



**The Great Grid Upgrade**

Sea Link

# Sea Link

**Volume 9: Examination Submissions**

**Document 9.45: Approach to Assessment of Public Rights of Way (PRoW)**

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**nationalgrid**

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# Executive Summary

- Ex1.0.1 This document sets out National Grid's approach to assessing impacts on Public Rights of Way (PRoW) for the Proposed Project following concerns raised by Suffolk County Council and Kent County Council, who have requested that PRoW's be treated as a standalone topic within the Environmental Statement (ES). National Grid considers this unnecessary. This document explains how PRoW impacts have been fully addressed across relevant ES chapters in line with established Environmental Impact Assessment (EIA) best practice and guidance.
- Ex1.0.2 Impacts on PRoW's have been assessed within Traffic and Transport, Landscape and Visual, Socio-Economics, Health and Wellbeing, and Cumulative Effects ES chapters, covering issues such as diversions, severance, visual intrusion, amenity, and user experience. Mitigation measures are secured through the Outline PRoW Management Plans for Suffolk and Kent, supported by commitments in the Construction Environmental Management Plan and REAC. This integrated approach avoids duplication, ensures proportionality, and reflects best practice.
- Ex1.0.3 Overall, the adopted approach provides a robust and comprehensive assessment of PRoW impacts while maintaining compliance with national guidance.

# 1. Introduction

- 1.1.1 During Statutory Consultation for the Proposed Project, concerns were raised over the impact of the Proposed Project on Public Rights of Ways (PRoWs) in Suffolk and Kent, this included feedback from Suffolk County Council (SCC) who requested that a standalone PRoWs assessment is produced and presented within the Environmental Statement (ES). Kent County Council (KCC) subsequently raised similar requests. This feedback from the stakeholders is outlined in Section 3 of this document.
- 1.1.2 National Grid (hereafter referred to as 'the Applicant') has produced this document for submission to the Examining Authority to clarify the approach that has been followed within the ES for the assessment of PRoW and the reasons why a standalone PRoWs assessment is not considered necessary. The approach to the assessment is set out in Section 4 of this report which includes further information in response to stakeholder feedback.
- 1.1.3 This report also provides further clarification on how the Applicant is proposing to address feedback received from consultees with regards to additional enhancements to the PRoW network which go over and beyond measures required to mitigate significant effects. This is also covered in Section 4 of this report.



## 2. Stakeholder Responses and Engagement

2.1.1 Statutory Consultation for the Proposed Project took place between 24 October and 18 December 2023. During Statutory Consultation concerns were raised over the impact on the Proposed Project on the PRowS in Suffolk and Kent. The following concern was also raised by Suffolk County Council (SCC) in December 2023 in their response to the Statutory Consultation (**Application Document 5.1.6 Appendix E Statutory Consultation Part 4 of 4 [APP-312]**):

*“The County Council considers it essential that PRowS should be addressed as a separate topic in the PEIR and therefore disagrees with the approach taken by the developer where the consideration of effects on PRowS and their users is covered across several chapters of the PEIR. This has made it difficult for the relevant officer to comment on the effects of the proposals on PRowS.*

*The division of the effects of the development on PRowS across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for that receptor, then they could be significant.*

*“The County Council disagrees with the current approach of dividing the consideration of the effects on PRowS and their users across several chapters, none of which consider the actual experience of the PRowS users. It also makes it unnecessarily difficult for consultees to engage with the process. The County Council requires PRowS to be considered as a separate theme considering the effect on the physical resource, the amenity value, and the quality of the user experience”.*

*“The County Council is disappointed that Public Rights of Way & Recreation have not been considered as a separate topic in the PEIR. Dividing the effect of the development on PRowS and their users across several chapters, each with its own set of criteria for sensitivity and magnitude, results in individual assessments which do not reflect the importance of the local access network and the quality of the user experience and amenity value. The combined effects of all the aspects of the development, such as the severance and loss of the physical resource, construction traffic, noise, visual intrusion, and loss of tranquillity, all contribute to the quality of the user experience inherent in a recreational walk or ride.*

*This fragmented approach gives rise to a weakness in the EIA process, as recognised in PINS advice note 9, that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. A walker, cyclist or horse rider using a public right of way or on open access land experiences the countryside, and hence any impacts, holistically; namely the quality and diversity of the views, wildlife and natural features, the sense of wildness, peace and quiet, the presence (and absence) of traffic, noise, lighting and air quality, and the connectivity of the network.*

*Therefore, the County Council's position remains that the impact on both the physical resource and the amenity value of the public rights of way and access network should be addressed as a separate theme within an Environmental Assessment. This should include both the effect on the physical resource from temporary or permanent closures and diversions, as well as the quality of user experience and amenity value.*

*The County Council welcomes that PRow have been taken forward to the stage 3 - Intra-project effects assessment but this should focus on more than just visual intrusion.*

*The County Council would like to see a commitment to keeping PRow open and available during the construction period through the use of management measures, such as controlled crossings, traffic marshals and signage. If temporary closures are required, then the number and duration should be kept to a minimum."*

- 2.1.2 Subsequently, in July 2024, SCC published their 'Public Rights of Way and Green Access Supplementary Guidance Document (SGD)' (Suffolk County Council, 2024).
- 2.1.3 In response to the above feedback and the publication of the SGD a PRow's Methodology Technical Note was developed and shared with both Suffolk County Council and Kent County Council on 13 September 2024 (See Appendices A). This note set out the methodology applied for the assessment of impacts on PRow specifically within the socio-economic and health assessments presented in the ES **[Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [APP-057], Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058], Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation, and Tourism [APP-070] and Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health & Wellbeing [AS-003]**. The technical note set out the detailed receptor sensitivity and magnitude of impact assessment criteria which had been informed by the Standard for Highway's Design Manual for Roads and Bridges (DMRB), the Institute of Environmental Management and Assessment (IEMA) (now known as the Institute of Sustainability and Environmental Professionals (ISEP)), and best practice methodology from assessments undertaken on other major infrastructure schemes. The technical note contained in **Appendix A** shows how the socio-economic and health and well-being assessments address the various types of effects on PRow identified in the SCC's Supplementary Guidance Document, in particular around physical changes to resources, changes to the equality of the resource, user stress due to role uncertainty and safety fears, changes to the experience when using recreational resources and tranquility and ambience experienced. To avoid duplication, **Appendix A** only contains the technical note issued to Suffolk County Council. The technical note issued to Kent County Council was largely the same but excluded the description demonstrating compliance with SCC's SGD.
- 2.1.4 Socio-economic thematic meetings were subsequently held with Suffolk County Council on Tuesday 1<sup>st</sup> October 2024 and with Kent County Council on Thursday 10<sup>th</sup> October 2024 where the Technical Note was discussed. At the meeting on 1st October, SCC requested further clarification on the magnitude of impact criteria as it did not use the same terminology as their SGD. Clarification was provided in an email in response to this query however no further comment was received.
- 2.1.5 In their Relevant Representations on 29 May 2025, SCC stated the following (see paragraphs 92 and 93): *"the Council is disappointed that the impacts on both the physical resource and the amenity value of the public rights of way and access network are not treated as a separate topic in the ES, as requested during consultation, but, instead, split up over a number of disciplines. This has made it difficult for the impacts on PRow to be clearly interpreted by the public. The division of the effects of the*

*development on PRow across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for a PRow user, could then be significant, as recognised in the Planning Inspectorate's Advice Note 9."*

- 2.1.6 KCC also have the following recorded position on the assessment of PRow diversions and closures in their draft SoCG (**Application Document 7.4.7 Draft Statement of Common Ground Between National Grid Electricity Transmission and Kent County Council [APP-328]**) which was published as part of the DCO application in March 2025: *'The Consultee does not consider the assessment to account for all criteria – public health, socio-economic, tourism, access to greenspace. A separate assessment of PRow should be carried out as its own topic.'* Following this, KCC in their Relevant Representation, stated that *'all of the issues raised by KCC during the pre-examination stage have been addressed by the applicant'*.
- 2.1.7 It should be noted, that there are other points which the local planning authorities have raised regarding the methodology on assessing PRow, but the rest of this report primarily focuses on the overarching comments about the need for PRow to be treated as a separate topic within the ES. The technical note contained in **Appendix A** shows how the socio-economic and health and well-being assessments address the various types of effects on PRow identified in the SCC's Supplementary Guidance Document. Other responses to comments relating to PRow's are contained within Applicant's Response to Relevant Representations: **Application Document 9.34 Applicant's Comments on Relevant Representations**.



# 3. Approach to Assessment of PRow

## 3.1 Justification for the PRow Assessment Approach

3.1.1 The approach to the assessment of impacts on PRowS as presented in the ES and associated documents, is considered to be robust, followed standard practice within EIA and addresses all potential impacts on PRowS where there is the potential for significant environmental effects to arise. As such, impacts associated with PRowS are assessed as relevant within the Landscape and Visual; Traffic and Transport; Socio-Economics, Recreation and Tourism; Health and Wellbeing; and the Intra-Project and Inter-Project Cumulative Effect topic assessments. Details of the specific aspects considered within each of the ES chapters is as outlined below:

- **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport [APP-054] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067]** considers Fear and intimidation, the impact of diversions/closures (including access to the wider PRow network), severance, pedestrian delay and user amenity.
- **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048] and Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]** addresses visual amenity and tranquility in the context of PRowS where impacts on the tranquility of areas of recreational and amenity value are considered, taking account of potential impacts from traffic, lighting and noise.
- **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [APP-057], Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058], Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation, and Tourism [APP-070] and Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health & Wellbeing [AS-003]** covers impacts on the quality of PRow user experience (see Appendix A for further detail).
- **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] and Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072]** considers the combined effects on PRow and their users, that have been identified across the various technical environmental topic chapters within the ES. This enables the identification of the potential for any combined significant environmental effect on PRowS.
- **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project [APP-060] and Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** considers the combined effects on PRowS and their users which may arise as a result of the impacts from the Proposed Project alongside other proposed developments in the area.
- **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] and Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-355]** have been produced as part of the

application which propose mitigation and management measures to reduce impacts to PRowWs, including any required PRow closures and diversions, and considers the impact of PRow crossings and separation. **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** includes measures to minimise lighting, noise and dust impacts during construction, which will mitigate impacts to users of the PRow network in close proximity to the construction of the Proposed Project.

- 3.1.2 Table 3.1 outlines the relevant application documents that cover the baseline, assessment and proposed mitigation and management measures relevant to PRow's and highlight the corresponding section and paragraph number for reference (where relevant).

**Table 3.1 Relevant Application Documents**

<b>PINS reference</b>	<b>Document</b>	<b>Section</b>	<b>Paragraph number/ table number</b>
APP-048	<b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape &amp; Visual</b>	Section 1.6 Baseline Conditions	Table 1.9
			Paragraph 1.6.24
		Section 1.8 Assessments of Impacts and Likely Significant Effects	Paragraph 1.8.11
APP-054	<b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic &amp; Transport</b>	Section 7.4 Approach and Methodology	Paragraphs 7.4.3 to 7.4.44
		Section 7.6 Study Area	Paragraphs 7.6.2 to 7.6.9
		Section 7.7. Baseline Conditions	Paragraphs 7.7.20 to 7.7.27
		Section 7.9 Assessment of Impacts and Likely Significant Effects	Paragraphs 7.9.45 to 7.9.83
APP-057	<b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism</b>	Section 10.4 Approach and Methodology	Paragraphs 10.4.12 to 10.4.28
		Section 10.7 Baseline Conditions	Paragraphs 10.7.15 to 10.7.17
		Section 10.9 Assessment of Impacts and Likely Significant Effects	Paragraphs 10.9.32 to 10.9.109
APP-058	<b>Application Document 6.2.2.11</b>	Section 11.6 Study Area	Paragraphs 11.3.10 to

<b>PINS reference</b>	<b>Document</b>	<b>Section</b>	<b>Paragraph number/ table number</b>
	<b>Part 2 Suffolk Chapter 11 Health &amp; Wellbeing</b>	Section 11.7 Baseline Conditions	Paragraph 11.7.41
		Section 11.9 Assessment of Impacts and Likely Significant Effects.	Paragraphs 11.9.43 to 11.9.86
APP-059	<b>Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects</b>	Section 12.1 Introduction	Table 12.1 and Table 12.2.
APP-060	<b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b>	Section 13.2 Assessment of cumulative effects	Table 13.10, Table 13.11 and Table 13.23.
APP-061	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b>	Section 1.7 Baseline Conditions	Paragraphs 1.7.23 to 1.7.25
		Section 1.9 Assessment of Impacts and Likely Significant Effects.	Paragraph 1.9.9
APP-067	<b>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic &amp; Transport</b>	Section 7.4 Approach and Methodology	Paragraphs 7.4.3 to 7.4.47
		Section 7.5 Basis of Assessment	Table 7.15
		Section 7.6 Study Area	Paragraphs 7.6.2 to 7.6.9
		Section 7.7 Baseline Conditions	Paragraphs 7.7.27 to 7.7.34
		Section 7.8 Proposed Project Design and Embedded Mitigation	Paragraphs 7.8.3 to 7.8.7
		Section 7.9 Assessment of Impacts and Likely Significant Effects	Paragraphs 7.8.3 to 7.9.46 to 7.9.85

<b>PINS reference</b>	<b>Document</b>	<b>Section</b>	<b>Paragraph number/ table number</b>
APP-070	<b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation, and Tourism</b>	Section 10.4 Approach and Methodology	Paragraphs 10.4.12 to 10.4.13, 10.4.18
		Section 10.7 Baseline Conditions	Paragraphs 10.7.17 to 10.7.19
		Section 10.9 Assessment of Impacts and Likely Significant Effects	Paragraphs 10.9.27 to 10.9.61, 10.9.75 to 10.9.86
APP-071	<b>Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health &amp; Wellbeing</b>	Section 11.7 Baseline Conditions	Paragraphs 11.7.39 to 11.7.40
		Section 11.8 Proposed Project Design and Embedded Mitigation	Paragraphs 11.8.4 to 11.8.5
		Section 11.9 Assessment of Impacts and Likely Significant Effects	Paragraphs 11.9.35 to 11.9.48
APP-072	<b>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects</b>	Section 12.1 Introduction	Table 12-1 and Table 12-2.
APP-073	<b>6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects</b>	Section 13.2 Cumulative Effects Assessment	Table 13-3, Table 13-6, Table 13-20, Table 13-36, Table 13-39 and Table 13-45.
APP-352	<b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk.</b>	The document in its entirety is relevant to the management of PRoW in Suffolk	
APP-353	<b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent.</b>	The document in its entirety is relevant to the management of PRoW in Kent	
APP-342	<b>Application Document 7.5.3.2 CEMP Appendix B Register of</b>	Table 1.1 Register of Environmental Actions and Commitments – Onshore mitigation	Table 1.1 – ID TT03
			Table 1.2 – ID LV13

PINS reference	Document	Section	Paragraph number/ table number
	<b>Environmental Actions and Commitments (REAC).</b>	Table 1.2 Register of Environmental Actions and Commitments – Suffolk Onshore Scheme	Table 1.2 – ID TT04  Table 1.2 – ID TT05  Table 1.3 – ID TT07
		Table 1.3 Register of Environmental Actions and Commitments – Kent Onshore Scheme	Table 1.3 – ID TT09

- 3.1.3 The ES presents a full assessment of likely significant effects on PRow in accordance with well-established practice in Environmental Impact Assessment (EIA) where effects on specific aspects associated with PRow are assessed within the relevant environmental topics (e.g. impacts of diversions/closure on users are considered within the Traffic & Transport assessment)
- 3.1.4 It is not conventional practice for an ES to have a standalone PRow assessment reported within its own ES topic chapter, nor is the Applicant aware of any best practice guidance which recommends that a separate PRow ES chapter should be produced. It is noted that most other local consented DCO schemes in Suffolk such as East Anglia ONE, East Anglia TWO, East Anglia ONE North and Bramford to Twinstead Reinforcement, also adopted a similar approach to the Proposed Project in their EIAs. Furthermore, other recent EIAs submitted nationally for consented DCO schemes adopt the same approach as the Proposed Project with no separate PRow ES chapter, including East Yorkshire Solar Farm, Viking Carbon Capture and Storage (CCS) Pipeline and the Tillbridge Solar Project to name a few.
- 3.1.5 In terms of guidance, the Design Manual for Roads and Bridges (DMRB) sets out specific environmental topic assessment methodologies, and it is worth noting that there is not a separate one for considering PRow. Instead, consideration of PRow is an integral part of the other topic assessments, such as Landscape and Visual Effects (LA 107) (Standards for Highways, 2020) and Population and Human Health (LA 112) (Standards for Highways, 2020). ISEP (formally IEMA) guidance on 'Environmental Assessment of Traffic and Movement' (July 2023) (ISEP, 2023), provides practitioners with good practice advice on how to carry out the assessment of traffic and movement of people as part of statutory EIAs, which traffic and transport assessments follow. PRow users are considered as a particular receptor group to consider within the traffic and transport assessment, which addresses aspects such as pedestrian delay (including all non-motorised users), non-motorised user amenity and fear and intimidation.
- 3.1.6 It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a separate PRow ES chapter it would risk double counting of effects already being reported somewhere else in the ES. SCC state their concern is that when considered



individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. This is exactly the point of the intra-project effects assessment, which has considered the combined effects on PRow and their users, that have been identified across the various topic chapters. This intra-project (or in-combination) assessment is presented in **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]** and **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072]**. The intra-project cumulative effects assessment found that users of only one PRow were considered likely to experience significant cumulative effects (491/010/0), the result of combined effects on both visual amenity and changes to user experience and local travel patterns. Table 12.2 of APP-059 states:

*‘There is potential for a significant intra-project cumulative effect to occur on PRow users of 491/010/0 as visual amenity effects were assessed as major adverse within the Landscape and Visual chapter, changes to user experience and local travel patterns were assessed as minor adverse in Socio-Economics, Recreation and Tourism chapter and the PRow may also be subject to minor adverse traffic and transport effects. These effects, when combined, are considered to result in a significant intra-project cumulative effect.’*

- 3.1.7 A fundamental point to note is that a separate PRow topic ES chapter/ assessment would not result in any difference in the outcome of the assessment of overall impacts on PRow and the required mitigation as currently presented within the ES and accompanying documents. Individual Outline PRow Management Plan have been developed for both Suffolk (**Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**) and Kent (**Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]**) and were submitted with the application. These documents outline the mitigation that will be required for any proposed PRow closures and diversions.

## 3.2 Additional Enhancements to the PRow Network

- 3.2.1 It should also be noted that as part of the assessment of impacts on PRow and in line with the wider EIA assessment, mitigation is only being proposed where it is required to address significant environmental effects.
- 3.2.2 For example, the Order Limits along the B1119 road do not include a permanent PRow connection in this location (only a temporary one) as this is not identified as essential mitigation to address operational impacts of the Proposed Project. Additional PRow enhancements which go beyond essential mitigation are not included as part of the Proposed Project and therefore powers are not sought for this as part of the DCO.
- 3.2.3 The Applicant is aware of other requests for enhancements to the PRow network and proposes to consider these separately to the EIA and DCO process. The Applicant will look to engage relevant stakeholders to understand local ambitions and continue to explore other avenues to deliver enhanced connectivity.

# References

*Suffolk County Council, Public Rights of Way and Green Access Supplementary Guidance Document, 2024. Available at: <https://www.suffolk.gov.uk/asset-library/green-access-prow-guidance.pdf> [Accessed: 13 October 2025].*

*Standards for Highways, DMRB, LA107 – Landscape and Visual Effects (2020), Available at: <https://www.standardsforhighways.co.uk/search/bc8a371f-2443-4761-af5d-f37d632c5734> [Accessed: 13 October 2025]*

*Standards for Highways, DMRB, LA112 – Population and Human Health (2020), Available at: <https://www.standardsforhighways.co.uk/search/1e13d6ac-755e-4d60-9735-f976bf64580a> [Accessed: 13 October 2025]*

*ISEP (Formally IEMA), Environmental Assessment of Traffic and Movement (2023), Available at: <https://www.iema.net/media/5mrmquib/iema-report-environmental-assessment-of-traffic-and-movement-rev07-july-2023.pdf> [Accessed 13 October].*

# **Appendix A Public Rights of Way Methodology – Technical Note (Suffolk)**

# Sea Link: Suffolk Onshore Scheme, Public Rights of Way Methodology - Technical Note

This technical note has been prepared to provide detailed guidance on the methodology applied in the socio-economic and health assessments of impacts on Public Rights of Way (PRoW). The approach has been informed by Standard for Highway's Design Manual for Roads and Bridges (DMRB), the Institute of Environmental Management and Assessment (IEMA), and best practice methodology from assessments undertaken on other major infrastructure schemes. The guidance in this technical note also aligns with the Public Rights of Way and Green Access Supplementary Planning Guidance released by Suffolk County Council (July 2024). Please refer to Appendix 1 of this Technical Note which provides further detail on this alignment.

## 1 Types of PRoW

The following reflect the types of PRoW considered in the assessments:

- Footpaths - for walking, running, mobility scooters or powered wheelchairs;
- Bridleways - for walking, horse riding, bicycles, mobility scooters or powered wheelchairs;
- Restricted byways – for walking, horse riding, bicycles or using any other vehicle that is not mechanically propelled; and
- Byways open to all traffic (BOATs) – for walking, horse riding, bicycles, or motorised vehicles of all kinds.

The above applies to routes used for both access and recreational purposes.

## 2 Socio-economics

The Socio-economics assessment will consider the direct temporary and permanent impacts of the Proposed Development on PRoW. Assessment criteria will consider the type, location and extent of walking, cycling and horse riding (WCH) provision, and the frequency of use.

Baseline data has been gathered to illustrate the existing conditions within and surrounding the Suffolk Onshore Scheme Boundary. This has been collected using various sources including Suffolk County Council Definitive Map and Statement of Public Rights of Way. Where relevant, the desk-based research is being supplemented by information gathered through stakeholder consultation.

### 2.1 Sensitivity

Sensitivity is defined according to the relative importance of existing socio-economic features of a receptor within a study area. The socio-economics approach will establish the sensitivity of PRoW' as either very high, high, medium, low or negligible based on the criteria outlined in Table 1 below.

The criteria for PRoW sensitivity is presented for both access use and recreation use. "Access" sensitivity criteria considers extent of usage, type of user, purpose of usage (e.g. commuting) and potential for substitution. "Recreation" sensitivity criteria considers the quality of user experience, quality of the route, purpose of usage (e.g. recreational) and potential for substitution.

**Table 1 – Public Rights of Way impact sensitivity criteria**

Sensitivity / Value	Description
<b>Very High</b>	<p><u>Access</u></p> <ul style="list-style-type: none"> <li>PRoW is of very high importance such as routes used for commuting (daily), connecting communities and services with a direct and convenient route.</li> <li>PRoW is regularly used by vulnerable travellers such as the elderly, school children and people with disabilities, who could be disproportionately affected by small changes in the baseline due to potentially different needs.</li> <li>PRoW with very limited potential to be substituted with other route options to access the wider network and/or community infrastructure.</li> </ul> <p><u>Recreation</u></p> <ul style="list-style-type: none"> <li>PRoW is of very high importance, such as national trails and routes used for recreation.</li> <li>PRoW is highly and regularly used and valued for its character and / or quality.</li> <li>PRoW with no comparable and accessible alternatives that exist within the study area and limited ability to absorb change.</li> </ul>
<b>High</b>	<p><u>Access</u></p> <ul style="list-style-type: none"> <li>PRoW is of high importance, connecting communities and services, but used regularly but to a lesser extent for commuting.</li> <li>PRoW is used by vulnerable travellers such as the elderly, school children and people with disabilities, who could be disproportionately affected by small changes in the baseline due to potentially different needs.</li> <li>PRoW with limited potential to be substituted with other route options to access the wider network or community infrastructure.</li> </ul> <p><u>Recreation</u></p> <ul style="list-style-type: none"> <li>PRoW is of high importance, such as regional trails and routes used for recreation.</li> <li>PRoW is regularly used and valued for its character and / or quality.</li> <li>PRoW with limited comparable and accessible alternatives that exist within the local area and limited ability to absorb change.</li> </ul>
<b>Medium</b>	<p><u>Access</u></p> <ul style="list-style-type: none"> <li>PRoW is of medium importance, such as PRoW close to communities.</li> <li>PRoW with some potential to be substituted with other route options to access the wider network or community infrastructure</li> <li>PRoW is used predominantly used by travellers who are not deemed vulnerable. Vulnerable travellers such as the elderly, school children and people with disabilities may use the PRoW but not regularly.</li> </ul> <p><u>Recreation</u></p> <ul style="list-style-type: none"> <li>PRoW is of medium importance, including promoted routes, PRoW used for recreation e.g. dog walking, and routes linking to a wider network of routes to provide options for longer recreational journeys.</li> <li>PRoW moderately or semi-regularly used and valued for its character and / or quality.</li> <li>PRoW with potential comparable and accessible alternatives within the local area and potential ability to absorb the change.</li> </ul>
<b>Low</b>	<p><u>Access</u></p> <ul style="list-style-type: none"> <li>PRoW is of low importance, such as routes disused through past severance or routes that do not offer meaningful access to utilities, with alternative routes available.</li> <li>PRoW with strong potential for substitution with other route options to access the wider network or community infrastructure.</li> </ul> <p><u>Recreation</u></p> <ul style="list-style-type: none"> <li>PRoW is of low importance, such as PRoW that are poorly maintained and do not offer a meaningful route for recreational purposes.</li> <li>PRoW is sparingly or infrequently used and valued as it does not currently offer a meaningful route for recreational purposes.</li> <li>PRoW with comparable / like-for-like and accessible alternatives exist within the local area.</li> </ul>



<b>Negligible</b>	<u>Access &amp; Recreation</u> <ul style="list-style-type: none"> <li>• PRow is of very low importance with alternative routes available.</li> </ul>
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## 2.2 Magnitude

Magnitude is defined as receptors' deviation from the established baseline conditions as a result of construction and / or operational phases of the Proposed Development. The socio-economics approach will be to establish the magnitude of impact on PRow receptors as large, medium, small or negligible based on the descriptions provided in

Table 2 below. Magnitude criteria considers temporary and/or permanent impacts on PRow in accordance with a change in routes' accessibility, ability to serve its purpose, and journey length. The application of this criteria will vary according to whether the PRow is used for recreational or access purposes or both.

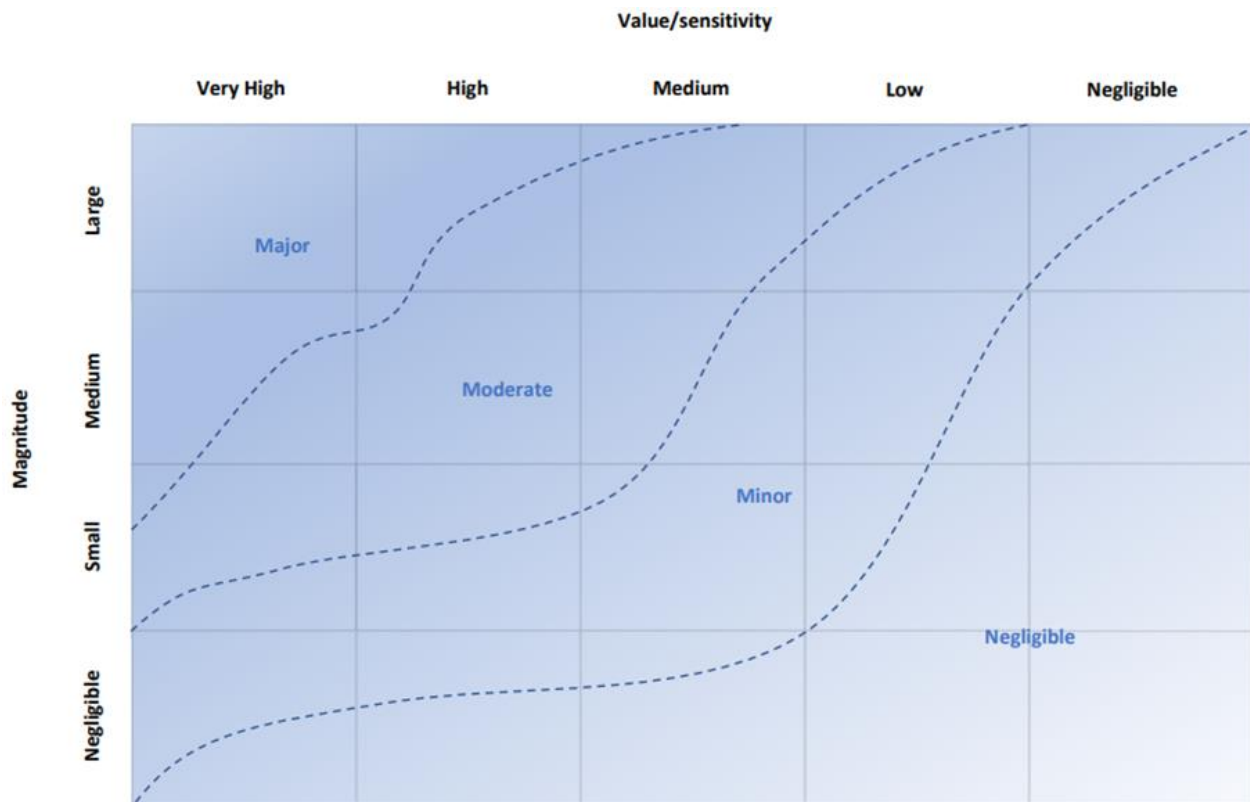
**Table 2 – Public Rights of Way magnitude of impact criteria**

<b>Magnitude of impact</b>	<b>Description</b>
<b>Large</b>	<ul style="list-style-type: none"> <li>• Long term (&gt;1 year – permanent) route closure. Extent of impact will depend on nature of diversion proposed through embedded mitigation.</li> <li>• Route compromised and unusable for its intended purpose(s) in the long term (&gt;1 year – permanent), such as increased/decreased opportunities for users to access the wider network and community infrastructure. Extent of impact will depend on nature of diversion proposed through embedded mitigation.</li> <li>• Substantial (&gt;500m) increase (adverse) / decrease (beneficial) in journey length.</li> </ul>
<b>Medium</b>	<ul style="list-style-type: none"> <li>• Temporary (6 months to 12 months) partial route closure. Extent of impact will depend on nature of diversion proposed through embedded mitigation.</li> <li>• Route compromised and unusable for a proportion of its intended purpose temporarily (6 months to 12 months). Extent of impact will depend on nature of diversion proposed through embedded mitigation.</li> <li>• &gt;250m – 500m increase (adverse) or decrease (beneficial) in journey length.</li> </ul>
<b>Small</b>	<ul style="list-style-type: none"> <li>• Temporary (1 month to 6 months) and reversible route closure. Extent of impact will depend on nature of diversion proposed through embedded mitigation.</li> <li>• Route compromised and its functionality is partly impaired or compromised. Extent of impact will depend on nature of diversion proposed through embedded mitigation.</li> <li>• &gt;50m – 250m increase (adverse) or decrease (beneficial) in journey length.</li> </ul>
<b>Negligible</b>	<ul style="list-style-type: none"> <li>• Temporary (&lt;1 month) and fully reversible minor route diversion.</li> <li>• Route is not closed and can continue to be used for its intended purpose without any significant inconvenience or detriment to the users.</li> <li>• &lt;50m increase (adverse) or decrease (beneficial) in journey length.</li> </ul>

## 2.3 Significance of Effect

The significance of effect reflects the relationship between the sensitivity of the affected route and the magnitude of impact. All effects, adverse and beneficial, will be assessed. The approach to assigning significance relies on reasoned argument, professional judgement of discipline experts and feedback to account for the views and local knowledge of relevant stakeholders. **Figure 1** shows how the assessment of the significance of effects is arrived upon.

**Figure 1 – Basis of Assigning Significance**



The following criteria is applied:

- 'Major' or 'moderate' effects are classed as 'significant';
- 'Minor' are classed as 'not significant', although they may be a matter of local concern; and
- 'Negligible' effects are classed as 'not significant'.

### 3 Health and Wellbeing

The Health and Wellbeing assessment draws on guidance from IEMA to inform the methodological approach to assessing impacts on PRow. The assessment considers potential changes to community connectivity and wider community services as well as amenity (quality of experience) impacts on users of PRow.

The impacts of the Proposed Development on health and wellbeing of PRow users will be assessed using IEMA guidance, professional judgement, best practice and drawing on the findings of other technical assessments to inform the extent of impact. The technical assessments considered are:

- Traffic and Transport;
- Landscape and Visual;
- Air quality;
- Sound noise and vibration and
- Socio-economics, Recreation and Tourism.

#### 3.1 Sensitivity

The health and wellbeing approach establishes the sensitivity of the human receptors (general populations and potentially vulnerable sub-populations) within the local communities as high, medium, low or negligible based on the criteria set out in Table below. The assessment takes account of the qualitative (rather than quantitative) sensitivity of relevant populations. Criteria for human receptors considers the local level of deprivation, inequality, long-term illness and disability and anxiety and concern, and the community's reliance on shared resources and capacity to adapt to change. This criteria is adapted from the IEMA Guide to Determining Significance for Health.

**Table 3 - Human Health Sensitivity Criteria**

<b>Sensitivity level</b>	<b>Sensitivity criteria</b>
<b>High</b>	High levels of deprivation (including pockets of deprivation); reliance on shared resources (between the population and the Scheme); existing wide inequalities between the most and least healthy; a community whose outlook is predominantly anxiety or concern; people who are prevented from undertaking daily activities; dependants; people with very poor health status; and/or people with a very low capacity to adapt.
<b>Medium</b>	Moderate levels of deprivation; few alternatives to shared resources; existing widening inequalities between the most and least healthy; a community whose outlook is predominantly uncertainty with some concern; people who are highly limited from undertaking daily activities; people providing or requiring a lot of care; people with poor health status; and/or people with a limited capacity to adapt.
<b>Low</b>	Low levels of deprivation; many alternatives to shared resources; existing narrowing inequalities between the most and least healthy; a community whose outlook is predominantly ambivalence with some concern; people who are slightly limited from undertaking daily activities; people providing or requiring some care; people with fair health status; and/or people with a high capacity to adapt.
<b>Very Low</b>	Very low levels of deprivation; no shared resources; existing narrow inequalities between the most and least healthy; a community whose outlook is predominantly support with some concern; people who are not limited from undertaking daily activities; people who are independent (not a carer or dependent); people with good health status; and/or people with a very high capacity to adapt.

#### 3.2 Magnitude

The health and wellbeing approach establishes the magnitude of impact on PRow as large, medium, low or negligible based on the descriptions provided in Table below. Magnitude criteria is adapted from the IEMA Guidance to Determining Significance for Health and entails consideration of the scale of the exposure of the population to an impact; whether the impact is one-off or continuous; the likely nature of the human health impact; the permanence of the change; and the proportion of the relevant study area population that would be affected.

**Table 4 - Human Health Magnitude of Impact Criteria**

Magnitude level	Magnitude criteria
<b>Large</b>	High exposure or scale; long-term duration; continuous frequency; severity predominantly related to mortality or changes in morbidity (physical or mental health) or very severe illness/injury outcomes; majority of population affected; permanent change; substantial service quality implications.
<b>Medium</b>	Low exposure or medium scale; medium-term duration; frequent events; severity predominantly related to moderate changes in morbidity or moderate change in quality of life; large minority of population affected; gradual reversal; small service quality implications.
<b>Low</b>	Very low exposure or small scale; short-term duration; occasional events; severity predominantly related to minor change in morbidity or moderate change in quality of life; small minority of population affected; rapid reversal; slight service quality implications.
<b>Negligible</b>	Negligible exposure or small scale; very short-term duration; one off frequency; severity predominantly relates to minor change in quality of life; very few people affected; immediate reversal once activity complete; no service quality implications.

### 3.3 Significance of Effects

The significance of health and wellbeing effects on users of PRow reflect the relationship between the sensitivity of the relevant population health and the magnitude of the impact. Table 3 shows how the assessment of the significance of effects is arrived upon. Where two options are shown for the assessment of significance (e.g. minor/negligible), professional judgement is used to determine which of the two options is most appropriate.

**Table 3 - Impact Assessment and Significance**

Magnitude of Impact	Sensitivity of Receptor			
	High	Medium	Low	Very Low
<b>Large</b>	Major	Major/moderate	Moderate/minor	Minor/negligible
<b>Medium</b>	Major/moderate	Moderate	Minor	Minor/negligible
<b>Low</b>	Moderate/minor	Minor	Minor	Negligible
<b>Negligible</b>	Minor/negligible	Minor/negligible	Negligible	Negligible

In accordance with the methodology set out within the PEIR, the following criteria is applied:

- 'Major' or 'moderate' effects are classed as 'significant';
- 'Minor' are classed as 'not significant', although they may be a matter of local concern; and
- 'Negligible' effects are classed as 'not significant'.

## APPENDIX 1

The Public Rights of Way and Green Access Supplementary Planning Guidance (SPG) released by Suffolk County Council (July 2024) sets out the effects that impact on the quality of the amenity experienced by receptors and the effect on the physical resource.

Table A1 presents the alignment between the guidance in this technical note and the effects identified within the SPG.

**Table A1 – Technical Note Alignment with SPG**

Effects	Technical Note Alignment
Physical changes to resources	Socio-economic assessment - temporary/permanent direct impacts on PRoW leading to potential closures and diversions.
Changes to the quality of the resource	Health & Wellbeing assessment- temporary/permanent indirect impacts (air quality, visual, noise, light pollution and traffic) on PROW.
User stress due to route uncertainty and safety fears	Socio-economic assessment - temporary/permanent direct impacts on PRoW leading to potential closures and diversions.
Changes to the experience when using recreational resources	Socio-economic assessment - temporary/permanent direct impacts on PRoW leading to potential closures and diversions.
Tranquillity and ambience experienced	Effects are picked up in Socio-economic assessment & Health & Wellbeing assessment i.e. through the impacts of physical changes to resources and changes to the quality of resource.

### Sensitivity Criteria

The sensitivity criteria within this Technical Note broadly aligns with the sensitivity criteria within the SPG. The SPG states that sensitivity comprises value of the resource to receptors, and susceptibility, the capacity to change which are all factors considered as part of the PRoW assessment methodology presented in this Technical Note.

The Socio-economics assessment in this Technical Note presents specific criteria for routes used (1) primarily for access and (2) primarily for recreational purposes given that level of sensitivities will differ according to type of user.

### Magnitude Criteria

The magnitude criteria within this Technical Note broadly aligns with the magnitude criteria within the SPG. The SPG states that the three components of magnitude are scale, duration and extent. These components are all considered as part of the PRoW assessment methodology presented in this Technical Note.

The SPG provides a table on “extent” of geographical area of the resource used by the receptors over which the impacts will be felt. Whilst such a table is not presented explicitly within the Technical Note, the extent of geographical coverage of the PRoW is considered as part of the magnitude criteria.



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