Proof of Evidence - Samantha Organ:

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

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

1.I have lived in Stonehouse since 1999 and have known and used the claimed routes across Verney Fields and the surrounding area for approximately twenty-four years. My evidence is based entirely on my own personal experience of using the claimed routes shown on the Definitive Map Modification Order 2025 plan (appended **SO1**). In particular, my evidence relates to the claimed routes U-G-H, J-N-M-O, O-Q-T-U-G-I and E-F-K-O. These routes formed part of my regular walking and running routes throughout my period of use. I am not related to any landowner and have never worked for any owner or occupier of the land crossed by the claimed routes. I never sought or received permission to use them. My use was always open and as a member of the public.

2. I used the claimed routes regularly between 1999 and 2023, generally around three times each week on foot for walking, running and general recreation e.g. sledging, nature trail / discovery walks. My use reduced during pregnancy in 2003-04 but otherwise remained consistent. The routes formed part of regular circular walks and runs linking Oak Way, Verney Fields, the spring area, Doverow Hill and the surrounding countryside. They provided attractive off-road routes for exercise and recreation and formed part of a connected network across the area. I used the routes both alone and with family members. My use was always open. I never felt any need to use the routes secretly and I was never challenged, stopped or prevented from using them during the challenge period.

3. U-G-H

My User Evidence Statement describing the route from the area of MST27 towards MST30 corresponds with the claimed route U-G-H. I used this route regularly from 1999 until 2023, generally around three times each week. It formed an important part of my regular walking and running circuits and provided access between the lower and upper parts of the route network.

J-N-M-O

My User Evidence Statement describing the route from SO8093305499 to SO8119405353 corresponds with the claimed route J-N-M-O. I used this route regularly throughout the period 1999-2023. It passed through the spring area and formed one of the principal routes that I used within Verney Fields.

O-Q-T-U-G-I

My User Evidence Statement describing the route from MST28 to SO8118305340 to SO8116705297 to SO8121205270 and then down towards MST27 corresponds with the claimed route O-Q-T-U-G-I. I used this route regularly throughout the period 1999-2023. In my evidence statement I described this as one of the busiest routes in the area because it provided an important connection between Brown's Lane, Rosedale and Doverow Hill.

E-F-K-O

My User Evidence Statement describing the route from Oak Way to SO8109805656, joining the wider route network, corresponds with the claimed route E-F-K-O. I used this route regularly throughout the period 1999-2023. It formed an important connection between Oak Way and the wider claimed route network.

4. With regards to the additional Public Footpath from Oak Way to MST30, this was and remains the primary access path to the area in question for myself and my family, particularly for walking but also accessing the area for recreational purposes as described above. This route has been used frequently for the entire period from 1999 to 2023, unobstructed and without challenge. I append a plan of this Order Route **SO2**.

5. The claimed routes were clearly visible on the ground and generally consisted of worn grass, earth or muddy paths. They formed established routes that were straightforward to follow. I did not need to use force to gain access to the claimed routes. I was not aware of barriers preventing use during my period of use. On one route there were old gateposts within hedges and brambles, but I never knew there to be a gate in place. For most of my period of use I did not see signs stating that the routes were private, permissive or unavailable to the public. In 2023 signs began to appear referring to private land, no public right of way, live camera monitoring and similar restrictions. Around the same time fencing and barbed wire were erected in parts of the network. In my experience this represented a significant change from the position that had existed throughout the previous two decades.

6. I hold GPS running records and photographs, with Google Earth imagery and OS Map records also being available, which support my evidence of long-term use of the claimed routes. My GPS running records extend from 2012 onwards and show repeated use of route corridors through Verney Fields and the surrounding area. The records also show changes in route selection after restrictions were introduced in 2023. In my view, this provides objective support for my recollection that the claimed routes were available and regularly used before the appearance of those restrictions.

7. I have reviewed the objections identified by Gloucestershire County Council. My comments are limited to matters within my own personal knowledge and experience, consistent with the guidance provided for witnesses.

Jones Family (04.10) - I found some aspects of this objection difficult to assess because several comments appear to refer generally to the claimed routes without identifying a particular route, location or period of time. Where comments are not linked to a specific claimed route, it is difficult to compare them directly with my own route-specific evidence. My evidence is that the claimed routes I used were visible, available and regularly used throughout the period 1999-2023.

Backus (04.11) - To the extent that this objection suggests that the claimed routes were unsuitable, impractical or little used, that does not accord with my experience. The claimed route O-Q-T-U-G-I formed one of the principal links between the residential area and Doverow Hill. I used it regularly over many years and regarded it as one of the most useful routes within the network.

Copland (04.12) - My experience does not support any suggestion that substantial barriers prevented public use throughout my period of use. The restrictions that I recorded, including signs, fencing and barbed wire, appeared during 2023. Before that time, I had used the claimed routes for many years without encountering comparable obstructions.

Godsell (04.13) - Where comments relate to areas of the claimed network that I personally used, my experience was that those routes formed part of an established and regularly used path network. Where comments relate to routes that I did not personally use or identify in my evidence statements, I am unable to comment because those matters fall outside my direct experience.

Nagai (04.14) - I never sought permission to use the claimed routes, and no permission was ever granted to me. Before 2023 I did not see signs suggesting that use of the routes was permissive or dependent upon permission from a landowner. Accordingly, throughout my period of use I regarded the claimed routes as routes that could be freely used by the public.

8. Throughout the challenge period 2003-2023, I used the claimed routes frequently and openly, without permission and without being challenged or prevented from using them. My User Evidence Statements, GPS records and personal experience support the conclusion that the claimed routes were available and regularly used throughout the challenge period.

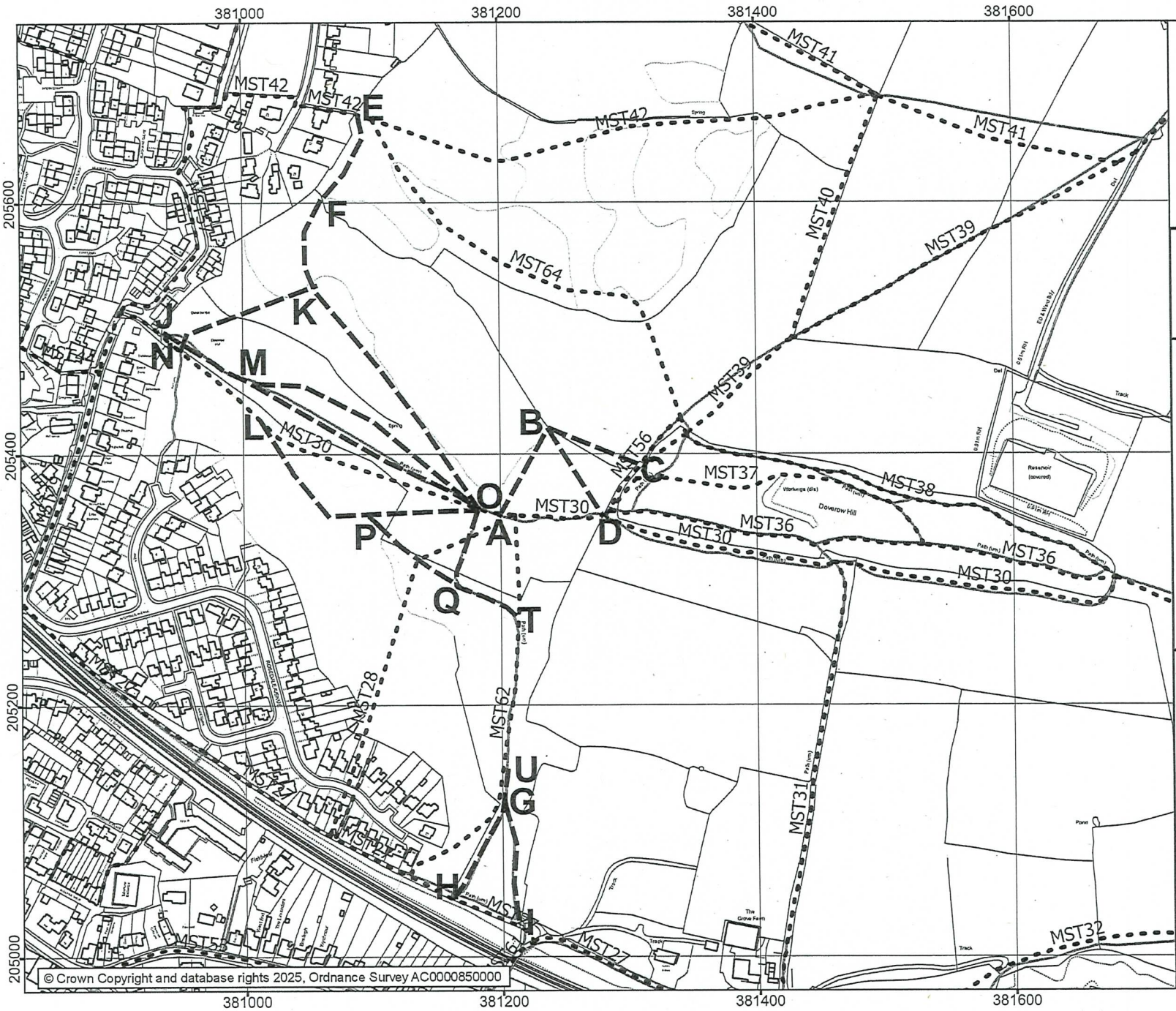
9. For approximately twenty-four years I used the claimed routes U-H-G, J-N-M-O, O-Q-T-U-G-I and E-F-K-O regularly, openly and without permission. They formed part of an established route network across Verney Fields and the surrounding area and were an important part of my regular recreational activities. My evidence, together with the GPS records, photographs and mapping evidence, supports the conclusion that these routes were in regular use over many years. The appearance of signs, fencing and

other restrictions during 2023 represented a significant change from the position that existed for most of my period of use. I therefore believe that my evidence supports the recording of these claimed routes on the Definitive Map.

I confirm that the contents of this Proof of Evidence are true to the best of my knowledge and belief and are based upon my own personal experience.

Signature..... [redacted] **.....** **Date**.....19/08/2026.....

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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

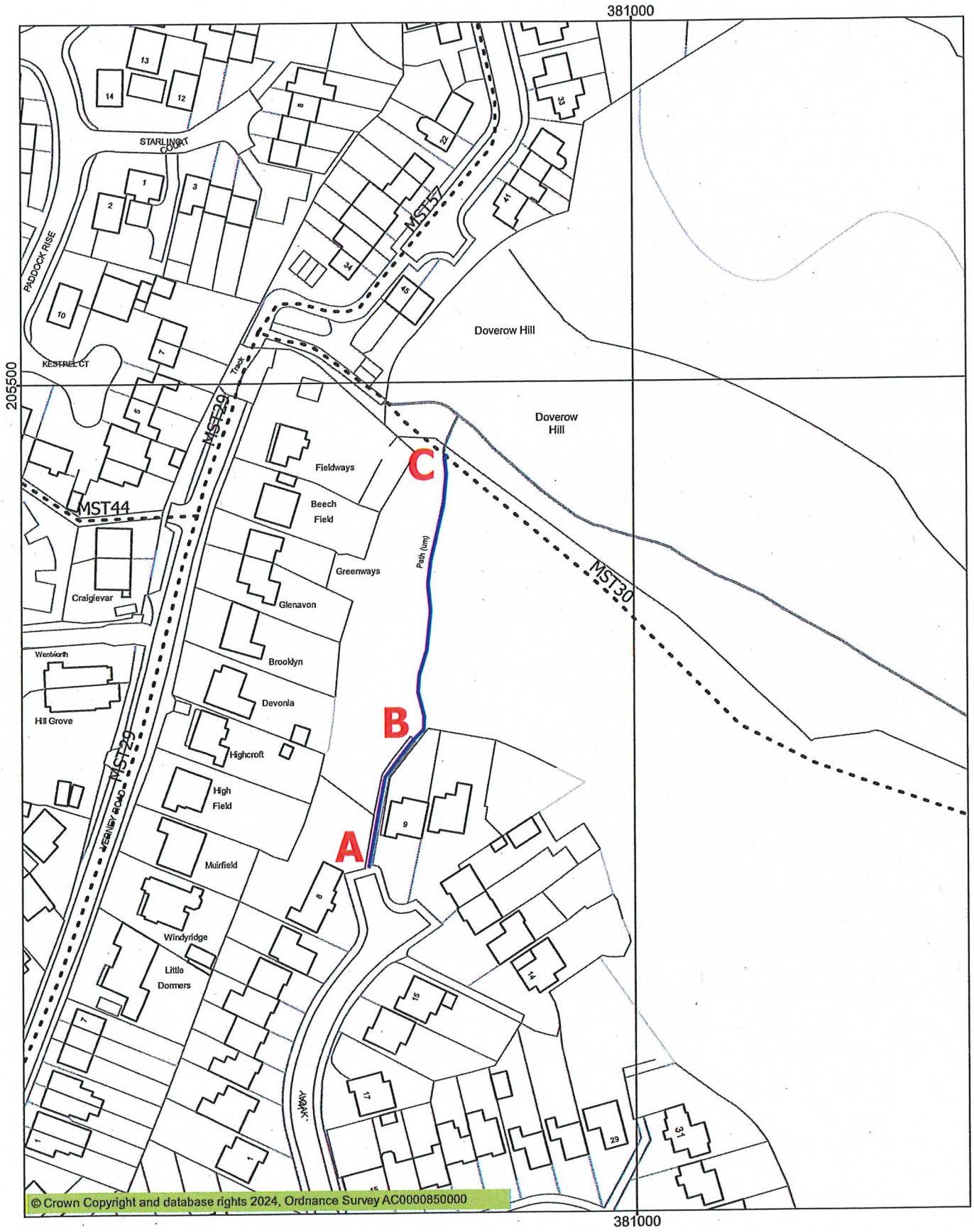
Public paths unaffected by this Order

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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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 N	**CLAIMED ROUTE** **OAK WAY, STONEHOUSE PARISH** **(573/11/212(4))**

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Claimed Route

Unaffected public rights of way