

**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**

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**PROOF OF EVIDENCE – VAL SIMPKIN**

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1. I, Val Simpkin of 9 Lower Dolphinhholme, Dolphinhholme, Lancaster, LA2 9AX moved to the local area in 1988, I first lived in Galgate until 2003 but I now live in Dolphinhholme. I have always enjoyed living on the coast and I originally lived on the east coast before moving to the west coast. I have always enjoyed walking and I came across this route not long after moving to the area around January 1989 when I was just walking and found the route.
2. My use of the route has varied over the years, from finding the route until I retired, in the years of 1989-2010 I used the route on average once per week as I was working full time and had less free time unless I was on holiday, since 2010 I use the route most days weather permitted I see other people using the route regularly and it is rare that I walk the route and I don't see anyone. It helped me when I first found the route that others were using it as I would just follow the path that they took.
3. When I walk the route I always start from Conder Green (Point A on the Order plan), I walk down the slope to Point B onto the shore, from here I follow the clear trodden line to Point C walking parallel to the sea wall. When I get to Point C I continue to walk alongside the sea wall to Point D where I walk up on top of the sea wall, this is the more natural route to take and is the way my dog walks, when I'm up on top of the wall it is also a good spot to take photographs. I have occasionally walked around the bottom of the wall if the dog decides to go this way. When I am up on top of the sea wall I continue to follow the path around Pennyhill and I begin to walk down the wall at Point F and get back onto the shore at Point G. From Point G I continue to walk around the boundary of Waterloo but I then walk closer to the marsh at Point H, I do on occasion exit the route at Point H as there is a gap in the fence. I then continue to walk up to Point I, I sometimes walk further along the shore or I turn round and walk the same route back. In previous years I would exit the route at Point J and walk back along the cycle track.

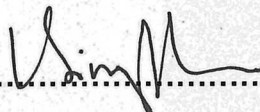
4. I always assumed this land was owned by the Duchy and the route I was using was a public right of way, I later found out that the Pye family owned the land and the 2 cottages Pennyhill and Waterloo which later went on sale. Since the trouble started with the attempted blocking of the route I have now found out who the new owners are by word of mouth. I myself have never met the new owners and in all the time I have used the route I have never been told not to use it or to be on the shore by the Pye family or by the new owners. I have met many other people who walk this route and some people have used it since they were children.
5. When the new owners took over the attempted to block the route by putting up a fence, this never stopped me from using the route, I would just walk around the fence and find another way onto the shore. I remember somebody who had a boat at Glasson Dock but a sign on the entrance at the Conder Green end that stated something like "This case is ongoing and to contact ... it is a public footpath and for any queries please contact ....".
6. As this route is along the shore it can be sometimes affected by tides, the part of the route A-C is mostly affected and this part can sometimes be completely under water, however this is only for half an hour or so until the tide goes back out and is usually only about 4 inches deep so I tend to just wear my wellies. This has never prevented me from using the route as I either just time my walks or wear suitable footwear, once the tide has gone back out the line from A-C is still visible on the ground, the tides have never been a problem for me when using the route.
7. I have used this route for numerous years and I have never had any problems, I always thought it was a public right of way. It has been a well-known route in the village and has been used by many other users. I have never been challenged when I have used the route nor have I ever asked permission.

#### **STATEMENT OF TRUTH**

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

**VAL SIMPKIN**

Signed .....



Dated .....

31 / 12 / 2024