

## Response to Request for Information

**Reference:** 4460  
**Date:** 21 October 2014  
**Type of request** Environmental Information Regulations

### Rights of Way GIS Data

I am writing to you to request information regarding the GIS data you hold on Public Rights of Way in Cambridgeshire. I see that you are able to produce an interactive visual representation of the County's Rights of Way in an online map at <http://my.cambridgeshire.gov.uk/myCambridgeshire.aspx?MapSource=CCC/AllMaps&Layers=row,row-TROs&tab=maps> . The underlying data used to generate the images and pop-ups depicting/describing the Rights of Way on this map must presumably be held in a digital database or datafile somewhere.

In this request I shall use the term "Rights of Way Database" to refer to this database or datafile, even though it may not be a traditional database. It may be that the same database holds more than just the Public Rights of Way data, in which cases, references to the "Rights of Way Database" should be taken to just refer to those parts or tables that hold Public Rights of Way data.

In relation to this, I would like to request the following under FOIA/EIR as appropriate:

1/ The name of database/file format used for your Rights of Way Database. (Here, I'm looking for an answer such as "a KML file", "a MySQL database", "an ARCInfo database with PostgreSQL storage".) If multiple databases exist in more than one format, please list all of them.

MapInfo table

2/ A copy of the database definition / schema for your Rights of Way Database. (Depending on the format from 1, this could be a file specification, the relevant SQL table definitions, or simply a list of the tables, their relationships, and the fields they contain.) If it is not obvious from any of the field names what information they contain, please provide a brief description.

3/ A full copy or data-dump of the information/data contained in your Rights of Way Database. (This should include, at a minimum, each Right of Way's name, parish, reference number, any internal ids, and the geographic/positional data necessary to define the route -- probably in the form of way segments and coordinates.)

For your responses to 2 and 3 I have a strong preference for the data to be provided in a open and re-usable electronic form.

A copy of the Rights of Way GIS table fields is attached in an Excel spreadsheet, providing notes where appropriate as to what the fields relate to.

In respect of a data dump, we note that the Environmental Information Regulations relate to the disclosure of 'information' rather than specific documents or files. As highlighted on the attached spreadsheet, the majority of the information is already publicly available and easily accessible on our online map, with some of the non-published fields being set to the same value (again, as explained in the spreadsheet). Under Regulation 6(1)(b) we are not required to make the information available in another form or format, as specified by an individual requestor if the information is already publicly available and easily accessible to the applicant in another form or format.

There are three fields that are not currently available and the information contained in these fields is exempt from disclosure as explained below.

Information recorded under the 'CCC\_Maintainable' field and 'Last checked' field are excepted from disclosure under Regulation 12(4)(d) as they "relate to material which is still in the course of completion, to unfinished documents or to incomplete data". These are internal note fields recorded as part of a Definitive Map Consolidation Review project. Whilst good progress has been made on this, the data recorded within the GIS fields is incomplete and a programme of work is currently ongoing with partner organisations to create a single accurate record. It is anticipated that the details relating to 'CCC\_Maintainable' will be added to the online map when the work is complete and we can publish accurate data.

The information recorded under the 'CCC\_Maintainable' and 'Last checked' fields is also excepted from disclosure under Regulation 12(4)(e) as it involves the disclosure of internal communications. Information recorded in the 'Notes' field is also excepted from disclosure under this Regulation.

The 'Notes fields' is used by the team to make various notes for colleagues to refer to as part of their working practices. They relate to an array of different topics, from contact names and telephone numbers of gate key holders (which is personal information about these individuals), references to ongoing legal matters, and general internal reference comments (such as 'see consolidation file').

The internal field entries by their very nature are often written in shorthand which would be understood by the teams but would not necessarily make any sense on their own otherwise without further clarification. Releasing the data could cause confusion in people misinterpreting what the notes say and clarifying these internal note comments could impose a significant burden on the authority. Providing such clarification for every individual entry as part of a request is likely to make such a request 'manifestly unreasonable' under Regulation 12(4)(b).

It is important to note that under the Regulations we are obliged to disclose accurate information, which would make it extremely difficult to meet our EIR obligations by disclosing incomplete and inaccurate data with an array of caveats about its contents.

There is some public interest in understanding the work undertaken in updating our records around Rights of Way; however disclosure of the internal note fields are unlikely to aid this process to any significant extent.

We hope to complete the 'CCC\_Maintainable' data soon, and do not believe it is in the public interest for an incorrect and incomplete list of this information to be made available before this point. Where there are individual queries on maintenance they can be researched and dealt

with as necessary; however releasing a complete list is likely to lead to people referring queries and complaints to the wrong organization, causing confusion and delaying the process of resolving the matter at hand.

It should be noted that as we have looked at the 'Notes' data and concluded that it is exempt from disclosure under 12(4)(e) we have not gone on to identify each individual entry that may contain information covered by other exceptions (primarily Regulation 13 – personal data) at this stage.

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