

STATUTORY DECLARATION OF:

DAVID WATKINS

I, DAVID JOHN WATKINS of [REDACTED] Dingle Road, Coombe Dingle Bristol BS9 2LN do Solemnly and Sincerely declare:

1. This statement is made in support of the application by Professor Alan Preece seeking confirmation of the City Council of Bristol Definitive Map and Statement Modification Order (No. 7) 2024.
2. The details set out below expand on and are in addition to the detailed breakdown of my use of the routes already set out in my user evidence form dated 15 January 2026.

Background

3. I am part of the Watkins family that has lived in Stoke Bishop for 150 years. My paternal Great Grandfather Albert Tyler was verger of Stoke Bishop Church for 42 years (1883-1925). My Grandmother Violet (Vi) was born in the flat above the Village Hall in 1897 and lived in Rayleigh Road, off Coombe Lane for most of her long life and used Stoke Lodge footpaths regularly.
4. Additionally, the family has been an important part of Stoke Bishop Cricket Club as players and officers from the 1910's to the present day. The cricket club's home ground was Stoke Lodge between 1929 and 1972. The pitch and cricket square were located to the North West of the main house adjacent to Ebenezer Lane. I watched and then played from 1955 onwards.
5. I am also the cricket club's archivist. In 2021 after collating information I created the website documenting the Club's history, from which Cotham School have taken much of their evidence.
6. The extended family has lived within a 'stone's throw' of Stoke Lodge for 5 generations and has a good knowledge of 20th Century Stoke Bishop local history.

7. I was born at ■ Dingle Road, Coombe Dingle on ■ I have remained single and have lived at the same address for 73 years. I attended Bradford University during term time from September 1971 to July 1975. Dingle Road is 300 yards from Stoke Lodge (3 minute walk) and it is the nearest open green space.
8. I set out below details of my Stoke Lodge footpath use from the age of 2 (1955) onwards
This is followed by other relevant information.

Cheyne Road to Shirehampton Road (Green Route) F-G-E-D-C

9. Before starting infant school in 1958 I accompanied my Mother on foot from our home in Dingle Road to the Stoke Bishop shops (at times via the Green footpath) where she visited the dress shop and post office. The Green footpath is the most direct and shortest route from Dingle Road to the Stoke Bishop shops. The route across the field is straight and a natural desire line from Cheyne Road to Shirehampton Road. My Mother would have favoured it, as it was traffic free and less hazardous with a toddler in tow. Between 1955 and 1958, with my Mother, I walked the Green Route (to and from Stoke Bishop) approximately 6 times per year. Although not mentioned in my user evidence form, I have since remembered this additional use as a child before 1958.
10. When I was eligible to vote in 1971 (local, national, EU) I would use the Green Route footpath to reach Cedar Park school via Coombe Bridge Avenue and Cheyne Road to cast my vote. The traffic-free scenic route gave the opportunity of seeing a fox, badger or tawny owl. When voting moved to Stoke Lodge House I continued to use the same route.
11. When Stoke Bishop Cricket Club left Stoke Lodge in 1972 it moved to the National Smelting Company (NSC) ground on the other side of Shirehampton Road, now occupied by the Queens Gate development. When I was not selected to play, I would walk to the ground from Dingle Road, via Coombe Bridge Avenue, Cheyne Road and across the field via the Green Route to Shirehampton Road to watch Saturday and mid-week games. I also used the same route for mid-week cricket practice. This continued up to 1994. From 1973 to 1994 between April and August, I walked this route on average 10 times per year for cricket related activities.
12. The NSC ran a skittles league in the clubhouse during winter months (September to April) and the cricket club entered two teams. From 1975 I captained one of the teams

(The Young Cricketers) and I would use the Green Route footpath to reach the clubhouse once or twice a week (in total roughly 40 times per year – perhaps a little more often than I originally recalled in my user evidence form) as it was the quickest, quietest and most direct route from my home in Dingle Road. Skittles finished in 1995 when the Avonmouth works closed and the sports ground was sold for housing.

13. For exercise, leisure and observing nature I enjoy walking. Stoke Lodge is an intermediate location crossed many times during my local walks. Between 1975 and 2026 (51 years) I have used the Green Route for leisure approximately 30 times per year.
14. In the mid 1980's my brother and I bought and sold cars under the trading name Auto Transfer. We rented space from [REDACTED] who leased Stoke Bishop Garage. The showroom, which no longer exists, was in the village on the corner of Stoke Hill and Old Sneed Road. After buying cars at auction and dropping them off at the showroom I would walk home to Dingle Road across Stoke Lodge using the Green Route footpath or the Blue Route footpath. This journey was also done in reverse. Between 1983 and 1987, I walked the Green Route, for car trade related business, roughly 10 times per year and the Blue Route about 15 times per year. The Blue Route is noted in my user evidence form for this purpose, but I have recalled that I would also use the Green Route for this purpose.
15. In addition to using the Green Route footpath I have regularly used the other Stoke Lodge footpaths. A selection of my other footpath use is listed below.

Cheyne Road to West Dene (Yellow Route) F-G-I-H

16. When I attended Cotham Grammar School between 1964 and 1971 I had a friend [REDACTED] who lived above the shops at Charlecombe Court, Stoke Lane. One of my routes on foot to reach Stoke Lane was via Coombe Bridge Avenue, Cheyne Road, Stoke Lodge (Yellow Route), West Dene, Coombe Lane and Red House Lane. I visited him around once a month between 1968 and 1971 while I was at the Grammar School. I had a second friend, [REDACTED], who lived in Withey Close East off Stoke Lane, who I also visited on average once a month from 1967 to 1971 using this route.
17. I have since 1975 in the winter months gone on a regular local walk on a Saturday afternoon. I would always finish the walk at my maternal Grandmother's house for tea

and a cake. In 1978 my Grandmother, Louie Goffe, moved from a prefab in Southwood Drive, Coombe Dingle to a newly built Council bungalow in South Dene. The Yellow Route footpath is midway between my house in Dingle Road and South Dene. From 1978 the walks ended at ■■■ South Dene, often via Cheyne Road, Stoke Lodge (Yellow Route), West Dene and Ebenezer Lane but over time using all the footpaths across the Lodge. Louie moved to a care home in 1994. Between 1978 and 1994, I walked the Yellow Route to visit my Grandmother at least 25 times per year primarily between October and March.

Cheyne Road to Druid Hill (Blue Route) F-G-B-A

18. I have explained my use of the Blue Route to travel between the Auto Transfer showroom and my home (both directions) in para 14 above.
19. My regular walks, frequently feature Stoke Bishop and the Downs – I incorporate the Blue Route as part of a longer walk for leisure/exercise around 25 times a year (1975 to date) in both directions. The Blue Route is the quietest, most direct and most picturesque walk from Druid Hill to my home in Coombe Dingle.
20. I also use the Blue Route to attend events at the Village Hall (twice a year 1980 to 2026) and to visit Salvatore the barber located at the bottom of Druid Hill (6 times per year 1990 to date).

All Routes (Green, Blue, Red and Yellow)

21. I have always been a keen walker during and since leaving university in 1975. I have probably walked every footpath within a 2 mile radius of my home on Dingle Road. This has included the Blaise Castle Estate, Kingsweston Estate, Sea Mills, Stoke Bishop, Westbury and Durdham Downs. Stoke Lodge is particularly important because of family and historic connections. Since my teenage years (I was born in 1953) I have traversed all the field's footpaths (Green, Red, Blue & Yellow in both directions) numerous times from 1970 to date. In total on average roughly 100 times per year, usually as part of a longer walk around the locality.
22. During my childhood years, 1953 to 1970, there were many one-off events (probably a few times per year) which involved walking one of the Stoke Lodge footpaths end-to-end. These one-off events revolved around Stoke Bishop Cricket Club, Coombe Dingle

Boys Club, Cub Scouts and family outings, including visits to relatives, shops and local attractions. Although my user evidence form focused on later use I would therefore say I have used these routes in some form throughout my whole life.

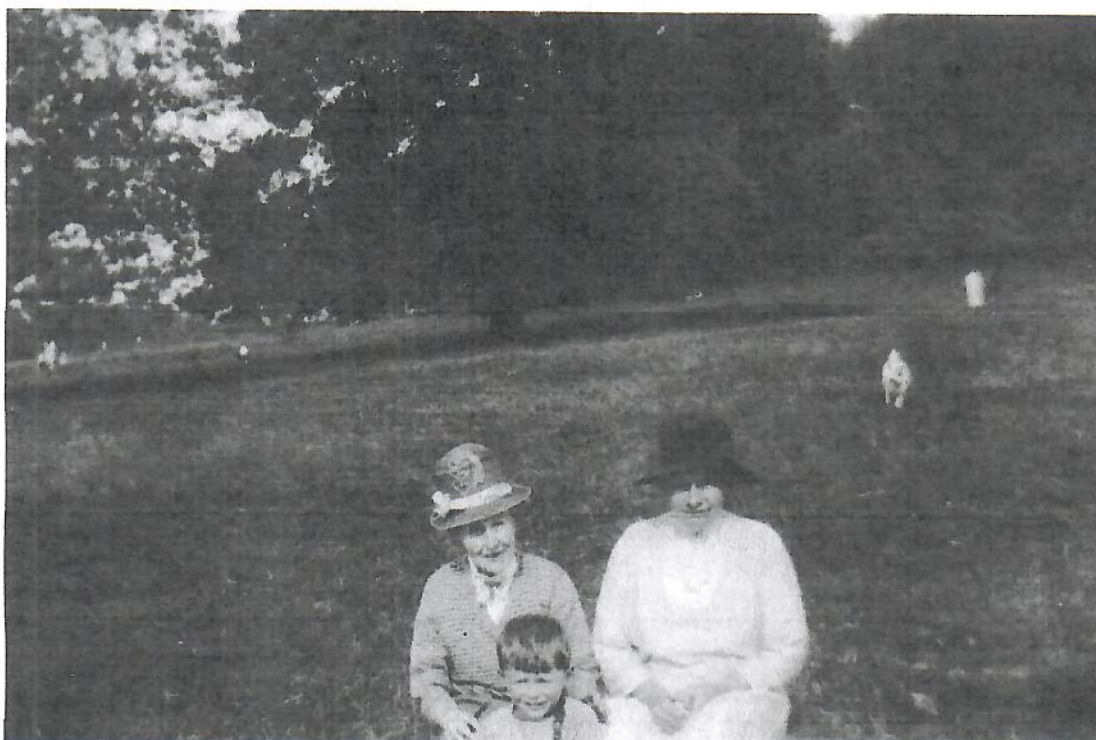
Additional information relevant to the period 1929 to 1985:

23. From 1929 to 1972 (43 years) the Stoke Bishop Cricket Club (SBCC) corner of Stoke Lodge was used for sport only by SBCC. The outfield and square were only used on a Saturday mid-April to mid-September, total 22 days per year, from 14:30 to 19:30pm. No Sunday games were played before 1967 and only a handful of home Sunday games played before the Club left in 1972. Only a minor diversion, following the cricket pitch boundary line and markers, was required if a game was in play, adding less than a minute to a journey. Walkers entering or exiting Cheyne Road could see if a match was in progress and would naturally keep just outside the clearly marked white boundary line.
24. In my experience Stoke Lodge was entirely activity free for around 85% of daylight hours. During the 1950's, 60's and 70's almost all adult games were played on a Saturday afternoon and school activity was largely restricted to games afternoons between 13:00 and 16:00pm Tuesday to Thursday. Sunday use of the field for sport was not allowed before 1967 when BCC adopted recently amended UK Sunday laws. During the winter months (weekdays and weekends) games could be called off due to unsuitable ground conditions.
25. Although Stoke Lodge was owned by the Butlin Sisters until 1946, they did not restrict access to the fields surrounding the main house. The lower part of the field (below the current pavilion) and probably the upper half as well, were accessible by the local population from at least 1932. Two photos (below) of Don Watkins (my Father) aged 6, taken in 1932, show use between the SBCC cricket pitch and Shirehampton Road. The photo location can be confirmed by the lie of the land, the cricket match taking place in the bottom left corner and the outline of the walled kitchen garden gazebo in the middle distance hedge line. The other prominent figures are Don's Step Grandmother Bertha Tyler (they both lived in the same house in Rayleigh Road) and a family friend Mary Cox who lived in Lopen cottages at the bottom of Druid Hill, plus Tarzan the dog! Don's Father Howard, as first team captain, would have been playing in the cricket

match and his Mother Vi preparing the cricket teas, which she continued to do until 1972. Mary and Bertha used the Red Route in the 1930's to visit each other's homes.



Don Watkins – Stoke Lodge 1932



Bertha Tyler, Mary Cox, Don Watkins – Stoke Lodge 1932

26. The rudimentary fence around the SBCC pitch was removed soon after 1947 when the BCC Education Committee consolidated the whole of Stoke Lodge into one unit. My family has used the Green, Blue, Red and Yellow routes from 1950 onwards, with no physical obstructions.

General additional information

27. In my lifetime (█████ onwards) freely available access to all of Stoke Lodge, including its footpaths, has been enjoyed by all. There were no warning signs restricting access or activities around the NW corner used by Stoke Bishop Cricket Club (or elsewhere) before the Club left in 1972. Around 1985 some cursory "No Dogs Allowed" signs briefly appeared at some entrances but I was not aware of any other signs around Stoke Lodge before around 2018 when Cotham unilaterally claimed exclusive use of the field during term time. I did not conclude from any sign that I was prohibited from walking my usual routes and I continued as before. I also did not notice any change in other footpath users behaviour until the current fence was erected.

28. As well as my own personal recollections I can record, if asked, relevant footpath information relating to members of the family who are no longer with us. My Mother, Father, both Grandmothers and Grandpa Watkins all made extensive use of the Stoke Lodge footpaths at some point during the period 1929 to 2005.

29. I never sought permission to use the Stoke Lodge footpaths as I presumed right of way.

30. I have never been challenged or ordered to leave while using the footpaths.

SUMMARY

In Summary I have used the following Routes over the following periods:

- Green Route: 1953 to present
- Yellow Route: 1953 to present
- Blue Route: 1953 to present
- Red Route: 1953 to present

And I make this solemn declaration conscientiously believing the same to be true by virtue
of the Statutory Declaration Act 1835

Signed.....

Print Name..... DAVID JOHN WATKINS

Sworn at..... Bristol

This 28th day of August 2026

Before

(Signing solicitor)

Karl Frank Stephan
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