

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

Decision notice

Date: 19 April 2021

Public Authority: Swansea Council

Address: freedomofinformation@swansea.gov.uk

Decision (including any steps ordered)

1. The complainant requested information concerning a particular development. Swansea Council ('the Council') refused to comply with the request, citing regulation 12(4)(b) of the EIR as it considered the request to be manifestly unreasonable. The Commissioner's decision is that the Council was entitled to refuse the request under regulation 12(4)(b) of the EIR and that the public interest favours maintaining the exception. The Commissioner requires no steps to be taken as a result of this decision notice.

Request and response

2. Following a previous request which the complainant submitted on 3 October 2018, which the Council refused as manifestly unreasonable, on 25 September 2019 the complainant wrote to the Council and submitted a refined request in the following terms

"On behalf of my ward and Penllergaer Community Council I am requesting from both Planning and Transport full disclosure of all electronic correspondence in relation to Parc Mawr Farm between the 23rd June 2011 to the present day that:

(a) has passed between these departments and Bellway, including Bellway's representatives Asbri and Aecom,

(b) correspondence passing between the two departments relating to the same and

(c) correspondence between the Council and Burrow Hutchinson Ltd".

3. The Council responded on 4 November 2019 and stated that it considered the refined request to be manifestly unreasonable. The Council applied regulation 12(4)(b) of the EIR to the request on the basis of the amount of time it would take to comply with it.
4. The complainant wrote back to the Council and requested an internal review into its handling of the request.
5. The Council provided the outcome of its internal review on 14 January 2020 and upheld its decision that regulation 12(4)(b) of the EIR applied to the request.
6. The complainant wrote back to the Council on 9 March 2020 advising that she still disagreed with the decision that the refined request was manifestly unreasonable. She confirmed that she would be referring the matter to the Commissioner.

Scope of the case

7. The complainant contacted the Commissioner on 11 March 2020 to complain about the way her request for information had been handled.
8. The analysis below considers whether the Council was entitled to rely on regulation 12(4)(b) of the EIR to refuse to comply with the request.

Reasons for decision

Is the information environmental information?

9. Information is "environmental information" and must be considered for disclosure under the terms of the EIR rather than the FOIA if it meets the definition set out in regulations 2(1)(a) to 2(1)(f) of the EIR.
10. The Commissioner considers that the information in this case can be classed as environmental information, as defined in regulation 2(1)(c) of the EIR. This provision provides that any information on measures such as policies, legislation, plans, programmes, environmental agreements and activities affecting or likely to affect the elements or factors of the environment listed in regulation 2(1)(a) and 2(1)(b) will be

environmental information. One of the elements listed under 2(1)(a) is land.

11. The request in this case is for information concerning a major mixed development including the erection of around 850 houses, a care home and a primary school at Parc Mawr Farm, Penllergaer, Swansea. The Commissioner considers that the planning and development of land constitutes a measure as defined in regulation 2(1)(c) of the EIR which would or would be likely to, affect the elements described in 2(1)(a), namely land and landscape. The Commissioner is therefore satisfied that the request is for environmental information, and that the request falls to be dealt with under the EIR.
12. Having concluded that the requested information is environmental information, and consequently covered by the EIR, the Commissioner has gone on to consider the application of regulation 12(4)(b).

Regulation 12(4)(b) – Manifestly unreasonable

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.
14. Regulation 12(4)(b) of the EIR is designed to protect public authorities from exposure to a disproportionate burden or an unjustified level of distress, disruption or irritation in handling information requests. In effect, it works in similar regards to two exemptions within the Freedom of Information Act 2000 ('FOIA'): section 12, where the cost of complying with a request exceeds the appropriate limit and section 14, where a request is vexatious.
15. In this case the Council asserted that complying with the request would impose a significant and detrimental burden on its resources, in terms of staff time and cost.
16. The EIR differ from the FOIA in that there is no specific limit set for the amount of work required by an authority to respond to a request, as that is provided by section 12 of the FOIA.
17. Specifically, the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004¹ ('the Fees Regulations') which apply in relation to section 12 of the FOIA are not directly relevant to the EIR because the cost limit and hourly rate set by the Fees Regulations do not apply in relation to environmental information. However, the Commissioner accepts that the Fees Regulations provide a useful starting point where the reason for citing regulation 12(4)(b) is the time and cost of a request, but they are not a determining factor in assessing whether the exception applies.

18. The Fees Regulations confirm that the costs associated with these activities should be worked out at a standard rate of £25 per hour per person. For local authorities, the appropriate limit is set at £450, which is the equivalent of 18 hours work.
19. Regulation 12(4)(b) sets a robust test for an authority to pass before it is no longer under a duty to respond. The test set by the EIR is that the request is 'manifestly unreasonable', rather than simply being 'unreasonable' per se. The Commissioner considers that the term 'manifestly' means that there must be an obvious or clear quality to the identified unreasonableness.
20. In the Commissioner's published guidance¹ on manifestly unreasonable requests, paragraph 19 states that in assessing whether the cost or burden of dealing with a request is too great, public authorities will need to consider the proportionality of the burden or costs involved and decide whether they are clearly or obviously unreasonable. The Commissioner considers this will mean taking into account all the circumstances of the case including:
 - the nature of the request and any wider value in the requested information being made publicly available;
 - the importance of any underlying issue to which the request relates, and the extent to which responding to the request would illuminate that issue;
 - the size of the public authority and the resources available to it, including the extent to which the public authority would be distracted from delivering other services; and
 - the context in which the request is made, which may include the burden of responding to other requests on the same subject from the same requester.
21. It should also be noted that public authorities may be required to accept a greater burden in providing environmental information than other information.

¹ <https://ico.org.uk/media/for-organisations/documents/1615/manifestly-unreasonable-requests.pdf>

The Council's position

22. The Council advised that the information being sought in this case is for all electronic correspondence from both the Planning and Transport Departments in relation to the 'Parc Mawr Farm' development, from 23 June 2011 to the present day, between departments and a number of third party organisations. The Parc Mawr Farm development is a strategic site within the Council's Local Development Plan ('LDP'), incorporating up to 850 dwellings, a mixed use commercial area, a school, parkland and leisure facilities. The Council explained that planning for the development in question has involved complex issues and discussions have been ongoing between various Council departments, partner organisations, external consultants and with the agent/applicant over a protracted period of time.
23. Because of the nature of the development and the length of time development has been considered for the site, the request requires a wide variety of officers to interrogate their document management systems. This would include the Strategic Planning Lead and at least ten officers within the Council's Planning and Regeneration Department have had involvement with the scheme. Two officers no longer work in the Council and their records may also need to be retrieved. In addition, a number of officers within the Highways and Transport department have also had an involvement.
24. The Council advised the Commissioner that the case officer that dealt with this specific planning application started working on the site in 2015. The formal pre-application enquiry was submitted in July 2015 and was ongoing until the formal planning application was submitted. The case officer alone has around 1,464 emails in their specific Parc Mawr outlook folder. This does not include sent items, items not filed in the correct folder or items stored in other folders where they relate to more than one site. Of these, 689 items are comments on the planning application but the Council advised that *"it is not possible to easily interrogate this further by date received. Therefore it is assumed that just under half of all received items relating specifically to Parc Mawr are objections from members of the public. However, there is no simple way of separating these from the remainder of the emails which are stored in date order"*. The Council conducted a secondary search in the inbox of the Strategic Planning Lead which identified 400 items which again would need to be reviewed for relevance and any exempt information.
25. In order to identify all the relevant information, the Council advised that searches would need to be carried out of the sent and received items of each officer involved. The Council advised that, whilst received items could be stored within separate folders, sent items would not be stored

in the same way. The Council stated that the one case officer alone has over 16,500 items saved in their sent items folder.

26. The Council confirmed that correspondence between the departments specified in the request and the developer (and all their agents) is stored within electronic files on its server, within multiple different folders and files across a number of departments. In terms of the submitted planning applications for the site, the files are catalogued according to the progress stage of the development proposals through the planning system. Electronic correspondence also includes archived and non-archived emails within the email accounts of the various officers who have had an involvement with the scheme.
27. The Council advised that, even within individual officer's drives, information has been saved within different folders depending on the stage and nature of the correspondence in question. For example, the Council explained that the *"the site has been proposed as a 'Candidate Site' for development to the Strategic Planning Section at various stages. The site has also been the subject of a Pre-Application Enquiry within the Development Management Section. An Environmental Impact Assessment Screening Request was received which subsequently resulted in an Environmental Impact Assessment Scoping Opinion Request"*. The electronic information and correspondence on each of these stages of the planning process is not contained solely within one folder or indeed on any one officer's drive. The Council explained that, as electronic files are stored on different network drives within each service area/section, it would be necessary for each officer who has had an involvement in the scheme to carry out searches on their respective network drives, and within their outlook mailboxes.
28. The Council advised that it would not be possible to search for items using terms such as 'Bellway' with any precision as *"there is a limit to search numbers shown using this technique, inevitably throwing up various development sites relating to the developer. Searches for 'Parc Mawr' are similarly imprecise as this identifies all sites/matters that have Parc (very common) and Mawr (which is a whole individual Electoral Ward in Swansea and of course the welsh word for 'large' which therefore associates it with a huge range of planning matters in Swansea)"*.
29. The Council also explained that in terms of the request for correspondence with 'Burrow Hutchinson', a search by just the case officer and Strategic Planning officers yielded *"hundreds of emails for this consultant, relating to a variety of sites, the majority of which are not likely to be related to Parc Mawr"*. Each communication would need to be checked to ascertain whether it related to the Parc Mawr site.

Correspondence with Bellway Homes has, in the main, been via their appointed agents. However, the Council advised that at least four different employees of the agent have been in communication with the case officer alone since the pre-application enquiry was submitted. This does not include communications with other agents such as architects, transport engineers, ecological/landscaping consultants. The Council explained that, as well as communications to and from external bodies and itself, there would also be internal communications between officers and departments which cannot be easily interrogated given that the same officers have been dealing with the same agents on numerous other sites. The Council pointed out that the planning consultancy firm advising the developer in this case is one of the most widely used within the Swansea area.

30. In addition to searches conducted by each individual officer, the Council would also need to interrogate its own records management system which is operated by Idox plc. The Council explained that this system is *"geared towards producing pinpoint results for searches on planning application numbers rather than generic terms. A general Idox search for terms such as 'Parc Mawr' (which is a term not consistently used to describe the development proposals), or 'Penllergaer site as far back as 2011 yielded over 1,000 results. Each of these results would need to be individually checked as to whether they yielded appropriate correspondence"*.
31. The Council provided the Commissioner with its estimate for the time it would take for each of the 13 officers who have had an involvement in the development to carry out the necessary searches of their drives and inboxes. The Council calculates that the process would take 132.5 hours to complete. This includes searching for information falling within the scope of the request and considering the information for disclosure. The Council also confirmed that a sampling check had been undertaken in order to verify its estimate. The sampling exercise involved two members of staff recording the time taken to locate, review and interrogate their Microsoft Outlook account and files stored on their personal drives and network drives in order to identify information relevant to the request. The Council advised that:

"This process took one officer over 8 hours to save correspondence in bulk on a similar strategic site that related specifically to that application. The search criteria was more limited than this FOI request as it only related to electronic communication over a 2 year period and did not involve review of the content of said correspondence for assessment of confidential information".

32. The Council confirmed that, to the best of its knowledge, it is not aware of any other methods available in order to locate and retrieve all the information relevant to the request. The Council also pointed out that this request is one of a number of requests received from the individual relating to the Parc Mawr site. A previous request received on 3 October 2018 was for:

"...from both Planning and Transport full disclosure of all correspondence in relation to Parc Mawr Farm that has passed between these departments and Bellway, and all its representative, from 23rd June 2011 to the present day. This should also include full disclosure of all correspondence passing between the two departments relating to the same"

The Council applied regulation 12(4)(b) to this request. The terms of the request which is the subject of this notice has only been reduced by removal of hard copy information within the scope of the request. The Council explained that the bulk of the resource intensive work required to comply with the request remains due to the volume of electronic material held. In addition, the Council pointed out that the scope of the request under consideration in this notice has actually increased to an extent by including correspondence between the Council and another third party – Burrow Hutchinson, who were commissioned by the Council to undertake a review and update of the evidence base relating to the viability of individual Strategic Development Areas within its LDP.

33. The Council argues that the considerable time it would take to comply with the request would prevent the officers involved from carrying out their core tasks. This would have any adverse effect on the efficiency and quality of services within the area. Development Management Officers would be diverted from considering and authorising planning applications which would reduce efficiency and result in developments being delayed. Strategic Planning Officers would be diverted from delivering high priority planning and development projects including urgent new planning guidance documents and delivery of the Swansea Bay Region regeneration agenda. Such delays would be recorded as part of the statutory monitoring of the Council's development plan and would be detrimental to service performance and the Council's reputation. It would also be likely to result in complaints from members of the public, developers and the wider industry. Delays could also result in appeals against non-determination, which could in turn open the Council up to applications for costs for unreasonable behaviour.
34. The Council advised that there are nine full time officers and three part time officers in the Area team dealing with hundreds of planning applications, pre-applications, enquiries, enforcement cases and appeals. There are no officers available to take over the duties

undertaken by Team Leader and Principal Officer in signing off and checking application reports from members of the team. The Council also advised that, when compared to other Welsh Planning Authorities it has a relatively small Strategic Planning Section, consisting of five full time and one part time officer.

35. In its refusal notice, in recognition of the fact that the complainant has submitted a number of requests about the subject matter, the Council offered to meet with the complainant to try to resolve the matter amicably. The Council considers that if they were able to ascertain the specific subject matter that the complainant was interested in in relation to the site it might be possible to provide information relating to it.

The complainant's submission

36. The complainant believes that the request which is the subject of this notice has *"greatly reduced the information originally sought"* (her request dated 3 October 2018 as referred to in paragraph 32 above). She considers that *"the filtering of electronic information has never been properly carried out"* by the Council.
37. In relation to the Council's statement that a preliminary search of the case officer's inbox identified 1,100 emails which may be relevant to the request, the complainant pointed out that a case officer was only appointed following the submission of a planning application in December 2018. She has suggested that the majority of emails within this inbox would constitute objections from the public to the planning application, which are already available on the Council's website. This is not the information she is seeking access to. She also suggests that there would be very few, if any, emails within the case officer's inbox from Bellway, their representatives or Burrow Hutchinson from December 2018 to the date of her request, and that these communications could be easily extracted.
38. The complainant accepts that the majority of information she is seeking will be held within electronic folders retained primarily by the Strategic Planning Lead. However, she considers that *"once this information undergoes the necessary define filtering process, I have no doubt that the information requested should become available with little or no redaction necessary if the filtering process is conducted properly"*.
39. The complainant alleges that there has been a lack of transparency and accountability on the part of the Council in its promotion of the Parc Mawr Farm site throughout the various stages of the Local Development Plan (LDP). The complainant pointed out that in 2007 the Council appeared to be vehemently against development on the land in question and the public is unaware of why it has now adopted a completely different stance regarding the site. The complainant also believes that

the Council has been resistant to any meaningful public participation in decisions regarding the site. As an example, the complainant explained that the site transitioned *"from a site allocation in the Candidate Site Register for 250 housing units to one that mushroomed to 1000 units in the Preferred Strategy, without any public consultation"*. She also pointed out that there has been a significant amount of opposition to the development and the number of objections is in excess of 650.

40. The Commissioner asked the Council to comment on the complainant's assertions regarding the lack of transparency and public consultation about decisions in respect of the site. The Council strongly refutes the allegations. The Council pointed out that the site in question is an allocated strategic development area in its LDP. The Council stated that it had complied with all the regulations and requirements set out in the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) and provided comprehensive representations to support its position.
41. The Council stated that the documents and reports² published on its website confirm the LDP process undertaken was sound. It also explained that *"procedural compliance was one of the matters subject to Examination in public into the LDP carried out in 2018 by independent inspectors appointed by the Welsh Government"*. The inspector's conclusions relating to procedural requirements are set out in chapter 2 of the report³ and concluded *"that the relevant procedural and legal requirements have been met"*. In addition, the Council referred to paragraph 2.3 of the report which considers the issue of community engagement and states that:

"Overall, it is evident that the Council engaged with a wide range of organisations and the general public at key stages of Plan production. The substantial number of representations received at deposit stage points to an effective and well-publicised consultation process that has provided ample opportunity for residents and general and specific consultation bodies to put forward their views. The general thrust of the CIS has been complied with and participants have not been prejudiced by the processes undertaken. As the deposit Plan and all subsequent amendments to it have been advertised and consulted on, we are

² <https://www.swansea.gov.uk/article/5006/LDP-preparation-and-evidence>

³ https://www.swansea.gov.uk/media/29844/Swansea-LDP-Examination-Inspectors-Report-31-Jan-2019/pdf/Swansea_LDP_Examination_Inspectors_Report_31_Jan_2019.pdf

satisfied that it complies with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) in this respect".

42. In addition to the public engagement and transparency about the site in line with the LDP requirements, the Council confirmed that three rounds of consultation on the actual planning application were undertaken. The Council acknowledged that the first round of consultation resulted in around 600 objections, but pointed out that a large number of the responses were received following local Facebook posts asking people to object to the proposals. The Council explained that many comments received did not consider the suite of information associated with the application in detail, some comments were received relating to the wrong site and/or the wrong developer and comments were also submitted by relatives of local residents who did not live in Swansea or Wales.
43. The Council acknowledged that there has been local objection to proposals for the site but confirmed that the application was considered based on all of the information submitted as part of the application process. Information about the planning application is in the public domain. This includes the Officer Report considered by the Planning Committee which addresses the pertinent issues raised by residents and made an informed decision that the proposals were acceptable in planning terms. The Council argues that there has been considerable scrutiny of the planning application and its resolution to approve planning permission has been based on "*a robust assessment of the Local Development Plan policies and all material considerations*".

Is the exception engaged?

44. The Commissioner's guidance states that as the FOIA fees regulations do not apply under the EIR, there is no specific provision for the aggregation of substantially similar requests for environmental information. Her position, however, is that there may be occasions where it is permissible to consider a number of EIR requests together when deciding if they are manifestly unreasonable on the grounds of cost. This is in line with the approach to requests considered manifestly unreasonable on the grounds that they are vexatious, where the context in which they are made can be taken into account.
45. The Commissioner has considered the Council's estimate for compliance with the request. She notes that the Council has identified 13 officers who have had an involvement with the development in question and appropriate searches which need to be undertaken of the records held by each of these officers. The Council's estimate for the time it would take for each officer to conduct searches ranges from 28 hours for the

case officer, to 3 hours for the section manager within Strategic Planning. These estimates include the time it would take to search for relevant information in their personal drives and within outlook folders, and to consider the information identified to see whether it is suitable for disclosure.

46. The Commissioner considers the cost estimate provided to her by the Council to be cogent and notes that a sampling exercise has been undertaken in order to compile the estimate. The Commissioner also notes that even if the estimated time taken to consider the information potentially falling within the scope of the request was reduced by two thirds, the time required would still be significantly greater than the 18-hour upper limit for FOIA requests, set out in the Fees Regulations. Compliance with the request would have a significant and disruptive impact on the Council's service provision within the departments in which the officers work, requiring a significant allocation of staff time, and the diversion of resources away from their core duties.
47. The Commissioner has considered the complainant's arguments that the data should be easily available for the Council to locate, and could be disclosed with very little redaction. However, until the necessary searches have been undertaken to identify information falling within the scope of the request, it is not possible to conclude with any certainty whether the information will be suitable for disclosure or subject to an exception under the EIR. The Commissioner appreciates that the request which is the subject of this notice has been refined from the complainant's original request, primarily by excluding hard copy information. However, she notes the Council's point that the resource intensive tasks in complying with the request relate to identifying and reviewing electronic information, particularly in light of the amount of information held and the lengthy and complex planning issues associated with the site, which have been ongoing for a protracted period of time. She also notes that the refined request also includes exchanges between the Council and Burrow Hutchinson.
48. Turning to the value and purpose of the request, the Commissioner acknowledges that it relates a major development including a significant number of new houses, a care home and a school. The Commissioner notes that the development has been one that has prompted a significant number of objections from local residents. The Commissioner does not doubt that the matter is important both to the complainant, and the local community. The complainant has also alleged that there has been a lack of transparency and accountability of the Council's actions relating to the site and a lack of consultation with the public. The information held relevant to this request may provide the complainant with further insight into the decision making process regarding the site and the planning application. The Commissioner is mindful, however,

that there is a significant amount of information already publicly available about the site both via the LDP process and the information on the public planning portal. The Commissioner also notes the Council's representations concerning the findings within the report on the examination of its LDP.

49. Having considered the volume of information in scope and the resultant time estimate, the Commissioner finds that significant resources would have to be diverted from core services for the Council to comply with the request. Assuming an average working day of seven hours, 30 minutes, 132.5 hours of work would take one person in excess of 17 working days to complete. This is an expense which the Council could not be expected to absorb without it affecting service provision in some way and it would therefore be manifestly unreasonable. Her decision is therefore that it would be manifestly unreasonable, on the grounds of cost and the burden that would be placed on its staff resources, for the Council to comply with the request.

Public interest Test

50. Regulation 12(4)(b) of the EIR is subject to a public interest test, as required by regulation 12(1)(b), and so the Commissioner must decide whether the public interest in maintaining the exception is stronger than that in complying with the request.

The public interest in the information being disclosed

51. The complainant pointed out that the development is of huge concern to local residents. She considers that there has been a lack of transparency and accountability on the actions of the Councils relating to the development along with a lack of effective consultation and participation with the local community. The complainant confirmed that a number of complaints had been made by Penllergaer Community Council about the Council's actions relating to the site, including allegations that it had withheld information from the inspectors appointed by the Welsh Government and its failure to address the requirements of the Well Being of Future Generations Act in its promotion of the site. These failings are evidenced by the large number of objections to the planning application. The complainant firmly believes that it is in the public interest for the requested information to be disclosed.
52. The Council accepts there is a public interest and need for transparency and accountability in relation developments of this size. It also acknowledges that disclosure would allow individuals to better understand decisions that affect them.

The public interest in the exception being maintained

53. The Council referred the Commissioner to the information it had already placed in the public domain about the site in question both through the LDP process and the planning process.
54. The Council also referred to the considerable burden that would be imposed through complying with the request which would result in the diversion of resources away from its core business, and would have a proportionally detrimental impact on its provision of services to the public. The Council does not consider this would be in the public interest.

Balance of the public interest

55. The Commissioner recognises the importance of accountability and transparency with regard to decision-making by public authorities and the necessity of a public authority bearing some costs when complying with requests for information. However, in considering the public interest test for this case, the Commissioner must assess whether the cost of compliance to, and impact on, the Council is proportionate to the value of the request.
56. The Commissioner appreciates that there has been considerable local interest in and opposition to the Parc Mawr Farm development. It is therefore reasonable to conclude that there will be some public discussion about the development and that the disclosure of relevant information may therefore increase public understanding of the Council's decision making process.
57. The Commissioner considers that the public interest identified has been served, to some degree, through the information that is publicly available on the Council's website about the site, both on the LDP webpages and on the public planning portal. Whilst the general public interest in openness and transparency would be served if disclosure of the requested information could have been achieved readily and at proportionate cost, the Council has demonstrated that complying with the request would be costly and time consuming and would divert available resources away from core services.
58. Whilst the Commissioner accepts that the request has a purpose and value, she nevertheless considers the burden that would be imposed by compliance with the request to be manifestly excessive to the extent that it would impact on other services. It is, therefore, the Commissioner's decision that the public interest lies in maintaining the exception.

Presumption in favour of disclosure

59. Regulation 12(2) of the EIR requires a public authority to apply a presumption in favour of disclosure when relying on any of the regulation 12 exceptions. As stated in the Upper Tribunal decision *Vesco v Information Commissioner* (SGIA/44/2019):

"If application of the first two stages has not resulted in disclosure, a public authority should go on to consider the presumption in favour of disclosure..." and *"the presumption serves two purposes: (1) to provide the default position in the event that the interests are equally balanced and (2) to inform any decision that may be taken under the regulations"* (paragraph 19).

60. As covered above, in this case the Commissioner's view is that the balance of the public interest favours the maintenance of the exception, rather than being equally balanced. This means that the Commissioner's decision, whilst informed by the presumption provided for in regulation 12(2), is that the exception provided by regulation 12(4)(b) applies.

Right of appeal

61. 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: grc@justice.gov.uk
Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

62. 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.
63. 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

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