

STATUTORY DECLARATION OF:

JOANNA SCOTT

I, Joanna Scott of [REDACTED] Hungarton Lane, Beeby Leicester LE7 3BJ and formerly of [REDACTED] South Dene, Stoke Bishop, Bristol, BS9 2BW 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. I lived at the above address next to Stoke Lodge from the age of 2 in 1972 until I graduated from medical school in 1993. Since then, I have visited my parents regularly and continued at almost every visit to use the routes as described below except for periods when the fence erected by Cotham School obstructed the right of way I was needing to use.
3. I am referring to routes by colour as many of my journeys across the field involved using 2 routes in one journey:
 - Route 1 – Blue route
 - Route 2 – Red route
 - Route 3 – Green route
 - Route 4 – Yellow route
4. The route I have used the most throughout my life is defined as the “Yellow route” between the West Dene entrance and Cheyne Road entrance (points F-G-I-H on the Order Plan). Prior to being old enough to go through Stoke Lodge alone or with friends (around the age of 8 or 9) I would be with one of my parents. I have always used this route via the top of Cheyne Road and Stoke Paddock Road to access the shops on Shirehampton Road where we used the bank, hairdressers and shopped at the newsagents, chemist and supermarket. Prior to 1988 I would use this route at least weekly and more as described below during school holiday. Stoke Lodge (or “the field” as we would call it) formed a key part of my life as a route to get to anywhere as a child and teenager.
5. I started university in October 1988 so when home for weekends and during the university holidays, I continued to use mostly the “Yellow route” for getting to

Shirehampton Road shops. I would come back home for the weekend 2 to 3 times a term and for the holidays until I finished university in 1993. On most weekends home I would visit Shirehampton Road shops for something. During the holidays, I would use routes across Stoke Lodge at least once a week. To this day, when visiting my parents, I use this route (unless Cotham School have kept the gates locked) especially on a Sunday morning to get their newspaper.

6. Throughout the years living at home (up to 1988) I also regularly used the "Red route" (points C-D-E-B-I-H on the Order Plan) to cross from West Dene to Shirehampton Road for example to reach the bus stop to Lawrence Weston to visit friends as a teenager (3 to 4 times a year), to access the shops (at least once a week and as an alternative to using the "yellow route") and weekly when I worked on a Saturday morning at the Chemist that used to be at the top of the parade on the corner with Stoke Paddock Road (between 1986 and 1988). As a primary school child (up to 1981) at Elmlea School, I would use this route to access the houses opposite Stoke Lodge house to sell raffle tickets and school fete programmes door to door (on a few days prior to the fete).
7. Also when primary school age (especially from about 1978 when I was 8 years old to 1981), I would use the "Red route" to get to the outbuilding area at Stoke Lodge (we called it the Secret Garden as children) to play. This was a seasonal activity but in the summer holidays especially, we would play in this area several times a week and in term time at least once a weekend. Often then we would visit the shops to buy sweets or comics so would either continue to Shirehampton Road directly on the "Red route" or via the "Blue route" to Cheyne Road.
8. I occasionally used the "Red then Blue route" when going to Druid Hill shops as it involved far less road walking than going via Parry's Lane.
9. When I was old enough to go alone to the shops from about the age of 8, my parents always preferred me to use the routes across Stoke Lodge as they were safer as open spaces where there were always other people rather than using Ebenezer Lane which was quite dark and isolated. On no occasion was I ever challenged about using Stoke Lodge to get to where I was heading and I do not recollect any signs present in the peak period when I used the field up until I was 18 years old in 1988. I have no personal recollection of any signs forbidding entry to Stoke Lodge parkland and access to the field was never obstructed and no one challenged the use of it.

10. I was a frequent user of Stoke Lodge for recreation during my childhood and teenage years including when schools were using it for sport. I had 1-2 afternoons a week at home during the week between 1981 and 1988 as we attended school on a Saturday morning instead. I was never challenged about being there at these times, but it was not frequent that the field was in use. I had longer school holidays as well so there were times when Fairfield was still in term time and so I remember seeing them there at these times. I cannot remember exactly where the PE lessons took place but if these had obstructed my routes across the field, I would have simply walked around the edge of the lesson area as a matter of courtesy. I do not recall it being a common occurrence and it did not stop my use of the paths across the Parkland.

SIGNS AND GATES

11. The Avon County Council signs apparently installed in the mid to late-1980s referred to 'the exercising of dogs or horses' as an activity that might cause nuisance or disturbance to users of the field. I would not have been permitted by my parents to ride a horse daily in Stoke Lodge (as I did over Easter 1984) had those signs been in place at that time. Because of the information set out below, I am certain that the signs cannot have been installed until after Easter 1984 and that no challenge was raised against me doing so.

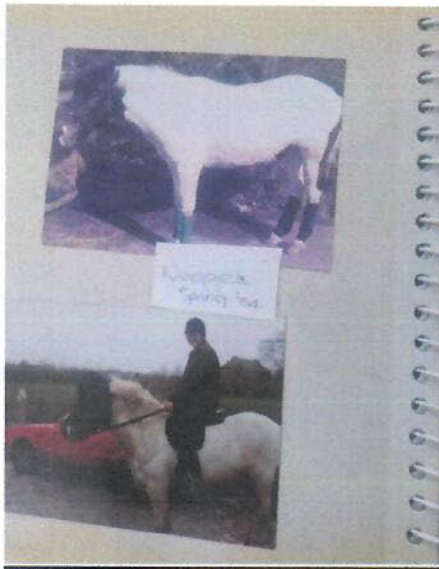
12. I had a pony on loan in the spring of 1984 and we stabled him at night in the garage at South Dene. He was outside during the day either in the front drive, the back garden or hand grazed around the edge of Stoke Lodge. I have found an old photo album from that time showing this pony in the driveway and garden at South Dene and being ridden in open spaces. The dates of my labels of all my horse pictures in this album clearly identify the year I had this pony (1984) and are positioned between other pictures from 1983 and 1985. Looking at my glasses, hair style and length, I can be sure these dates and the order of the pictures are correct. I also found a single photo in a frame that has been by the bed in my childhood bedroom since 1984 – in the back of this frame was paper used to hold the picture in place. This is a permission slip for tickets for a school play clearly marked as relating to summer term 1984.

13. I rode the pony almost daily down Ebenezer Lane from our back gate, through the West Dene entrance into Stoke Lodge Parkland and around the edge of Stoke Lodge. I

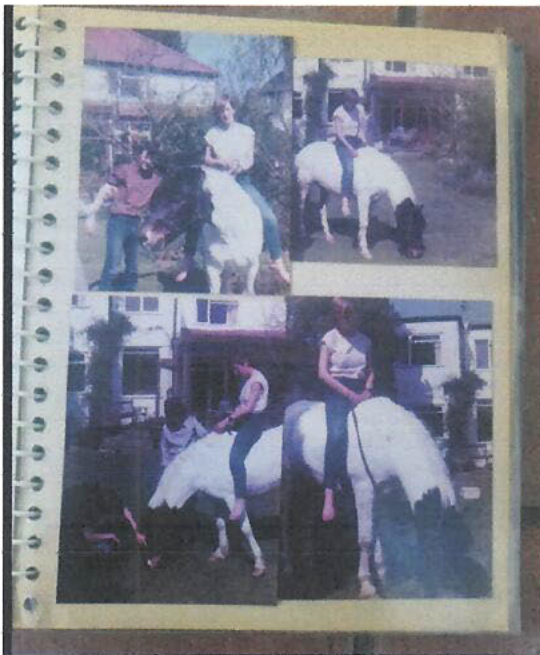
also used to ride to Cheyne Road and then onwards across Bell Barn Road to access Blaise woods and a jumping arena off a small pathway along Canford Lane.

14. I was never challenged by the groundsman for riding in and across Stoke Lodge parkland except on one occasion when I had accidentally let the pony go in Ebenezer Lane and he trotted off, turned into Stoke Lodge at West Dene (no gate obstructing him) and cantered off to graze. The groundsman helpfully caught him for me when he stopped to graze and asked me to keep to the edges and to keep control of him! I would not have been permitted by my parents to ride him daily in Stoke Lodge had signs been there at that time and the groundsman did not tell me to stop coming into Stoke Lodge either.
15. Until Cotham School erected the fence, there were no gates obstructing access into Stoke Lodge. At one point (though I cannot recollect the exact year) after I had the horse in 1984, I believe there was a gate at West Dene entrance for a while but this was never locked. This gate definitely wasn't there when I had the pony in 1984 (as he would not have been able to get into the field when he was loose).
16. In summary – I have used all the routes described above throughout my life from 1972 with the majority of frequent (weekly or more often) use between around 1978 when I was old enough to go to shops independently and 1988 when I finished school. After 1988, the frequency of my use of footpaths across Stoke Lodge Parkland reduced as I went away to University in Leeds but continued to visit my parents in South Dene regularly. Therefore, since I graduated in 1993 to the present day, though I lived in Leeds and now Leicestershire, I have used the "Yellow route" consistently especially when staying in South Dene 4-5 times a year (every few months on average). At times in recent years I have not been able to cross Stoke Lodge via the "Yellow route" due to the fence and gates erected by the school but still continue to use the shops at Shirehampton road. I would have used the "yellow route" for this had I been able. During the 54 years of my life when I have either lived by Stoke Lodge or visited my parents at the same address, I have therefore used the footpaths across Stoke Lodge hundreds of times in total.
17. Photos – these are photos of the pages of the photo album. The originals can be supplied if required but will be brought in person not posted.

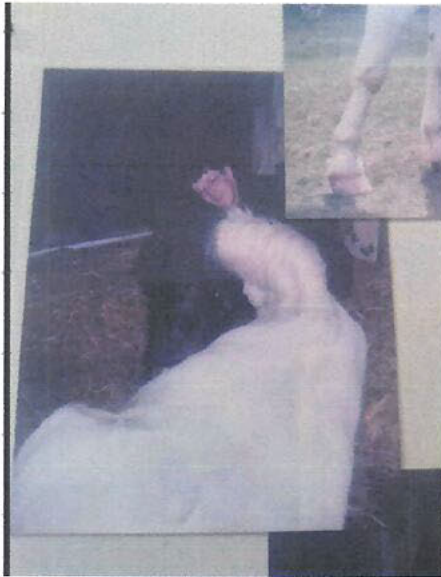
a. Pony with date label showing Spring '84



b. Pony in garden and driveway of [redacted] South Dene



c. Pony in garage



SUMMARY

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

- Red Route: 1972 to present
- Yellow Route: 1972 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.....Joanna Scott

Sworn at.....Edward Hands + Lewis

This 24th day of August 2026

Before...

(Signing solicitor)

REBECCA LAUETT

Edward Hands & Lewis
Solicitors
1320 Melton Road, Syston
LE7 2EQ