	Front sheet(s)	1	3			
1	Macara, Sir Alexander	4	10			
2	Carter, Dr Sheila Barbara	11	17			
3	Alpass, T Henry Cockcroft	18	24			
4	Parsons, Sharon Elizabeth	25	32			
5	Shinner, Michael	33	38			
6	Evans, Judith Margaret	39	45			
7	Mason, Stewart William	46	53			
8	Preece, Sheila Margaret	54	59			
9	Powles, Mr D J and Mrs P R	60	66			
10	Preece, Alan William (Professor)	67	73			
11	Goss, A R	74	80			
12	Carter, Oonah Mary	81	87			
13	Hilyer, John David	88	94			
14	Richardson, Paul E C	95	101			
15	Hayes, William	102	108			
16	Parsons, Jennifer	109	115			
17	Parsons, John Richard	116	122			
18	Davies, Malcolm	123	129			
19	Worrall, Celia	130	137			
20	Evans, Ewart Harold Lyle	138	144			
21	Singleton, Ian James	145	153			
22	Wright, Julie Grace	154	162			
23	Wright, Graham William	163	169			
24	Andlaw, R J Dr	170	176			
25	Barnes, Catherine	177	183			
26	Barnes, Andrew Nicholas, Morrison	184	190			
27	Hollyman, John	191	197			
28	Page, Gaynor	198	205			
29	Huggins, Gabrielle Rosalie	206	214			
30	Harris, Stacey	215	222			
31	Rose, Nicholas Henry	223	230			

<<9>>

Stoke Lodge Parkland – TVG Application – Applicants bundle						
	Paginated Page Number Index					
	File 5					
Tab	Name of Statement providers	from	to			
0	Front sheet(s)	1	3			
1	Dibb, Sarah	4	12			
2	Ackland, James Bryant	13	19			
3	Crook, Lorna Louise	20	27			
4	Nicholas, Graham	28	34			
5	Hayes, Susan	35	41			
6	Windows, Jeremy Fredrick Guy	42	49			
7	Wright, Ann	50	56			
8	Levinson, Thomas G D	57	63			
9	Jenkins, Christopher	64	70			
10	Pope, Alfred George	71	77			
11	Richardson, Sally A	78	84			
12	Smith, Phillip	85	91			
13	North, Patricia	92	98			
14	Hall, Richard	99	105			
15	Bansall, Irmgard K M	106	113			
16	Brooks, Michael	114	119			
17	Elson, Christopher John	120	127			
18	McKenna, Bryan John	128	135			
19	McKenna, Ben James	136	143			
20	Cockerham, Polly-Anna	144	154			
21	Powlesland, Rachel	155	163			
22	Alpass, Mary	164	171			
23	Mayer, Susan Jane	172	180			
24						
25						
26						
27						
28						
29						
30						
31						

<<10>>

Stoke Lodge Parkland – TVG Application – Applicants bundle						
	Paginated Page Number Index					
	File 6					
Tab	Description	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						

<<11>>>

<u>Sto</u>	Stoke Lodge Parkland – TVG Application – Applicants bundle				
	Paginated Page Number Index				
	File 7				
Tab	Description	from	to		
	Bosnonso to U.P. Coombo Dingle Sports Contro 21 st March 2012				
	Response to UoB – Coombe Dingle Sports Centre 31 st 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 31 st 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		
	Response to Rockleaze Rangers Football Club 31 st March 2012				
	Response to Rockleaze Rangers Football Club 31 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		

Stoke Lodge Parkland – TVG Application – Applicants bundle			
Paginated Page Number Index			
File 8			
Description	from	to	
Response # 3, dated 5 th October 2012			
Front sheet(s)	1	1	
	2	2	
Response to Bristol City Council dated 5 th October 2012	3	31	
Response # 4, dated 31 st January 2013			
Front sheet(s) and covering letter	32	33	
Contents list	34	34	
Response to Bristol City Council dated 31 st January 2013	35	55	
Response to Mudford Road Report	56	123	
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			
Front sheet(s)	150	150	
		177	
	178	178	
Ordnance Survey Plan	179	179	
Red Line SE Boundary	180	180	
Response # 7 dated 16 th December 2013			
Front sheet(s)	181	181	
Response to statement made by Mel Sperring	182	191	
Response to statement made by Ross Burnham	192	201	
Response to statement made by Simon Hinks	202	216	
Response to statement made by Bob Hoskins	217	230	
	Paginated Page Number Index File 8 Description Response # 3, dated 5 th October 2012 Front sheet(s) Covering Letter Response to Bristol City Council dated 5 th October 2012 Response to Bristol City Council dated 31 st January 2013 Front sheet(s) and covering letter Contents list Response to Bristol City Council dated 31 st January 2013 Response to Bristol City Council dated 31 st January 2013 Response to Bristol City Council dated 31 st July 2013 Response to Mudford Road Report Applicant's Legal Statement Response # 5, dated 31 st July 2013 Front sheet(s) Response # 6, dated 26 th August 2013 Front sheet(s) Response to Bristol City Council dated 26 th August 2013 Clarification of SE Boundary Ordnance Survey Plan Response # 7 dated 16 th December 2013 Front sheet(s) Response # 7 dated 16 th December 2013 Front sheet(s) <td>Paginated Page Number IndexFile 8IDescriptionfromResponse # 3, dated 5th October 2012fromFront sheet(s)1Covering Letter2Response to Bristol City Council dated 5th October 20123Response to Bristol City Council dated 31st January 20137Front sheet(s) and covering letter32Contents list34Response to Bristol City Council dated 31st January 201335Response to Bristol City Council dated 31st January 201335Response to Bristol City Council dated 31st January 201335Response to Bristol City Council dated 31st July 2013124Response to Mudford Road Report56Applicant's Legal Statement124Response to Cotham Academy dated 22nd July 2013135Response to Cotham Academy dated 22nd July 2013136Front sheet(s)150Response to Bristol City Council dated 26th August 2013151Clarification of SE Boundary178Ordnance Survey Plan179Red Line SE Boundary181Response # 7 dated 16th December 2013181Front sheet(s)1811Response to statement made by Mel Sperring182Response to statement made by Ross Burnham192</td>	Paginated Page Number IndexFile 8IDescriptionfromResponse # 3, dated 5 th October 2012fromFront sheet(s)1Covering Letter2Response to Bristol City Council dated 5 th October 20123Response to Bristol City Council dated 31 st January 20137Front sheet(s) and covering letter32Contents list34Response to Bristol City Council dated 31 st January 201335Response to Bristol City Council dated 31 st January 201335Response to Bristol City Council dated 31 st January 201335Response to Bristol City Council dated 31 st July 2013124Response to Mudford Road Report56Applicant's Legal Statement124Response to Cotham Academy dated 22 nd July 2013135Response to Cotham Academy dated 22 nd July 2013136Front sheet(s)150Response to Bristol City Council dated 26 th August 2013151Clarification of SE Boundary178Ordnance Survey Plan179Red Line SE Boundary181Response # 7 dated 16 th December 2013181Front sheet(s)1811Response to statement made by Mel Sperring182Response to statement made by Ross Burnham192	

<<13>>

	Paginated Page Number Index		
	File 9		
Tab	Description	from	to
	Response # 8, dated 15 th June 2015		
0a	Front sheet	1	1
0 b	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 25 th 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 31 st 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 28 th January 2016		
	Front sheet(s)	273	273
	List of Unresolved issues dated 28 th January 2015	274	277

<<14>>

Ste	Stoke Lodge Parkland – TVG Application – Applicants bundle					
	Paginated Page Number Index					
	File 10					
Tab	Description	from	to			
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 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			
18	Applicant's letter dated 15 th February 2016	70	81			

<<15>>

<u>Sto</u>	Stoke Lodge Parkland – TVG Application – Applicants bundle					
	Paginated Page Number Index					
	File 11					
Tab	Description	from	to			
0	Front sheet	1	1			
1	Contents list	2	2			
2	Covering letter	3	4			
3	Index of paginated pages (Files 1 – 11)	5	15			
4	Sequence of Applicants witness statements to be heard at the NSPI	16	16			
5	Cllr J Goulandris' open letter printed in the Bristol Post on 16 th May 2016	17	18			
6	Witness statement from Charles Elderton to be heard at the NSPI	19	26			
7	Rebuttal to Bristol City Council statement of case	27	55			
8	Rebuttal to Cotham Academy statement of case	56	93			
9	Locality & Neighbourhood paper	94	119			
10	a. Additional statements A - B	120	156			
	b. Additional statements C - D	157	179			
	c. Additional statements E - G	180	204			
	d. Additional statements H - I	205	232			
	e. Additional statements J - M	233	263			
	f. Additional statements N - Q	264	285			
	g. Additional statements R - S	286	318			
	h. Additional statements T - Z	319	350			
11	Additional statements	351	364			
12	Additional photographs of Community use "as of right"	365	368			