

**The Definitive Map and Statement of Public Rights of Way for the County of
Lancashire**

Wildlife and Countryside Act 1981

Lancashire County Council

**The Lancashire County Council Definitive Map and Statement of Public Rights
of Way (Definitive Map Modification) (No.6) Order 2012**

**Claimed Public Footpath from Conder Green to Nans Buck,
Thurnham, Lancaster City**

PROOF OF EVIDENCE – CATHERINE CARDUS

1. I, Catherine Cardus of 5 Quernmore Drive, Glasson Dock, LA2 0DN have grown up in the area of Glasson and Thurnham and I have known of the route shown between Points A-I on the Order plan from a young age. I have used the route between the years of 1961 and present day, but I did work away for around 7 months between the years of 1994-1995. My husband and I also lived elsewhere between the years of 1978-1986 but as many family still lived in the area we would visit and continue to use the route to walk the dogs or to go out for a walk with my parents. From 1986 until present day I have been permanently in the Glasson area.
2. I knew the land affected by the route was originally owned by W&J Pye as my mother is a member of the Pye family. As a child we used to play all over the Ashton Estate and use it as a playground. There was always access onto the shore so we always used it as we knew we could, I also remember when I was child people used to ride ponies along the shore too. It wasn't the type of place I would ever ask permission to use as for as long as I can remember I have just used it as part of my upbringing.
3. The frequency of use of the route has varied over the years, I was often playing up and down the route as a child with friends or with my family. When I was older and when I had dogs I would use this route as their walk 4-5 times per week. When my most recent dog passed away in 1996 I stopped using the route for a couple of years and I then started to use the route again in around 1998. I mainly use the route now for pleasure and enjoyment and I also collect drift wood as I have a wood burner fire at home, my use varies now from a few times per month to sometimes 2-3 times per week. The majority of the time I use this route I see other people using it, it would be very unusual if I didn't see anyone else using it. Sometimes I knew the people who were using it as they are friends and sometimes they are people I do not know, I don't see people using the route on ponies now but it was quite likely when I was a child.

4. When I start the route, I access onto the shore at Conder Green from Point A as shown on the Order plan. I think the gate at this point is now locked, however there is stile like fence that is quite easily accessible, so I just step over it and walk down to Point B. It is quite obvious on the ground where people walk so I follow the trodden path that seems to be parallel to the sea wall in a northerly direction to Point C. I then continue to follow the line on the ground and walk round the sea wall to Point D, here I always find myself walking up the sea wall to Point E as this is the more natural route to take. I walk towards Pennyhill and then I start to walk down the sea wall at Point F and come back onto the shore at Point G. At Point G I walk around the boundary of Waterloo to Point H and then I walk in a straight line all the way to Point I, I then walk up the slope almost turning back on myself and exit off the route out of the gate at Nans Buck Point J. I do also walk from Nans Buck to Conder Green, I take the exact same route in either direction.
5. I am aware that Mr Clark now owns the land that was formally owned by W&J Pye, he has tried to stop people walking on this route, he erected a barbed wire fence and locked the gate at Conder Green (Point A), I also remember there was sign put up saying "private", but someone took this down and every time he replaced it got taken down. I personally have never met him or been personally challenged by him and I have always continued to use the route as there was always a way to access it. As my mother is related to the Pye family I am aware that they knew people were using the route and they never mentioned anything to anyone and it was well known and acknowledged.
6. This route is affected when the very high tides or the Spring tides come in, it makes the walk on top of the sea wall between points E-F even more suitable. The Spring tides occur around once a month but they are not always high enough to affect the whole route. On average I would say 1-2 times per year the very high tides prevent access from walking the whole route, some of the smaller tides make it more difficult and I just time my walks for when the tide is out.
7. I have known the route for the majority of my life and enjoy walking along the shore, I enjoyed playing a child with my friends and family and I enjoyed walking my dogs in later years. It has been available to use for many years and it should continue to be that way.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement prepared in 2016 are true.

CATHERINE CARDUS

Signed C. Cardus.....

Dated 20/12/24.....