AIR PHOTO SERVICES
Expert Interpretation of Aerial Imagery

EVIDENCE FROM AERIAL PHOTOGRAPHS AND SATELLITE IMAGERY
STOKE LODGE PLAYING FIELDS, WEST DENE, STOKE BISHOP, BRISTOL, BS9 2BH

STATEMENT OF CHRISTINE DIANE COX BA MA MCIFA FSA

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AREA OF EXPERTISE	:	INTERPRETATION AND MAPPING FROM AERIAL PHOTOGRAPHS AND SATELLITE IMAGERY

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1. SUMMARY OF FINDINGS

1. The available aerial photographs and satellite imagery provide a visual record of Stoke Lodge Playing Fields from 28 separate image acquisitions, representing 27 dates or survey periods between 1946 and 2024.

2. These images were captured in 1946, 1947, 1955, 1960, 1963, 1970, 1971 (2 occasions), 1980, 1982, 1999 (2 occasions), 2004-05, 2007, 2010, 2014, 2016, 2017, 2018 (2 occasions), 2020 (2 occasions), 2021, 2022, 2023 (2 acquisitions), and 2024. Historic documentary and mapping evidence for sporting use as a bounded cricket ground in the northeast of the site is available from 1928 and 1936.

3. The aerial and satellite images currently examined demonstrate a long history of organised sporting use extending over more than sixty years, with an apparent interruption in visible organised sporting activity on imagery captured in 2017 and 2018. No 2019 imagery has been identified to be able to comment on use in this year.

4. For the substantial majority of the period 1946 - 2024, no visible continual evidence has been identified of sustained pedestrian movement across the playing fields or on the claimed DMMO routes.

5. Visible pedestrian tracking appears only during a brief period from approximately 2017-18 and change is again observed in 2020. The surface is susceptible to wear from footfall and pedestrian use, as demonstrated in this analysis, and repeated pedestrian use at a level sufficient to produce wear would be expected to leave visible surface traces where image resolution permits.

6. Even during the period 2017-18, the observed claimed DMMO routes are spatially limited to part of 683, and do not fully correspond at all with the routes identified within the claimed DMMO application.

7. **Appendix 1** is a tabulated summary of my findings, which are illustrated and described in detail in this report.

2. STATEMENT OF EXPERTISE

8. I am Christine Diane Cox, a professional interpreter of aerial and satellite imagery and Director at Air Photo Services Ltd.

9. My qualifications comprise a BA (Honours) degree in Archaeology from the University of Liverpool Department of Archaeology and Oriental Studies (1983), and an MA in Aerial Photographic Interpretation from the University of Sheffield, Department of Archaeology and Prehistory (1984).

I am trained and experienced in technical historic and modern aerial photographic interpretation. Since 1985 I have pursued a continuing professional career in this field and have used comparative historic and modern mapping evidence professionally throughout as appropriate.

10. My areas of expertise encompass access, boundary, landscape and site history, Public Rights of Way (PROW), Rights of Way (RoW), heritage, building history and construction dates, adverse possession, Rights of Light (RoL), Village Green (VG), Town and Village Green (TVG), minerals extraction, residential planning and other land use issues.

11. I am a member of the Chartered Institute for Archaeologists (CIfA, membership number 947, elected 1990, original area of competence Air Photo Interpretation), and a CIfA NVQ L3 and 4 and an L3, 4 and 7 Apprenticeship Assessor for professionals who work in the fields of airborne and spaceborne remote sensing.

12. I am a Fellow of the Society of Antiquaries of London (elected October 2014) and fully vetted on the UK Register of Expert Witnesses, which I joined in 2021, and an Associate Member of the Expert Witness Institute (EWI) since 2022.

13. Air Photo Services provides CIfA-approved training in the interpretation of aerial photographs for planning, heritage and archaeology, and supports training in mapping using Geographic Information Systems (GIS) and visualised Airborne laser Scan (also known as LiDAR) data. I am a Trustee of the worldwide Aerial Archaeology Research Group (AARG https://aargonline.com/wp/) since 2023, and an academic Editorial committee member for the bi-annual peer-review *AARGnews* journal (https://aargonline.com/wp/aarg-news/).

14. Since 1998 I have assisted legal and planning cases with objective analytical statements of expert witness opinion from aerial and satellite imagery and, more recently, visualised Light Detection and Ranging (LiDAR) data, as both a Joint and Individual Expert. I have acted as an expert to cases in Court and at Public Inquiry where I have submitted written representations and given evidence in chief. All evidence for either court, Inquiry or mediation proceedings is researched, analysed and delivered in compliance with the standard and guidance required by The Ministry of Justice Civil Procedure Rules Part 35 (CPR 35 for experts and assessors https://www.justice.gov.uk/courts/procedure-rules/civil/rules/part35).

15. My CV is appended to this report.

3. CONFLICT OF INTEREST

16. I have no conflict of interest in this case. Neither party to it is known to me personally and I have applied all professional judgement to remain objective as required of me under CPR part 35 for experts and assessors.

4. INTRODUCTION

17. I am instructed, as director at Air Photo Services Ltd, by Goodenough Ring Solicitors, on behalf of the Objector, Cotham School. This is to undertake interpretation of historic and modern aerial photographs and modern satellite imagery relating to the land at Stoke Lodge Playing Fields, West Dene, Stoke Bishop, Bristol BS9 2BH.

18. This report details my opinion on evidence from date-authenticated historic aerial photographs taken between 1946 and 1982, and comparative selected modern aerial and satellite imagery taken in and after 1999.

19. Technical assistance has been provided by my colleague David Lang BA PCIfA to undertake data searches and compilation of Figures, Tables and QA over the formatting of this document.

5. OBJECTIVE

20. The objective of this report is to provide a date-authenticated sequence of observations of the conditions at the site from historic and modern aerial and satellite images with comparison, to the routes detailed in the 2024 Bristol City Council Notice of Order[1].

21. This is undertaken to identify visible current evidence or traces of past evidence for:

- Organised sports use on the site
- Changes in land use and condition over time
- Visible tracking and pedestrian activity at the site
- Access to and from the site at stated points

6. THE SITE

22. The study area comprises Stoke Lodge Playing Fields, West Dene, Stoke Bishop, Bristol BS9 2BH and is shown in **Figure 1.**

[1] Bristol City Council Definitive Map and Statement Modification order No. 7 2024. Wildlife and Countryside Act 1981 Section 53. Footpath Nos. 678-686.

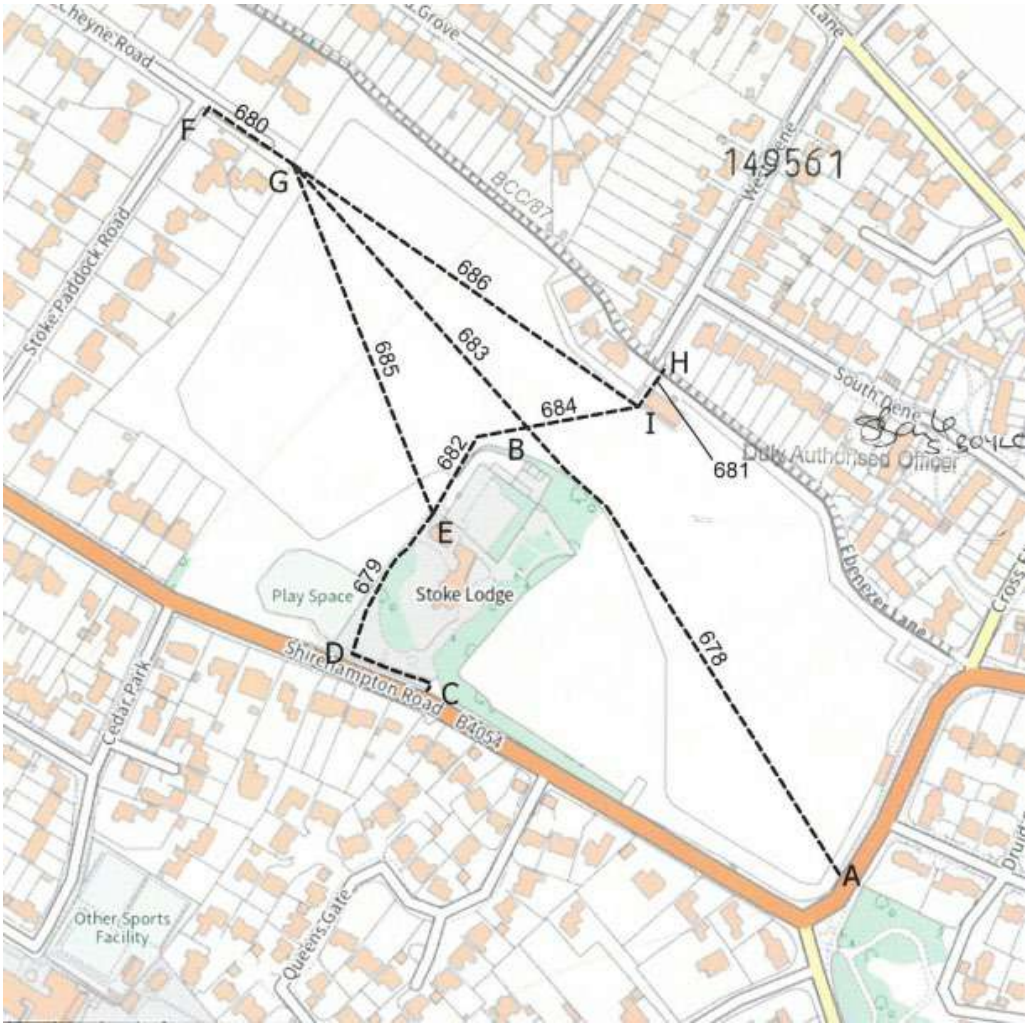


FIGURE 1: THE SITE AND THE CLAIMED ACCESS ROUTES
After Bristol City Council, 2024.

23. The site consists of long-established playing fields supporting organised sporting activities which include cricket, field athletics activities, rugby football (rugby) and association football (football) within a suburban context. The site is bounded by mature residential garden boundaries to the north and north-west, by West Dene and Stoke Lodge to the south and Shirehampton Road B4054 in its southern and southeastern aspects.

7. IMAGERY

24. The imagery currently examined comprises authenticated aerial photographs dating from various occasions between 1946 and 1982, together with a sequence of modern analogue and digital aerial and satellite imagery extending from 1999 to 2024.

8. INTERPRETATION AND MAPPING

25. Examination of the imagery was undertaken using a magnifying mirror stereoscope to see the site and its components in 3D within the overlapping (c.60%) parts of the pre-1999 paper based and scanned vertical aerial photographs. The use of a stereoscope is illustrated in **Appendix 2**.

26. This examination is in accordance with the standard methodology for examination of prints from large format negatives, and in some cases scanned material on-screen. Stereoscopic examination of pairs of vertical aerial photographs allows detailed examination of height differences, barriers, ground conditions and any upstanding features. This examination was undertaken over the historic aerial photos where pairs were available, dated 1946 – 1982 inclusive.

27. Digital images were examined and magnified on a high resolution large monitor screen.

28. Older aerial photos and the claimed DMMO route map were georeferenced[2] to an Ordnance Survey (OS) basemap and overlain to identify the claimed routes in their real-world positions against the aerial photographs. To do this I used QGIS[3] industry standard mapping software georeferencing tool[4] over level ground.

9. DOCUMENTS AND MAPS

29. Documents and maps were consulted to provide background to the case, with care to preserve the objectivity of the interpretation of the aerial and satellite imagery as appropriate. The following documents and maps were examined to inform the analysis by providing locational detail and context. The images were analysed in advance of any detailed documentary and cartographic consultation to preserve objectivity, then compared with documents as appropriate for concordance or query.

[2] Georeferencing is the process of aligning an unreferenced digital map, aerial photo, or raster dataset with real-world geographic coordinates, via matching of ground Control Points (GCPs) between the image and a digital map such as an OS vector base.

[3] QGIS is a free and open-source geographic information system software. QGIS supports Windows, macOS, and Linux. It supports viewing, editing, printing, and analysis of geospatial data in a range of data formats. Its name comes from an abbreviation of its previous name, Quantum GIS.

[4] The QGIS Georeferencer is a tool for aligning unreferenced raster or vector layers to known coordinate systems using Ground Control Points (GCPs). It supports exporting transformed rasters (GeoTIFF) and vectors (shapefiles, geopackages, etc.) or writing accompanying world files (for raster only). The basic approach to georeferencing a layer is to locate points on it for which you can accurately determine coordinates.

- Bristol City Council Definitive Map and Statement Modification order No. 7 2024. Wildlife and Countryside Act 1981 Section 53. Footpath Nos. 678-686, to inform the analysis.

- Statement of Case (SoC) on Behalf of the Applicant, Professor Alan Preece, including Town and Village Green. To inform the analysis, read after the interpretation was complete, and then including named statements of TVG user evidence.

- Statement of Case on behalf of the Defendant, Cotham School, To inform the analysis, read after the interpretation was complete.

- Agreement for a cricket field at Stoke Lodge, Stoke Bishop, Bristol, dated October 12th, 1928. A lease agreement, term of one year from 29th September 1928, between The Misses A.J, M. E. and E. G. Butlin and Messrs. V. Barnard, T Fletcher and H. G. Waymouth. To inform the analysis.

- Ordnance Survey (OS) map Gloucestershire LXXXI.7 Revised 1936 and published 1938 at 25.344 inches to one statute mile. Viewed as a scan from the original OS printed map sheet and purchased by the applicant as a digital copy for reference in this case.

10. HISTORIC AERIAL PHOTOGRAPHS (1946–1982)

30. The following aerial photographs provide coverage between 1946 and 1982 and include imagery captured during different sporting seasons, enabling assessment of both land management and seasonal recreational use. They are provided in the digital annexe (226 06 03_02) to this report as full frame and cropped images at their full resolution as supplied by the original holding archives. Where possible, those held as prints at the Historic England Archive were examined in person in the archive as stereo pairs and runs.

TABLE 1: HISTORIC AERIAL PHOTOGRAPHS

Date	UK date format	Reference	FIGURE
1946 12 04	04 DECEMBER 1946	RAF/CPE/UK/1869/RP/3027	FIGURE 2
1947 08 14	14 AUGUST 1947	RAF/CPE/UK/2223/V/5198-9	FIGURE 8
1955 03 31	31 March 1955	RAF/540/F21/0084	FIGURE 10
1960 06 26	26 JUNE 1960	OS/60062/V/125	FIGURE 13
1963 07 26	26 JULY 1963	RAF/543/2332 1F22/0110	FIGURE 15
1970 05 18	18 MAY 1970	OS/70118 V/035	FIGURE 16

1971 07 14	14 JULY 1971	HSL/UK/71/0124/5742	FIGURE 17
1971 08 16	16 AUGUST 1971	HSL/UK/71/0163/102	FIGURE 18
1980 10 12	12 OCTOBER 1980	OS/80156 V/416	FIGURE 19
1982 04 25	25 APRIL 1982	ADA/083 V/025	FIGURE 20

10.1 04 DECEMBER 1946



FIGURE 2: 04 DECEMBER 1946
Source: RAF/CPE/UK/1869/RP/3027 ©Historic England Archive RAF Photography. Image cropped to site

OBSERVATIONS, 1946

31. The aerial photograph was captured as part of a run of vertical aerial survey photos during the winter, outside of the cricket season, but when pitch surfaces are usually maintained. Deciduous

trees devoid of foliage were present, but the image provides generally good visibility across the site.

32. The cricket field was clearly defined by a circular boundary, consistent with its use for organised matches. There were some light-toned areas on the ground at the NE corner of the field within the cricket pitch circle area. These do not appear to be external access tracking or paths or connect in a linear fashion to the adjacent housing area.

33. A fence enclosing the cricket pitch is visible and corresponds closely with the extent shown on the 1928 cricket lease plan, **Figure 3.**

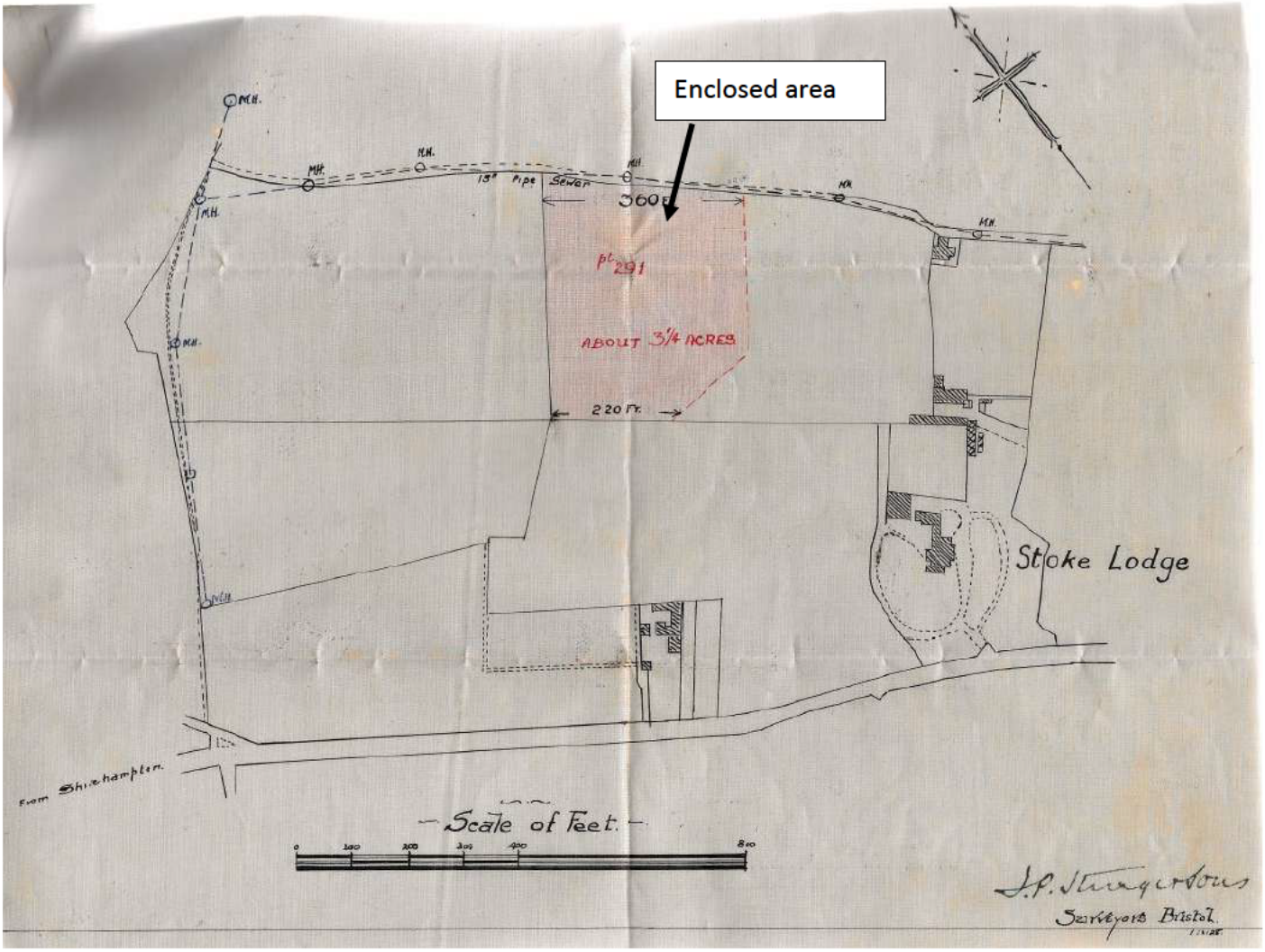


FIGURE 3: 1928 LEASE SHOWING THE AREA FENCED FOR CRICKET

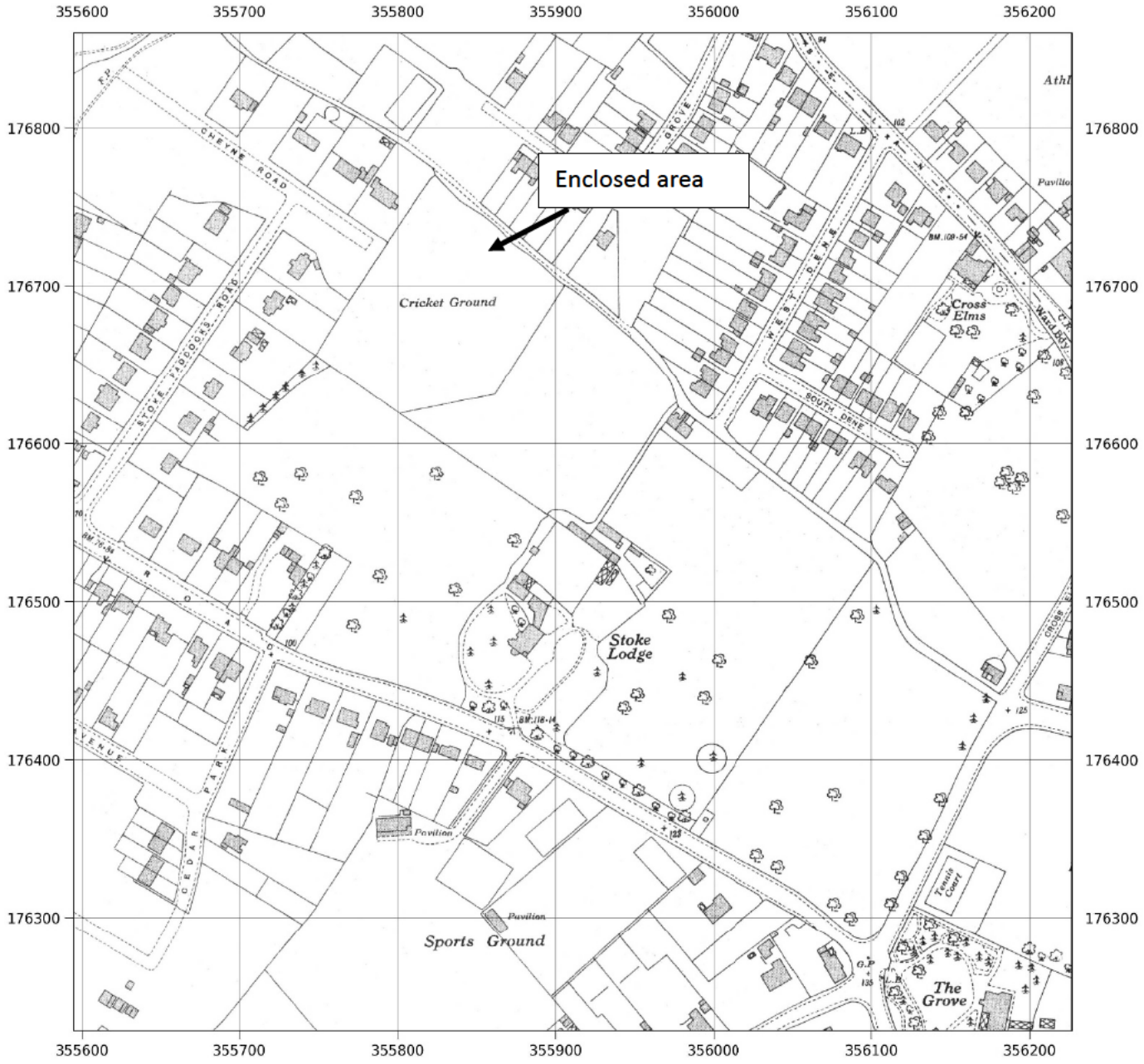


FIGURE 4: OS 25 INCH TO ONE MILE MAP REVISED IN 1936 AND PUBLISHED IN 1938

34. The 1936 OS map was georeferenced[5] to the modern map and 1946 aerial photograph in QGIS to show the position of the fenced area.

[5] Georeferenced means that a digital map, aerial photo, or raster image is tied to a specific real-world coordinate system on Earth. This process assigns spatial coordinates to image pixels, so the data aligns accurately with modern maps in geographic information systems

35. **Figure 5** shows the 1946 aerial photograph with the overlain numbered claimed routes for comparative purposes. The Ground Control Points (GCPs) used for the georectification which matches these spatial data to the real-world co-ordinates are recorded as small red points.



FIGURE 5: 1946 AERIAL PHOTO OVERLAIN WITH THE CLAIMED ROUTES

36. The claimed routes were not visible as worn or trodden access ways across the site in 1946.

37. **Figure 6** shows the site in 1946, overlain with the 1936 OS map at 68% transparency. This indicates the concordance of the boundary around the ground in 1936 and 1946.



FIGURE 6: 1936 MAP OVER 1946 AERIAL PHOTO

38. **Figure 7** shows a close-in part of 1946 aerial photo at the area marked as a 'cricket ground' in the 1936 OS map. This is the first visible sports facility recorded on the aerial photos.



FIGURE 7: CLOSE UP SHOWING THE CRICKET GROUND AND ENVIRONS IN 1946

39. The grassed playing field appears well maintained and free from significant surface disturbance. Some vegetation growth is visible at the interface of the field and Cheyne Road.

40. No evidence of pedestrian tracks is visible around the perimeter of the playing fields.

41. No informal or formal footpaths or desire lines were visible crossing the playing fields. A straight path is visible connecting the Lodge and the buildings on the northern perimeter of the site.

42. Point G had no visible barrier to access from Cheyne Road. The cricket ground was established very close to G. To the east of G and west of H a mown track is visible to the cricket ground. A small structure is visible in the northwest part of the site near the cricket ground with a further structure east of the enclosure.

43. Point H is situated at the interface of the site with West Dene and in the 1946 photo was in some shadow. A light toned intermittent linear feature is visible just inside the boundary, within a garden in the site. This does not indicate a boundary, but likely a feature on the ground, and was visible again in 1947. The land to the immediate south of and adjacent to point H has the appearance in 1946 of a private home garden, possibly laid to domestic vegetable rows, as was common when food rationing was still in place after WWII until 1954. No access through this garden area is visible at all.

10.2 CONCLUSION 1946

44. The 4 December 1946 aerial photograph demonstrates that the northwest part of the site was already established and managed as an organised cricket ground shortly after the Second World War.

45. The correlation between the visible cricket enclosure in 1946, the 1928 cricket lease plan and the 1936 OS map indicate that the formal layout of the cricket ground remained substantially unchanged during this period to 1946.

46. The absence of visible pedestrian tracks or informal routes across or around the playing fields indicates that pedestrian use was not occurring at a level sufficient to produce detectable ground disturbance at the time of photography. Tracks visible in later imagery demonstrate that the ground surface was susceptible to wear from repeated pedestrian use.

10.3 14 AUGUST 1947



FIGURE 8: 14 AUGUST 1947
Source: RAF/CPE/UK/2223/V/5198 ©Historic England Archive RAF Photography. Image cropped to site.

OBSERVATIONS

47. The aerial photograph, **Figure 8**, was captured during the summer season, with deciduous trees in full foliage, but not impeding visibility across the site. The conditions are similar to those recorded in December of the previous year.

48. The cricket pitch is clearly defined by a circular boundary, consistent with its use for organised cricket.

49. A fenceline enclosing the cricket pitch is visible and corresponds closely with the extent shown on the 1928 cricket lease plan.

50. The grassed playing field appears well maintained and free from significant surface disturbance. Lines on this image are the result of scratches on the negative roll which have occurred during the automated development and/or printing process of the large format film.

51. No evidence of pedestrian tracks is visible around the perimeter of the playing fields.

52. No informal footpaths or desire lines are visible crossing the playing fields. A formal path is visible connecting the lodge and the buildings on the northern perimeter of the site.

53. There is a visible dark toned linear feature across the boundary of the site at Point H with no visible access from West Dene into what was then a private garden area. This is shown on **Figure 9**.



FIGURE 9: NO ACCESS AT POINT H, 1947

CONCLUSION 1947

54. The 14 August 1947 aerial photograph demonstrates that the site was, as in 1946, established and managed as organised cricket and recreational grounds shortly after the Second World War.

55. The correspondence between the visible cricket enclosure and the 1928 cricket lease plan indicates that the formal layout of the cricket ground remained substantially unchanged during this period.

56. The absence of visible pedestrian tracks or informal routes across the cricket ground and wider site indicates that pedestrian use was not occurring at a level sufficient to produce detectable ground disturbance at the time of photography, or recently prior to its capture.

10.4 31 MARCH 1955



FIGURE 10: 31 MARCH 1955

OBSERVATIONS

57. The aerial photograph was captured over the central and northwestern parts of the site in spring 1955, at the crossover between the winter rugby and football seasons and the summer cricket season.

58. By 1955 sports use had expanded to three visible cricket pitches with well-maintained squares, with a visible football pitch and goals and rugby pitches and goals.

59. The barrier enclosure indicated in the 1928 deed, 1936 map and 1946 and 47 aerial photo had been removed in the northwest area of the site since 1947.

60. No evidence of pedestrian tracks is visible around the perimeter of the playing fields.

61. No informal footpaths or desire lines are visible crossing the playing fields on the later claimed routes. A former access path between the Lodge and the buildings in the north area of the field was not present in 1955.

62. A series of small narrow tracks are visible in the grass within the site, which do not traverse the site but indicate access to and from the sporting areas. Again, these tracks show that the surface is susceptible to wear as it occurs.



FIGURE 11: TRACKING BETWEEN SPORTS AREAS, 1955

CONCLUSION 1955

63. The March 1955 aerial photograph demonstrates that the sporting use at the site had by this date expanded across the fields, with removal of a barrier and addition of multiple cricket pitches, football and rugby pitches with distinctive markings and upstanding goal structures.

64. No visible pedestrian tracks or informal routes cross the playing fields along the later claimed routes. The small tracks associated with access to the sporting areas demonstrate that the grassed surface was capable of recording wear, indicating that pedestrian use along the claimed routes was not occurring at a level sufficient to produce detectable ground disturbance at the time of photography.

65. **Figure 12** shows that the claimed routes would have had to cross active sports pitches and access an area over a private garden if used at this date. The full resolution photograph included in the annexe should be consulted to see the details of the pitches and goals visible in 1955.



FIGURE 12: 1955, WITH THE CLAIMED ROUTES WHICH WOULD HAVE TRAVERSED PITCHES IF PRESENT

10.5 26 JUNE 1960



FIGURE 13: 26 JUNE 1960

Source: OS/60062/V/125©Historic England Archive RAF Photography. Image cropped to site.

OBSERVATIONS

66. The aerial photograph was captured during the summer season, with deciduous trees in full foliage, but not impeding visibility across the site. A small area of low cloud is present over the southeast part of the site.

67. The cricket pitches were clearly defined, and the sporting use had expanded to include athletics throwing and jumping sport areas.

68. The grassed playing field appears well maintained and free from significant surface disturbance. There are multiple cricket squares visible, alongside the well-maintained long jump and throwing sport areas.

69. No evidence of pedestrian tracking is visible around the perimeter of the playing fields and no evidence can be seen of access at point H.

70. No informal footpaths or desire lines are visible crossing the playing fields. As in previous years, the claimed routes would have had to cross active sports playing areas if present and would have been visible as worn lines in the receptive ground surface, which they are not.

10.6 CONCLUSION 1960

71. The 26 June 1960 aerial photograph demonstrates that the site was established and managed as organised cricket and athletic areas in the summer field sports season.

72. The absence of visible pedestrian tracks or informal routes across the playing fields indicates that pedestrian use was not occurring at a level sufficient to produce detectable ground disturbance at the time of photography.

73. **Figure 14** shows that the claimed routes would, if present in 1960, have had to traverse an active cricket pitch and a permanent throwing sports area at point I, when in fact they were not at all visible either as active or residual tracks in what is proven to be a susceptible surface.

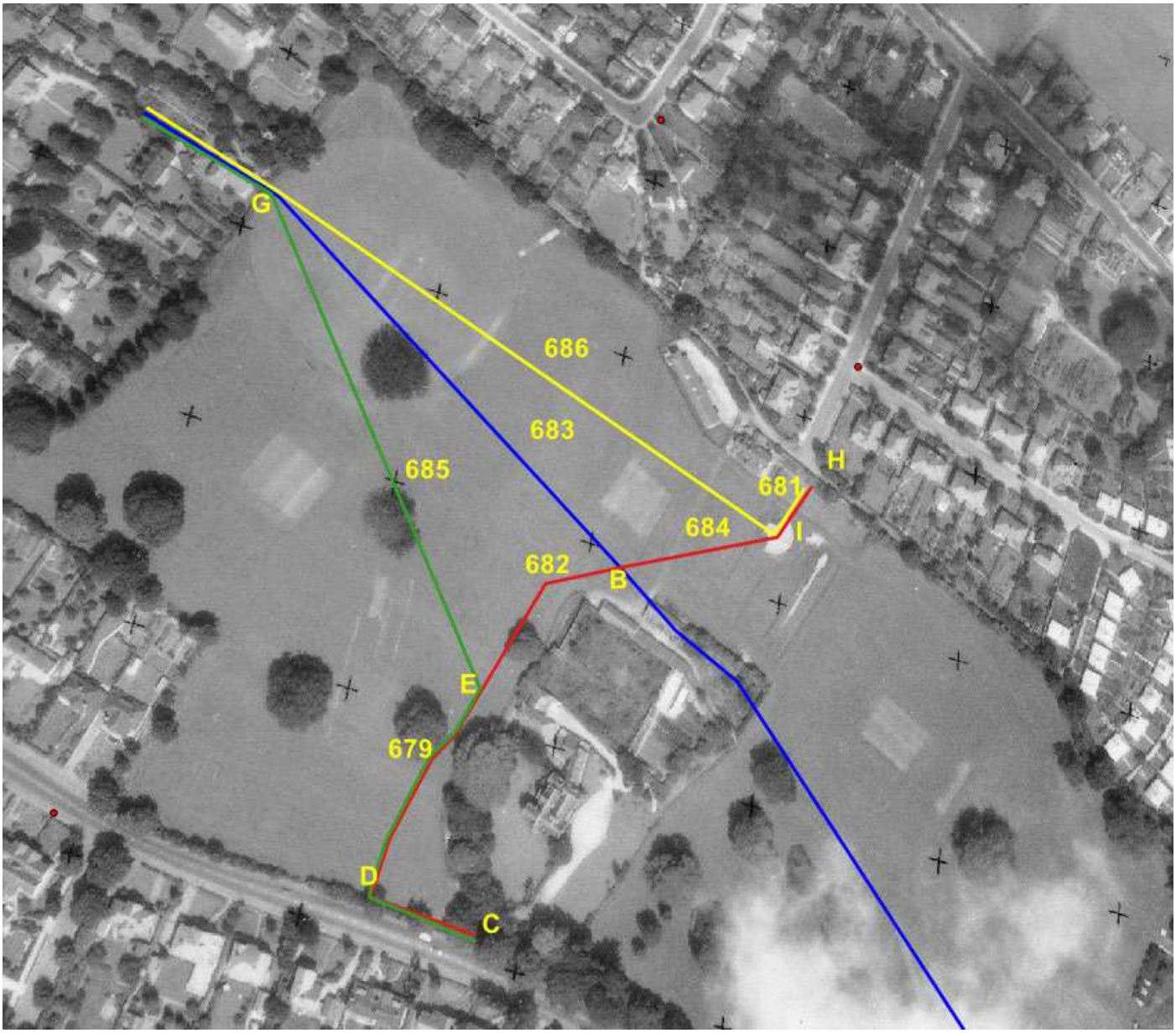


FIGURE 14: 1960 AERIAL PHOTOGRAPH WITH OVERLAIN CLAIMED DMMO ROUTES

10.7 26 JULY 1963



FIGURE 15: 26 JULY 1963
Source: RAF/543/2332 1F22/0110 ©Historic England Archive RAF Photography. Image cropped to site.

OBSERVATIONS

74. The aerial photograph was captured during the athletics and cricket season.

75. The playing fields are maintained to a high standard with closely mown grass throughout the sports areas.

76. Cricket pitches and prepared cricket squares are clearly visible.

77. A long jump pit is also visible.

78. No evidence is visible of worn pedestrian tracks around the perimeter of the playing fields. A formal path visible in 1946 connecting the lodge and the buildings on the northern perimeter of the site is now not prominent although its former line can be discerned in the grass.

79. No informal pedestrian routes cross the playing field and no access is evidenced at point H. A small line and small square object are visible in the field side around point A, but no well-defined access is visible at A.

80. The site boundaries comprise mature hedgerows adjoining residential gardens to the north and north-west and roadside vegetation to the south and east. No boundary fencing is visible.

CONCLUSION 1963

81. The imagery demonstrates active management of the site for organised sporting activities.

82. The absence of visible perimeter or internal pedestrian wear suggests that informal access across the playing fields was not occurring at a level sufficient to produce detectable ground disturbance at the time of photography, on a susceptible surface as proven in 1955.

10.8 18 MAY 1970



FIGURE 16: 18 MAY 1970
Source: OS/70118 V/035 ©Crown copyright Ordnance Survey. Image cropped to site.

OBSERVATIONS

83. The photograph was captured during the cricket and athletics season.

84. Cricket pitches remain clearly visible.

85. Full oval athletics running track and long jump facilities are present and maintained. Linear and square markings for ball sports are visible in the area to the west of Stoke Lodge.

86. The grass is uniformly close-cut throughout the sporting areas.

87. No evidence of informal perimeter paths is visible.

88. No pedestrian routes are visible across the playing fields, and if they were present would have had to traverse cricket areas, jump sport areas near I, and the oval marked out athletics track enroute to point A. As in 1963 a small square object is visible in the field near point A, and access here is not well defined, with no line or wear leading into or across the field to or from A.

89. Access is visible to and from H via a light toned line across the now-grassed garden area and around a rectangular building north of the established jumping athletic sports areas. This is shown on **Figure 14**.

90. Boundary hedgerows remain integral around the northern, western and eastern margins.

91. Limited fencing is present around Stoke Lodge buildings and the adjacent car park but not around the principal playing fields.

CONCLUSION 1970

92. The imagery indicates continuing sporting use of the playing fields with no visible evidence of sustained pedestrian movement across or around the site.

10.9 14 JULY 1971



FIGURE 17: 14 JULY 1971
Source: National Collection of Aerial Photography. © NCAP. Image cropped to site.

OBSERVATIONS

93. The aerial photograph was captured during the summer athletics and cricket sporting season.

94. This indicates continued organised sporting use of the playing fields.

95. The grass across the site is closely maintained, consistent with active recreational management.

96. The site remains open and uninterrupted by vegetation or other features that would obscure interpretation.

97. No evidence of perimeter or crossing pedestrian tracks is visible. There is now a break in the hedge visible at point H.

CONCLUSION JULY 1971

98. The 14 July 1971 aerial photograph is consistent with the 1963 and 1970 imagery, demonstrating the continued management of the site for organised sport.

99. No evidence of informal pedestrian access, perimeter desire lines, or the claimed routes around or across the site is visible within the available imagery.

10.10 16 AUGUST 1971



FIGURE 18: 16 AUGUST 1971
Source: National Collection of Aerial Photography, HSL/UK/71/0163/102. © NCAP. Image cropped to site. Note damage to negative, not reversible.

OBSERVATIONS

100. The aerial photograph was captured during the summer sporting season.

101. A cricket square is faintly visible, indicating continued organised sporting use of the playing fields.

102. The grass is closely maintained throughout the site.

103. An area of image disturbance is visible across the southern part of the playing fields but does not prevent interpretation of the remainder of the site.

104. No evidence of perimeter pedestrian tracks is visible.

105. No informal pedestrian routes are visible crossing the playing fields.

CONCLUSION AUGUST 1971

106. The 16 August 1971 aerial photograph is consistent with the 1963, 1970 and July 1971 imagery, demonstrating the continued management of the site for organised sport.

107. Apart from the localised area of image disturbance, which is a fault on the original negative (cause was checked with the supplying archive) no evidence of informal pedestrian access or the claimed routes are visible at all around or across the site.

10.11 12 OCTOBER 1980



FIGURE 19: 12 OCTOBER 1980
Source: OS/80156 V/416 ©Crown copyright Ordnance Survey. Image cropped to site.

OBSERVATIONS

108. The photograph was acquired during the football and rugby season.

109. Football and rugby pitch markings and goals are clearly visible across the site.

110. A match appears to be in progress.

111. Rugby goals are present.

112. The long jump facility remains visible.

113. The grass continues to be closely maintained throughout the sports ground.

114. No perimeter pedestrian tracks are visible.

115. No internal pedestrian routes are visible. If the claimed routes were present they would have crossed active pitches and have been visible in the ground, which they are not.

116. Boundary hedges remain intact.

CONCLUSION 1980

117. The playing fields remain in intensive sporting use with no observable evidence of casual pedestrian access across the areas occupied by the sporting facilities.

10.12 25 APRIL 1982



FIGURE 20: 25 APRIL 1982
Source: ADA/083 V/025 ©Crown copyright Ordnance Survey. Image cropped to site.

OBSERVATIONS

118. The photograph captures the transition between the winter football season and the summer athletics and cricket season. Sports use was intense and over the whole field area.

119. Football and rugby markings and goals are visible.

120. The long jump facility continues to be maintained.

121. The grass is uniformly managed throughout the site.

122. No perimeter pedestrian tracking is visible.

123. No informal pedestrian routes are visible across the sports ground, which presents intensive evidence for multi-sport use. Again, as in all previous years, the claimed routes would have had to cross active sporting areas but no corresponding pedestrian wear is visible along their lines. This spatial overlap is demonstrated in **Figure 21** and **Figure 22**, which show particularly that claimed route 683 (blue) would have passed through a cricket square, football pitches and a football goal area. 686 (yellow) would have crossed a cricket pitch and edge of a square, and 685 (green) traversed marked visible cricket and football pitches during both seasons.

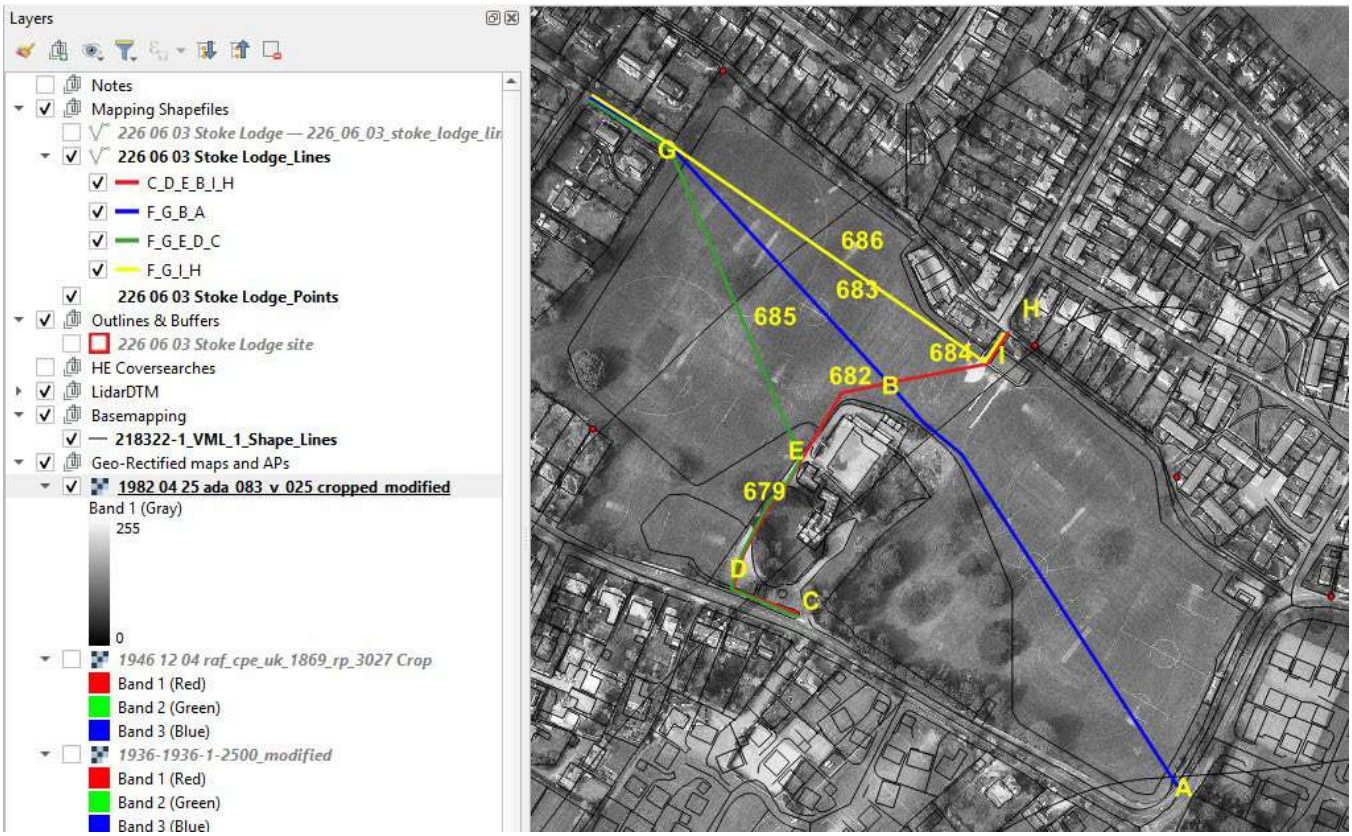


FIGURE 21: 1982 AERIAL PHOTOGRAPH WITH OVERLAIN CLAIMED DMMO ROUTES

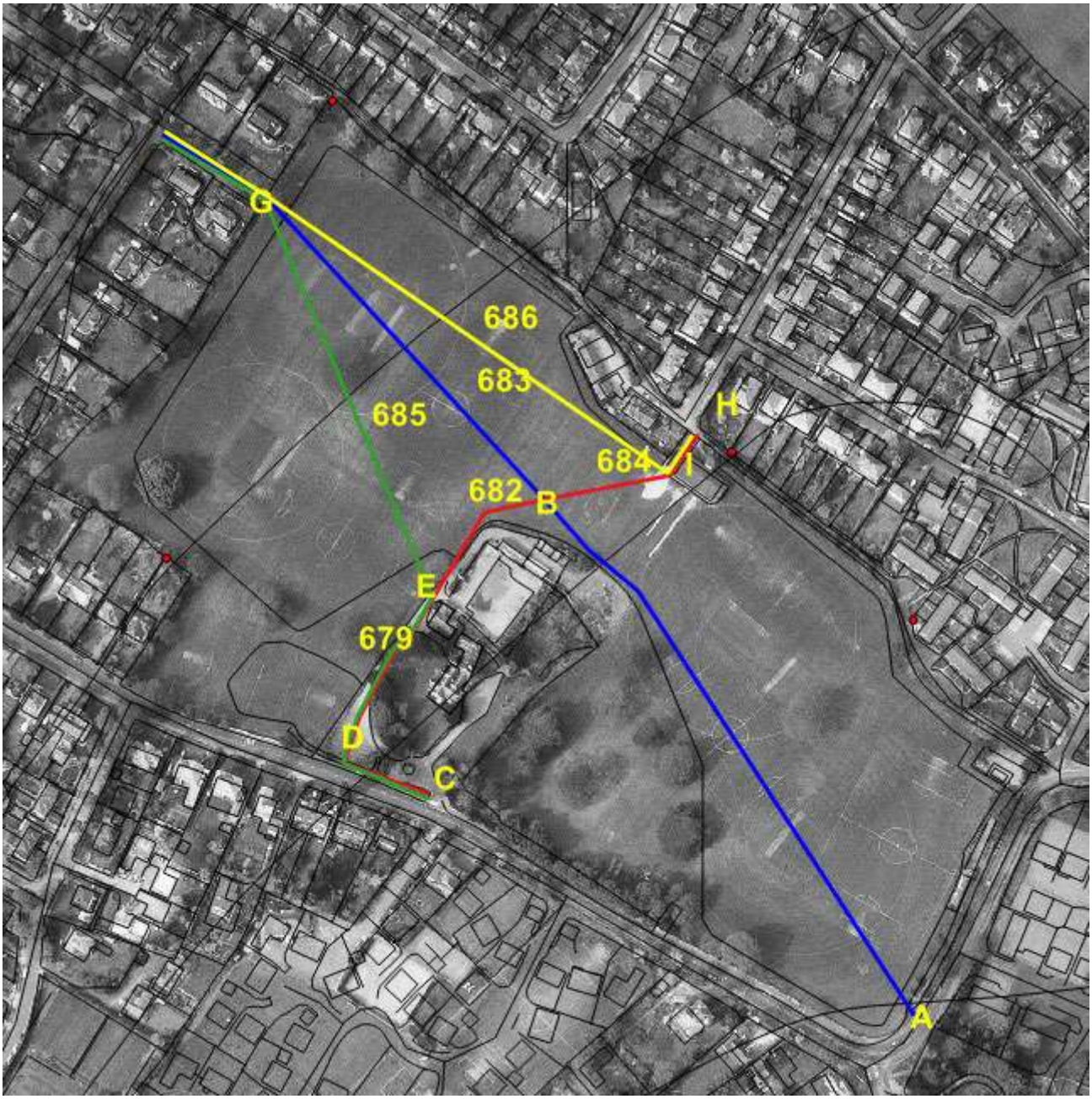


FIGURE 22: 1982 PHOTO SHOWING THE CLAIMED ROUTES AND THE CONFLICTING SPORTS USE

124. Boundary vegetation and limited fencing around the buildings remain consistent with earlier photography. There was a gap at Point G in the boundary, but no substantial tracking around this point in 1982. Point G directly abutted the marked outer circle of a cricket pitch and the claimed routes also traverse marked football pitches, and a throwing sport area. Notably the 'Blue route' 683 traversed the marked goal area of a football pitch to the northwest of point A as noted above and shown in **Figure 22.**

10.13 CONCLUSION 1982

125. The 1982 aerial photograph continues the pattern established throughout the historic imagery, demonstrating organised sporting use and the absence of visible worn pedestrian routes.

11. MODERN AERIAL AND SATELLITE IMAGERY (1999–2024)

126. A chronological review of modern aerial and satellite imagery has been undertaken to assess changes in the condition and use of Stoke Lodge Playing Fields following the period covered by the historic aerial photographs.

127. The imagery demonstrates a long period of consistent surface maintenance and sporting use **between 1999 and 2016** with short grass maintenance before a short-lived and specific period change in pedestrian activity **between 2017 and 2020**. From 2020, organised sporting use continued alongside the introduction of physical barriers and the disappearance of the previously visible cross-site pedestrian tracking.

TABLE 2: MODERN AERIAL AND SATELLITE IMAGERY

Date	UK date format	Reference	FIGURE
1999	1999	Infoterra/Bluesky aerial imagery (Google Earth Pro)	FIGURE 23
1999 07 24	24 JULY 1999	Getmapping plc	FIGURE 24
2002 07 15	15 JULY 2002	Getmapping plc	FIGURE 25
2004-5	21 AUGUST 2004 – 27 MAY 2005	Bluesky International Ltd	FIGURE 26 FIGURE 27 FIGURE 28
2007 04 14	14 APRIL 2007	Infoterra/Bluesky aerial imagery (Google Earth Pro)	FIGURE 29
2010 04 23	23 APRIL 2010	Bluesky International Ltd	FIGURE 30 FIGURE 31
2014 09 09	09 SEPTEMBER 2014	Google imagery (Google Earth Pro)	FIGURE 32
2016 10 05	05 OCTOBER 2016	Bluesky International Ltd	FIGURE 33
2017 06 17	17 JUNE 2017	Google imagery (Google Earth Pro)	FIGURE 34 FIGURE 35 FIGURE 36
2018 04 19	19 APRIL 2018	Google imagery (Google Earth Pro)	FIGURE 37 FIGURE 38
2018 09 27	27 SEPTEMBER 2018	CNES Airbus satellite imagery (Google Earth Pro)	FIGURE 39 FIGURE 40
2020 02 25	25 FEBRUARY 2020	Maxar Technologies satellite Imagery (Google Earth Pro)	FIGURE 41
2020 04 23	23 APRIL 2020	Google imagery (Google Earth Pro)	FIGURE 42

2021 05 29	29 MAY 2021	Google imagery (Google Earth Pro)	FIGURE 43
2022 03 12	12 MARCH 2022	Google imagery (Google Earth Pro)	FIGURE 46
2023 05 20	20 MAY 2023	Airbus satellite imagery (Google Earth Pro)	FIGURE 47
2023 05 20	20 MAY 2023	Bluesky International Ltd	FIGURE 48
2024 07 19	19 JULY 2024	Google imagery (Google Earth Pro)	FIGURE 50

11.1 PHASE ONE: ESTABLISHED SPORTING USE (1999–2016 INCLUSIVE)

1999 (MONTH AND DAY NOT STATED AT GOOGLE EARTH)



FIGURE 23: 1999
Source: Infoterra/Bluesky imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

128. This aerial photograph was taken in 1999. Rugby and football pitch markings and goals were visible alongside the permanent and maintained athletics sports pits. The use extends over the

site, and would have been traversed by the claimed routes, as in 1982 (**Figure 22** compared to **Figure 23,** both showing sports use).

129. No tracking was visible across the site in this 1999 aerial photograph, and even at this 25cm resolution, would have been visible if present, which it was not.

130. The absence of visible tracking and the positive visible evidence for sports use continued in subsequent years in this period.

131. A further 1999 aerial photograph, securely dated by the provider to 24th July of that year confirms the sports use in 1999 alongside an internal or potentially sports maintenance track across the site from external sources as shown in **Figure 24**.

24 JULY 1999



FIGURE 24: 24 JULY 1999
Source: ©Getmapping plc

132. In July 1999, ball sport goals were visible in the northwest of the site, athletics pits were present.

133. A marked and maintained cricket pitch overlaid part of the area formerly marked as a running track in the southeast sector, where lane markings were still visible.

134. There was a slightly indented track, marked on **Figure 24,** which led to or from the cricket pitch outer circle marking and towards a light toned structure abutting the southeastern boundary.

135. Mowing and maintenance of the grass had taken place, which was evidenced by wide machine track marks on the mown grass surface.

136. No tracking was evident at all along or in the vicinity of the claimed DMMO routes. As in previous years any routes would have had to cross active sports areas including ball sport pitches and a well-maintained cricket pitch which coincided in its eastern part with the markings of a full-sized running track.

15 JULY 2002



FIGURE 25: 15 JULY 2002
Source: ©Getmapping plc

137. In July 2002, site wide sports use was again visible, as shown in **Figure 25.**

138. Ball sports goals, cricket and an overlapping running track were marked.

139. The grass was well maintained with tracking internally likely for this purpose and a red vehicle evident in the site.

140. Some items, likely people, were visible on the southern part of the marked track and in the southeast sector.

141. Point A was in tree shadow. Access from H is visible again with no continuation tracks into the main grassed area of the site. None of the claimed DMMO routes were visible, although other tracking was visible on this date within the site, which is in accordance with the closely maintained condition of the site at these and other dates of observation from aerial and satellite-based sources.

AERIAL SURVEY CAPTURED BETWEEN 21 AUGUST 2004 – 27 MAY 2005



FIGURE 26: SURVEY CAPTURED AUGUST 2004 – MAY 2005
Copyright ©Bluesky International Ltd

142. This 25cm resolution aerial photograph, **Figure 26**, was taken as part of a digital aerial survey captured between 21 August 2004 and 27 May 2005.

143. It clearly shows the site was mown closely recent to the time of photography and machine lines are visible in the grass surface. There were no football or rugby markings visible at the date of capture, and a cricket pitch was present.

144. Two groups of items which are likely people were visible in the site. One group is visible adjacent to the well-maintained athletics jumping area, where some new rectangular markings indicated ongoing use as shown in **Figure 27.** Another group of likely people was visible on the area of the previously marked northwestern cricket pitch, as shown in **Figure 28.**



FIGURE 27: ATHLETICS JUMPING AREA IN 2004-5



FIGURE 28: LIKELY PEOPLE AND MOWING LINES, 2004-5

14 APRIL 2007



FIGURE 29: 14 APRIL 2007
Source: Infoterra/Bluesky imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

145. In April 2007, the site was again marked out for intense and site-wide multi-sport use with no evidence for tracking over the claimed routes. A small item is visible on the ground and some wear near point G, but no tracking at all from this point. Again, these routes would have had to cross ball sports pitches and athletics areas as demonstrated in **Figure 29,** which they did not and were not visible. There was slight wear on the grass adjacent to point G but no tracking from this point over the claimed routes. There was a worn track from point H across to and round a

rectangular structure within the site near the athletics jumping areas. No signs of any tracks over the site connecting to the access at H or A were visible.

23 APRIL 2010



FIGURE 30: SPORTS MARKINGS AND USE IN APRIL 2010
Copyright ©Bluesky International Ltd

146. In April 2010, the site was marked out for multiple sporting activities, including football, a smaller football pitch, and running, throwing and jumping athletics. A marked throwing-sports area, likely associated with discus or shot putt, occupied part of the area crossed by the claimed routes. Surface wear on the grass was indicative of active organised sporting use across the site.

147. As in previous years, the claimed routes, if present and visible, would have traversed these activity areas, which they did not, as shown by comparison of **Figure 30** and **Figure 31**. There were no signs of these routes on the ground surface. A light toned linear feature along the northwestern boundary was likely a maintained boundary hedge in blossom.

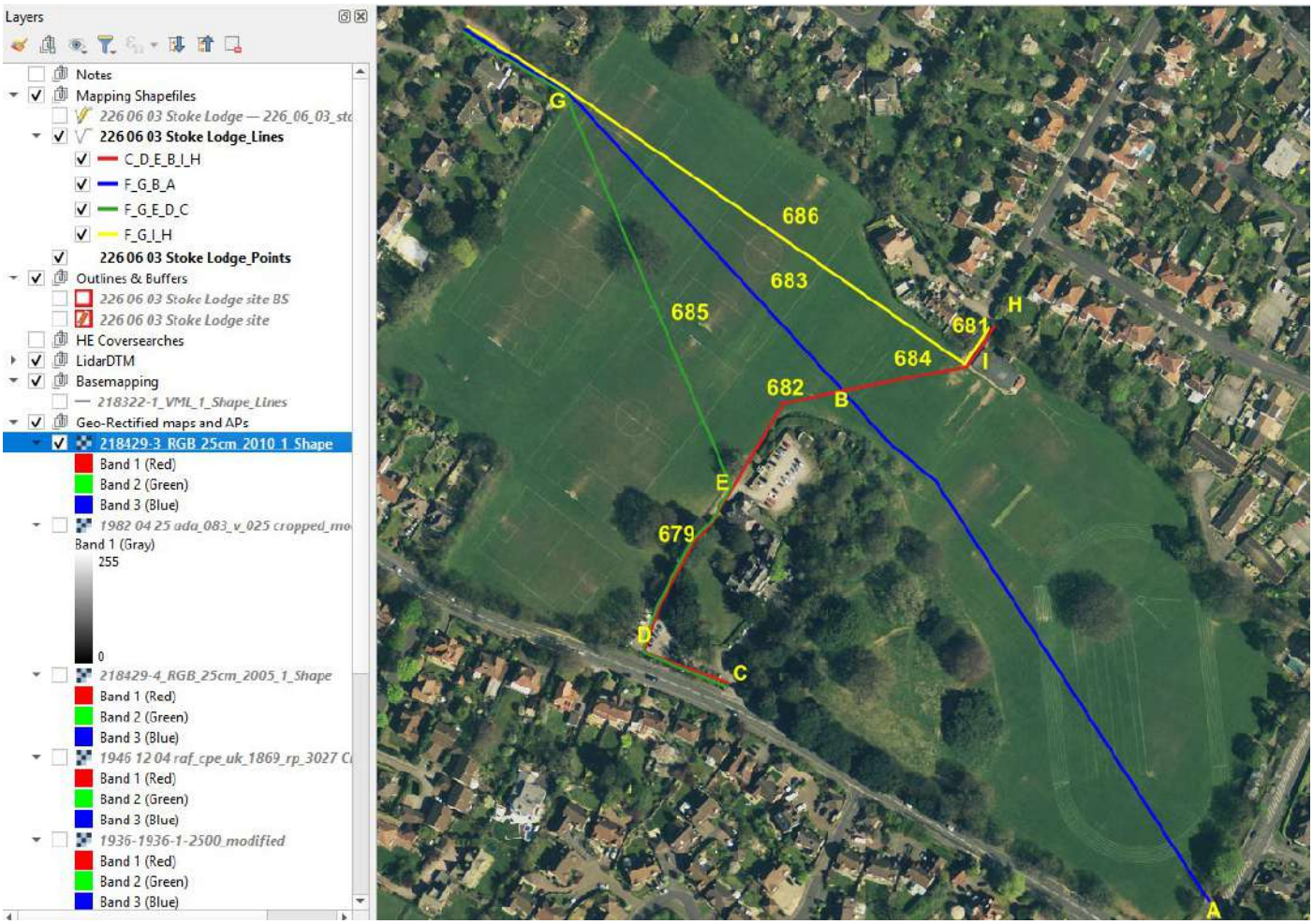


FIGURE 31: THE SITE IN 2010, OVERLAIN WITH THE CLAIMED DMMO ROUTES

09 SEPTEMBER 2014



FIGURE 32: 09 SEPTEMBER 2014
Source: Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

148. An enclosed playpark area is visible in 2014 in the southern part of the site.

149. Again, there are no visible tracks over the claimed routes, as shown in **Figure 32.**

150. Ball sports goals are visible.

05 OCTOBER 2016



FIGURE 33: 05 OCTOBER 2016
Source: ©Bluesky International Ltd

151. In October 2016 this 12.5cm resolution aerial photograph shows the northwestern part of the site under active football use, with some likely people on the pitches, and visible goal posts, as shown in **Figure 33**.

152. The athletics jumping area was not so well maintained as in previous years.

153. Sports markings were visible in the southeastern extent of the site.

154. The enclosed playpark was again visible in the south of the site and had been extended by 2016.

155. No traces at all of the claimed routes were visible on the well-maintained grassed surface. This surface has been proven to show markings in the event of access, and in 2016 there were again no signs of external leisure access across the site.

CONCLUSION 1999 - 2016

156. Throughout this period the site is consistently maintained as an organised playing field which displays variable levels of marking and use.

157. Sports pitch and area markings and locations are regularly visible and vary according to the sporting season in which each image was acquired.

158. The grass is maintained to a high standard across the entire site.

159. The mature hedgerows defining the northern, north-western, eastern and south-eastern boundaries remain intact.

160. Residential garden boundaries continue to define the north-western edge of the site.

161. No evidence is visible of perimeter pedestrian tracks.

162. No informal routes are visible crossing the playing fields.

163. No visible evidence corresponds with the claimed pedestrian routes subsequently identified on the Definitive Map Modification Order (DMMO) application.

164. The site continues to function as a managed sports facility, with organised sporting activity appearing to represent the principal land use throughout this period, although the intensity of use fluctuates, as indicated by the varying visibility and extent of sports markings.

165. No visible evidence has been identified to indicate sustained informal pedestrian movement either around the perimeter or across the playing fields. This is in accordance with the 1946-1982 period and in direct contrast to part of the subsequent period, between 2017-18.

11.2 PHASE TWO: APPEARANCE OF PEDESTRIAN TRACKING (2017–2018)

17 JUNE 2017



FIGURE 34: 17 JUNE 2017
Source: Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

166. Some perimeter tracking was visible as worn lines in the grass in 2017 alongside some tracking from the grass and wooded area to the east of Stoke Lodge. This newly visible tracking is shown in overview in **Figure 34.** These tracks did not coincide with all the claimed routes. Only the fan-shaped access from Point G, directly corresponding with part of route 683, has been identified as matching part of the claimed DMMO network.

167. **Figure 35** shows well defined tracking around and across the northwest part of the site.



FIGURE 35: 17 JUNE 2017 NORTHWEST OF SITE
Source: Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to tracking and perimeter in northwest of the site.



FIGURE 36: 17 JUNE 2017 SOUTHEAST OF SITE
Source: Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to tracking and permitter in southeast of the site.

168. **Figure 36** shows tracking around the southeast part of the site. Notably again there was no tracking to Point A, in a maintained grassed area which is receptive to showing tracking wear if it had been present.

169. It is notable that only the northeastern part of route 683 was visible as a worn line. If the remainder of the routes had been walked, then these would also have been visible, which they

were not. Access had occurred at and around point G, but in June 2017 was not visibly sustained over the claimed routes.

19 APRIL 2018



FIGURE 37: 19 APRIL 2018
Source: Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

170. In April 2018, no current sports use was visible, and neither were any traces of the claimed routes as shown in **Figure 37.** Enlargement of this 12.5cm resolution aerial photo shows a well-defined track around the land to the southeast of Stoke Lodge and across the site to its northeast corner.

171. No access was visible along or around any of the claimed DMMO routes in April 2018.



FIGURE 38: TRACKING ACROSS THE SOUTHEAST SECTOR IN APRIL 2018

27 SEPTEMBER 2018



FIGURE 39: 27 SEPTEMBER 2018
Source: ©CNES Airbus satellite, red-green-blue 'normal' colour sensor, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

172. By September 2018, the visible pedestrian use of the site comprised tracking from point G – B – A across the site, as shown in **Figure 39**.

173. No sports markings were visible and the athletics jumping areas were grassed over and visible as indentations in the ground.

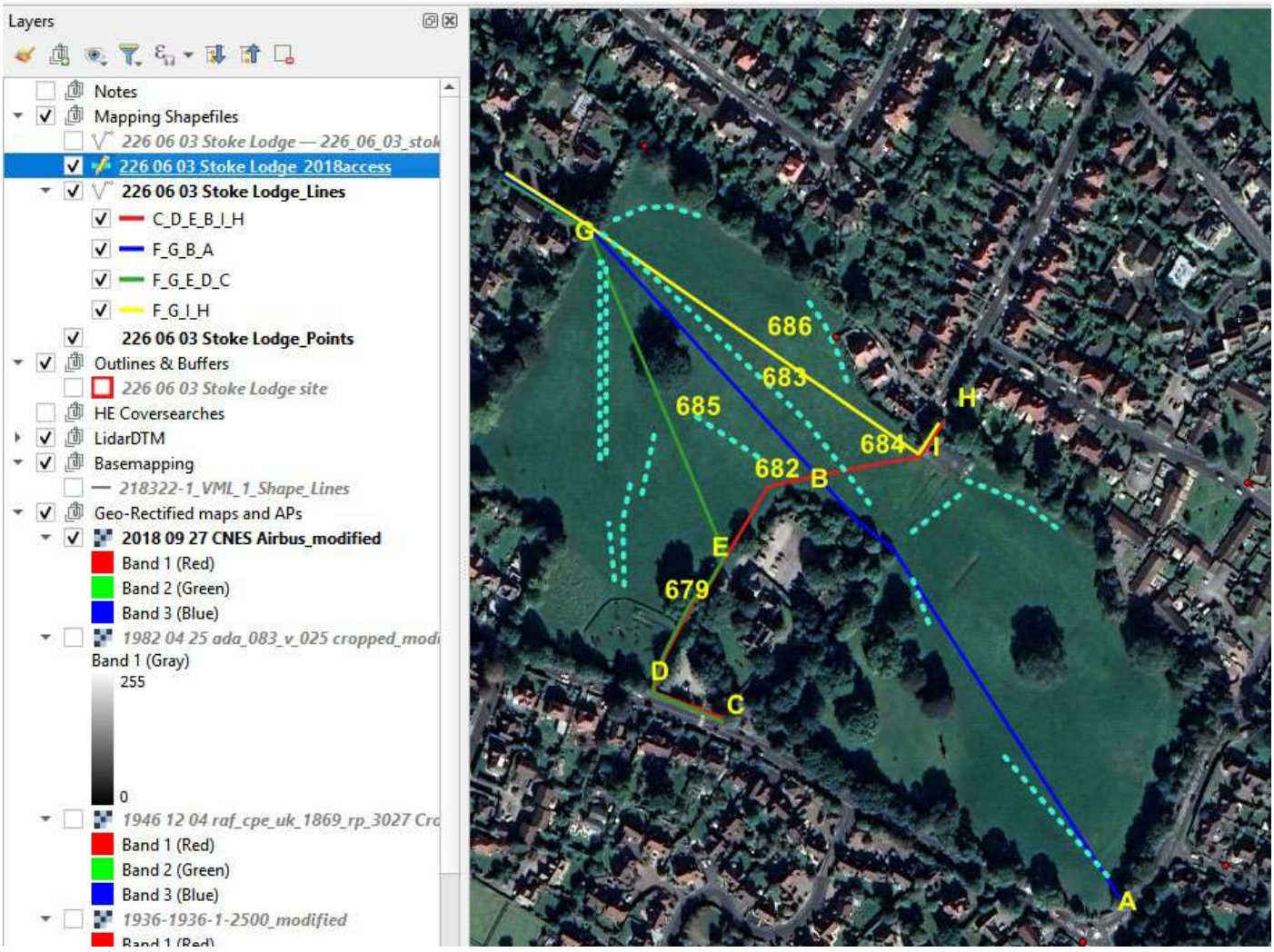


FIGURE 40: VISIBLE WEAR IN SEPTEMBER 2018

174. In **Figure 40,** the cyan coloured dashed lines show the visible linear tracking in September 2018 compared to the numbered claimed DMMO lines.

OBSERVATIONS 2017-18

175. The imagery acquired during 2017-18 represents the **first significant change** visible in the land access since 1946. No traces of the routes nor the perimeter tracking were visible prior to 2017.

176. A worn pedestrian route became visible around parts of the perimeter of the site in 2017.

177. The most pronounced wear occurred within the north-western corner of the playing fields and to the southeast of Stoke Lodge.

178. Pedestrian access appears to enter from the direction of Point G before diverging into several lightly worn tracks in 2017.

179. Limited internal tracking is also visible.

180. Tracking extends to the southeast part of the site in April 2018, when access around Stoke Lodge area is also evident. This is shown in **Figure 38.**

181. Several light linear marks were present over the years which may represent maintenance vehicle movements. The grass was well maintained as a sports surface.

182. Small numbers of people are visible within the imagery, and their purpose of access is not defined.

183. By September 2018 the same pedestrian routes remain visible and additional worn linear tracking was visible within the south-eastern sector.

184. The complete network of routes shown on the DMMO application is **not and never was evident** within the dated history provided by aerial and satellite imagery, with only a small section of the mapped route 683 coinciding with the evidence of wear on the ground. Intermittently visible directional tracking did traverse the site from G to B to A. This tracking did not break the grass or wear the grass to visible substrate.

11.3 CONCLUSION 2017-18

185. The imagery captured in 2017 and 2018 demonstrates a **distinct but short-lived** period during which pedestrian movement became visible within parts of the site as defined by worn tracks.

186. The observed routes were principally concentrated within the northwestern and southeastern areas and are not representative of widespread pedestrian movement across the entire playing field.

187. Importantly, only one of the routes, G – B - A claimed within the DMMO application can be identified within the available imagery. This does not exactly follow the mapped DMMO route.

188. This access was not visible in 2016 and was confined to the period between 2017 and 2018.

189. **Figure 40** shows the worn tracking across the site which was visible on aerial and satellite images in 2017 and 2018, in comparison to claimed DMMO routes.

11.4 PHASE THREE: REINSTATEMENT OF SPORTING USE AND PHYSICAL EXCLUSION (2020–2024)

25 FEBRUARY 2020



FIGURE 41: 25 FEBRUARY 2020
Source: ©Maxar Technologies satellite, red-green-blue 'normal' colour sensor, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

190. This 2020 lower resolution satellite image, **Figure 41**, shows the site had by this date been bounded.

191. There was some residually visible, not likely current, tracking between B and A.

192. Light toned linear features are likely to be ball sports goals, likely for football.

23 APRIL 2020



FIGURE 42: 23 APRIL 2020
Source: Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Higher resolution image, cropped to site.

193. **Figure 42** shows that the site was bounded in April 2020 with no signs of current pedestrian tracks or access, at the end of the winter football season. There are some signs of residual tracking from points G to B. Worn tracking outside the site boundary around the area was visible.

194. The grass was short and maintained.

29 MAY 2021



FIGURE 43: 29 MAY 2021
Source: Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

195. In May 2021 the site was under close mown maintained grass with an area of exposed substrate in the northeast part of the site. The site was bounded by defined linear features with

a worn path on the outside of the boundary which separated the site from its immediate environs all round its visible extent.

196. Fence post shadows were variably visible when they cast shadows in the sunlight which shone from the south, as exemplified in **Figure 44**.



FIGURE 44: FENCE AND PERIMETER PATH IN 2021

197. Extensive ball sports and athletics markings are present.

198. A group of people congregate around the end of a running track in the southeast of the site.

199. Some residual grass marks show the site of former surfaces or compacted areas to the north of Stoke Lodge, alongside some temporary now disused athletics features as shown in **Figure 45**.



FIGURE 45: MARKS IN THE GRASS SHOWING FORMER FEATURES

200. It is notable that there are no grass marks, on this obviously dry occasion of photography, over the claimed DMMO routes, which if used continually enough to be compacted would have shown as marks in grass on this occasion, which they do not.

12 MARCH 2022



FIGURE 46: 12 MARCH 2022
Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

201. In 2022, the boundary and active sports markings and surface wear associated with playing sport over a receptive surface which shows wear when crossed or played on were visible.

202. The site was used for active sports and no trace of active crossing from external points or wear over the claimed DMMO routes was evident.

20 MAY 2023



FIGURE 47: 20 MAY 2023 (1 0F 2)
©Airbus, lower resolution satellite image (RGB) viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

203. In May 2023, the site was bounded, although full fencing is not certain, with evidence for both recent ball sports and athletics markings and use. Activity is in progress on a squared marked out area where likely people are playing.

204. Varied goals and markings were visible for ball sports and athletics including the running track, across the site which intersected the line of the claimed route to Point A. In 2023 this track had been extended to its south.

205. No evidence for external access or tracking was visible and would indeed have had to traverse the active sporting areas if present.

206. There are no traces of tracking corresponding with the claimed DMMO routes across the site. A separate higher-resolution Bluesky aerial image, also captured on 20 May 2023, confirms the intensive sporting use and players visible on the site. **Figure 47** derives from the Airbus satellite acquisition, while **Figure 48** and **Figure 49** derive from the separate Bluesky aerial acquisition.

20 MAY 2023



FIGURE 48: 20 MAY 2023 (2 OF 2)
©Bluesky International

207. Notably, a group of people, likely engaged in active sport, was present in the southeast sector of the site on 20 May 2023, which would have been traversed by route 683 (blue). This is shown in **Figure 48** and **Figure 49**.



FIGURE 49: ACTIVE SPORTS ON 20 MAY 2023

208. **Figure 49** shows active sports players within the claimed blue route 683, and a likely person on the path around the site outside its boundary.

209. The claimed routes are not evident at all and would again have traversed active sports playing areas.

19 JULY 2024



FIGURE 50: 19 JULY 2024
Source: Google imagery, viewed in Google Earth Pro. Image extracted 23 June 2026. Image cropped to site.

210. In 2024, the site was marked up for football and short football pitches across its entire extent.

211. There was no visible barrier on this occasion around the site but no evidence for tracking across the claimed DMMO routes.

212. Tracking around the site was visible near Cheyne Road and continuing around Stoke Lodge, but not across the site.

OBSERVATIONS

213. From 2020 onwards the imagery records the introduction of variably visible physical barriers around sections of the site.

214. Vegetation and fencing in places at the edge of the site became progressively visible via the shadows cast by the fence posts and structures.

215. The extent of visible fencing varies through time, barriers are visible on several post-2020 dates but their visibility/extent varies and no barrier is discernible in 2024.

216. Active and worn pedestrian tracks visible during the preceding period 2017-18 were no longer apparent.

217. Sports markings returned to the playing fields along with evidence for active sports playing on the site.

218. Football pitches were clearly visible and seasonal sporting use continued.

219. No evidence of continuing pedestrian wear is visible.

220. The 2024 imagery continued to demonstrate organised sporting use.

221. Although sections of fencing vary in appearance, no sustained pedestrian routes were evident across the site and the claimed DMMOs would have traversed active sporting areas.

CONCLUSION 2020-24

222. The imagery demonstrates a clear change in management following the period of visible pedestrian activity.

223. The introduction of physical barriers coincides with the disappearance of worn pedestrian routes.

224. The playing fields continued to function as an organised marked sports facility with regular seasonal maintenance and use.

225. No evidence has been identified within the imagery to suggest continuing informal pedestrian use into 2020.

12. SUMMARY OF FINDINGS

226. The available aerial photographs and satellite imagery provide a visual record of Stoke Lodge Playing Fields at intervals from 1946 to 2024.

227. The imagery demonstrates several consistent characteristics throughout this period.

12.1 HISTORIC AERIAL PHOTOGRAPHY (1946 -1982)

228. The historic aerial photographs consistently demonstrate the playing fields in active organised sporting use.

229. Seasonal evidence for cricket, athletics, football and rugby is clearly visible within the imagery.

230. Sports facilities, including cricket squares, running tracks, throwing sport areas and long jump facilities, are maintained throughout the period.

231. The grass is consistently managed to a high standard.

232. No evidence has been identified for informal pedestrian tracking around the perimeter of the site.

233. No evidence has been identified for casual pedestrian routes crossing the sports pitches.

234. The routes subsequently identified within the claimed DMMO application were occupied by active sporting facilities during this period.

235. Points G, H and A are not connected by visible worn claimed DMMO or other access routes across the site. Local access at Point H is visible on some dates but does not continue as a worn route across the playing fields along the claimed DMMO network. Points G and A are often obscured by vegetation..

12.2 MODERN AERIAL IMAGERY (1999–2016)

236. The modern aerial and satellite imagery continues the pattern established within the historic aerial photographs.

237. The playing fields remained in organised sporting use to varying levels of intensity.

238. No evidence has been identified for informal pedestrian routes.

239. The site boundaries remain defined by mature vegetation and adjacent residential properties. Local access from Point H to a rectangular building is visible, and Point A may also be visible.

However, this localised access does not continue as visible worn tracking across the playing fields along the claimed DMMO routes, and no such cross-site tracking is visible from Points G or A.

12.3 CHANGE OBSERVED BETWEEN 2017 AND 2018

240. The imagery demonstrates a distinct change beginning during 2017, but no complete claimed DMMO route was visible in that year.

241. A perimeter pedestrian track became visible together with limited internal tracking, principally within the north-western part of the site.

242. Some additional worn areas developed during 2018.

243. The observed claimed DMMO routes were very limited in extent in 2018, as indicated in **Figure 40**.

244. Not all the routes shown within the DMMO application are visible within the available imagery.

245. Based upon the imagery examined to date, this period of visible pedestrian activity appears to extend for approximately two years.

12.4 2020–2024

246. From 2020 onwards, no new pedestrian tracking was evident, and any visible traces appeared to be residual from earlier use.

247. Physical barriers, including vegetation and sections of fencing, became visible.

248. Organised sporting use continued.

249. Sports markings again occupied areas which previously showed limited pedestrian wear in 2017 - 18.

250. No evidence has been identified of continuing informal pedestrian access following the introduction of the barriers.

12.5 OVERALL FINDINGS

251. The imagery currently examined demonstrates a long history of organised sporting use extending over more than sixty years, with an apparent interruption in visible organised sporting activity on imagery captured in 2017 and 2018. There is no available imagery captured in 2019 to comment on use in this year. From 2020, organised sporting use is again visible, together with the

introduction of physical barriers and the disappearance of the cross-site pedestrian tracking visible in the preceding period.

252. For most of the period 1946-2024, no visible continual evidence has been identified of sustained informal pedestrian movement across or around the playing fields.

253. Visible pedestrian tracking appears only during a relatively brief period in 2017-18, and change is again observed in 2020.

254. Even during this period, 2017-18, the observed routes are spatially limited and do not fully correspond at all with the routes identified within the DMMO application.

13. STATEMENT OF TRUTH

255. Although this report is written to assist an Inquiry not a Court, I have included a statement of truth.

256. I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

SIGNATURE



Christine D Cox BA MA MCIfA FSA

07 SEPTEMBER 2026

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END OF REPORT

14. APPENDIX 1 SUMMARY RESULTS TABLE

Date	Land use	Point G	Point H	Point A	678	679	681	682	683	684	685	686
4 December 1946	Enclosed cricket ground	Open	No	Not visible	No	No	No	No	No	No	No	No
14 August 1947	Enclosed cricket ground	Tree crown	No	Not in frame	No	No	No	No	No	No	No	No
31 March 1955	Cricket pitches (3)	Tree crown, possibly open	No	Not in frame	No	Tree shadow	No	No	No	No	No	No
26 June 1960	Cricket pitches (4 visible, with some cloud in the southeast), jumping athletics areas	Tree crown	No	No wear or apparent access	No	No	No	No	No	No	No	No
26 July 1963	Cricket pitches and jumping athletic areas	Tree crown	No	Slight line to the north of Point A and small square object. No continuation of access into the main playing field.	No	No	No	No	No	No	No	No
18 May 1970	Cricket, ball sports, running track and other athletics markings over whole field	Tree crown	Yes – access	No lines of wear or desire lines; small object still visible at Point A.	No	No	No	No	No	No	No	No
14 July 1971	Cricket pitches and jumping athletic areas	Tree crown	Yes – access	Wear on verge outside the site at Point A and possible gap.	No	No	No	No	No	No	No	No
16 August 1971	Maintained grass and a cricket square. Some damage to the negative	Tree crown	Not fully discernible due to negative damage	Not fully discernible due to negative damage	No	No	No	No	Not visible	No	No	No

Date	Land use	Point G	Point H	Point A	678	679	681	682	683	684	685	686
	in the southeast part of the frame.											
12 October 1980	Sports players on field, marked out for rugby and football. Jumping athletics areas as previously.	Tree crown	Dark-toned linear feature across Point H.	Small light-toned object on verge outside Point A. No desire or other lines visible to or from it.	No	No	No	No	No	No	No	No
25 April 1982	Extensive multi-sport markings, cricket, football and athletics.	Likely open; some tree branches.	Access via a light-toned path around the north and west sides of the rectangular building to the athletics area.	Likely access break, with a short light-toned line on the ground within the field, but no connecting path visible through the intensively used sports area.	No	No	No	No	No	No	No	No
1999 (month and day unspecified)	Football markings and goals (rugby and football)	Tree crown	Tree crown, but track from Point H to rear building within the site.	Not visible	No	No	No	No	No	No	No	No
24 July 1999	Extensive multi-sport markings, cricket, football and athletics.	Tree crown; some possible localised wear of unspecified source.	Tree crown, but track from Point H to rear building within the site.	No	No	No	No	No	No	No	No	No
15 July 2002	Extensive multi-sport markings, cricket, football and athletics.	Tree crown	Tree crowns and shadow	No	No	No	No	No	No	No	No	No

Date	Land use	Point G	Point H	Point A	678	679	681	682	683	684	685	686
2004–2005	Cricket pitch and likely players/people on site.	Tree crown	Tree crown	Tree crown	No	No	No	No	No	No	No	No
14 April 2007	Extensive multi-sport markings, cricket, football and likely rugby, and athletics.	Tree crown	Track from Point H.	Possibly open; no tracking.	No	No	No	No	No	No	No	No
23 April 2010	Extensive multi-sport markings, cricket, football and likely rugby, and athletics.	Tree crown	Tree crown at point, but track visible.	Small light-toned item; no tracking.	No	No	No	No	No	No	No	No
9 September 2014	Goalposts visible; play park enclosed; jumping sports areas less well defined; short football markings and cricket square visible; full football pitch marked near Point A.	Tree crown	Tree crown	Tree crown	No	No	No	No	No	No	No	No
5 October 2016	Football markings, with visible players, across the site.	Tree crown	Tree crown	Tree crown	No	No	No	No	No	No	No	No
17 June 2017	Former cricket square and jumping areas visible but not maintained.	Some access; tree crown.	Tree crowns and shadow	Tree crown	Partial	No	No	No	No	No	No	No
27 September 2018	No visible sports	Tree crown, but access track visible on the	Tree crowns and shadow	Tree crown, but track in grass (not worn to the substrate) leads towards Point A.	Partial	No	No	No	No	No	No	No

Date	Land use	Point G	Point H	Point A	678	679	681	682	683	684	685	686
		ground within the site.										
25 February 2020	Sports goals and linear boundary to the site.	Bounded	Tree crowns; bounded.	Tree crowns, but residual track.	Residual; none to the southeast.	No	No	No	No	No	No	No
23 April 2020	No visible sports; site bounded.	Bounded	Tree crowns; bounded.	Tree crowns, but residual track.	No	No	No	No	No	No	No	No
29 May 2021	Sports and athletics markings; fence visible.	Bounded; access onto track around the site outside the fence.	Access visible to the area of the building.	Throwing-sports and running-track markings directly along the claimed route to Point A. Tree crowns on boundary.	No	No	No	No	No	No	No	No
12 March 2022	Football pitches marked and worn; goals visible; other sports markings; site fenced.	Bounded; access onto track around the site outside the fence at Point G.	Access visible	Boundary at area.	No	No	No	No	No	No	No	No
20 May 2023	Goals visible; people on a marked sports area; running track.	Bounded; access onto track around the site outside the boundary.	Tree crowns	Tree crowns	No	No	No	No	No	No	No	No
19 July 2024	Marked for football pitches across the full site.	Access track to path around, not across, the site.	Tree crowns	Tree crowns	No	No	No	No	No	No	No	No

15. APPENDIX 2 STEREO VIEWING

257. Stereoscopic viewing uses a pair of overlapping aerial photographs to create the perception of three-dimensional terrain and surface features. Vertical aerial photographs are normally acquired with sufficient forward overlap to allow successive images to be examined stereoscopically.

258. Mirror stereoscopes enable the interpreter to view the overlapping image pair simultaneously, allowing subtle variations in relief, earthworks and other surface features to be examined in three dimensions. Digital imagery can also be examined stereoscopically using specialist software where suitable image coverage is available.

259. The following figures illustrate the principle of stereoscopic overlap and examples of the equipment used by Air Photo Services for stereoscopic examination of aerial photographs.



FIGURE A2. 1 STEREOSCOPE IN USE

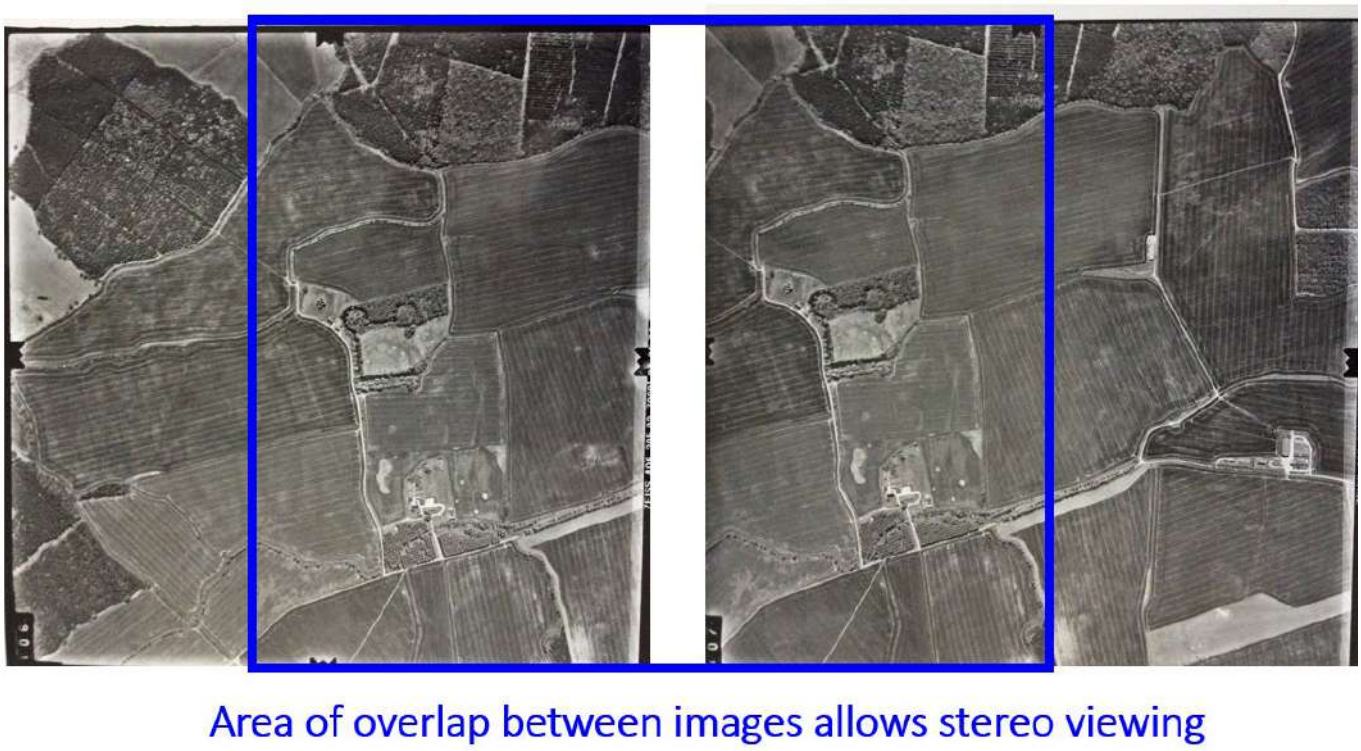


FIGURE A2. 2 OVERLAPPING PHOTO PAIR



FIGURE A2. 3 CLOSE-UP OF STEREOSCOPE



FIGURE A2. 4 ARCHIVE STEREOSCOPIC SETUP

16. APPENDIX 3 CHRISTINE COX CV

CHRISTINE COX

MA (SHEFFIELD) MCIFA FSA

DIRECTOR | AIR PHOTO SERVICES

www.airphotoservices.co.uk | chris.cox@airphotoservices.co.uk | +44 7827 810361 | Swindon, UK

TECHNICAL SKILLS

- Aerial imagery & LiDAR Interpretation
- Heritage Consultancy
- Expert Witness Services
- GIS & Ortho-rectification
- Infrastructure Project Delivery
- Training & Development

EDUCATION

MA, Air Photo Interpretation – University of Sheffield, 1984

BA (Hons), Archaeology of the Eastern Mediterranean – University of Liverpool, 1983

REFERENCES & TESIMONIALS

Available upon request.

PROFESSIONAL OVERVIEW

Heritage consultant, aerial photo interpreter, and legal expert witness with 36+ years of experience delivering specialist analysis of aerial photography, satellite imagery, and LiDAR data for planning, heritage, and infrastructure. Founder and Director of Air Photo Services Ltd (UK), providing expertise to government, legal, and commercial clients across the UK.

Recognised for pioneering methodologies in aerial imagery interpretation, accredited training delivery, and leadership in major infrastructure and cultural heritage projects. Elected Fellow of the Society of Antiquaries of London (2014) and longstanding MCIfA member, with extensive contributions to professional standards, training, and mentoring in archaeology and heritage consultancy.

WORK EXPERIENCE

Director | Air Photo Services Ltd (UK)
1990 – Present

- Founded and grew a heritage consultancy specialising in aerial imagery and LiDAR interpretation.
- Delivered technical evidence for major infrastructure projects (transport, utilities, and energy) across the UK.
- Acted as Legal Expert Witness, providing independent opinion and evidence for High Court, planning inquiries, and compensation claims.
- Designed and led CIfA-accredited training courses in GIS, LiDAR, and aerial photo interpretation.
- Oversaw recruitment, mentoring, and development of professional and graduate staff.
- Coordinated collaborations with Historic England, National Grid, Highways England, and multiple leading archaeological units.

PROFESSIONAL MEMBERSHIPS & APPOINTMENTS

Member (MCIfA), Chartered Institute for Archaeologists – Member since 1990

NVQ Level 3 Assessor, CIfA

Former Advisory Committee & Board Member, IfA

Trustee, Aerial Archaeology Research Group (AARG)

Associate Member, Expert Witness Institute (EWI)

Fellow, Society of Antiquaries of London (FSA)

PROFESSIONAL DEVELOPMENT

Design & Delivery of Professional Courses – LiDAR, GIS, Aerial Photo Interpretation

NVQ Level 3 and Apprenticeship Assessment – mentoring heritage professionals through accreditation

Workshops & International Conferences – AARG, CIfA, professional symposia

EXAMPLE PROJECTS & CASEWORK

HS2 (High Speed 2 Rail Project, UK)

- Lead interpreter of historic aerial imagery and LiDAR data to identify, map, and assess heritage assets along multiple sections of the HS2 route. Delivered GIS datasets aligned with engineering design requirements and contributed to mitigation strategies.

National Grid Infrastructure Schemes

- Provided specialist aerial and LiDAR analysis for overhead line, cable route and substation projects across England. Produced legally compliant mapping and assessments feeding into Development Consent Orders.

Highways England Major Road Projects

- A14 Cambridge to Huntingdon Improvement Scheme – Led aerial photo interpretation to identify cropmarks and buried features along the route.
- A303 Stonehenge Tunnel Scheme – Provided expert analysis of aerial photography to inform heritage impact assessments within a highly sensitive World Heritage landscape.

Legal Expert Witness Testimony

- Represented clients in boundary disputes and compensation claims where aerial photography was critical evidence.
- Delivered expert reports under CPR Part 35 for High Court and Planning Inquiry cases, including historic land use and damage assessments.

Archaeological & Heritage Landscapes

- Directed large-scale aerial survey projects, including GIS-based mapping of ancient settlement systems and water management features.
- Contributed to regional heritage strategies through data integration with national archives and Historic Environment Records (HERs).

Training & Professional Development

- Designed and delivered CIfA-accredited training workshops in aerial photo and LiDAR interpretation. Examples include:
- Environment Agency LiDAR Training Programme – capacity building for environmental consultants.
- CIfA and AARG Courses – supporting heritage professionals in aerial and satellite image analysis.

PUBLICATIONS & RESEARCH CONTRIBUTIONS

(Sample selection – full list available on request)

- Contributions to **peer-reviewed journals and AARG proceedings.**
- Specialist reports for **Historic England and National Infrastructure projects.**
- Co-authored training manuals and technical guidance in aerial imagery interpretation.