

**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 – MAXINE CHAMBERS

1. I, Maxine Chambers of 20 Tithebarn Hill, Glasson Dock, Lancaster, LA2 0DQ moved to this address in 2002, previous to that I have lived in St Helens and Scotforth. I came to know of the route marked A-I on the Order plan when I was about 4 or 5 years old as my best friends mum and dad (John and Beryl Pye) owned Waterloo Cottage. During the summer time my friend and her family would holiday at the Cottage and I visited regularly, about once a week from the age of 4-5 up until I was 11.
2. We used to walk the path in both directions from Waterloo, if we walked the path from Waterloo up to Nans Buck, we would exit at the gate at Nans Buck and go into the golf club and walk around the lake, but we would also walk down to Conder Green (Point A) on the Order Map and then play along the old railway line.
3. From the years of leaving Primary School and up until 2002 I have used the route less frequently, around 3-4 times per year as I didn't live in the local area. However I would come and visit my parents and we quite often would go for a walk along the shore and stop off for a cup of tea.
4. From moving back to Glasson Dock in 2002 my use of the route has increased and I would walk the route every weekend, I walk from the Conder Green Picnic Park up to Nans Buck and come back, sometimes I walk further past Nans Buck to the Pylons and then come back and I have also walked up into Lancaster. However for the past 3 years I have had a dog and I now walk the route twice a day. There has never been a period throughout the years in which I have known the route that I did not use it, my use has just varied over years.
5. When I walk the route I am most likely to get onto the route at Point A as shown on the Order plan where the gate is, but I have occasionally got onto

the route at the metal fence which is just before Point A. From Point A I walk onto the route and down the slope to Point B I then walk in a northerly direction as shown on the plan to Point C walking more towards the sea wall and the hedges on the right hand side. I then continue to walk parallel to the sea wall to Point D. At Point D I continue to walk up onto the sea wall to Point E and follow it round to Pennyhill, I do sometimes however walk along the bottom of the sea wall and follow it around to Point G but this depends on the tide. When I am on top of the sea wall I then make my way down at Point F which I believe is slightly more south of Pennyhill and walk down to Point G.

6. I continue my route around the wall of Waterloo to Point H which I would say is more West than what is shown on the plan and then I walk in a straight line up to Nans Buck. If I am exiting my walk at this point I cut through the route directly East across to Point J and miss out Point I. I have on the odd occasion used other access points onto and off the route, these are gaps in the fences in line with the cycle track, I used these access points as a child when playing on the route and I have used them recently when the path is muddy to exit onto the cycle track.
7. From using the route as a child I have never come across any problems, from spending time with my friend and her family at Waterloo Cottage I remember seeing Mr Pye greeting fellow walkers with 'hello' as they walked past. For as long as I can remember I have never asked permission to use the route and I am not aware of anyone else receiving permission, it was just always accessible for the public, almost every time I walk the route I see others enjoying the same the walk, it is well used route as far as I'm concerned. I do have a memory from when I was younger and when I was visiting Waterloo Cottage with my friend and her family, and I remember saying to Mr John Pye "why are people walking in your garden", as a child it looked like it was his garden and John responded to me with "Maxine people can walk past because it's a footpath". The concrete sea wall between points D – F was put up by Mr John Pye and when he put it up he said it should last another 50 years, as he was the previous owner of the land he was responsible for maintaining it.
8. On the odd occasion the tide has prevented access onto the route this is usually around the equinoxes which happen around 4 times a year, the tide is very high and it isn't possible to walk the route. However when other high tides occur around once a month or so only part of the route is affected and as the tide only comes in for about an hour or so I just time my walks around the tide and walk it when the tide is out.
9. When the new owners took over they attempted to block the route with barbed wire fencing, but this never stopped me from using it because as soon as it was put up it was soon cut down and people still accessed the route and continued to use it. I believe they also attempted to put cattle on the shore but again this never prevented me from accessing and using the route.

STATEMENT OF TRUTH

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

MAXINE CHAMBERS

Signed 

Dated 21st December 2024