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

CHERRY NOBLE

Dated 7 September 2026

Proof of Evidence

I, **CHERRY NOBLE**, of [redacted] Oaken Lane, Claygate, Surrey KT10 0RG 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. I was born at [redacted] Cheyne Road in 1964, and lived there full time until 1982. From 1982 to 1986 I was at university, returning home in the university holidays. From 1986 until 2023, I made regular visits to my parents who continued to live in Cheyne Road until my mother's death in 2023.

The Blue route (Cheyne Rd to Druid Hill roundabout)

2. I would describe the orientation of the Blue Route as a direct line from the top of Cheyne Road to the gap in the fence next to the roundabout at the junction of Druid Hill and Shirehampton Road.
3. I estimate I would have used this route about 60-80 times a year between 1964 and 1982.
4. I used this route (accompanied when younger) from 1964 to 1979 to visit my grandparents who lived in Sunnyside at the bottom of Druid Hill. For all my living memory I used to walk across Stoke Lodge in both directions to visit them, either accompanied by my parents, brothers or grandparents, or on my own when I was older. I would make this journey once or twice a week - probably more often in school holidays and weekends, and a bit less in term time. My grandparents would often look after me when my mother was busy and then walk me home afterwards.
5. I also used this route from about 1975 to 1982 to return from school sports lessons at The Grove. I would sometimes leave via the main gates of The Grove, and sometimes from the side entrance onto Parrys Lane. In younger years my mother would walk across Stoke Lodge to fetch me.
6. Since 1982, I have occasionally used the route to go to the Stoke Bishop Village shops and very occasionally the Downs, including after 1986 up to recent years when visiting my parents in Cheyne Road.

Use of other routes

The Green route (Cheyne Rd to Stoke Lodge House/Shirehampton Rd)

7. I would describe the orientation of the Green Route as a direct line from the top of Cheyne Road to the car park at Stoke Lodge House.

8. From about 1971 to 2023 I have used this route as part of a longer dog walk, which would continue through the car park to the south end of Stoke Lodge. From 1971 to 1982 this would be about 5 times a week. After 1982 it would be whenever I visited my parents. Visits to my parents varied in frequency depending on the stage of life, but I probably visited every 4-6 weeks between 1986 and about 2005, gradually rising to every 2-3 weeks from about 2013. I would stay 2-3 days and walk the dog twice each day.

9. Before 1971 we did not have a dog, and therefore would not have used this route as part of a longer dog walk before that, and I would have been too young to use the route unaccompanied. I may have occasionally used this route before that time with my parents or grandparents. My mother [redacted] used the routes before that time as she has mentioned in her user evidence form so may have had me with her (this was the basis of the 1964 date in my user evidence), but it's hard to remember specifically.

10. From about 1975 to 2023 I would very occasionally walk from Cheyne Road to the Shirehampton road shops via this route, in order to combine a dog walk with some shopping.

The Yellow route

11. I would describe the orientation of the Yellow Route as a direct line from the top of Cheyne Road to the pavilion, then a left turn past the north end of the pavilion to the exit onto West Dene. It is the quickest and most direct route to cut across from Cheyne Road to West Dene.

12. I can remember walking the yellow route from the top of Cheyne Road to West Dene on a regular basis (maybe 20 times/year) from about 1975 to about 1986 for the following reasons:

- To access the school tennis courts at The Grove. I would often use the small side gate which opened from The Grove onto Parry's Lane either when walking home

from sports lessons, or during weekends and holidays to play recreational tennis at The Grove.

- To walk to the dentist on Parry's Lane (the dentist was Charles Innocent).
- Occasionally to walk to Stoke Lane shops.

13. When walking to these destinations, I would sometimes exit through the gate behind the pavilion and continue up Ebenezer Lane to Parry's Lane, and sometimes continue through Stoke Lodge to the small car park in the Parry's Lane corner of Stoke Lodge.
14. Prior to 1975 I would have been too young to use the route independently, but I think I would still occasionally have gone to the dentist or the Stoke Lane shops via the yellow route with a parent or grandparent. From 1971 to 1982 I would also have used the yellow route as part of a longer dog walk about 5 times a week.
15. After 1986, I used the route as part of a longer dog walk or occasionally to visit Stoke Lane shops when visiting my parents. Visits to my parents varied in frequency depending on the stage of life, but I probably visited every 4-6 weeks between 1986 and about 2005, gradually rising to every 2-3 weeks from about 2013. I would stay 2-3 days and walk the dog twice each day.
16. I think there may have been a sign about the use of Stoke Lodge at the West Dene entrance, but I don't remember what it said, and I never understood it to mean that we were denied access.

Access to Stoke Lodge 1964 to 2023

17. I never had to climb over a locked gate or over some physical obstacle to enter Stoke Lodge.
18. As a teenager, my friend and I used to chat to the groundsman from time to time, and he never asked us to leave or told us we shouldn't be there.
19. I never sought or received permission from anyone to use the route, and I don't remember ever being denied access.
20. I remember that there were sometimes football matches on the pitches. From memory I think these were on a Saturday morning. When walking the dog we had strict instructions from our mothers to keep the dog off the pitches! If there was a match in progress we would continue on our way but skirt around the pitch.

SUMMARY

21. In summary I have used the following Routes over the following periods:

- Blue route: 1964 to 2023
- Green route: 1971 (or earlier) to 2023
- Yellow route: 1971 (or earlier) to 1986

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: [redacted]

CHERRY NOBLE

Dated: 07/09/2026