Statement of Case — Stephen Armstrong:

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, Stephen David Armstrong, moved into my current property in Verney Road in March 2000. Since this time, I have extensively walked the paths in the local area including those which pass across the land known as Verney Fields.

2. For the record I am not related to the landowners, nor have I been employed by the landowners in any capacity.

3. As keen walkers, both my wife and I, have always enjoyed being outdoors and we have walked many of these paths together and with our son, who was born in 2001. We would often walk in the local area usually more than once a week, even in poor weather and in all seasons. In 2013, we bought a puppy which meant we walked the paths around Verney Fields on a daily basis.

4. I have walked these paths on all days of the week and at varying times of day, both in daylight and at night.

5. With reference to the additional footpaths routes shown on the Definitive Map Modification Order, I have walked all these routes at one time or other. A copy of the Order Plan for Verney Fields is appended **SA1** and a copy of the Order Plan for Oak Way to MST30 is appended **SA2.** Given that we live at the top of Verney Road, our usual starting point for walks would have been the pathway at the side of our

neighbours property, point J on the map. Access to the field was by a stile. Once in the field there was a choice of routes, these can be described as follows:

6. Heading northeast to pick up MST42 or MST64 via points K, F and E. There was a stile at point F. This stile at point F was blocked around May 2023. Before May 2023 there was never any obstruction on this route nor any signage to state that access was not permitted. Additionally, I had no need to use the route secretly nor use force to gain access at any time, nor did anyone ever say that I was not permitted to use this route. There was no need to seek permission to use the route as the route had every appearance of a commonly used route with a well-trodden path and access stile en route.

7. Heading southeast to point O (where there is a large oak tree and until recently, a bench) there were two paths up the hill; one path to the right followed the contours of the hill and the one to the left ran more in the valley until they met up just below the large oak tree. Again, before May 2023 there was never any signage or indication of any kind that access through the field was not permitted and no force or secrecy was required to access the route.

8. Although not marked on the Modification Order plan there was another route I commonly used which ran from point M to L over another stile on the boundary line between the field and woodland. From point L, I would walk on to the viewpoint at point P and then back to the oak tree at point O, crossing another stile on the border between the woods and the field. Again, before May 2023 there was never any signage or indication of any kind that access through the field was not permitted and no force or secrecy was required to access the route.

9. Additionally, I would often walk the linking route between points K and O, which crossed the boggy ground by a water trough.

10. From point O (oak tree and bench) there were a few options available. Heading south I would walk along the path through a gate which became a track at point Q. At no time was this gate ever locked not was access ever prevented. From point Q, I would pass through point T, U and G. Depending on my route I would either branch left or

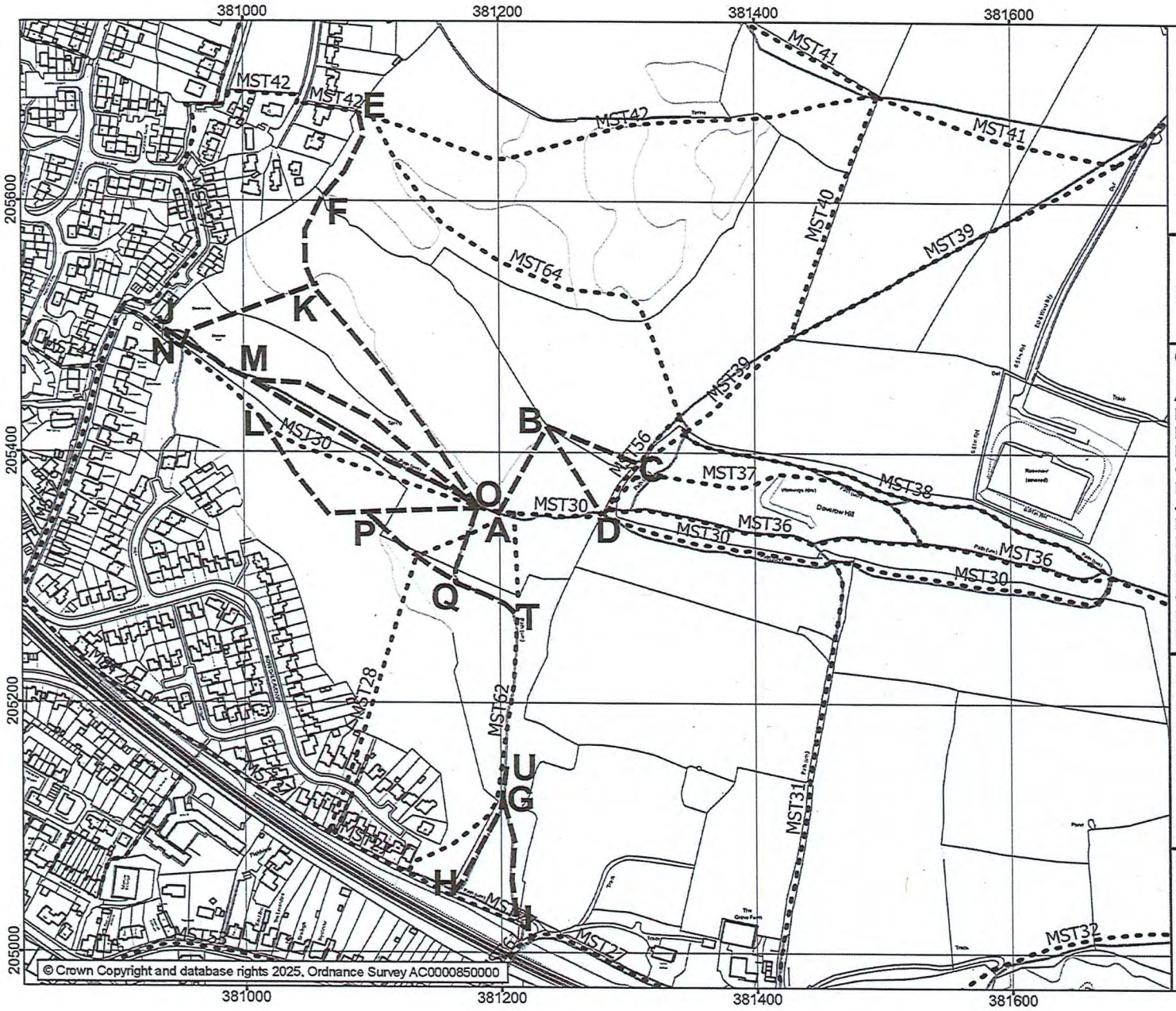
right. I would then head to either point H or I. As with all previous routes, before May 2023, there was never any obstruction on this route not any signage to state that access was not permitted. Additionally, I had no need to use the route secretly not use force to gain access at any time, not did anyone ever say that I was not permitted to use these routes.

11. Alternatively, from point O, I would head northwards to the gate and stile at point B, with a route either heading straight up the hill or via a more leisurely zigzag via point D. Until 2020 there was a stile by this gate at point B. At some time in 2020, the stile and gate were removed and a new gate without a stile was installed. At the same time that the stile was removed signage was placed by point C to indicate that it was no longer a footpath. Access could still be gained around the side of the gate between a gap in the hedge and the gatepost. Before 2020 there was never any obstruction on this route nor any signage to state that access was not permitted. Additionally, I had no need to use the route secretly nor use force to gain access at any time, nor did anyone say that I was not permitted to use these routes. From point B, I would either continue onto point C or would head northwest along another path which is not shown on the Modification Order plan via another stile (removed in 2020) to join MST64.

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

Signature: [redacted]

Date: 25/08/26



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

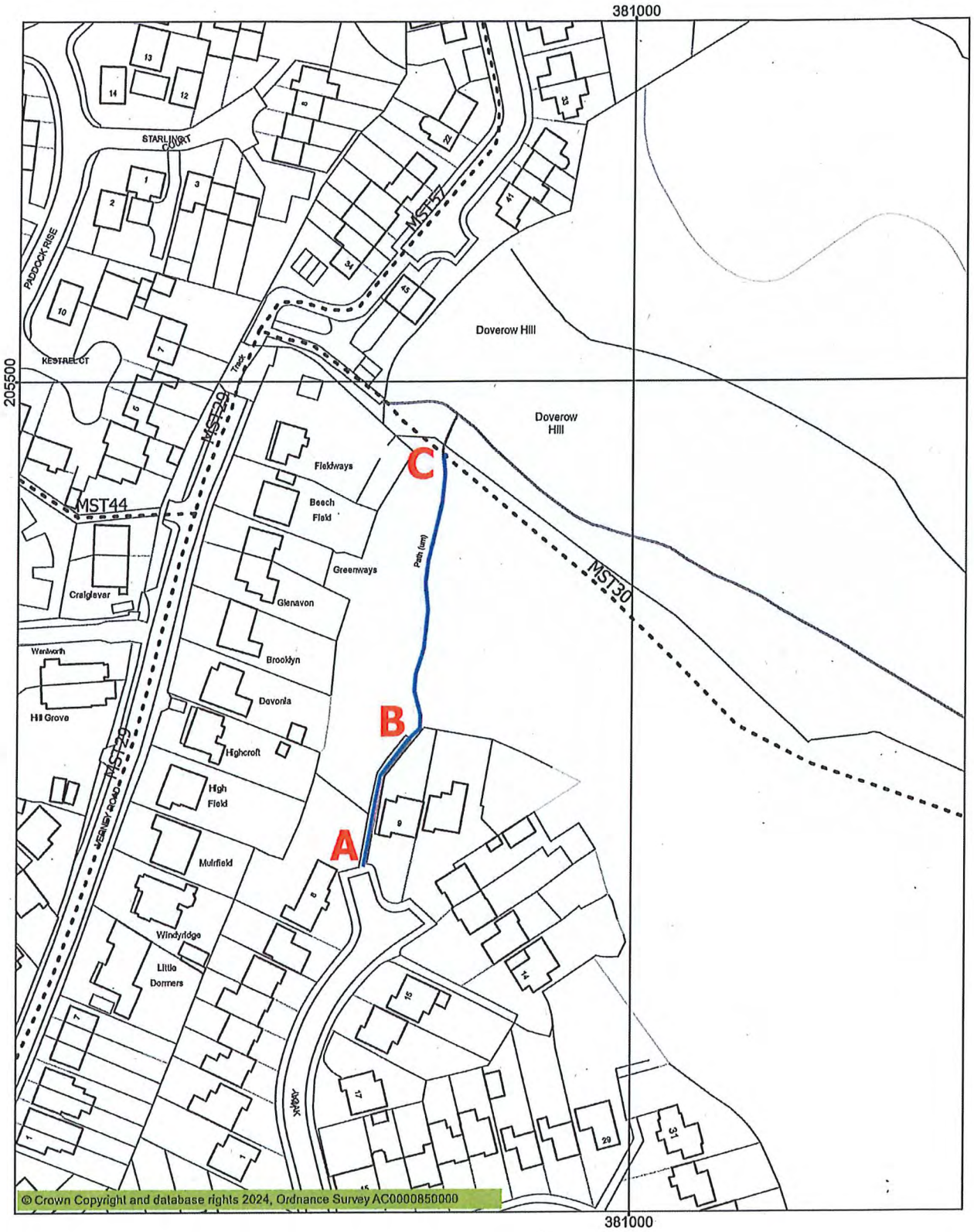
Highway Records
Shire Hall, Westgate Street,
Gloucester GL1 2TG
Tel. 01452 328981
www.gloucestershire.gov.uk

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

© Crown Copyright and database right 2025. Ordnance Survey AC0000850000. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form. This plan may be subject to distortions in scale so any measurements taken may not match those between the same points on the ground.

TJS

SA2



Highway Records Shire Hall, Westgate Street, Gloucester GL1 2TG Tel. 01452 427969 www.gloucestershire.gov.uk	Drawn by: J Haworth SCALE: 1:1,250 DATE: 27 September	**CLAIMED ROUTE** **OAK WAY, STONEHOUSE PARISH** **(573/11/212(4))**

This map is reproduced from (or based upon) Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of His Majesty's Stationery Office. © Crown Copyright and database right 2024, Ordnance Survey AC0000850000. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Claimed Route ——————

Unaffected public rights of way - - - - - - - - - - - - - - -