

Wildlife & Countryside Act 1981
The City Council of Bristol Definitive Map and Statement Modification Order (No 7) 2024 (Stoke Lodge Playing Field)
PINS Ref: ROW/3363939

The City Council of Bristol Definitive Map and Statement Modification Order (No 7) 2024 (Stoke Lodge Playing Field)

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Core Documents List

1. APPLICATION DOCUMENTS

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2. REPORTS AND MINUTES

Doc No	Document title	Web link
2.1	Applicant's comments on BCC Consultant's draft report, dated October 2024, plus supporting documents	file
2.2	Objector's comments on BCC Consultant's draft report, dated October 2024	file
2.3	Landowner submissions	file
2.4	BCC Consultant's Report Appendices: Appendix 1 – plan of application routes - see CD 2.5 Appendix 2 – Application forms - see CD1.1 Appendix 3 – user evidence forms for R1 - see CD1.2 Appendix 4 – user evidence forms for R2 - see CD1.3 Appendix 5 – user evidence forms for R3 - see CD1.4 Appendix 6 – user evidence forms for R4 - see CD1.5 Appendix 7 – summary of UEF - see CD 2.6 Appendix 8 – TVG reports - see CD7.1-4 Appendix 9 – Applicant's comments on draft report - see CD2.1 Appendix 10 – Objector's comments on draft report - see CD2.2 Appendix 11 – landowner submission - see CD2.3	file
2.5	BCC Consultant's plan of application routes	file
2.6	Summary of User Evidence Forms prepared by BCC consultant	file
2.7	Report to Committee, dated 27 November 2024	file

4. STATEMENTS OF CASE – BRISTOL CITY COUNCIL

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	Appendix 2 – Definitive Map Modification Order, made 10.12.25 - see CD 3.1	
	Appendix 3 – Objection from Objector - see CD3.2	
	Appendix 4 – <i>R. (on the application of Cotham School) v Bristol City Council</i> [2018] – see CD7.5	
	Appendix 5 – <i>Cotham School v Bristol City Council</i> [2025] - see CD7.6	
	Appendix 6 – Consultant's Report to PROW Committee - see CD2.4	
	Appendix 7 – BCC Report to Committee - see CD2.7	
	Appendix 8 – Public Forum submissions - see CD2.8	
	Appendix 9 – Sauvain on Highway Law (6th Edition), pgs 12-58 – see CD9.5	
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5. APPLICANT'S STATEMENT OF CASE

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5.3	Appendix 2 - Description of Bristol Green Walk	file
5.4	Appendix 3 - County of Avon Education Committee minutes 12 April 1994	file
5.5	Appendix 4 - BCC Education Committee minutes 11 December 1997	file
5.6	Appendix 5 - 2005 University of Bristol Report	file
	Appendix 6 – R v Oxfordshire County Council, ex parte Sunningwell [1999] - see CD8.17	
	Appendix 7 – R (on the application of Godmanchester Town Council) v Secretary of State for the Environment, Food and Rural Affairs [2007] see CD8.18	
	Appendix 8 – Roxlena Limited v Ramblers [2026] - see CD8.19	
5.7	Appendix 9 - Additional User Evidence Forms	Appendix 9 - 2025-2026 new UEFs_Redacted_V3_Redacted.pdf
5.8	Appendix 10 - 2018 UEFs missing or misplaced	file
5.9	Appendix 11 - Excel chart showing user evidence over time	file

5.10	Appendix 12 - Email from Department for Education to Helen Powell dated 12.6.23	file
5.11	Appendix 13 - Cotham School Lease dated 31 August 2011	file

6. OBJECTOR'S STATEMENT OF CASE

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	Appendix 3 – Poole v. Huskinson (1843) 152 - see CD8.20	
	Appendix 4 – Mann v. Brodie - see CD8.21	
	Appendix 5 – Merstham Manor v. Coulsdon - see CD8.22	
	Appendix 6 – Lewis v. Thomas - see CD8.9	
	Appendix 7 – British Transport Commission v. Westmorland CC [1958] - see CD8.14	

	Appendix 8 – Sykes v. Holmes - see CD8.23	
	Appendix 9 – Thrasyvolou v. Secretary of State for the Environment - see CD8.24	
	Appendix 10 – Jaques v. Secretary of State for the Environment - see CD8.25	
	Appendix 11 - R v. Suffolk County Council, ex parte Steed - see CD8.26	
	Appendix 12 – Todd & Bradley v. Secretary of State for the Environment, Food and Rural Affairs - see CD8.6	
	Appendix 13 – Godmanchester Town Council v. Secretary of State for Environment, Food and Rural Affairs - see CD8.18	
	Appendix 14 – R(Lewis) v. Redcar & Cleveland BC - see CD8.27	
	Appendix 15 – Wright v. Secretary of State for the Environment, Food and Rural Affairs [2016] EWHC 1053 - see CD8.28	
	Appendix 16 – R(Mann) v. Somerset CC - see CD8.29	
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	Appendix 18 - Network Rail Infrastructure Ltd v. Welsh Ministers - see CD8.11	
	Appendix 19 – Easteye Ltd v Malhotra Property Investments Ltd - see CD8.13	

	Appendix 20 – DPP v. Instone - see CD8.30	
	Appendix 21 – Highways Act 1980 - see CD9.2	
	Appendix 22 – Wildlife and Countryside Act - see CD9.1	
	Appendix 23 – Local Government (Miscellaneous Provisions) Act 1982, section 40 - see CD9.3	
	Appendix 24 – Phipson on Evidence (20th ed.) para.6-06, 6-07 - see CD9.4	
6.4	Appendix 25 - The Education Act 1996, Section 547	file
6.5	Appendix 26 - The School Standards and Framework Act 1998, section 77	file
6.6	Appendix 27 - The Education (Independent School Standards) (England) Regulations 2010 (ISS), Schedule 1, Part 5 and The School Premises (England) Regulations 2012	file
	Appendix 28 – Cotham School Lease - see CD5.11	
6.7	Appendix 29 - Department for Education’s ‘Advice on standards for school premises’ March 2015	file
6.8	Appendix 30 - Department for Education Guidance, ‘Controlling access to school premises’ (27 November 2018)	file
6.9	Appendix 31 - Department for Education Guidance: Health and safety: responsibilities and duties for schools 5 April 2022	file

6.10	Appendix 32 - Funding agreement between the DfE and the School dated 1 September 2022	file
6.11	Appendix 33 - 'Levelling the playing field: the physical education subject report' '(20 September 2023) (relevant extracts, Main Findings section)	file
6.12	Appendix 34 - The DfE Guidance on potential security threats and preventative measures updated 3 July 2026	file
6.13	Appendix 35 – 'Keeping children safe in education' – DfE statutory guidance for schools and colleges September 2025 extracts	file
6.14	Appendix 36 – Ofsted's Inspection Toolkit 9 September 2025	file
6.15	Appendix 37 – Working together to safeguard children March 2026 extracts	file
6.16	Appendix 38 – Cotham School's latest risk assessment 31 March 2026	file
6.17	Appendix 39 – Cotham School Safeguarding Policy 2026	file
6.18	Appendix 40 – Cotham School's articles of association	file
6.19	Appendix 41 – 1928 – Cricket lease	file
6.20	Appendix 42 – 1946 – Stoke Bishop Cricket Club photograph	file
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6.23	Appendix 45 – Stoke Bishop Cricket club fixture lists 1946- 1949, 1950-1951, 1956	file
6.24	Appendix 46 – 13 February 1948 – Western Daily Press article re rugby	file
6.25	Appendix 47 – 25 March 1950 – Western Daily Press article re rugby	file
6.26	Appendix 48 – 11 July 1950 – Western Daily Press article re scout divisions	file
6.27	Appendix 49 – 20 July 1950 – Western Daily Press article re Fairfield Grammar School sports day	file
6.28	Appendix 50 – 13 August 1962 – Bristol Evening Post article re archery	file
6.29	Appendix 51 – 6 February 1964 – Bristol Evening Post article re football	file
6.30	Appendix 52 – 8 February 1964 – Bristol Evening Post article re rugby	file
6.31	Appendix 53 – 20 June 1964 – Stoke Bishop Cricket Club 75th Anniversary Match – Stoke Bishop Cricket Club Archive	file
6.32	Appendix 54 - 20 June 1964 – 75th anniversary Cricket Match photograph	file
6.33	Appendix 55 – Link to cinefilm of 75th Anniversary match (20 June 1964) and friendly match (July 1965)	file
6.34	Appendix 56 – 25 July 1964 – Bristol Evening Post article re Fairfield sports day	file
6.35	Appendix 57 – 27 January 1966 – Bristol Evening Post article re rugby	file
6.36	Appendix 58 – 3 May 1969 – Bristol Evening Post article re cricket	file

6.37	Appendix 59 – 20 May 1969 – Bristol Evening Post article re cricket	file
6.38	Appendix 60 – 31 May 1969 – Bristol Evening Post article re cricket	file
6.39	Appendix 61 – 10 June 1969 – Bristol Evening Post article re cricket	file
6.40	Appendix 62 – 28 June 1969 – Bristol Evening Post article re tennis	file
6.41	Appendix 63 – 19 July 1969 – Bristol Evening Post article re cricket	file
6.42	Appendix 64 – 25 August 1969 – Bristol Evening Post article re cricket	file
6.43	Appendix 65 – 25 July 1970 – Bristol Evening Post article re cricket	file
6.44	Appendix 66 – 12 December 1970 – Bristol Evening Post article re football	file
6.45	Appendix 67 – 18 June 1971 – Bristol Evening Post article re St Michael's sports day	file
6.46	Appendix 68 – 14 August 1971 – Bristol Evening Post article re cricket	file
6.47	Appendix 69 – 28 June 1972 – Bristol Evening Post article re football	file
6.48	Appendix 70 - 30 March 1973 – Bristol Evening Post article re cricket	file
6.49	Appendix 71 – 30 September 1974 – Bristol Evening Post article re football	file
6.50	Appendix 72 – 13 May 1978 – Bristol Evening Post article re cricket	file
6.51	Appendix 73 – 20 May 1983 – Bristol Evening Post article 'Public scared off'	file

6.52	Appendix 74 – 11 August 1983 – Bristol Evening Post article re dog fouling	file
6.53	Appendix 75 – 8 January 1990 – article on Guerilla Tactics	file
6.54	Appendix 76 – 16 January 1990 – Bristol Evening Post article re no dog signs, dog fouling and health/safety risks	file
6.55	Appendix 77 – 1998 – Fairfield – 1898-1998 The Life of a School	file
6.56	Appendix 78 – 8 July 2010 – Bristol Observer article	file
6.57	Appendix 79 – 4 March 2011 – TVG1 application cover letter	file
6.58	Appendix 80 – 11 May 2016 – Cllr Goulandris letter published in the Bristol Evening Post	file
6.59	Appendix 81 – Cricket Grounds – Stoke Bishop Cricket Club Archive (including 1928 lease map)	file
6.60	Appendix 82 – Maps showing unbroken stone wall in 1936, 1951 and in 1957 the widened Parry's Lane and pedestrian footpath	file
6.61	Appendix 83 – Photographs showing chain link fence at Parry's Lane	file
6.62	Appendix 84 – Maps showing the footprint of the pavilion as built (1970-1974 and 2003)	file
6.63	Appendix 85 – Maps relating to a solid stone wall blocking access from West Dene (1936-1951-1970-1974)	file
6.64	Appendix 86 – Maps showing car park changes to the gate at Point C and gate on OS maps (1936, 1951, 1970-74)	file

6.65	Appendix 87 – Google Street view images of the pedestrian gate at Point C and the position before 2014	file

7. VILLAGE GREEN REPORTS AND JUDGMENTS

Doc No	Document title	Web link
7.1	TVG Report dated 2016	file
7.2	TVG report dated 2021	file
7.3	TVG Report dated March 2023	file
7.4	TVG Report dated May 2023	file
7.5	<i>R. (on the application of Cotham School) v Bristol City Council</i> [2018] EWHC 1022 (Admin)	file
7.6	<i>Cotham School v Bristol City Council</i> [2025] EWHC 1382 (Ch))	High Court Judgment Template

8. LEGAL AUTHORITIES

Doc No	Document title	Web link
8.1	<i>Fowler v SSE</i> (1992) 64 P & CR 16	CD 8.1 Fowler v Secretary of State for the Environment and another [1991] Lexis Citation 1946
8.2	<i>Mayhew v SSEnv</i> (1993) 65 P & CR 344	P&CR 1993 Vol 65.pdf
8.3	<i>R (on the application of Roxlena Ltd) v Cumbria CC</i> [2019] EWCA Civ 1639	R (on the application of Roxlena Ltd) v Cumbria County Council [2019] EWCA Civ 1639
8.4	<i>R. v Secretary of State Ex p. Bagshaw and Norton</i> (1994) 68 P. & C.R. 402	P&CR 1994 Vol 68.pdf
8.5	<i>R. v Secretary of State for Wales Ex p. Emery</i> [1998] 4 All E.R. 367	31_emery.fme
8.6	<i>Todd and Bradley v Secretary of State for the Environment, Food and Rural Affairs</i> [2004] EWHC 1450 (Admin)	file
8.7	<i>R (on the application of Norfolk CC) v Secretary of State for the Environment, Food and Rural Affairs</i> [2006] 1 W.L.R. 1103	file
8.8	<i>Trevelyan v Secretary of State for the Environment, Transport and the Regions</i> [2001] 1 W.L.R.1264	file
8.9	<i>Lewis v Thomas</i> [1950] 1 KB 438	file

8.10	<i>R (oao Alfred McAlpine Homes Limited) v Staffordshire County Council</i> [2002] EWHC 76 (Admin)	R (on the application of McAlpine Homes Ltd) v Staffordshire County Council [2002] EWHC 76 (Admin)
8.11	<i>Network Rail Infrastructure Ltd v Welsh Ministers</i> [2020] EWHC 1993 (Admin)	High Court Judgment Template
8.12	<i>R (Lancashire County Council) v Secretary of State for Environment, Food and Rural Affairs</i> [2021] AC 194	02 lr699.xml. 194..261
8.13	<i>Easteye Ltd v Malhotra Property Investments Ltd</i> [2020] EWHC 2606 (Ch)	file
8.14	<i>British Transport Commission v Westmoreland County Council</i> [1958] AC 126	file
8.15	<i>R (on the application of Newhaven Port and Properties Limited) v East Sussex County Council</i> [2015] AC 1547	03 lr620.xml. 1547..1599
8.16	<i>Ramblers Association v SoSEFRA</i> [2017] EWHC 716	CD8.16 Ramblers Association
8.17	<i>R v Oxfordshire County Council ex parte Sunningwell</i> (1999) UKHL 28 (2000)	31_Sunningwell.fm
8.18	<i>R (on the application of Godmanchester Town Council) v SSEFRA</i> [2007] UKHL 28	03 lr193 221..268
8.19	<i>Roxlena Limited v Ramblers</i> [2026] EWCA Civ 534	file
8.20	<i>Poole v. Huskinson</i> (1843) 152 ER 1039	file
8.21	<i>Mann v. Brodie</i> (1885) 10 App. Cas. 378, 392	file
8.22	<i>Merstham Manor v. Coulsdon</i> [1937] 2 K.B. 77, 85	9780406850027.pdf
8.23	<i>Sykes v. Holmes</i> [1985] Crim LR 791	file

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9. LEGISLATION AND GUIDANCE

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10. PROOFS OF EVIDENCE - BCC

Doc No	Document title	Web link
10.1	Proof of Evidence of Robin Carr	file
10.2	Appendix 1 to Proof of Evidence of Robin Carr	file
10.3	Summary Proof of Evidence of Robin Carr	file

11. PROOFS OF EVIDENCE/STATUTORY DECLARATIONS – APPLICANT

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11.1	Proof of Evidence of Helen Powell and Appendices	file
11.2	Proof of Evidence of Andrew Ackland	file
11.3	Proof of Evidence of Anna Caple	file
11.4	Proof of Evidence of Cherry Noble	file
11.5	Proof of Evidence of Geoffrey Causton	file
11.6	Proof of Evidence of Gillian Mary Cleverdon	file
11.7	Proof of Evidence of Hilary Corfield	file

11.8	Proof of Evidence of Ian Creer	file
11.9	Proof of Evidence of Judith Forster	file
11.10	Proof of Evidence of Peter Weeks	file
11.11	Proof of Evidence of Rona Taylor	file
11.12	Statutory Declaration of Alan Preece	file
11.13	Statutory Declaration of Bruce Perrot	file
11.14	Statutory Declaration of David Watkins	file
11.15	Statutory Declaration of Geraldine Sloggett	file
11.16	Statutory Declaration of Joanna Scott	file
11.17	Statutory Declaration of John Hollyman	file
11.18	Statutory Declaration of Judith Stirk	file
11.19	Statutory Declaration of Kathryn Vaughan	file
11.20	Statutory Declaration of Lorna Crook	file
11.21	Statutory Declaration of Malcolm Davies	file
11.22	Statutory Declaration of Maura Hughes	file
11.23	Statutory Declaration of Sarah Dibb	file

13. ADDITIONAL RELEVANT DOCUMENTS

Doc No	Document title	Web link
13.1	Cotham School Report on Title July 2011 [extract]	file
13.2	Letter to constituents from Darren Jones MP dated 18 June 2018	file
13.3	Ofsted letters to Tom Dove June 2018	file
13.4	Cotham School Health, Safety and Wellbeing Policy December 2025	Health, Safety and Wellbeing Policy - Document 2 (Nov 2025) - REDACTED COPY
13.5	Collegiate School Independent Schools Inspectorate Report March 2024	file
13.6	Cotswold Academy Ofsted report March 2025	file
13.7	Ashton Park Ofsted report Nov 2022	file
13.8	Harrow School Independent Schools Inspectorate Report Feb 2024	file
13.9	QEH Independent Schools Inspectorate Report Dec 2025	file
13.10	National Library of Scotland OS Map dated 1957	file
13.11	RAF Aerial Image 0021 31 March 1955	file (4322×5291)
13.12	RAF Aerial Image 0084 31 March 1955	file (4346×5322)
13.13	RAF Aerial Image 4040 4 December 1946	file (4375×5154)
13.14	Cotham School Draft Fencing Layout Plan	file

13.15	Neighbourhood Partnership Minutes 15 Sept 2010 and CCS letter to Annie Hudson	file
13.16	Bristol Evening Post article dated 19 September 1983	file
13.17	Land & Buildings Subcommittee Minutes 31 Oct 1983	file
13.18	Academy Trust Handbook	file
13.19	HM Land Registry entry for the freehold of Stoke Lodge Playing Fields, Shirehampton Road, Bristol	file
13.20	HM Land Registry entry for the leasehold of Stoke Lodge Playing Fields, Shirehampton Road, Bristol	file
13.21	Map showing the area of the School's Playing Fields within the School's fencing line	file
13.22	Department for Education updated 'School and college security guidance' July 2026	file
13.23	Note of meeting between Bristol City Council and Cotham School on 3 August 2018	file
13.24	The Education (Independent School Standards) Regulations 2014	file
13.25	Department for Education – National curriculum in England: physical education programmes of study 11 September 2013	file
13.26	Video of three dogs off-lead at the Playing Fields in November 2013 https://hgrlaw.egnyte.com/dl/XdilQqIDyY	file
13.27	1955 03 31 raf_540_1576_f21_0084 https://hgrlaw.egnyte.com/dl/T9gHKhKvkRyW	file

13.28	1955 03 31 raf_540_1576_f22_0085 https://hgrlaw.egnyte.com/dl/MfFJr6rkYgBg	file
13.29	1999 07 24 gm063A Getmapping plc https://hgrlaw.egnyte.com/dl/cbwqtkfR9MQF	file
13.30	2002 07 15 gm01241 Getmapping plc https://hgrlaw.egnyte.com/dl/x37DJvR4T8wb	file
13.31	2010 04 23 Bluesky Int Ltd 218429-3_RGB_25cm_2010_1_Shape https://hgrlaw.egnyte.com/dl/p4yQ6cVbXtkF	file
13.32	2016 10 05 Bluesky Int. Ltd 218429-2_RGB_12.5cm_2016_1_Shape https://hgrlaw.egnyte.com/dl/Kd9kYVbYpV7p	file
13.33	2018 09 27 CNES Airbus Google Earth https://hgrlaw.egnyte.com/dl/YjhrfYgHyygX	file
13.34	2020 02 25 Maxar Google Earth https://hgrlaw.egnyte.com/dl/tYKtDYM8hQ89	file
13.35	2023 05 20 Airbus Google Earth https://hgrlaw.egnyte.com/dl/3cDk6fHrtyX6	file
13.36	226 06 03 Stoke Lodge Playing Fields Bristol Authentication Letter	file
13.37	Index to Christine Cox' Appendices	file
13.38	Harrow School PINS Diversion Order Decision	CD 13.38- Harrow Schools PINS Diversion Order Decision
13.39	Court of Appeal Order to refuse permission to appeal	file

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