Proof of Evidence – Peter Seccombe:

Wildlife and Countryside Act 1981
The Definitive Map and Statement of
Public Rights of Way for Gloucestershire

Ref: ROW/3377321 - Additional Public Footpaths across land known as Verney Fields and Surrounding Area, Stonehouse Parish Modification Order 2025

&

Ref: & ROW/3365454 - Additional Public Footpath Connecting Oak Way and MST30, Stonehouse Parish Modification Order 2025

1. I am Peter Seccombe and I live on Pearcroft Road near the Browns Lane entrance to Verney Fields. I have lived there for over 30 years and Verney Fields and Doverow Hill and Wood have been a very important part of my appreciation of this area. I have walked in Verney Fields nearly every day during the 20-year period, 2003-2023, and also before that period and to present day. I walked the paths marked as G-I, O-Q-T and A-B-C, as part of a circular route which continues through Far Westrip Farm and along the Cotswold Way back to Stonehouse. I generally walked the route alone but often also with my partner, family and friends. I mostly walked early in the morning starting around 6.00 in summer and 7.30 in mid-winter, but at other times too. I am a keen naturalist and birdwatcher, and I have a great interest in how the fields change through the year and how they have changed through time. There are many habitats, including grassland, scrub and woodland, with many mature trees, which provide homes for varied wildlife close to the centre of Stonehouse. I have been supplied with a copy of the Order Plan for reference which is appended **PS1**.

2. The Fields are a hugely important place for informal recreation for the people of Stonehouse. For as long as people can remember the fields have been a place where you can walk, enjoy some open space, listen to the birds and the grasshoppers around you and appreciate fantastic views across the Severn Vale. In winter, when there has been snow on the ground, families have delighted in sledging from Doverow Wood to the oak tree, and then down towards Bramble Lane.

3. We all know this is private land, with tenants who use it for agriculture. Over the years, paths have been created, many of which do not follow public rights of way. They are paths that people have used for many years to walk their dogs and enjoy the fields. It is three sections of these paths that are the subject of this statement. At no time have any of the owners or tenants shown any objection to my use of these paths. There were no obstacles or notices that prevented their use and nobody has asked me over the years not to use them. In fact, there were wooden steps, at point B on the DMMO map, installed I assume by a landowner or tenant, to improve access across the field boundary. This was removed in 2020.

4. Mr Nagai claims in his evidence that in 2006 a gate at point B was 'lifted off its hinge, this was the only year this route showed any footfall prior to ACV council's tourist-travel-agent-like promotion & subsequent COVID Lockdown wandering.' This is nonsense as the route A-B was in continuous use during 2003-2023, and I, along with many others, frequently used the wooden steps over the fence next to the gate at point B. He also claims that the route B-C 'has rarely if ever existed on it's applied-for course, this is clearly evidenced.' This again is nonsense as the route B-C was a clearly used path and I was a frequent user.

5. Mr Nagai claims that at point Q there was 'a locked gate throughout much of recent history until 2014, when someone broke through it & launched it into the field north. This is clearly evidenced with aerial maps & photos.' This is not true. The gate was open and attached by its hinges to the gate post throughout most of the period 2003-2023 and there was free and well-used access along the route O-Q-T. He claims that 'multiple statements confirm this gate was always locked.' This is again wrong; I walked through this open gateway most days throughout the 20-year period.

6. Mr Nagai claims that the route G-I 'has also varied in course, not existing in multiple years, often showing demonstrating a wide curve…This route was not frequently used.' This again is untrue. This was a well-used route, being the principal access route from the gate at point I. The only time it deviated was after the excavation and burial of electricity cables in 2018 adjacent to the path, when people walked along a short section of newly cleared ground where the cable was buried rather than the existing

path. This was my main access point to Verney Fields, and I walked it nearly every day.

7. With the change of ownership in 2023, and its intended use as a fruit farm, I was greatly dismayed that the paths I had been using were closed off and fencing, with barbed wire, was installed to channel people along the designated rights of way. We know that the new landowner had every right to do this, but I could not understand the reason why. If it was considered not to be a problem for people to walk amongst grazing cattle what was the problem for people to use land on a fruit farm?

8. I have greatly respected the fact that it is not a publicly owned park. It is private land. I know that people drop litter and I am aware that it can be damaging for cattle. But many of us who use the paths collect litter and dispose of it properly. I have been greatly concerned by the dumping of old caravans recently on to the fields that have turned a beautiful place into an eyesore. This never happened during the 20-year period 2003-2023, and if it had I would have helped to clear the rubbish that is both unsightly and damaging to wildlife.

9. It is private land, but we have a legal right to claim designation of public right of way status for paths that have been continually used for 20 years. I appreciate that landowners and tenants may object to this change for a variety of reasons but there is no evidence, on past use of the land, that this would impact negatively on how the land is used now. I understand that people and dogs can bring pathogens onto farms that can infect cattle and other livestock. I appreciate that this is a serious problem, but there is access already onto these fields using other rights of way and it would be difficult to reason that access on the paths that I had been using causes further threat.

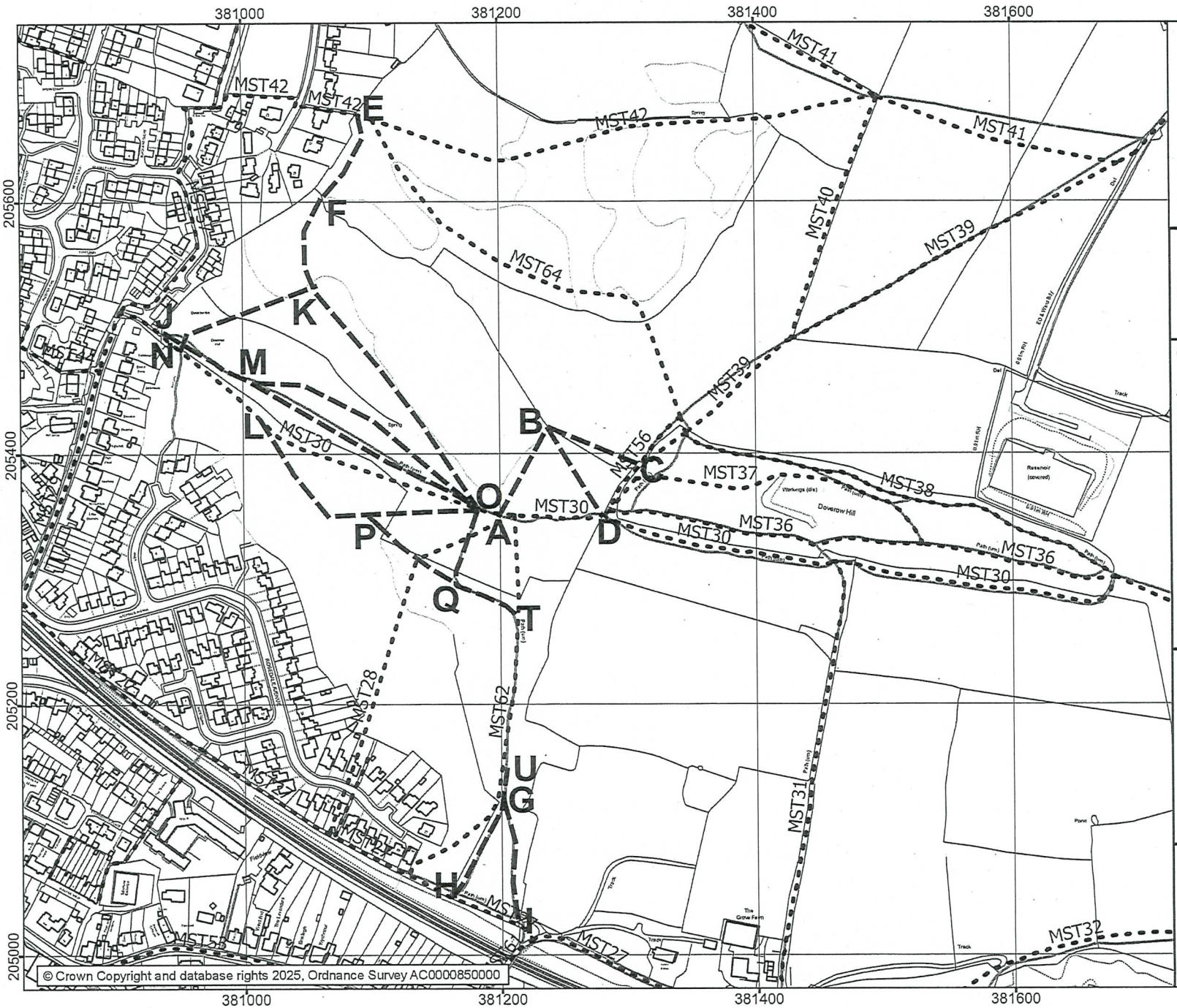
10. If ever there was a case for creating legal rights of way for the enjoyment of a neighbouring population then it is this. It is an enormously popular place for people to appreciate the benefits of fresh air and exercise, it has a long history of use by local communities, and it brings peace and happiness to an urban population. There is clear evidence, not only that people appreciate the area, but that they respect it and help to keep it safe and litter-free. There is also an immense desire, evidenced by the large number of witness statements from local people, to continue access along the

traditionally used paths in these fields and, in particular, for the routes described in my statement here between points I and C on the Order plan.

11. I hereby declare that to the best of my knowledge and belief this is a true statement

Signature.... [redacted] ..... **Date**..30.09.26

PS-1



ADDITIONAL PUBLIC FOOTPATHS ACROSS LAND KNOWN AS VERNEY FIELDS & SURROUNDING AREA, STONEHOUSE PARISH

DEFINITIVE MAP MODIFICATION ORDER 2025

Claimed footpaths:

A-B
B-D
B-C
E-F-K-O
O-Q-T
N-K
J-O
M-O
L-O
P-Q
U-H
G-I

Public paths unaffected by this Order

Highway Records
Shire Hall, Westgate Street,
Gloucester GL1 2TG
Tel. 01452 328981
www.gloucestershire.gov.uk

Drawn by: J Harris
SCALE: 1:4,000
DATE: 08/01/2025

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