

Freedom of Information Act 2000 (FOIA) Environmental Information Regulations 2004 (EIR)

Decision notice

Date:

14 February 2019

Public Authority: Address: London Borough of Camden Town Hall Judd Street London WC1H 9JE

Decision (including any steps ordered)

- 1. The complainant has requested information from the public authority in relation to a Compulsory Purchase Order to acquire the leasehold interests in the properties on Bacton Low Rise Estate. The public authority refused to comply with the request on the basis of the exception at regulation 12(4)(b) EIR (manifestly unreasonable request).
- 2. The Commissioner's decision is that the public authority was entitled to rely on the exception at regulation 12(4)(b).
- 3. No steps required.



Background

4. The request was submitted against the backdrop of a redevelopment project. According to the public authority, the complainant has a leasehold interest in a property in the Bacton Low Rise Estate which is the subject of a redevelopment project of the public authority. He has not been, and continues not to be, willing to agree a price for the public authority to acquire his leasehold interest in the property. Accordingly, the public authority had to acquire the complainant's leasehold interest in the property by compulsory purchase. Flowing from this Compulsory Purchase Order (CPO) there have been numerous court cases, complaints, Subject Access Requests (SARs) and FOIA requests which all relate to matters pertaining to the CPO and actions flowing from it.

Request and response

- 5. On 12 December 2017 the complainant submitted a subject access request (SAR) to the public authority pursuant to section 7 of the Data Protection Act 1998 (DPA 1998). That request is reproduced in Annex A.
- 6. The public authority concluded that part of the request did not constitute his personal data and should be handled under the EIR. The rest of the request was handled under the DPA 1998. The request which was handled under the EIR is reproduced in Annex B. Part of that request became the focus of the Commissioner's investigation. More on this later.
- 7. The public authority provided its response to the request at Annex B on 28 February 2018. It refused to comply with the request on the basis of the exception at regulation 12(4)(b) EIR (manifestly unreasonable request).
- 8. The complainant wrote back to the public authority on 5 April 2018. Amongst the number of allegations levelled at a named officer, he disputed that his request was vexatious and suggested that since it was submitted under the DPA 1998, the whole of the request should have been dealt with under that legislation.
- 9. The public authority concluded that the letter constituted an appeal of its response to the request and consequently conducted an internal review of the response. It wrote to the complainant with details of the outcome of the internal review on 15 May 2018. The review explained,



with reference to the definition of personal data in the DPA 1998, why part of the request was handled under the EIR rather than the DPA 1998. It also upheld the application of regulation 12(4)(b) on the following grounds: (1) the burden of complying with the request would be too great and, (2) the request was vexatious in nature.

Scope of the case

- 10. The complainant initially contacted the Commissioner following his letter of 5 April 2018 to the public authority requesting an internal review to complain about the public authority's handling of his request. The Commissioner advised him on 10 April 2018 that his complaint could not be accepted for investigation before the public authority had completed its internal review.
- 11. The complainant contacted the Commissioner again on 15 May 2018 following the outcome of the internal review to complain about the public authority's handling of his request. He provided the following statement in support of his complaint:

"I would like to emphasize that apart from the actions contrary to the Freedom of Information Act 2000 and the Environmental Information Regulations 2004, Camden LBC has been also acting contrary to the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).

It is submitted that Camden LBC deliberately acted contrary to Article 4 "Access to environmental information" of the Aarhus Convention.

It is submitted that Camden LBC deliberately failed to comply with Article 5 "Collection and dissemination of environmental information" of the Aarhus Convention.

It is submitted that Camden LBC deliberately acted contrary to Article 6 "Public participation in decisions on specific activities" of the Aarhus Convention.

It is submitted that Camden LBC deliberately acted contrary to Article 9 "Access to justice" of the Aarhus Convention by failing to disclose the relevant information until the relevant deadlines for judicial challenges of decisions expire. For example, officers of Camden LBC deliberately contravened the requirement of serving public notices at the planning application stages in not less than three developments as well as



withheld information about presence of cancerogenous asbestos materials."

12. The scope of the Commissioner's investigation was to determine whether the public authority was entitled to rely on the exception at regulation 12(4)(b) EIR. Part of the request in Annex B was not considered pursuant to the application of the exception for the reasons explained further below.

Reasons for decision

Regulation 12(4)(b) – manifestly unreasonable request

- 13. Regulation 12(4)(b) provides that a public authority may refuse to disclose information to the extent that the request for information is manifestly unreasonable.¹
- 14. The Commissioner considers that the inclusion of `manifestly' in regulation 12(4)(b) indicates Parliament's intention that, for information to be withheld under the exception, the information request must meet a more stringent test than simply being `unreasonable'. `Manifestly' means that there must be must be an obvious or tangible quality to the unreasonableness of complying with the request.
- 15. The exception will typically apply in one of two sets of circumstances; either where a request is vexatious or where compliance with a request means a public authority would incur an unreasonable level of costs, or an unreasonable diversion of resources. As mentioned, the public authority has argued that the request is vexatious and also that complying with the request would place a disproportionate burden on its resources.

Manifestly unreasonable on the grounds that request is vexatious

16. The Commissioner has considered whether the request is manifestly unreasonable on the grounds that it is vexatious. However, before setting out the public authority's arguments, she has briefly set out

¹ For the full text of the exception, visit: <u>http://www.legislation.gov.uk/uksi/2004/3391/regulation/12/made</u>



below a pertinent factual finding following her enquiries to the public authority in relation to the burden of complying with the request.

- 17. The public authority clarified that it had published or previously disclosed to the complainant some of the information held within the scope of his request in Annex B. However, it considered that complying with the remaining parts of the request would impose an unreasonable burden on its resources. These include the requests for: "all internal and external communication related to the discussed Compulsory Purchase Order [re Bacton Low Rise Estate] including but not limited to.....", "All documents the Council relies on in its application for a Compulsory Purchase Order including but not limited to....." and "Communication between the Council and the Department for Communities and Local Government, including the National Planning Casework Unit." The public authority submitted that the complainant's request for the information it has previously released adds weight to its view that the request is disproportionate with no practical purpose and therefore manifestly unreasonable.
- 18. The public authority's letter to the Commissioner containing its clarified position above as well as its submissions on the burden of complying with the remaining parts of the request was forwarded to the complainant on 11 January 2019.

Public authority's submissions on the vexatious nature of the request

19. Further to the Commissioner's enquiries the public authority provided an explanation in support of the view that the request is vexatious with reference to its wider context and history, the detrimental impact of complying with the request and, why this impact would be unjustifiable or disproportionate in relation to the request itself and its inherent purpose or value.

Wider context and history

- 20. The chronology of the interaction between the complainant and the public authority in the context of the redevelopment project is summarised below.
- 21. Following a challenge of the CPO by the complainant, a CPO Inquiry was held in September 2016 before an independent inspector who submitted a report to the Secretary of State for Communities and Local Government on 4 January 2017 recommending confirmation of the CPO. The Secretary of State subsequently confirmed the CPO on 7 March 2017. At the time of the Inquiry the complainant's property was the only occupied property on Bacton Low Rise Estate, all 98 other



residential occupiers having vacated the Estate by agreement with the public authority.

- 22. On 19 July 2017, the General Vesting Declaration (GVD) served on the complainant by the public authority under the CPO took effect and the complainant's long leasehold in the property on Bacton Low Rise Estate was transferred to the public authority. On 20 October 2017 the public authority lawfully evicted the complainant from the property.
- Demolition of Bacton Low Rise Estate subsequently began in January 2018 and the complainant's property was demolished on 16 January 2018. The entire Estate has now been demolished and is a cleared site awaiting redevelopment.
- 24. The complainant has contested the CPO and its enforcement by the public authority via a number of court proceedings. The more pertinent proceedings are summarised below.
- 25. On 11 August 2016 he issued proceedings against the public authority in the Clerkenwell & Shoreditch County Court for damages and an injunction to prevent the public authority's "soft strip" demolition works being carried out on the Estate. His application for a summary judgement was dismissed on 3 February 2017.
- 26. On 2 August 2016 he had issued similar proceedings in the Lambeth County Court against the public authority's demolition sub-contractors. On 3 February 2017, at the hearing in the Clerkenwell & Shoreditch County Court, the District Judge also ordered that that the case against the sub-contractors be transferred from Lambeth County Court and that the two cases be listed together for a costs and case management hearing. No further steps have been taken in the two cases since 3 February 2017.
- 27. On 11 May 2017 the complainant and a company alleged to be a sublessee of part of his property on the Estate (the company) issued separate challenges in the Planning Court to the confirmed CPO. The defendants in each claim were the Secretary of State and the public authority.
- 28. On 25 May 2017 the complainant issued an application in the Planning Court for permission to apply for judicial review of the GVD served on him pursuant to the CPO. The three sets of proceedings were expedited and listed together for hearing on 1 and 2 August 2017. On 26 September the Judge handed his judgement dismissing all of the claims. On 31 October 2017 the Judge refused to grant permission to the claimants to appeal his judgement.



- 29. Following the execution of the GVD on 20 October 2017, the complainant made an emergency ex parte application in the Queen's Bench Division (QBD) on 24 October 2017 who ordered the public authority to let him back into the occupation of the property. The public authority made arrangements to do so but the complainant did not return to reside at the property. On 26 October 2017 at the Court's invitation the public authority appeared ex parte and the Judge discharged his Order of 24 October 2017.
- 30. On 2 November 2017 he applied to the Planning Court to set aside the Order of 26 October 2017 at the QBD and, for an Order under section 24(1) of the Acquisition of Land Act 1981 suspending the operation of the CPO. Both applications were dismissed by the Planning Court on 7 November 2017.
- 31. On 16 November 2017 he issued an application to the Court of Appeal for permission to appeal against the QBD's Order of 26 October. On 22 November he and the company issued an application to the Court of Appeal for permission to appeal against the Planning Court's Order of 7 November. Neither application for permission to appeal has been determined to date.
- 32. On 5 December 2017 the complainant and the company issued an application in the Court of Appeal for an urgent order inter alia staying the operation of the CPO and GVD. The application was refused by on 20 December 2017.
- 33. He has also made complaints to the public authority between April and July 2018 regarding property allegedly in a state of disrepair, housing allocations and homelessness. In some cases pursuing matters to the Local Government Ombudsman (LGO). The investigations that have concluded did not result in any adverse findings against the public authority.
- 34. He has also submitted 6 SARs to the public authority since 2016 for information relating to his contact with the public authority further to the redevelopment project and related matters. According to the public authority an exceptionally voluminous SAR submitted on 10 May 2018 would have been refused as manifestly excessive had it been considered under the General Data Protection Regulations and Data Protection Act 2018 which have replaced the DPA 1998.
- 35. In terms of requests considered under the FOIA/EIR, prior to the request in this case on 12 December 2017, the complainant submitted two requests for information in relation to the redevelopment project on 18 April 2017 and 22 August 2017 both of which were complied



with. Subsequent to the request in this case he made further requests for information to the public authority on 21 May 2018, 30 May 2018, 13 June 2018, 25 June 2018, 30 July 2018, 20 September 2018, 1 October 2018 and 14 October 2018. The Commissioner notes that some of these subsequent requests are not directly related to the redevelopment of Bacton Low Rise Estate.

36. The public authority acknowledged that the bulk of the FOI/EIR requests were submitted following the request in this case. It however argued that the requests are relevant because they show a continuing course of conduct -ie- that the complainant is still actively and resolutely pursuing matters which have been dealt with by the courts and the public authority's complaints team. Further, correspondence associated with the requests often contains unfounded allegations of misfeasance and other wrong doing by officers. The complainant's ongoing actions including litigation show a course of conduct that could be characterised as obsessive and demonstrate that he is likely to continue submitting further requests for information in relation to the redevelopment project. In addition, his use of aggressive accusatory language and the levelling of unfounded allegations about staff further indicate that he is unlikely to engage meaningfully with the public authority in relation to the redevelopment project.

Detrimental impact of complying with the request

- 37. The public authority's submissions are summarised below.
- 38. It estimates that it would take 610 hours to comply with the request. Whilst handling requests is an important part of its core business, officers do have other main parts to their roles and taking significant amounts of time to answer complex and voluminous requests like the request in this case necessarily take them away from other work. The public authority has a number of active regeneration schemes and officers taking time out to undertake lengthy detailed searches will take them away from their regeneration work. These would have a detrimental effect on these schemes and therefore the residents concerned.
- 39. To illustrate, the former Head of Regeneration & Development was responsible for the Bacton regeneration project, the subject matter of the requests, complaints, and proceedings submitted and initiated by the complainant. According to the former Head of Regeneration & Development:

"The queries, complaints, FoI's, public enquiries, and court actions linked to the negotiations about acquisition of [the complainant's]



former leasehold interest in....Bacton and the associated CPO process have consumed a considerable portion of my time, it is hard to put hours to it......I have 18 main folders and 20 sub-folders dealing with the issues he has raised, in each case, in my opinion he has knowingly complicated and frustrated the process"

40. There would also be an adverse on the Information and Records Management Team who have a total of 3 case officers handling requests for information. Further, handling the requests, complaints and litigation has had a detrimental effect on staff some of whom have been left stressed and distressed by the some of the language used by the complainant in particular the allegations against their personal conduct.

Why the impact of complying with the request would be unjustifiable or disproportionate in relation to the request itself and its inherent purpose or value.

- 41. The public authority's submissions are summarised below.
- 42. The requests all relate to the complainant's personal circumstances and flow from the public authority's CPO of his property. While it is understandable that the complainant is highly aggrieved that he has lost his leasehold interest in the property, these are all matters that affect him as an individual and are not of wider concern. There have been no other FOI requests regarding the public authority's acquisition of the leasehold interests in the properties on Bacton Low Rise Estate by CPO. There is no inherent value in the request, it is made to enable the complainant to continue to pursue his legal actions and campaign against the public authority further to his dissatisfaction regarding its handling of the CPO process.
- 43. Therefore, when balancing the detrimental impact of the request on the public authority with is low value, the balance clearly falls on the side of the impact being disproportionate. This is especially the case when considering the complainant's wider course of conduct and history and the likelihood, as evidenced by his actions following the refusal of the request in this case, of continuing to submit requests to the public authority of a vexatious nature.

Balance of the public interest

44. The public authority also provided the Commissioner with details of its consideration of the balance of the public interest which she has summarised below.



- 45. The public authority acknowledged that there is a presumption in favour of disclosure in the EIRs and there is a public interest in promoting transparency and openness in the public authority's dealings.
- 46. However, there has been no wider public concerns around the redevelopment project and the CPO process. The matters raised in the request largely relate to the private interests and concerns of the complainant.
- 47. There is a public interest not disrupting the routine and core business of the public authority. The public authority owes a fiduciary duty to tax and rate payers and stakeholders to use its resources wisely and efficiently to ensure public funds are used appropriately. There is a public interest in avoiding negative knock on effects on other council work from handling disproportionate requests.
- 48. On balance, the factors in favour of maintaining the exception outweigh the public interest in complying with the request.

Commissioner's considerations

- 49. In considering whether a request for information is vexatious, the key question in the Commissioner's view is whether the request is likely to cause a disproportionate or unjustified level of disruption, irritation or distress. This will usually involve weighing the evidence about the impact on the public authority and balancing this against the purpose and value of the request. This should be judged as objectively as possible; in other words, would a reasonable person think that the purpose and value are enough to justify the impact on the public authority. Where relevant, this will involve the need to take into account wider factors such as the background and history of the requests.
- 50. The request in this case was submitted following two requests by the complainant on the same subject matter which considered in isolation hardly indicates that the request is likely to cause a disproportionate level of disruption to service delivery. However, the Commissioner considers that the wider history of the complainant's contact with the public authority in relation to the redevelopment/regeneration project carries significant weight in answering the key question. Further, against that backdrop, she also considers that the number and frequency of the requests subsequently submitted by the complainant in relation to the redevelopment/regeneration project also carries significant weight.



- 51. Notably, the complainant increased the number and frequency of his requests for information in relation to the redevelopment project once it appeared he was running out of legal options overturning the Secretary of State's decision to confirm the CPO and/or preventing the public authority from enforcing the CPO. In the Commissioner's view, this clearly indicates that he wanted to continue what had increasingly become an endless and, certainly at that point, unsuccessful attempt to reverse the CPO further to the public authority's acquisition of the leasehold interest in his property. According to the public authority, all 98 other residential occupiers had most likely vacated the Estate by agreement with the public authority by July 2017 when the complainant was served a GVD. Consequently it was highly unlikely that the CPO would be reversed at that stage.
- 52. The view that he wanted to continue pursuing the matter despite numerous rulings in favour of the public authority is borne out by the fact that between 21 May 2018 and 14 November 2018 he submitted eight further requests for information to the public authority as a result of his dissatisfaction with the CPO. He is unlikely to have submitted those requests had the public authority not acquired the leasehold interest in his property on Bacton Low Rise Estate or had he agreed a price with the public authority which he felt reflected the value of his property.
- 53. In the Commissioner's view, there is clearly some serious purpose to the request for information relating as it does to the handling of the CPO process and this should not be dismissed. However, the fact that there is little evidence to indicate that the substantive issue of concern to the complainant is widely shared is significant in the circumstances of this case. With respect to the specific issues he has highlighted further to his complaint to the Commissioner in this case, he has not provided any evidence to substantiate the suggestion that officers deliberately contravened planning application requirements or that they withheld information about the presence of "cancerogenous" asbestos materials.
- 54. Although there is a serious purpose to the request for the complainant, a balance must be struck between the amount of time and resources the public authority spends responding to requests from the complainant on an issue of concern to him that is however not widely shared and, the time and resources it needs to devote to requests from other applicants under the FOIA/EIR and to the delivery of other services. The FOIA/EIR was not designed as an alternative means of disputing or resolving legal matters particularly in a case such as this where the courts have consistently maintained that the CPO is legally enforceable and complaints submitted by the complainant in relation to



the process have not resulted in any substantive adverse findings against the public authority. Against that backdrop, the Commissioner considers that the request constitutes, in the words of the Upper Tribunal, "a manifestly unjustified, inappropriate or improper use" of the EIR.² Applicants have a responsibility and the Commissioner a duty to ensure that freedom of information legislation is not brought into disrepute by the misuse of information access rights.

- 55. The Commissioner considers that experienced officers should be able to handle requests with minimal amount of irritation or distress from persistent applicants who may level unsubstantiated allegations against them. She recognises however that spending significant amounts of time dealing with correspondence by an applicant in relation to a specific subject matter can cause an unjustified level of irritation or distress. The complainant had submitted two requests for information to the public authority prior to 12 December 2017 which generally speaking should not have caused an unjustified level of distress to officers.
- 56. However, given the frequent nature of the complainant's other contact with the public authority, the Commissioner considers that handling his request of 12 December 2017 is likely to have caused officers an unjustified level of distress. This is because the complainant's other contact with the public authority strongly indicated that he was likely to submit further requests for information in relation to the redevelopment of Bacton Low Rise Estate. Although some of the requests subsequently submitted by the complainant do not appear to relate to the redevelopment project, all of the requests in the Commissioner's view are likely to have been motivated by the complainant's dissatisfaction with the decision to acquire the leasehold interest in his property through a CPO.
- 57. Taking all of the above into account, the Commissioner finds that the public authority was entitled to engage the exception at regulation 12(4)(b) on the basis that the remaining part of the request of 12 December 2017 which the public authority has not previously responded to is vexatious.

² The Upper Tribunal in Information Commissioner v Devon County Council & Dransfield [2012] UKUT 440 (AAC) at Paragraph 27.



Balance of the public interest

- 58. The exceptions from the duty to disclose information are subject to the public interest test set out in regulation 12(1)(b) EIR. Therefore, the Commissioner has considered whether in all the circumstances of the case the public interest in maintaining the exception at regulation 12(4)(b) outweighs the public interest in disclosing the requested information.
- 59. The Commissioner has not inspected the information held within the scope of the request because the public authority additionally considers that searching for and compiling the information would place an unreasonable burden on its resources.
- 60. Nevertheless, the Commissioner considers that there will always be some public interest in disclosure to promote transparency and accountability of public authorities, greater public awareness and understanding of environmental matters and more effective participation in environmental decision making.
- 61. These public interest considerations carry some weight in view of the background to the request (ie a CPO on the properties in Bacton Low Rise Estate further to a regeneration project) and the nature of the request itself.
- 62. However, the weight of the public interest in disclosure for the reasons identified is somewhat reduced by the fact that there has been no wider concerns around the redevelopment project and the CPO process.
- 63. Significantly, there is a strong public interest in ensuring that resources are not disproportionately used to respond to requests for information from an applicant who is clearly dissatisfied about an issue and seeks to keep it alive until there is a conclusion or resolution he considers favourable. That is simply not what the freedom of information legislation was designed to achieve and consequently there is a strong public interest in ensuring that the EIR is not brought into disrepute from inappropriate or improper use.
- 64. The Commissioner therefore finds that on balance, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in complying with the complainant's request for information.



Other Matters

- 65. During the course of her investigation, the Commissioner attempted to informally resolve this matter by inviting the complainant to consider refining the scope of his request further to the duty in regulation 9 EIR for a public authority to provide advice and assistance so far as it would be reasonable to applicants.
- 66. Although the complainant considered submitting a refined request to the public authority, he also sought to continue to contest the public authority's view that complying with his request would impose a disproportionate burden on its resources. The public authority subsequently explained to the Commissioner that since it had also concluded that the request was vexatious, it did not consider that it was under any obligation to provide advice and assistance further to the duty in regulation 9.
- 67. Unable to resolve the complaint informally, the Commissioner proceeded to fully consider the grounds for the application of regulation 12(4)(b) to the complainant's request.



Right of Appeal

68. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from: First-tier Tribunal (Information Rights) GRC & GRP Tribunals, PO Box 9300, LEICESTER, LE1 8DJ

Tel: 0300 1234504 Fax: 0870 739 5836 Email: <u>GRC@hmcts.gsi.gov.uk</u> Website: <u>www.justice.gov.uk/tribunals/general-regulatory-chamber</u>

- 69. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
- 70. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Terna Waya Senior Case Officer Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF



Annex A

<u>Request submitted by the complainant pursuant to section 7 of the DPA 1998.</u>

"I am writing to make a data subject access request pursuant to Section 7 of the Data Protection Act 1998.

Being a leaseholder of a property located at [REDACTED] which is part of the London Borough of Camden, I have been involved into substantial communication with the Council of the London Borough of Camden. In fact, the Camden Council is not only my local authority but also is a landlord of the property.

As a local authority, landlord of the property, an administrator of my council tax and service charge accounts and a data controller, Camden Council held and processed personal data of which I am the subject......

Please accept my gratitude in advance for your assistance. For the avoidance of doubt, this request comprises 8 pages.

Scope of my request

Since Camden Council processed a wide range of personal data about me, I would like to request copies of the relevant data as well as internal and external correspondence, including the following data:

- All communication between myself and the Council including but not limited to:
- Communication and documents related to the property I am residing in [REDACTED] for which the Local Authority acts in several capacities (e.g. as a landlord, as a managing agent, as an local administrative body and as a service benefits provider);
- ii. Communication and documents related to my complaints for the service failures and breaches of the Lease agreement;
- iii. Communication and documents related to my application to extend the lease (e.g. enfranchisement), including the original and amended lease documents and land registry data.
- iv. Communication and documents related to my application for enrolment into the housing list;
- v. Records related to service charges and council tax payments.



- vi. Communication and documents related to the dispute over the service charge payments which have been referred to the First Tier Lands Tribunal for adjudication.
- vii. All internal and external communication which included either my name, contacts or my residential address. If any documents have been exchanged, please provide copies of such documents.
 - Recordings of all telephone conversation which include either my name, contacts or residential address.
 - The requested information includes but is not limited to
 - 1. Communication with the Council employees following the burglary of my shed (B6 in Bacton Estate) on 9 April 2016.
 - 2. Communication with Ettiene Insley
 - 3. Communication with the Housing management and housing maintenance sections.
 - 4. The 2011 stock condition survey
 - 5. Communication between the Council and the Department for Communities and Local Government, including the National Planning Casework Unit.

Since my house us also affected by the potential Compulsory Purchase Order in respect of the Bacton Estate (also referred to as Bacton Low Rise Estate), please also provide me all internal and external communication related to the discussed Compulsory Purchase Order, including but not limited to:

- 1. The viability report
- 2. The Environmental assessment report
- 3. Communication with architects (including Karakusevic Carsen Architects (KCA)) and regulatory bodies
- 4. Copies of feedback forms received from regulatory bodies and members of the local community

1. All documents the Council relies on in its application for a Compulsory Purchase Order including but not limited to:

- 1. Camden Council's Local Development Framework (2010)
- 2. Camden's Housing strategy 2011-16



- 3. Camden's Sustainable Community Strategy 'Camden Together'
- 4. Camden Community Investment Programme (2010-25)
- 5. Cabinet report, minutes and decision endorsing redevelopment of the scheme dated 12 Sept. 2012
- 6. Directors delegated authority dated 6 Feb. 2015 and associated report approving the making of the compulsory purchase order
- 7. Planning application submission documents for application referenced 2012/6338/P including:
- Application form
- Site plan
- Proposed ground floor plan
- Planning statement (Quod planning)
- Design and Access statement

8. Officer's report to Planning Sub-Committee recommending grant of planning permission and minutes of Planning Sub-Committee.

9. Planning Application submission documents for applications referenced 2014/3633/P

10. GLA, Housing in London 2014: evidence base for the Mayor's Housing Strategy (April 2014)

11. GLA, The 2013 London strategic Housing Market Assessment: Part of the evidence base for the Mayor's London Plan (January 2014):

12. Housing in London 2014: the evidence base for the Mayor's Housing Strategy (April 2014).

I envisage that a number of individuals may process personal data on the above. Some of the data processed will be held in the form of sent and receive e-mails and word-processed documents. Presumably these can be identified through the use of search tools.....

I believe the relevant data are likely to be in correspondence (including but not limited to emails) of...."

The complainant went on to list the names and email addresses of over a 100 Council officers.



Annex B

Part of the original request which was dealt with by the public authority under the EIR

- "- The 2011 stock condition survey
- Communication between the council and the dept. for communities
- The viability report
- Environmental assessment report
- Communication with architects and regulatory bodies
- Copies of feedback forms received from regulatory bodies and local community

- All documents the council relies on in its application for a compulsory purchase order including:

- Council's local development framework 2010
- Housing strategy 2011-16
- Camden's sustainable community strategy 'Camden together'
- Community investment program 2010-25

- Cabinet report, minutes and decision endorsing redevelopment of the scheme dated 12 Sept. 2012

- Directors delegated authority dated 6 Feb. 2015 and associated report approving the making of the compulsory purchase order

- Planning application submission documents for PA 2012/6338/P including:
- Application form
- Site plan
- Proposed ground floor plan
- Planning statement (Quod planning)
- Design and Access statement

Also



- Officers report to planning sub-committee recommending grant of planning permission and minutes

- PA submission documents for 2014/3633/P

- GLA, housing in London 2014: evidence base for the mayor's housing strategy (Apr. 2014)

- GLA, the 2013 London strategic Housing market assessment: part of the evidence base for the Mayor's London plan (Jan. 2014)

- [Any of the above in the emails of 100 plus accounts listed in your request.]"