


WILDLIFE AND COUNTRYSIDE ACT 1981Claimed Public Right of Way at The Paddock, Marine Drive, BrightonStatement of Stephen White of CityParks Operations (East)

1. My employment history with Brighton & Hove City Council ("the Council") is as follows. In 1977 I started work with Brighton Borough Council and in 1995 my employment was transferred under TUPE (Transfer of Undertakings Protection of Employment) to Ecovert, a private contractor carrying out work for the Council. In 2004 I came back in house to the Council and now work as Gardener Team Leader for CityParks Operations (East) ("CityParks"). The work I carry out in this role is the same work I have been doing for about 18 years. The area for which I am responsible includes The Paddock at Black Rock, Marine Drive, Brighton ("The Paddock").
2. CityParks has maintained the path nearest Marine Gate along the western edge of The Paddock for as many years as I can remember.
3. In 2013 my manager at the time, Graeme Rolf, instructed me that paths were also to be cut along the northern and eastern edges of The Paddock. The first time I and my team members cut these paths in 2013 we had to use an Aebi which is a flail mounted all wheel drive tractor as our verge mowers were not powerful enough for the massively overgrown brambles.
4. Graeme instructed me to keep the paths clear from that time on, which CityParks have been doing. We keep the paths around the western, northern and eastern edges of The Paddock cut throughout the season with our verge mowers. Mowing takes place approximately monthly between April and October.
5. A map showing the routes of all the paths that are now being mown by CityParks at The Paddock is attached to this statement and marked "SW 1".

Signed 

Stephen White

Date 6.12.16



"SW 1"