

15/5/25

Dear Doreen,

Please find enclosed my signed statement. The delay is partly because the statement was sent to the wrong address, that of another witness, Dennis Robinson.

There are still 2 spelling mistakes in the statement, but I have signed it. See paragraph 7 - sign is repeated, and paragraph 17 line 3 should be year not ear. Perhaps these could be changed.

Karen Taylor

(13 Glebe Lane, Banks
PR9 8EW).

**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 KAREN TAYLOR

1. My name is Karen Taylor, and I live at 13 Glebe Lane, Banks. I was born in 1963. I have never been employed by any of the owners of the land crossed by the footpaths that run across Banks Enclosed Marsh (the 'Order routes').
2. I have known of the routes across Banks Enclosed Marsh since childhood having grown up in Banks. As a child I lived at 15 Glebe Lane (but not at my current address) before moving with my family to 49 Ralph's Wife's Lane.
3. I completed four separate user evidence forms in 2012 detailing my use on foot of routes on Banks Enclosed Marsh. I completed the forms at the request of Kath Prince and some other local residents who were gathering evidence of use of the footpaths after the landowner started to challenge local people who were using the routes. Having known and used the routes since the late 1960s I did not think this was right.

4. I have reviewed the content of each of my user evidence forms and this Witness Statement provides further information regarding my use.
5. With specific reference to Order route 1 which ran from George's Lane to the New Embankment (shown between points A-B-C-D-E on the Order Map) I used it from 1968 through to 2012 when I completed the user evidence form. I was never stopped or turned back when using the route, and never sought permission or was given permission to use the route.
6. I used the route on foot, walking from home and back – sometimes with the family dog. My use of the route varied throughout the year depending on the weather and daylight and how old I was but it was often about once a week in the summer. I remember using it occasionally on a bicycle when I was very young but not often. Over the years I would see other people using the route when I did.
7. I recall a stile at the far end of the route (point D) for people to climb over. I do not recall seeing any signs private signs on the route. I never really thought about whether it was a footpath or bridleway at the time, but if I had done so, I might have assumed it was a footpath because of the stiles.
8. 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) I used this route from 1968

onwards through to 2012 when I completed the user evidence form.

9. I was never stopped or turned back when using the route, and never sought permission or was given permission to use the route.
10. I used the route on foot, sometimes with our dog. My use varied throughout the year but on average I used it approximately 12 times a year but mainly in the summer and I remember seeing other people walking it. I also used it occasionally on a bicycle but only when I was very young.
11. I was never stopped or challenged when using the route. I don't recall seeing any Private signs on the route but there was a stile for people to use at the far end.
12. I always believed the route to be a public footpath and although I sometimes saw people on bicycles, I never questioned this.
13. With specific reference to Order route 3 which ran from the bridleway at Fiddler's Ferry along the old sea embankment to the footpath along the New Embankment (shown between points J-K-L-M-N-O on the Order Map) I also used this route from 1968 onwards. I always believed the route to be a public footpath.
14. I used the route on foot from 1968 onwards. I would vary the routes that I used so that I made a circular route from home. I

sometimes walked with a dog but not always. Again, the amount I used the route varied throughout the year, but I only used it occasionally, due to the distances involved. When I used it however I would see other people walking it and do not recall using it on a bicycle.

15. I was never stopped or turned back when using the route. I never sought permission to use it and always believed it to be a public footpath.
16. 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 1968 to 2012 and always believed the route to be a public footpath.
17. I used the route as part of various circular walks that I did from home. I sometimes walked the route with our dog. My use of the route varied throughout the year but on average I used it about 12 times a year.
18. When I used the route, I would see other people walking along it too.
19. I was never stopped or turned back when using the route and I never had cause to question whether the route was a public footpath or not – I just thought it was and used it.
20. I was aware of another route 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) but I did not use that route. I was aware of the entrance into the wood and had seen other people going that way but I didn't walk that route myself. I am not really sure why, perhaps through habit or because we enjoyed walking further along the top of the embankment and then going home along one of the other routes to Charnley's Lane or George's Lane.

21. In summary, I have known of and used the full lengths of Order routes 1, 2, 3 and 4 from 1968 through to 2012 having lived in the village all my life. I have always believed the routes to be public footpaths.

STATEMENT OF TRUTH

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

Signed: KF Joughw Date: 15/5/25