

**THE LANCASHIRE COUNTY COUNCIL DEFINITIVE MAP AND
STATEMENT OF PUBLIC RIGHTS OF WAY**

**PUBLIC FOOTPATHS AT BANKS ENCLOSED MARSH, NORTH
MEOLS, WEST LANCASHIRE BOROUGH (DEFINITIVE MAP
MODIFICATION) ORDER 2014**

WITNESS STATEMENT OF MR ROY EDWARD TAYLOR

1. My name is Roy Edward Taylor and I was born in 1968. I live at 61 Church Road, Banks and I am a qualified aerospace design engineer. I have never been employed by any of the owners of the land known as Hesketh Enclosed Marsh.
2. I have known about the paths across Hesketh Enclosed Marsh for most of my life, having grown up in Banks, living with my mother, father and sister, firstly in Glebe Lane, and then in Ralph's Wife's Lane. We moved to Ralph's Wife's Lane in 1980 when I was aged 11.
3. I probably started using the paths on my own or with friends after we moved to Ralph's Wife's Lane as I remember from then that I started going out on my own around the village on foot and on my bike.
4. I went away to university between 1987 and 1990 but would still use the paths occasionally to walk the dog when I came home during the holidays.

5. After university I used the paths even more infrequently as I was then living away from Banks, so I only had the opportunity to use them when visiting my parents.
6. I moved abroad in 2000 and from then only used the paths infrequently. I moved back to Banks in 2017.
7. During a visit to see my parents in 2012 I completed five user evidence forms confirming my use on foot of four routes on Banks Enclosed Marsh.
8. I had heard that the landowner had started to challenge local people who were using the routes. Having known and used the routes since childhood I did not think this was right.
9. I have reviewed the content of each of my user evidence forms and this Witness Statement provides further information regarding my use and knowledge of the routes.
10. With specific reference to Order route 1 which ran from Georges Lane to the New Embankment (shown between points A-B-C-D-E on the Order Map) I used this route throughout my childhood for recreation, going on picnics, exercise and as I got older, I would go birdwatching. I can remember being three years old (1972) and being taken along the track by my father on his bicycle.
11. I was never stopped or turned back when using the route, and

never sought permission or was given permission to use the route.

12. As I got older I continued to use the route on foot and on my bicycle, and estimate that I would use it on foot an average of 5 times a year between 1975 and 2000 and then once a year from 2000 to 2007. I used it on a bicycle several times per year from 1972 through to 2000.
13. When I used the route, I would often see other people walking and cycling along it to. I recall a stile in the fence which provided access onto the footpath along New Embankment.
14. If I was on my bike (a Raleigh Grifter) I would lift it over the stile next to the gate because the gate was normally kept locked. If I had taken my bike, once on the New Embankment I would continue by foot, walking with my bicycle, or if it was dry or not too overgrown I would sometimes cycle it.
15. With specific reference to Order route 2 which ran from Charnley's Lane to the New Embankment (shown between points F-G-H-I on the Order Map) my earliest memories of using this route are also as a young child when my father took me along it.
16. I was never stopped or turned back when using the route, and never sought permission or was given permission to use the route.

17. I used the route on foot, as a child I would use it when I was out playing and for picnics, as I got older, I would use it for exercise and birdwatching. I used it on average 3 to 10 times a year. I also used it on a bicycle about twice a year when I was younger (1977-1984).
18. When I used the route, I would see others using it on foot, bicycles and on horseback.
19. I recall a stile in the fence which provided access onto the footpath along the New Embankment. I always believed the route to be a public footpath lifting my bicycle over the stile to continue along the New Embankment.
20. With specific reference to Order route 3 which ran from the bridleway at Fiddler's Ferry along the old sea defense embankment to the footpath along the new embankment (shown between points J-K-L-M-N-O on the Order Map) I used this route from 1971 with my father through to 2000.
21. I used the route as part of a walk from the village to the new embankment, sometimes for exercise and because I liked to bird watch and it was a good place to see a variety of birds. I used it on average 3 times a year on foot. I also used it on my bicycle about 3 times a year.
22. I was never stopped or turned back when using the route, and never sought permission or was given permission to use the route. I remember there being a stile at the western end but I

don't recall any private signs and would lift my bike over the stile to continue.

23. With specific reference to Order route 4 which ran from the bridleway at Fiddler's Ferry along the track to the New Embankment (shown between points K-P-Q-R on the Order Map) I also used this route from 1979 to 2000. I always believed the route to be a public footpath.

24. I used the route on foot to get to the footpath on the New Embankment. I used this route on foot about 5 times a year for pleasure and exercise and for birdwatching. About twice a year I used the route on a bicycle.

25. I would often see other people using the route on foot at the same time as me.

26. I recall that there was a gate and a stile at the far end of the route. The stile was used by people on foot but I can't remember whether you could open the gate or not. I lifted my bike over the stile if I was continuing onto the New Embankment.

27. I was never stopped or turned back when using the route and do not recall any private signs. I had never had cause to question whether the route was a public footpath or not – I just thought it was and used it.

28. With specific reference to Order route 5 which ran from Cross Bank Cottage through the wood to the footpath along the New

Embankment (shown between points S-T-U-V on the Order Map) I used this route but only recall using it until about 1985 when I was 12 years old.

29. I only used this route on foot, sometimes going out to the New Embankment for picnics with friends and sometimes to go birdwatching. I used it on average 1-3 times a year and recall seeing other people walking it.

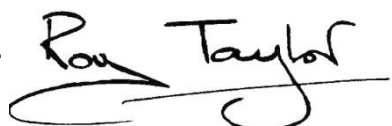
30. I was never stopped or turned back when using the route, and never sought permission or was given permission to use the route. I always believed the route to be a public footpath. I don't recall seeing bird pens or game keepers in the wood.

31. I recall that there was a stile at the New Embankment end of the route but access was never prevented and I do not recall any private signs.

32. In summary, I have known of and used the full lengths of Order routes 1, 2, 3, 4 and 5 for most of my life and I have always believed the routes to be public.

STATEMENT OF TRUTH

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

Signed: .. 

Date: 11/9/2025