

Green Hill Solar Farm

EN010170

Outline Public Rights of Way and Permissive Paths Management Plan

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1 Introduction

1.1 Outline

- 1.1.1 This Outline Public Rights of Way (PRoW) and Permissive Paths Management Plan has been prepared by KMC Transport Planning (KMC) on behalf of Green Hill Solar Farm Limited (the 'Applicant') in relation to an application for a Development Consent Order (DCO) for Green Hill Solar Farm (hereafter referred to as the 'Scheme').
- 1.1.2 The Scheme spans several local authorities:
- West Northamptonshire Council;
 - North Northamptonshire Council; and
 - Milton Keynes City Council.
- 1.1.3 This Outline PRoW and Permission Paths Management Plan provides a framework for the management of routes throughout the Site. The key objective is to ensure that PRoWs remain open, and safe at all times throughout the Scheme's construction, operational and decommissioning phases, with the same applying to permissive paths during the operational phase.
- 1.1.4 This Outline PRoW and Permissive Paths Management Plan considers both PRoWs and permissive paths:
- Currently or proposed within the Scheme;
 - During the Construction Phase;
 - During the Operation Phase; and
 - During the Decommissioning Phase.
- 1.1.5 It will be the responsibility of the developer to ensure that the appointed contractor complies with all statutory regulations and guidelines in relation to construction and movement activities.

1.2 The Scheme

- 1.2.1 The Scheme will comprise the construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) electricity generating facility and Battery Energy Storage System (BESS) with a total capacity exceeding 50 megawatts. The Scheme comprises nine land parcels ('Sites'). The Sites are connected by a Cable Route Corridor to each other and to the Point of Connection (PoC) at Grendon National Grid Substation.
- 1.2.2 The Sites are in an area of countryside to the west and south of Wellingborough, and north, east and south east of Northampton as shown in **Figure 1.1**.

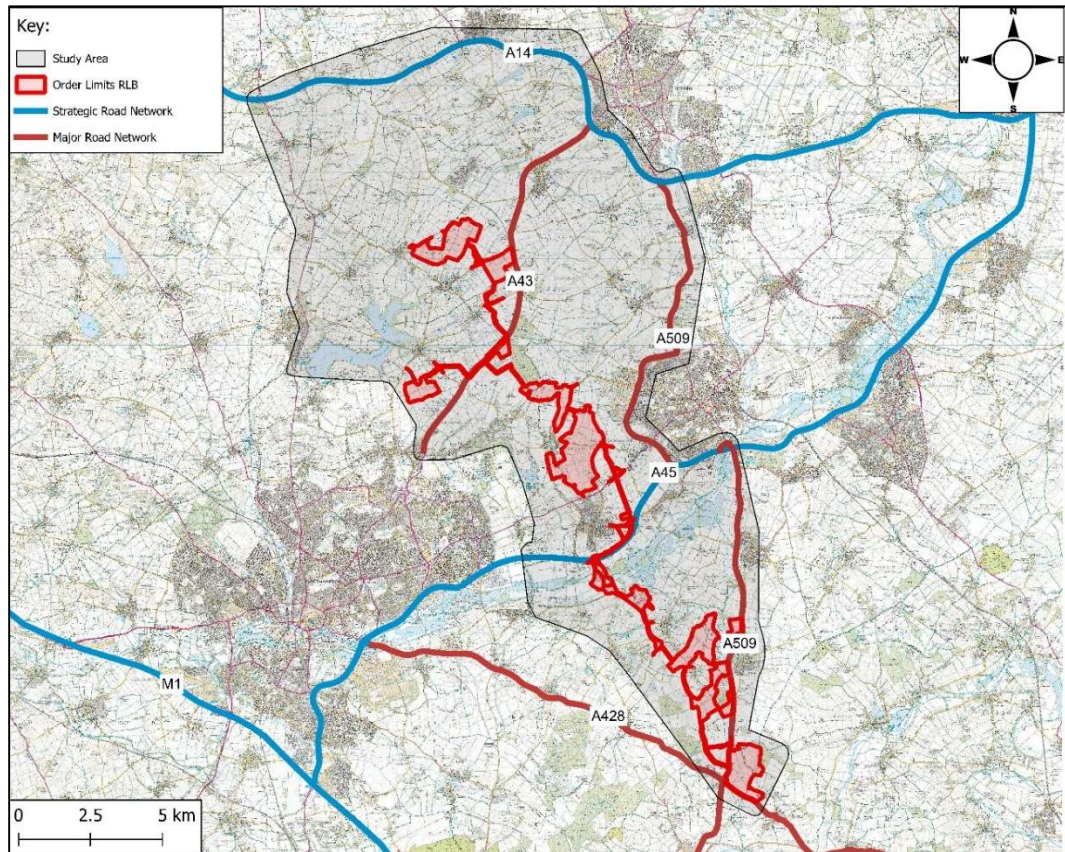


Figure 1.1 – Scheme Overview and Highway Network Context

1.3 The PRow and Permissive Paths Management Plan

- 1.3.1 This PRow and Permissive Paths Management Plan provides a framework for the management of PRows throughout the Scheme. The key aim is to ensure that PRows remain open, accessible and safe at all times throughout the Scheme's construction, operational and decommissioning phases. It also provides a framework for the management of the permissive paths provided as part of the Scheme during the operational phase.
- 1.3.2 It will be the responsibility of the applicant to ensure that the appointed contractor complies with all statutory regulations and guidelines in relation to construction activities.
- 1.3.3 This PRow and Permissive Paths Management Plan should be read in conjunction with the Environmental Statement and the Transport Assessment submitted as part of the DCO application.

2 Public Rights of Way within the Order Limits

2.1 Overview of the Scheme

Solar Arrays

- 2.1.1 The main element of the Scheme comprises eight Sites that will accommodate the solar arrays. These are referred to as:
- **Green Hill A** – Accessed via Access A-1: Broughton Lane
 - **Green Hill A2** – Accessed via Access A.2-1: Ketting Road
 - **Green Hill B** – Accessed via Access B-1: Sywell Road
 - **Green Hill C** – Accessed via Access C-1: Sywell Road/Glebe Road junction
 - **Green Hill D** – Accessed via Accesses:
 - D-1: Highfield Road adjacent to Sywell Road
 - D-2: Highfield Road adjacent to the access to Highfield Happy Hounds
 - D-3: Highfield Road, c.200m south of the access to Highfield Happy Hounds
 - **Green Hill E** – Accessed via Access E-1: c.200m south of the access to Highfield Happy Hounds
 - **Green Hill F** – Accessed via Accesses:
 - Access F-1: Off the A509, north of Bozeat.
 - Access F-2: Easton Lane/Private Access to Motorcycle Dealership junction
 - Access F-3: Off the A509 to the west of Bozeat.
 - **Green Hill G** – Accessed off the A428, c.100m to the east of the junction with the A509.
- 2.1.2 An Energy Storage Facility (also referred to as a Battery Energy Storage System (BESS)) is proposed. The preferred location for the BESS is at Green Hill BESS adjacent to Grendon National Grid Substation, however BESS may also or alternatively be located within Green Hill C.
- 2.1.3 The Cable Route Corridor will comprise underground electrical cables to connect the Sites to the Point of Connection (PoC) at Grendon Substation. The Cable Route Corridor runs for approximately 31km from Green Hill A at its most northern extent to Green Hill G at its southernmost point

2.2 Public Rights of Way within the Order Limits

- 2.2.1 There are a number of PRowWs that run through the Scheme and this includes both the Sites and the Cable Route Corridor.
- 2.2.2 The existing PRowWs are presented on the Public Rights of Way Plan [EN010170/APP/GH2.6].
- 2.2.3 The PRowWs are presented in **Table 2.1** and across **Figures 2.1 to 2.5**.

Table 2.1 PRoWs across the Scheme

PRoW Name	Status	Nearest Site
NN DF 4	Footpath	Green Hill A
NN DT 8	Footpath	Green Hill Cable Route Corridor - Between A and A.2
NN CT 3	Bridleway	Green Hill Cable Route Corridor - Between A.2 and B
NN CT 5	Bridleway	Green Hill Cable Route Corridor - Between A.2 and B
NN CT 6	Footpath	Green Hill Cable Route Corridor - Between A.2 and B
NN CW 1	Footpath	Green Hill Cable Route Corridor and Green Hill B
NN DG 2#2	Footpath	Green Hill B
TN7	Bridleway	Green Hill C
TN3	Footpath	Green Hill D
TU3	Footpath	Green Hill E
TU2 *	Footpath	Green Hill E
TN1	Footpath	Green Hill E
TC14 *	BOAT	Green Hill Cable Route Corridor - Between E and BESS
TC17	Footpath	Green Hill Cable Route Corridor - Between E and BESS
TF3	Footpath	Green Hill Cable Route Corridor - Between E and BESS
TF10	Footpath	Green Hill Cable Route Corridor - Between BESS and F
TF4	Footpath	Green Hill Cable Route Corridor - Between BESS and F
TA4 *	Footpath	Green Hill F
TA1	Footpath	Green Hill F
TD3	Footpath	Green Hill F
TF5	Footpath	Green Hill F
TD2	Footpath	Green Hill F
TD9	Bridleway	Green Hill F and Cable Route Corridor connecting Green Hill F
TD8	Bridleway	Green Hill F and Cable Route Corridor - Between F and G
TD5 *	Footpath	Green Hill F
TD7	Footpath	Green Hill F

PRoW Name	Status	Nearest Site
TA20	Footpath	Green Hill Cable Route Corridor - Between F and G
TA8	Bridleway	Green Hill G
MK Lavendon 015#1	Bridleway	Green Hill G
MK Lavendon 015#2	Bridleway	Green Hill G
MK Lavendon 002	Bridleway	Green Hill G
MK Lavendon 014	Bridleway	Green Hill G
MK Lavendon 004	Bridleway	Green Hill G
MK Lavendon 005	Footpath	Green Hill G
MK Lavendon 001	Footpath	Green Hill G
MK Warrington 007	Footpath	Green Hill G

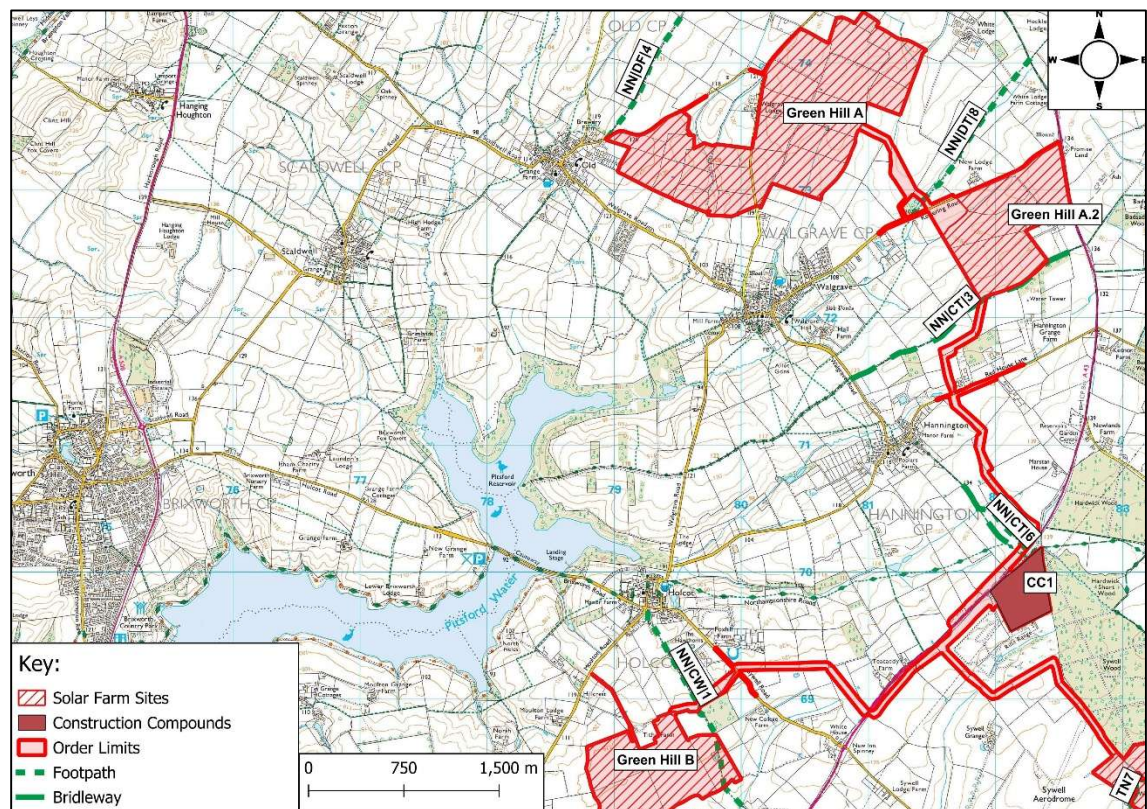


Figure 2.1 PRoWs associated with the scheme – North area

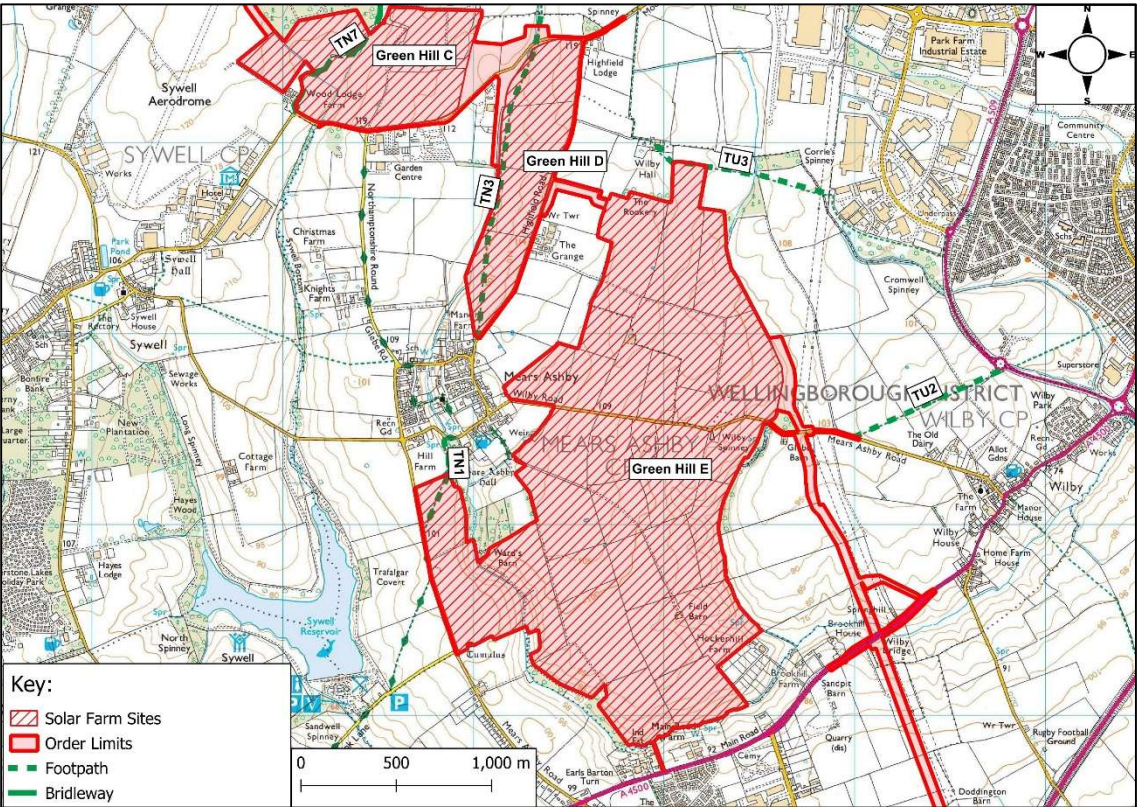


Figure 2.2 PRoWs associated with the scheme – Area around Green Hill C, D and E

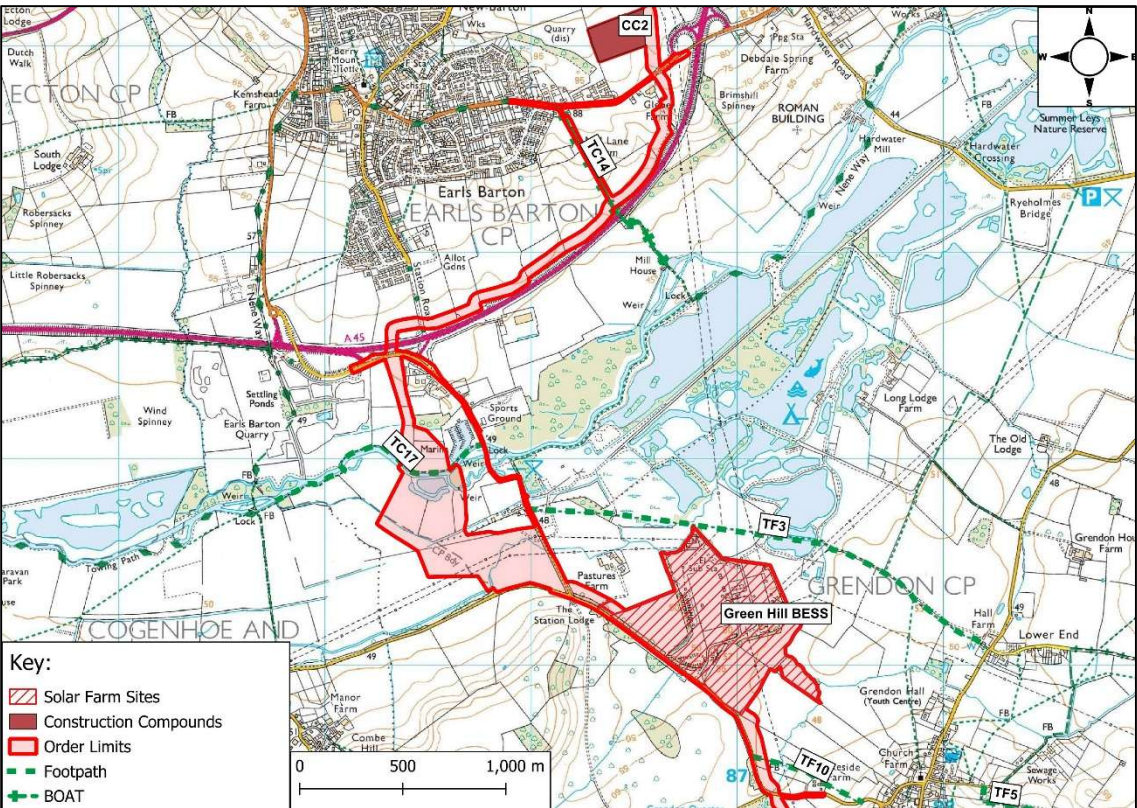


Figure 2.3 PRoWs associated with the scheme – Area around Green Hill BESS and Earls Barton

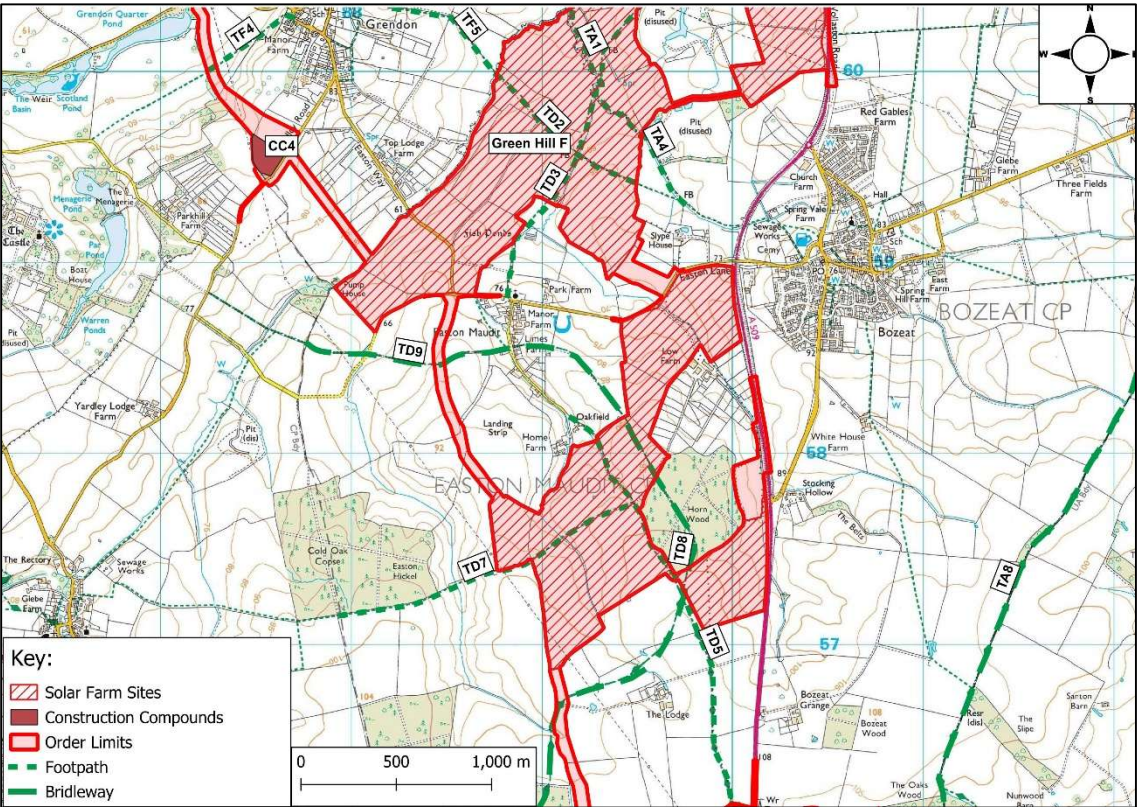


Figure 2.4 PRoWs associated with the scheme – Area around Green Hill F

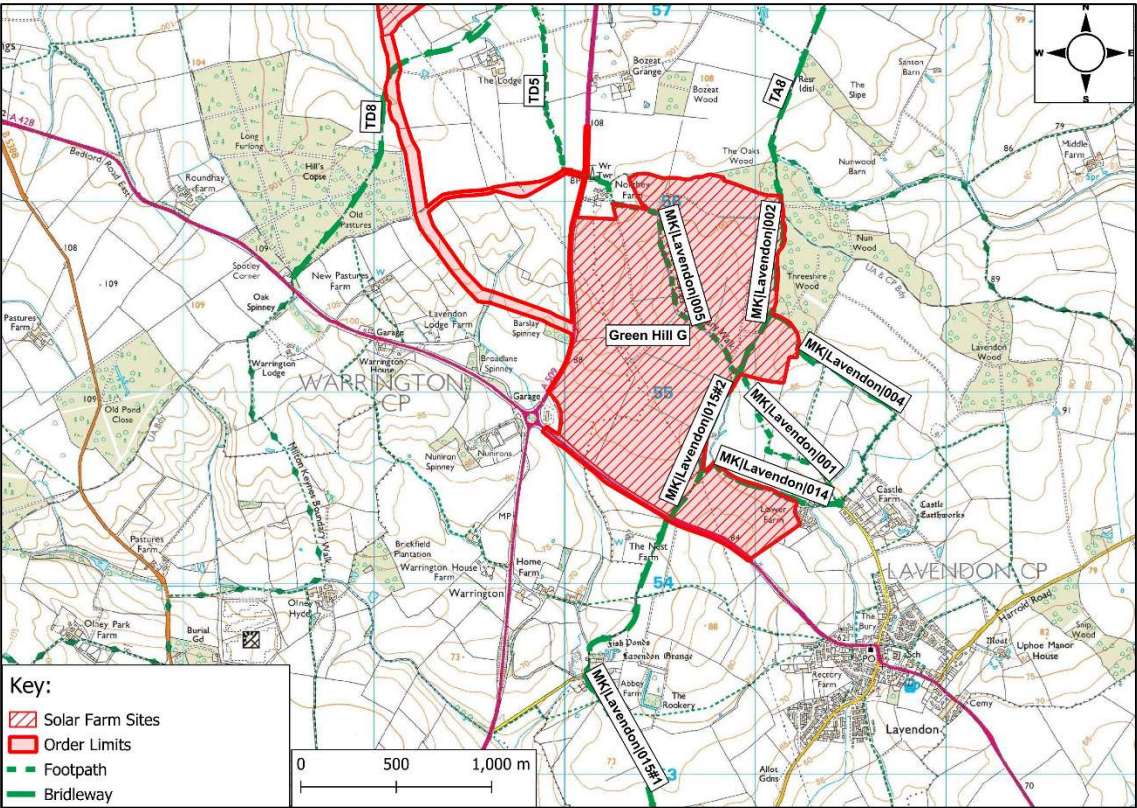


Figure 2.5 PRoWs associated with the scheme – Area around Green Hill G

2.3 Definitive Map Modification Orders

2.3.1 A review of Definitive Map Modification Orders (DMMO) has been undertaken. A single DMMO application has been identified as being relevant to the Scheme which is presented in **Table 2.2**.

Table 2.2 Identified DMMOs

DMMO reference	Description	PRoWs affected	Nearest Site
Applicants Path Reference: NOR-0183	Yardley Hastings going east to Horn Wood then north and ends at Easton Maudit.	Footpath LE9 Footpath TD7 Footpath TD5	Green Hill F

2.3.2 The application summarised in **Table 2.2** was submitted in September 2020. The proposal is to alter the status of the existing PRoW from Yardley Hastings to Easton Maudit from a footpath to a Bridleway. The application route is shown as footpaths LE9, TD7 and TD5. The route traverses the south western area of Green Hill F.

2.3.3 An extract of the proposed route shown in red dashes is provided in **Figure 2.6**.

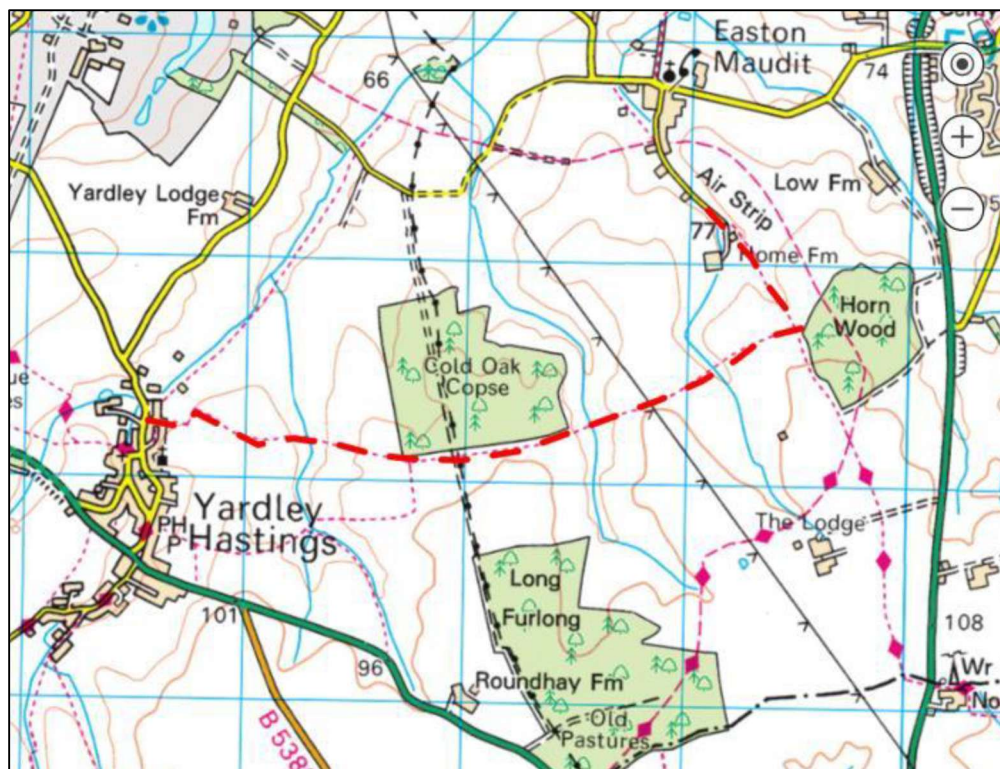


Figure 2.6 Extract of DMMO Applicants Path Reference: NOR-0183

3 Management of Public Rights of Way during the Construction Phase

3.1 Programme

3.1.1 The Scheme currently has a grid connection date of 2029. It is anticipated that construction works will commence, at the earliest, in Q1 2027 and will run to 2029. The construction phase for the Scheme will last approximately 24 months in total.

3.1.2 An indicative construction programme is shown in **Figure 3.1**.

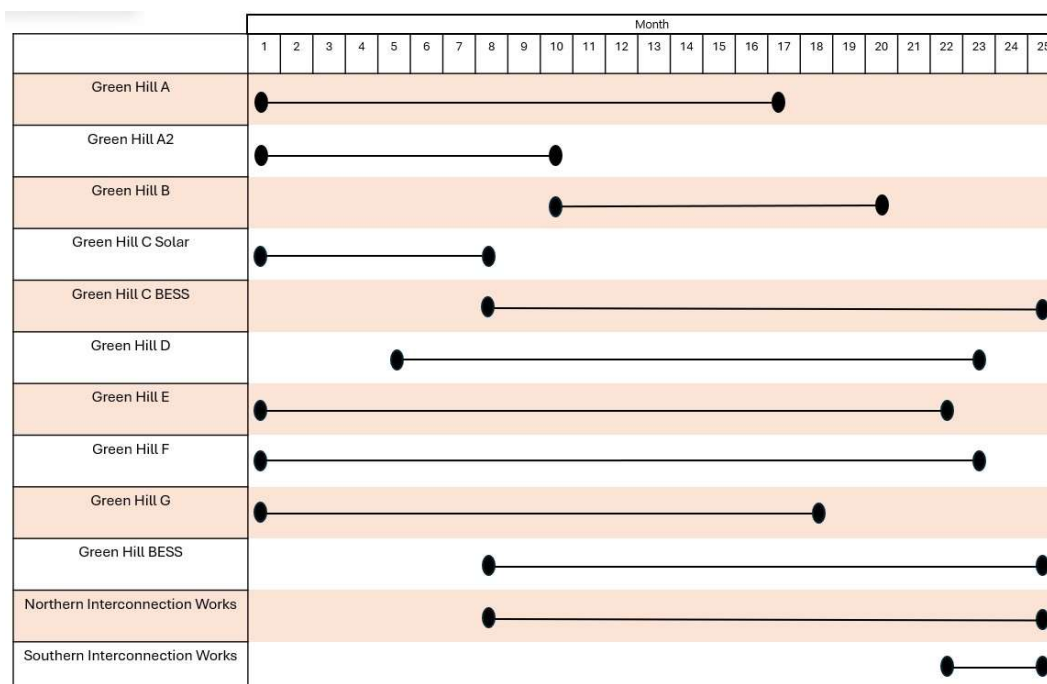


Figure 3.1 Indicative construction programme for Green Hill Solar Farm

3.1.3 The construction period will include the delivery of equipment to the Sites by HGVs together with the movement of worker and other equipment, largely by vans and smaller vehicles. Equipment will be transported across Sites via an internal access track and along the Cable Route Corridor via a construction track.

3.1.4 There are instances where the works and associated tracks cross PRoWs within the Order Limits. In these instances, public access to PRoWs will be retained so far as is practicable to do so. However, the PRoWs will be managed throughout the construction period, to ensure the safety of all users.

3.2 PRoW Management

Green Hill Sites

3.2.1 The majority of the Sites have been designed such that solar panels and power management equipment are located such that construction vehicles will not need to cross a PRoW.

- 3.2.2 The exception to this will be for instances where measures such as fencing or wider ecology measures are proposed. Some minor movements may need to cross a PRoW and will be managed in the same way as those detailed below. Compounds located in places that reduce the need to cross PRoWs within each Site.
- 3.2.3 Solar array equipment will be installed within fields across each Site with PRoWs falling between the sites and the point of Site access. Accordingly, construction vehicles will need to cross the PRoWs (as currently occurs with farming activities) and as such the process will need to be managed.
- 3.2.4 The PRoWs that are within Green Hill Sites and which will need to be crossed by internal access tracks and construction vehicles is presented in **Table 3.1**.

Table 3.1 PRoWs required to be crossed during Green Hill Site construction

PRoW Name	PRoW Type	Green Hill Site
TA4 *	Footpath	Green Hill F
TA1	Footpath	Green Hill F
TD3	Footpath	Green Hill F
TD2	Footpath	Green Hill F
TD8	Bridleway	Green Hill F
TD7	Footpath	Green Hill F
MK Lavendon 015#2	Bridleway	Green Hill G
MK Lavendon 002	Bridleway	Green Hill G
MK Lavendon 005	Footpath	Green Hill G

- 3.2.5 The Transport Assessment sets out the number of construction vehicles that will visit each site on a daily basis during the construction period. The number of vehicle movements is provided on an individual Site basis, and this confirms that numbers are low. Further, the proportion of these vehicles that will need to cross the PRoW will be a small proportion of the overall numbers.
- 3.2.6 Compounds are located on places where arrivals by workers and other equipment will not need to cross a PRoW. As such, movements will be associated with the direct construction of equipment in fields that fall beyond the main Site.
- 3.2.7 It is anticipated that the PRoWs presented in **Table 3.1** will remain open to users throughout the construction period although there may be instances where temporary closures may be necessary. The PRoWs will need to be managed, and a range of proposed measures have been identified as follows:

- Wider access tracks will be considered to ensure vehicles can pass all PRow users safely;
- Appropriate signage will be installed along the PRow to make PRow users aware of the construction activity. This will include information on construction times and contact details for the Site Manager;
- The provision of banksmen to hold vehicles if a PRow user is present and advise PRow users of the presence of construction vehicles;
- Vehicle speeds across and on the approach to the PRow to be limited to 5 to 10mph;
- Drivers will stop at all PRow crossings; and
- The PRow will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable.

Cable Route Corridor

- 3.2.8 The electricity generated by the Scheme will be exported to the National Grid substation at Grendon via underground electrical cables sited within the defined cable route corridor. The Cable Route Corridor will require crossings of a number of PRow.
- 3.2.9 The Cable Route Corridor will be built out in sections over a 24-month period, with each section requiring a number of site accesses which will be in use simultaneously.
- 3.2.10 The PRow presented in **Table 3.2** will be crossed by the Cable Route Corridor and will require specific management during construction.

Table 3.2 PRow Requiring management associated with Cable Route Corridor

PRow Name	PRow Type	Location
NN DT 8	Footpath	Green Hill Cable Route Corridor - Between A and A.2
NN CT 3	Bridleway	Green Hill Cable Route Corridor - Between A.2 and B
NN CT 6	Footpath	Green Hill Cable Route Corridor - Between A.2 and B
NN CW 1	Footpath	Green Hill Cable Route Corridor and Green Hill B
TC14	BOAT	Green Hill Cable Route Corridor - Between E and BESS
TC17	Footpath	Green Hill Cable Route Corridor - Between E and BESS
TF10	Footpath	Green Hill Cable Route Corridor - Between BESS and F
TD9	Bridleway	Cable Route Corridor connecting Green Hill F
TD8	Bridleway	Green Hill F and Cable Route Corridor - Between F and G

- 3.2.11 The PRow will be crossed by the proposed haulage road associated with the Cable Route Corridor. Management measures will be put in place to ensure the safe movement of PRow users.

- 3.2.12 The measures to be employed where the PRoW is crossed by the Cable Route Corridor haulage road are as follows:
- Appropriate signage will be installed along the PRoW to make PRoW users aware of the construction activity. This will include information on construction times and contact details for the Site Manager;
 - The provision of banksmen to hold vehicles if a PRoW user is present and advise PRoW users of the presence of construction vehicles;
 - Vehicle speeds across and on the approach to the PRoW to be limited to 5 to 10mph;
 - Drivers will stop at all PRoW crossings; and
 - The PRoW will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable.
- 3.2.13 During the installation of the cable within the Cable Route Corridor, there may be some instances where the PRoW needs to be closed to users for a short period. This will not occur at all PRoWs.
- 3.2.14 Open cut trenching will be primarily utilised for crossings. The open cut technique may require the temporary closure of PRoWs.
- 3.2.15 Where there is a requirement to temporarily close or divert the PRoW, works will be undertaken over-night so far as is practicable to do so, where PRoW user numbers will be low, or undertaken in a short duration. It is anticipated that the installation of cables over short sections where the PRoW is located can be undertaken in a single overnight period. The PRoW will remain open, and managed, during the daytime period wherever practicable.
- 3.2.16 Prior to commencement, the extent and duration of the closure will be reviewed depending on, construction programming and sequencing, the final design of the scheme and the time of year. Where practicable, access on foot will be maintained or diverted throughout the period of the temporary road closure. Advisory signage will be in place to notify users. Notifications will be provided as early as practicable.
- 3.2.17 Where a temporary closure, restriction or diversion of a PRoW is required, prior notice to the PRoW officers at the local highway authority will be provided.
- 3.2.18 In addition to PRoWs identified in **Table 3.2**, TD5 is located at a proposed Cable Route Corridor access and as such the design will need to ensure vehicle movements are separated from the PRoW. TC14 is a Byway and can be used by vehicles. This is included in the Order Limits to provide flexibility and a potential alternative access to the Cable Route Corridor for smaller sized vehicles. Management measures will apply to these PRoWs.
- 3.2.19 Any damage to the surface of the PRoW will be repaired as soon as practicable. The surface will be returned to its original condition following construction.

3.3 PRow Diversions and Closures

- 3.3.1 It is expected that PRowS will remain open throughout the construction period with management to ensure the safety of all PRow users so far as is practicable to do so.
- 3.3.2 It is not anticipated that any long term PRow diversions or diversions of more than a day will be required.
- 3.3.3 Should an instance arise where PRowS are temporarily affected and its diversion is not possible, the PRow may be temporarily closed or restricted.
- 3.3.4 Where there is a requirement to temporarily close a PRow such as for the installation of underground cables, work will be undertaken overnight to ensure effects to users are minimised.
- 3.3.5 In respect of the Sites, the Applicant will only exercise the power to temporarily close, restrict or divert a PRow in the event that the management measures are not considered sufficient to ensure user safety. Where a temporary closure, restriction or diversion is required, this will only be put in place for as long as is reasonably necessary.

4 Management of Public Rights of Way and Permissive Paths during the Operational Phase

4.1 Existing PRowS

- 4.1.1 The alignment of existing PRowS across the various component Scheme Sites have been incorporated into the design of the Scheme layout. The alignment of PRowS will be unaffected during operation of the Scheme.
- 4.1.2 All PRowS will have a buffer on either side to any infrastructure associated with the Scheme including fencing. Therefore, PRowS will be located within an open corridor.
- 4.1.3 Day-to-day operational and maintenance vehicles may cross PRowS during visits to the Site. These instances will be infrequent at less than one visit per day per Site for maintenance purposes, similar to the existing farming activities. This is likely to be comparable to existing agricultural movements crossing PRowS and therefore does not present any additional risk.
- 4.1.4 Operational and maintenance vehicles would typically comprise a van or 4x4 type vehicles. These vehicles will not cause any material effect to PRowS.
- 4.1.5 In instances that there is damage to the surface of any PRow caused by maintenance vehicles, it will be repaired as soon as practical and returned to its existing condition.

4.2 Permissive Paths

- 4.2.1 Several permissive paths are incorporated into the Scheme design. An overview of the proposed permissive paths is outlined below.
- 4.2.2 The permissive paths will contribute to the wider network of PRowS facilitating, greater public access to the Countryside. The design and implementation of the permissive paths is set out in the Landscape and Ecology Mitigation Plans **[EN010170/APP/GH6.4.4.10]** to **[EN010170/APP/GH6.4.4.20]** and Outline Landscape and Ecological Management Plan (OLEMP) **[EN010170/APP/GH7.4]** and secured by a Requirement in the draft DCO **[EN010170/APP /GH3.1]**.

Green Hill A

- 4.2.3 Permissive path for pedestrians connecting Broughton Road and Newland Road.
- 4.2.4 Permissive path for pedestrians and equestrian users, providing a loop through Green Hill A (fields AF17 to AF29), connecting to Newland Road near to its junction with Broughton Road, and to the green lane north of the Acorn Centre.

Green Hill A.2

- 4.2.5 Permissive path for pedestrians and equestrian users, providing a loop around the perimeter of Green Hill A.2, with access to Kettering Road, and to bridleway WN|CT|3.

Green Hill D

- 4.2.6 Permissive path for pedestrians to align with an existing walked route across Green Hill D, parallel to footpath NN|TN|3, and connecting to the continued route of NN|TN|3 north of Green Hill D.

Green Hill E

- 4.2.7 Permissive path for pedestrians and equestrian users, to connect Mears Ashby at byway open to all traffic NN|TN|10 to Earls Barton (A4500). Throughout non-statutory consultation it became apparent this route is already used in part by local residents and would address the request for a route to connect the two villages.
- 4.2.8 Permissive path for pedestrians between the proposed permissive Mears Ashby-Earls Barton route, to Wilby Road via Field EF13, and a continued permissive path parallel to Wilby Road through Field EF9 and EF10. Providing these new permissive routes within the field margins east of Mears Ashby Road, would allow for safer access and would provide an alternative to walking along the road.
- 4.2.9 Permissive path for pedestrians parallel to Mears Ashby/Earls Barton Road in Fields EF33 and EF33, connecting footpath NN|TN|1 to the termination point of footpath NN|TN|2 and to the junction of Mears Ashby Road and Washbrook Lane. Providing this new permissive path within the field margins would allow for safer access and would provide an alternative to walking along the road.

Green Hill F

- 4.2.10 Permissive path for pedestrians within field FF6 to provide connection between the existing PRoWs, these being footpaths NN|TA|1 and NN|TA|4.
- 4.2.11 Permissive path for pedestrians within field FF11 to provide connection between the existing PRoWs, these being footpaths NN|TD|2 and NN|TD|3.
- 4.2.12 Permissive path for pedestrians connecting an existing PRoW – footpath NN|TD|2 at field FF8 to Easton Way (Easton Maudit) at field FF13, and continuing parallel to Easton Way within field FF15 to meet Yardley Road.
- 4.2.13 Permissive path for pedestrians and equestrian users, from Easton Lane at field FF25 at the entrance to the proposed onsite substation, along the eastern boundaries of fields FF26, FF27 and FF28 to the point existing PRoW, bridleway NN|TD|8, enters Horn Wood.

- 4.2.14 Permissive paths for pedestrians continue from both the north and south end of the proposed permissive route for pedestrians and equestrian users. The northern permissive path extends from the entrance to the proposed onsite substation to Easton Lane approximately 50 m west of its bridge over the A509. This provides an off-road alternative for users. The southern permissive path extends from existing PRow, bridleway NN|TD|8 to the junction of existing PRows, footpaths NN|TD|5 and NN|TD|7.
- 4.2.15 Permissive access along the eastern boundary of Field FF19 has been retained for use during the International Wendel Walk Weekend only during the Scheme's operational lifetime.

Green Hill G

- 4.2.16 Permissive path for pedestrians connecting existing PRows, footpath Lavendon|FP1 and bridleway Lavendon|BW2, running along the northern boundaries of fields GF1 and GF2.
- 4.2.17 Permissive path for pedestrians also connecting existing PRows, footpath Lavendon|FP1 and bridleway Lavendon|BW2, between fields GF6 and GF9.

Summary

- 4.2.18 As with formal PRows across the Scheme, day-to-day operational and maintenance vehicles may cross Permissive access routes during visits to the Site.
- 4.2.19 Movements will be largely smaller vehicles and infrequent. Damage to Permissive access routes will be rectified as soon as is practical.

4.3 Replacement Period

- 4.3.1 During the operation phase, movements will generally be low in number and will largely result in limited effects across PRows and permissive paths.
- 4.3.2 Across the 60-year lifetime of the Scheme, a period of replacement for equipment that comprises the solar aspects and equipment associated with battery stage will be required at times across the lifetime of the scheme. Further details are provided in the Outline Operational Environmental Management Plan (OOEMP) **[EN010170/APP/GH7.2]**.
- 4.3.3 It is not expected that an extensive replacement of all components will be required across the entirety of the Scheme during one period; instead, the programme for replacement of equipment across the Scheme is anticipated be staged to maintain the electrical export to the National Grid.
- 4.3.4 Replacement programming might reasonably compromise:
- Solar PV Panels will be replaced once during the lifetime of the Scheme. The Solar PV Panels are anticipated to be replaced over a maximum 12 to 24 month period; and
 - The BESS and inverters could be replaced up to five times.

- 4.3.5 The effects on PRoWs and the permissive paths will be managed in the same way as outlined for the construction phase. The clear objective will be to retain the operation of all PRoWs and permissive paths. The continued and safe operation of each will be the overriding aim.
- 4.3.6 The effects on the Cable Route Corridor and PRoWs along its length will be unaffected during the replacement period.

4.4 Definitive Map Modification Orders (DMMO)

- 4.4.1 The Definitive Map Modification Order (DMMO) in proximity to Green Hill F is acknowledged. The effect of the DMMO is to change existing footpaths into bridleways, with no change or addition being made to the route of the path. If this DMMO is made, the resulting bridleway will continue be managed within the Order Limits during operation of the Scheme as set out in this management plan.

5 Management of Public Rights of Way and Permissive Paths during the Decommissioning Phase

- 5.1.1 The Scheme is anticipated to have a design life of 60 years. At the end of the Scheme's operational life, it is intended that it will be decommissioned. An Outline Decommissioning Statement **[EN010170/APP/GH7.3]** has been prepared.
- 5.1.2 A final Decommissioning Plan will be submitted to the local planning authorities for approval prior to decommissioning. The provision of a Decommissioning Plan will be secured as a requirement of the DCO.
- 5.1.3 During the Decommissioning Phase, PRoWs will be managed in a similar way as the Construction Phase, as set out in Chapter 3.
- 5.1.4 As at the date of decommissioning, as defined in the DCO, the requirement to provide the permissive paths will cease in order that the land can be returned to its current use. Permissive Paths will be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to the relevant local authority in the Decommissioning Plan. The Decommissioning Plan may seek to maintain access to the permissive paths during the initial stages of decommissioning where this is reasonable practicable, in which case the permissive paths will be managed in the same way as PRoWs. Signage will be put in place to notify users of the closure date for each permissive path.
- 5.1.5 There are likely to be instances where access tracks cross PRoWs. In these instances, public access to PRoWs will be retained so far as is practicable to do so. However, the PRoWs will be managed to ensure the safety of all users.