CCC472179635 - Highway Operational Services - Weed killing Policy

Directorate: Highways & Transport - Highways Maintenance

Service: Asset Management

Team: Asset Planning

Your name: Barry Wylie

Your job title: Asset Planning Manager

Directorate: Highways & Transport - Highways Maintenance

Service: Asset Management

Team: Asset Planning

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Proposal being assessed: Highway Operational Services - Weed killing Policy

Business plan proposal number: Cambridgeshire County Council

Key service delivery objectives and outcomes: The Highway Maintenance service currently has a Service Standard for its approach to the management of weed growth within the highway. The current policy within the Highway Operation Services states that the authority will apply weed killer within 'built up' village/town areas within 40mph limits or below only (excluding central islands) twice per annum. The key objective is to prevent weed growth where it is not desirable in the highway.

What is the proposal: The proposal is to amend the current policy from 2 blanket weed killer applications per annum, to a more risk based approach, as recommended in the highway maintenance Code of Practice. This will enable targeted weed killing to areas of concern to the user.

What information did you use to assess who would be affected by this proposal?: The nationally approved highway maintenance code of practice recommends taking a risk based approach to highway maintenance activities. All users of the footways would be affected by this policy amendment.

Are there any gaps in the information you used to assess who would be affected by this proposal?: No

Does the proposal cover: All service users/customers/service provision countywide

Which particular employee groups/service user groups will be affected by this proposal?: No employee groups will be affected by this proposal. All users of the footways will be affected by this proposal.

Does the proposal relate to the equality objectives set by the Council's Single Equality Strategy?: Yes

Will people with particular protected characteristics or people experiencing socio-economic inequalities be over/under represented in affected groups: About in line with the population

Does the proposal relate to services that have been identified as being important to people with particular protected characteristics/who are experiencing socio-economic inequalities?: No

Does the proposal relate to an area with known inequalities?: No

What is the significance of the impact on affected persons?: The existing policy approach is to apply weed killer a maximum of twice per annum. This new policy will allow for a targeted approach on a risk assessed basis, which has the ability to improve the safety and serviceability of footways for those affected by some protected characteristics.

Category of the work being planned: Policy

Is it foreseeable that people from any protected characteristic group(s) or people experiencing socio-economic inequalities will be impacted by the implementation of this proposal (including during the change management process)?: Yes

Please select: Age, Disability, Pregnancy and maternity

Research, data and /or statistical evidence: The Code of Practice for Highway Maintenance is nationally recognised. The CoP advocates a risk based approach to highway maintenance activities. The move from a blanket 2no per annum weed killer applications to a risk based approach adheres to the CoP and therefore reflects current best practice.

Consultation evidence: Whilst there has been no specific consultation on the risk based approach to dealing with weed killing in Cambridgeshire, the CoP was widely consulted upon prior to its adoption. Many other highway policies adopted by the County Council rely upon such an approach.

Based on all the evidence you have reviewed/gathered, what positive impacts are anticipated from this proposal?: By taking a risk assessed approach to weed killing, it is likely that there will be no impact to the majority of those with protected characteristics, however the following could benefit from a more targeted approach, rather than the current approach of two blanket treatments per year. Age, Disability, Pregnancy and maternity

Based on consultation evidence or similar, what negative impacts are anticipated from this proposal?: There are no perceived negative impacts.

How will the process of change be managed?: The change will be implemented through the Highway Maintenance team, who have experience in both risk assessment of highway maintenance activities, and of delivering a highway weed killing service. There should be no need to involve those people who may be affected with protected characteristics, as the service will be delivered by the highways maintenance team.

How will the impacts during the change process be monitored and improvements made (where required)?: It is not anticipated that there will be any noticeable impacts to the change in policy/service. The new Policy will be monitored and reviewed and any lessons learnt considered accordingly.

Equality Impact Assessment Action Plan:

Details of negative impact (e.g. worse treatment/outcomes)	Groups affected	Severity of impact	Action to mitigate impact with reasons/evidence to support this or justification for retaining negative impact	Who by	When by
There are no perceived negative impacts	Age, Disability, Gender Reassignment, Pregnancy and maternity, Religion or belief (including no belief), Sexual orientation, Marriage and civil partnership, Race, Sex, Socio- economic inequalities	Low	There area no perceived negative impacts	Highway Maintenance Team	31/03/2024

Head of service: Jon Munslow

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Confirmation: I confirm that this HoS is correct

CCC472218897 - Memorials and floral tributes on the highway

Directorate: Highways & Transport - Highways Maintenance

Service: Asset Management

Team: Asset Planning

Your name: Barry Wylie

Your job title: Asset Planning Manager

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Proposal being assessed: Memorials and floral tributes on the highway

Business plan proposal number: Cambridgeshire County Council

Key service delivery objectives and outcomes: This Policy is amending an existing Policy which refers to how the highway authority will manage memorials and floral tributes placed upon the highway. It is increasingly common for families and friends to place memorials on the highway in memory of loved ones who have died in road traffic collisions, or other circumstances on the highway. The Council recognises and respects the wish of bereaved families and friends to mark these deaths in this way but has a legal duty to ensure that highways are safe and to make sure that public open spaces are kept free from debris.

What is the proposal: The significant changes within the amended policy are as detailed below, and are being implemented to ensure such matters continue to be managed with due regard to their sensitive nature.: In the current policy the following text exists, that has been removed from the new policy 'as part of the grieving process, any request from the police for traffic management support during any site visit for the purposes of placing a tribute will be treated sensitively and will be provided free of charge.' In the new policy, the period that floral tributes will be allowed to remain on the highway has been extended from 'generally not more than 30 days' to 'generally not more than 14 weeks. There has been some additional and amended text, but this is for clarification and explanation/guidance and does not amend the existing policy. Any ban on the placing of roadside tributes following would be difficult to enforce and potentially insensitive. Therefore, it is proposed that these are dealt with in a sympathetic, understanding, and sensitive way, with each request considered based on the specific location and circumstances involved. The placing of floral tributes or memorials will therefore involve liaison between the bereaved family, the Police Family Liaison Officer and the Highway Maintenance Manager for the respective area.

What information did you use to assess who would be affected by this proposal?: This Policy amendment has been developed through liaison with CCC Road Safety Officers, the Police Family

Liaison Officer and the Road Victims Trust. This proposal will affect those families affected by the loss of loved ones who have died in road traffic collisions.

Are there any gaps in the information you used to assess who would be affected by this proposal?: No

Does the proposal cover: All service users/customers/service provision countywide

Which particular employee groups/service user groups will be affected by this proposal?: All service users.

Does the proposal relate to the equality objectives set by the Council's Single Equality Strategy?: Yes

Will people with particular protected characteristics or people experiencing socio-economic inequalities be over/under represented in affected groups: About in line with the population

Does the proposal relate to services that have been identified as being important to people with particular protected characteristics/who are experiencing socio-economic inequalities?: No

Does the proposal relate to an area with known inequalities?: No

What is the significance of the impact on affected persons?: There will be no affect to any people with protected characteristics.

Category of the work being planned: Policy

Is it foreseeable that people from any protected characteristic group(s) or people experiencing socio-economic inequalities will be impacted by the implementation of this proposal (including during the change management process)?: No

Age: The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Disability: The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Gender reassignment:

The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Marriage and civil partnership: The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Pregnancy and maternity: The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Race: The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Religion or belief (including no belief): The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Sex: The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Sexual orientation: The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Socio-economic inequalities: The proposed amendments do not materially affect the authorities management of roadside memorials or floral tributes. People with this protected characteristic will not be affected by the changes in this policy.

Head of service: Jon Munslow

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Confirmation: I confirm that this HoS is correct

<u>CCC469282003 - Definitive Map Modification Order Applications Statement</u> of Priorities

Directorate: Highways & Transport - Highways Maintenance

Service: Asset Management

Team: Asset Information

Your name: Camilla Rhodes

Your job title: Asset Information Manager

Directorate: Highways & Transport - Highways Maintenance

Service: Asset Management

Team: Asset Information

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Proposal being assessed: Definitive Map Modification Order Applications Statement of Priorities

Business plan proposal number:

Key service delivery objectives and outcomes: Asset Information has an existing Statement of Priority for Definitive Map Modification Order applications and orders that CCC promotes proactively ('the DMMO SoP'), which sits in the Highway Operational Standards at Appendix J. The Council has insufficient resources to process all applications and proactive cases that come in in chronological order within 12 months of being duly made, so the purpose of the DMMO SoP is to enable prioritisation of cases that meet the criteria. The criteria currently include paths at risk due to development and significant detrimental impact to landowners or communities that would be resolved by a DMMO.

What is the proposal: There are several reasons why the DMMO SoP needs to be reviewed: To take account of the government's u-turn on the 2026 cut-off date for making applications to register 'lost highways' based on documentary evidence only To deal with the huge number of lost highway applications received in 2021-2 To create a more equitable system so that older applications do not sit forever at the bottom of the list, and so that applications based on user evidence where witnesses are likely to die, resulting in the evidence being lost, receive higher priority. The new system will mean that the process of prioritisation is transparent for customers and makes it easier for officers to manage casework. The revised SoP will be included within the updated Highway Operational Standards, which will go to the H&T Committee in March 2023.

What information did you use to assess who would be affected by this proposal?: To address the revisions needed a scoring system using a broader list of priorities which will replace the criteria currently listed in the SoP has been developed. The new system has been thoroughly developed by officers in Asset Information in consultation with the ROW Officers. Advice was sought from Public Health and a new section overing Equalities, Connectivity, Health and Wellbeing included. The criteria include a factor for a route being a strategic active travel link, and another for whether a

route is in a ward identified as a place of rural isolation or poverty by Cambridgeshire Insight. Impact on biodiversity is another criterion. The Cambridgeshire Local Access Forum, which comprises representatives from all the non-motorised user groups, was consulted on it in March 2022 and changes have been made as a result of comments received. Officers have tested the scoring system against existing sample cases. It is likely that small tweaks may be necessary once it is in place, as it is difficult to envisage every possible scenario, but officers are content that it is fit for purpose and ready to go. Scores will be approved by the Asset Information Manager, and should a score be challenged, we are recommending that it goes to the AD for decision, as being the appropriate decision-making role in the Scheme of Authorisation. CCC has not received challenges on our prioritisation decisions to date. It is therefore considered that CCC is unlikely to receive many challenges, but this additional process is being proposed to ensure that CCC has a clear auditable process in place just in case.

Are there any gaps in the information you used to assess who would be affected by this proposal?: No

Does the proposal cover: All service users/customers/service provision in specific areas/for specific categories of user

Which particular employee groups/service user groups will be affected by this proposal?: No particular employee groups will be affected. The policy will be applied by Asset Information, being the service that undertakes the relevant statutory function of processing DMMO applications and investigations. User groups that align to the rights carried by the different legal classes of public rights of way are affected. Local communities that would be served by a route that is the subject of a DMMO application of CCC proactive case would also be affected, as would landowners. Their needs have all been considered through the review, consultations and testing of the new system.

Does the proposal relate to the equality objectives set by the Council's Single Equality Strategy?: Yes

Will people with particular protected characteristics or people experiencing socio-economic inequalities be over/under represented in affected groups: About in line with the population

Does the proposal relate to services that have been identified as being important to people with particular protected characteristics/who are experiencing socio-economic inequalities?: No

Does the proposal relate to an area with known inequalities?: Don't know

What is the significance of the impact on affected persons?: This is a (revised) policy that will help manage individual applications for DMMOs to register new, or amend existing, public rights of way. The criteria include consideration of impact on affected persons that will be assessed for each individual application, with points being awarded where the criterion is met. It will only be possible to identify those affected when assessing a new case and its particular geographic area. Therefore I am content that the revised policy is compliant.

Category of the work being planned: Policy

Is it foreseeable that people from any protected characteristic group(s) or people experiencing socio-economic inequalities will be impacted by the implementation of this proposal (including during the change management process)?: No

Age: This characteristic should be positively impacted, because we are introducing a specific criterion recognising that applications that are based on user evidence should be prioritised. This is because such witnesses are often elderly, so it is important to interview them as quickly as possible

whilst they are still able to do so. If we do not then their evidence will be lost which could have a significant impact on the success of the application.

Disability: This characteristic should be positively impacted, because we are introducing a specific criterion that considers user safety and health and wellbeing, and links that create a significant positive impact on the PROW network such as filling in a missing link or creating a circular route that might make a route more accessible. There is also a criterion (6.4) that specifically considers whether the route concerned would have a positive impact on accessibility under the Equality Act.

Gender reassignment:

unaffected

Marriage and civil partnership: Unaffected

Pregnancy and maternity: Potentially positively impacted, because there are criteria that consider whether the application route is a path to local amenities or not.

Race: Unaffected.

Religion or belief (including no belief): Unaffected.

Sex: Unaffected.

Sexual orientation: Unaffected.

Socio-economic inequalities: Positively impacted, because the revised criteria include consideration as to whether a route would provide a strategic active travel link e./g. to work and education centres, health facilities and shops, and whether it is in an area identified as being a place of rural isolation or poverty.

Head of service: Jon Munslow

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Confirmation: I confirm that this HoS is correct

<u>CCC469824176 - Public Rights Of Way Change of Surface Authorisation</u> <u>process</u>

Directorate: Highways & Transport - Highways Maintenance

Service: Asset Management

Team: Asset Information

Your name: Frances Louise Haggett

Your job title: Asset Information Manager

Directorate: Highways & Transport - Highways Maintenance

Service: Asset Management

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Proposal being assessed: Public Rights Of Way Change of Surface Authorisation process

Business plan proposal number: NA

Key service delivery objectives and outcomes: Asset Information works in collaboration with colleagues in Public Rights Of Way (PROW) Maintenance, Transport Strategy, Ecology, Highways Development Management and other services to comment upon planning applications and to provide advice to developers, colleagues and third parties seeking to deliver developments of all kinds, including transport schemes, that affect public rights of way in Cambridgeshire.

What is the proposal: Recent developments have involved changes to the surface of a number of PROW that have resulted in significant negative feedback from users entitled to use the public rights of way. The issues have highlighted the complexity of different processes leading to changes to surfaces being delivered, and an unintended lack of transparency and joined up decision-making across services. It is proposed to introduce a new process for any proposal that would result in a change to the surface of a PROW that will require formal authorisation by the Assistance Director Highways Maintenance. The reason for this is that the ongoing maintenance and management of all public rights of way, whether surfaced or not, is the responsibility of the Highways Maintenance Service. Any changes need to be compliant with the services standards in terms of choice of material and infrastructure, and the service is best placed to advise on the implications for ongoing management. Therefore it is appropriate that that service is able to authorise such changes. PROW are used for a variety of different reasons but can be basically split into 1) active travel and 2) leisure use. Both purposes can be undertaken to assist with physical and mental well-being. The intention of the new form is to make the decision-making process for a change of surface of a PROW transparent and consistent.

What information did you use to assess who would be affected by this proposal?: The new process is based on an existing form that has existed for a number of years to help the ROW Maintenance service manage changes arising from landowners, such as changes to farm tracks. The form has been

significantly developed in consultation with colleagues in Highways Maintenance, Transport Strategy, Ecology, and others. Officers have also considered the feedback received from complaints from user groups, Cambridgeshire Local Access Forum, local communities, and members involved in the cases that have brought the issue to officers' attention. The Assistant Director Highways Maintenance and Assistant Director Transport Strategy have been involved in the process and are supportive of it. It is intended that the proposed new process is included in the revised Highway Operational Standards, which will go to H&T Committee in March for consideration and approval.

Are there any gaps in the information you used to assess who would be affected by this proposal?: No

Does the proposal cover: All service users/customers/service provision countywide

Which particular employee groups/service user groups will be affected by this proposal?: The proposed process, if approved, will apply county-wide to all planning applications, CCC and GCP transport schemes, and third party schemes affecting public rights of way. It will therefore affect all services involved in advising on and/or determining such applications and schemes. Key services affected will be: - Highways Maintenance (ROW Officers and Local Highway Officers) - Highways Development Management - Transport Strategy - Ecology Other services that may be affected are Historic Environment, Road Safety It is not intended to cover Nationally Significant Infrastructure Projects, which should undertake extensive consultation with all affected stakeholders and involve a public consultation process as part of the statutory requirements. It will also not affect day-to-day operational maintenance decisions for Rights of Way Officers or Local Highway Officers.

Does the proposal relate to the equality objectives set by the Council's Single Equality Strategy?: Yes

Will people with particular protected characteristics or people experiencing socio-economic inequalities be over/under represented in affected groups: Don't know

Does the proposal relate to services that have been identified as being important to people with particular protected characteristics/who are experiencing socio-economic inequalities?: Yes

Does the proposal relate to an area with known inequalities?: Yes

What is the significance of the impact on affected persons?: This policy would be applied county-wide because the PROW network extends county-wide, and so it would affect areas suffering from socio-economic inequality or other inequalities. The new form will require the scheme proposer to demonstrate that they have undertaken an EqIA for their scheme, that they have considered the implications, and how they have or intend to address the implications. The form will also require the scheme proposer to demonstrate that they have consulted key PROW user groups and the local parish or town council.

Category of the work being planned: Policy

Is it foreseeable that people from any protected characteristic group(s) or people experiencing socio-economic inequalities will be impacted by the implementation of this proposal (including during the change management process)?: Yes

Please select: Age, Disability, Pregnancy and maternity, Socio-economic inequalities

Research, data and /or statistical evidence: Changes of PROW surfaces have the potential to affect four protected characteristics: - Age - Disability - Pregnancy/maternity - Socio-economic inequalities The form requires the scheme promoter to provide details of the existing path character and width, and the proposed changes, and rational. Amongst other actions, they are required to consult with

statutory user groups of rights of way, Cambridgeshire Local Access Forum (the statutory body set up to advise the county council on rights of way and public access matters), the parish or town council, road safety, and the Rights of Way Officer or Local Highway Officer (who will have detailed understanding of the historic use of the route and any issues). They are also required to undertake a scheme-specific Equality Impact Assessment, which is to be appended to the Request for Authorisation. The scheme promoter is required to provide an analysis of all the supporting evidence submitted, stating the implications of any EqIA and including an analysis of the physical and mental health and well-being considerations for existing and proposed additional users. This should enable the decision-maker, the Assistant Director Highways Maintenance, to make an informed decision as to whether he will authorise the proposed change of surface or not.

Consultation evidence: Colleagues in Transport Assessment, Highways Development Management, Ecology, Road Safety, Highways Maintenance and Public Health have all been consulted as part of the data-gathering exercise from June to December 2022. Feedback from PROW user groups regarding experience with schemes recently delivered has been taken into account. The Assistant Director Transport Strategy and Assistant Director Highways Maintenance have been involved in the development of the new procedure and have given it their approval.

Based on all the evidence you have reviewed/gathered, what positive impacts are anticipated from this proposal?: The new procedure will ensure that there is a documented, transparent decision-making process for any Cambridgeshire County Council or externally promoted scheme that seeks to change the surface of a public right of way. This should address the relevant criticism received from some members, local communities and user groups. It will also assist colleagues in the different specialisms involved in planning applications and transport schemes by providing a clear list of all the issues that need to be considered when thinking about changing the surface of a PROW. The new procedure will be cross-referenced in the Highways Development Management Guidance and in the Transport Assessment Guidance to provide clear, consistent guidance to developers. This should mitigate the current problem whereby developers do not consider the implications of using a PROW to deliver certain elements of a scheme, only to find that there are constraints or conflicts that affect the viability of the scheme. Above all, the procedure will ensure that a holistic assessment of the implications of changing the surface of a route is undertaken, enabling a fully informed decision that will then enable officers to make clear, appropriate and consistent recommendations for planning applications and transport schemes. This will give greater certainty as to the viability of schemes, benefiting developers, planners and scheme promoters. Arguments over existing cases have resulted in significant officer time being spent trying to resolve the conflict, so the new procedure should also assist colleagues in managing their resources more effectively.

Based on consultation evidence or similar, what negative impacts are anticipated from this proposal?: Some stakeholders may not be content with the outcome of a decision. However, the situation will be much better than before because there will have been a robust, transparent and documented process leading to the decision where previously there was not. Developers and transport scheme promoters may be frustrated, because they will be asked to undertake a significant additional procedure before their scheme can proceed. However, it is hoped that they will appreciate that this work should be done at an early stage anyway in order to avoid problems arising later. it should enable more consistent, connected decision-making across the county council, GCP and planning authorities.

How will the process of change be managed?: A communications plan has been agreed as follows: Liaise with DC LPAs explaining our proposed new process. Seek their comments/ideas to help ensure the planning process is as smooth as possible. Update Transport Assessment, Highways Development Management and Definitive Map planning guidance with a link to new form, both of which should be available on our webpages. This will enable consistent signposting to a single form and the specific guidance that is attached to it. One Briefing note to serve all for consistent messaging to the following: Relevant ADs – Mike Williams and David Allatt, to be cascaded to those who manage projects and development; GCP Combined Authority who promote transport schemes

A standard informative for Highways Development Management, Transport Assessment and CCC Asset Information to brief developers they are in regular contact with Ask Comms if it is worthwhile doing any comms 4. Key PROW user groups and the Cambridgeshire LAF have already been advised that this new procedure is being developed to help address the concerns they have raised. These groups will be advised as and when the procedure is approved by the County Council's Highways & Transport Committee (proposed for March 2023 agenda). 5. As the new procedure is going through HT Committee members will have the opportunity to become aware of the proposed change. As Cllr Shailer is the NMU rep this will enable him to help spread the message about the new procedure and direct any queries back to the appropriate service. The Vice Chair of Highways & Transport Committee, Cllr Neil Shailer, who is also the NMU representative for the council, has been consulted and is supportive. Service planning guidance will be updated

How will the impacts during the change process be monitored and improvements made (where required)?: The implementation of the new procedure will be monitored by the Asset Information Manager, Asset Information Definitive Map Manager, Highways Maintenance Manager and Assistant Director Highways Maintenance. It is likely, and accepted, that the procedure will need to be amended from time to time to address issues that can only be discovered once it is applied to a range of real cases. Therefore, if it is discovered that groups with protected characteristics/experiencing socio-economic inequalities are being affected the officers will assess the feedback and propose appropriate amendments.

Equality Impact Assessment Action Plan:

Details of negative impact (e.g. worse treatment/outcomes)	Groups affected	Severity of impact	Action to mitigate impact with reasons/evidence to support this or justification for retaining negative impact	Who by	When by
No immediate actions needed - the purpose of the new procedure is to ensure that developers and transport scheme promoters do the work to undertake a scheme-specific EqIA, assess the implications and propose appropriate measures. the AD Highways Maintenance will then take that information into account when making an overall decision as to whether he should authorise the change to the surface of a public right of way. Previously there was no consistent or transparent decision	Age, Disability, Pregnancy and maternity, Socio- economic inequalities	Low	No immediate actions - please see above. The implementation of the new procedure will be monitored by the Asset Information Manager, Asset Information Definitive Map Manager, Highways Maintenance Manager and Assistant Director Highways Maintenance. It is likely, and accepted, that the procedure will need to be amended from time to time to address issues that can only be discovered once it is applied to a range of real cases. Therefore, if it is discovered that groups with protected characteristics/experiencing socio-economic inequalities are being affected the officers will assess the feedback and propose appropriate amendments.	the Asset Information Manager, Asset Information Definitive Map Manager, Highways Maintenance Manager and Assistant Director Highways Maintenance	25/09/202

Details of negative impact (e.g. worse treatment/outcomes)	Groups affected	Severity of impact	Action to mitigate impact with reasons/evidence to support this or justification for retaining negative impact	Who by	When by
making process. It					
should help ensure					
that inappropriate					
changes to PROW that					
will adversely affect					
users of the PROW,					
which may include					
those with the					
protected					
characteristics					
identified, do not					
occur. The					
introduction of the					
procedure is therefore					
a considerable					
improvement that					
should overall					
significantly benefit					
those with protected					
characteristics/in					
areas of socio-					
economic inequalities.					

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Confirmation: I confirm that this HoS is correct