

In an inquiry relating to:

**Wildlife and Countryside Act 1981
Section 53**

**City Council of Bristol Definitive Map and Statement
Modification Order No.7 2024**

Planning inspectorate reference:	ROW/3363939
Applicant:	Mr Alan William Preece
Order Making Authority:	Bristol City Council
Date of Inquiry:	6 October 2026

PROOF OF EVIDENCE

OF

IAN CREER

Dated 6 September 2026

Proof of Evidence

I, Ian Creer, of [REDACTED] Cheyne Road Bristol BS9 2DH write this proof of evidence in support of Professor Alan Preece's application that The City Council of Bristol Definitive Map and Statement Modification Order (No. 7) 2024 should be confirmed.

1. This statement primarily gives evidence for Route 3, also known as The Green Route, route F-G-E-D-C on the Order Plan. I have however used all of the routes applied for over the years.

The Green Route

2. I would describe the orientation of the Green Route as going from the entry at Cheyne Road to the driveway at the side of Stoke Lodge House, now the Adult Learning Centre. I recall seeing wear in the grass, more visible in the winter months.
3. From 1963 I used the Cheyne Road to Shirehampton Road footpath across Stoke Lodge regularly and from 1968 as part of my everyday life. My use changed over the years as my circumstances changed, but using Stoke Lodge was always something that came naturally rather than something I ever had to think about.
4. In 1963 my wife and I became engaged and later married. At that time we lived in Redland, but we had friends, two couples in particular, who lived in Stoke Bishop, on roads close to Stoke Lodge. We would often drive over to visit them, sometimes parking at one house and walking across Stoke Lodge using the Green Route to meet the other couple before perhaps going to the shops on Shirehampton Road, Druid Hill or elsewhere locally. On other occasions we would do the journey the other way round, perhaps visiting the shops before returning to one of their houses for coffee.
5. Everything changed in 1966 when all three couples had our first children. I clearly remember pushing prams across Stoke Lodge on occasions, although naturally the women were much busier looking after young babies and, for a time, the three of us husbands would often meet up for a walk instead. It was a chance to get out of the

house for a while and catch up with one another. Sometimes we would pick up shopping for our wives, sometimes call at a local cafe or pub. There was no fixed pattern; the Green Route was simply part of our normal way of getting around the area. The most common entrance/exit points for me were Cheyne Road and Shirehampton Road or Parrys Lane.

6. In 1968 we moved to Bell Barn Road, which brought us even closer to Stoke Lodge. From then on my use of the footpaths became even more frequent. It was perfectly normal for me to walk down Bell Barn Road, up Cheyne Road, enter Stoke Lodge and walk across to Shirehampton Road. From there I would turn up Shirehampton Road and down Druid Hill perhaps to visit the hardware shop. The house we bought in Bell Barn Road needed a great deal of renovation and I spent several years carrying out improvements myself, so I made many trips to buy tools, fittings and other materials. I also regularly used the Post Office, as most correspondence in those days was still done by letter. I might also visit the shops on Shirehampton Road, perhaps the Newsagents for a paper or to pick up groceries for my wife.
7. During those first years after moving to Bell Barn Road I used the paths across Stoke Lodge frequently, depending on need and the weather – this would on average be about once every 2 weeks. Later, as my engineering business became busier and more successful, I found myself working much longer hours and my opportunities for walking reduced considerably, perhaps to around once a month. By the early 1980s life had become a little less hectic and my wife and I would often walk together again now that our children were old enough to be left at home. Stoke Lodge footpaths remained our preferred route wherever we were headed because they were usually a bit shorter, but even when it was a bit longer, because they were simply a much more pleasant walk than following the surrounding roads.

Use of other routes

8. During the earlier years, my friends and I made many different uses of the other Routes criss-crossing Stoke Lodge depending on what we decided to do on any given day or if we were to run any errands. It might also depend on what it was like underfoot. We would usually arrange to meet, but exactly where we went was often decided on the spur of the moment.

9. When I was renovating the house in Bell Barn Road and while we lived there, I might choose to walk the full length of Stoke Lodge (Route 1, the Blue Route), exiting on Parry's Lane before turning right and going down Druid Hill to the hardware store or Post Office perhaps. On other occasions I might turn towards Stoke Lane to visit the bakery, local shops or the garage, where I sometimes left my car for servicing or its MOT before walking home and returning later to collect it.
10. Early on, my use of the Yellow Route was fairly infrequent in comparison to the Blue and Green Routes, perhaps three or four times a year, but after we moved to Cheyne Road, in the mid-eighties, this route was more convenient if I was going to Stoke Lane or Canford Park for example. Use during this period would have been perhaps twice a month for a while, gradually reducing as we got older and used the car more often.
11. General
 12. I particularly remember that the entrances and exits to the paths across Stoke Lodge were always obvious because so many people used them. The grass was worn away at these points, especially during wet winter weather. Although the wear across the middle of the route was sometimes less pronounced, the line of the path was still visible at times because of the regular foot traffic. I never had to climb over a locked gate or over some physical obstacle that had been designed to prevent entry or exit in order to enter Stoke Lodge.
 13. On the odd occasion there might have been a sports activity such as football going on, some people might be watching it but on those occasions we would simply skirt the pitch so as not to disturb the game. I don't recollect this happening very often, it was infrequent enough that I can't remember what day of the week it might have been or how long ago although it was many years ago.
 14. In those days many more people walked than they do now. Few families owned more than one car and many everyday journeys were made on foot. Although it was perfectly possible to use the pavements beside the roads, Stoke Lodge was always the route I preferred. It was and is a beautiful open space to walk through and it was not uncommon to meet neighbours or friends on the way. Looking back now, I realise I never thought of this as anything unusual. The footpaths were simply there to be

used, and I used them in exactly the same way as everyone else I knew who lived nearby.

15. I never saw any signs warning me that it was private land or that I couldn't use it or walk across it, no one ever stopped me or questioned my use and it never crossed my mind that I needed anyone's permission. I never sought or received permission from anyone to use the route. There was never any obstacle or gate to obstruct the route.
16. I still use these paths today when the gates are open, since retiring I decided that with more time and less pressure, walking more and using the car less would be a healthier lifestyle.

SUMMARY

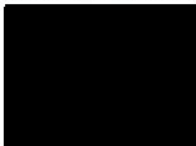
17. In summary I have used the following routes (with varying frequency as set out above) over the following periods:

- Green Route: 1963 to present
- Blue Route: 1963 to present
- Yellow Route: 1963 to present

Statement of Truth

I believe that the facts stated in this proof of evidence are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth

Signed:



IAN CREER

Dated:

6 SEPTEMBER 2026