

Wildlife and Countryside Act 1981

The Kirklees Council (Huddersfield Public Bridleway 231 Sandy Lane to Nether Moor Road, South Crosland) Public Path Modification Order 2018 (“Order”)

Statement of Case on behalf of the Objectors, Mr and Mrs Bradley of Nether Moor Farm, Sandy Lane, South Crosland, Huddersfield HD4 7BX (“Objectors”)

PINS Reference: ROW/3202859

Proof of Evidence of Kenneth William Bates on behalf of the Objectors

1. Introduction

- 1.1. My name is Kenneth William Bates. My address is Delves Cottage, Delves, Netherton, Huddersfield, HD4 7BU.
- 1.2. I am self-employed in exterior maintenance and development, as well as owning a small holding.
- 1.3. I have prepared this proof of evidence in support of the Objectors to the Order. I have known the Bradley family all my life. My property (previously my parents' property) is just down from them on Nether Moor Road. We are neighbours.
- 1.4. I intend to attend the public inquiry into whether the Order should be confirmed, which I understand from the Objectors is due to commence on 29 January 2019.
- 1.5. The facts and matters set out in this Proof of Evidence are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified. Any

facts and matters derived from other sources are true to the best of my knowledge and belief.

1.6. Where I refer to documents within this Proof of Evidence, these are to documents taken from the Objectors' document list. Unless stated otherwise, a reference to a page number within this Proof of Evidence is to the corresponding page of the Objectors' document list (e.g. OBJ/1).

2. Evidence

2.1. As a boy, I occasionally used the Order Route as a short-cut home on my bike. My father, Clifford Bates, always told me that if I needed to use the Order Route, I had to ask permission from Mr Arthur Bradley. On each occasion that I wanted to use the Order Route in this way, I knocked the door at the farmhouse and asked if it was okay to use the Order Route. Arthur Bradley always gave me permission to use it.

2.2. My father, over the years, had used the Order Route to bring hay down in the summer for the benefit of our family's farm, but he informed me that he always asked Arthur Bradley if it was okay before doing so.

I believe that the facts stated in this Proof of Evidence are true.

Signed



Name: K.W. BATES

Dated: 9.1.19