

**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 – JACKIE PYE

1. I, Jackie Pye of, Cliffdale, Thurnham, Lancaster, LA2 0DW have lived at this address for the past 33 years. I married William Pye who is now deceased and his family have been in the area for well over 100 years. I came to know of the route almost immediately after moving to the area as it was previously owned by the Pye family whom are my relatives.
2. My husband's family farmed the whole of Thurnham and Stodday including the Ashton Estate, and my husband was a tenant farmer of the Ashton Hall Estate. He had a riding school in earlier years and members of the riding school would ride up and down the shore as part of a route. I remember horse riding along the shore in earlier years of my use of the route, however I have always walked the route and still do today. There has never been a period of time when I stopped using the route and I have used the route on average 3-4 times per week whether it was for horse riding or dog walking. I often see other people walking the route, sometimes it's the regulars and other times its people I don't know, it all depends on what time I walk the route.
3. As I live close by to Conder Green, I start my walk from Point A (shown on the Order Map) there is a gate a point A but also a gap that is very easily accessible onto the shore, I walk through gap and down onto the shore at Point B. I then continue it walk in a straight line parallel to the sea wall to Point C, at Point C I continue to follow the sea wall slightly curving round to Point D. At Point D this is the start of the concrete wall, here I sometimes walk up on top of the wall to Point E and follow it around to Penny Hill then walk down at Point F – G, but I also sometimes walk around the bottom of the concrete wall from Point D to Point G, this usually depends on which rout the dog has taken or how wet the shore is. I continue my walk from Point G round past Waterloo to Point H and then in a straight line parallel to the old railway track to Point J, I don't walk to Point I and then to Point J I just walk straight across to J and exit out of the gate.
4. I do occasionally walk the route to Penny Hill as I am friends with the owners, I exit the route here and walk around the Ashton Estate and then come back on the route at Nans Buck (Point J) and back down to Conder Green. As I am a relative of the owner of Nans Buck I also have a key to the locked gate so I do exit this gate when visiting my friend, however there is access for the public at Point J through an unlocked gate that takes people back onto the old

railway track. When the Pye family owned the land they also owned Waterloo Cottage, this was then shared by the other family members during summer months, each family would take it in turn to holiday at the cottage.

5. As this route is along the shore it can be affected by tides, occasionally there are very high tides which prevent people from walking the whole route however this is a rarity. Whenever the tide is in I just avoid walking the route at that time or I take detour and come off at Penny Hill to visit my friends and come down the old railway track.
6. My husband's grandfather started the company and his father was a director of the company, my husband was always a tenant farmer of the land owned by W&J Pye and once asked if he could buy the land he tenanted but he was told that all the land owned by W&J Pye was for the enjoyment for the whole family. At no time was anyone challenged or prevented access onto the shore during the ownership of the Pye's, it was encouraged for people to use it and all the members of the family are very honest and kind and wanted to share the privilege with the local people. No one ever questioned access and it was well known that people used the route for walking, horse riding, dog walking and general pleasure of the shore. They enjoyed what they had and wanted others to be able to have the same enjoyment.
7. When the land was sold over to the new owners, just like anyone else in the area they were welcomed as people generally are when living in a village. Soon after they attempted to prevent access by putting up barbed wire fencing, locking the gate at Point A and verbally challenging people. I myself have never been challenged but saw the locked gate and barbed wire. I am also aware they tried to put cattle on the shore but as far as I am aware this didn't work out. About a week or so later the barbed wire was taken down and the lock on the gate was removed, people continued to use the route as there were other access points onto the shore. A fence was put up at the boundary of Penny Hill preventing them access onto shore and they were verbally approached by the new owners.
8. This route is an obvious walk from my house especially when taking out the dog, I have lots of relative and family members who live in the estate and it is a very pleasant walk to exercise the dog and visit friends or family for a coffee. I have been using this route for 33 years since I moved to the area, use of the route was always accessible for the public and it still should be.

STATEMENT OF TRUTH

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

JACKIE PYE

Signed 

Dated 22.12.24

2 Tamworth Cott
Bhton - W. Stodday
Lancaster LA2 0AH

23.12.24

Dear Ms Elliott

I return statement duly signed
as requested. All facts stated
in 2016 are true and I
am agreeable to a being
submitted. However, I have
moved house and although
I walk down the beach
fairly regularly, no longer
use the Bhton Estate.

I trust this is of use

Sincerely
Jaenae Pyle