

APPENDIX 1

EVIDENCE: SCHEDULE OF NON-DISCLOSURES

The following table contrasts the Council's public narrative against the internal reality discovered via FOI/EIR disclosures.

Period / Date	Council's Public Position / Representation	Internal Evidence / The Reality (FOI Disclosure)	Statutory / Constitutional Breach
Sept 2019	Site promoted & owned by sitting Councillor Louise Jones-Roberts (LJ-R) as a viable option for the Local Plan.	PRE/19/00262: Technical finding that the site is an "unsustainable location" and development is "unlikely to be supported" (see Appendix 2).	NPPF Para 35: Failure of the "Justified" test (Material Non-disclosure of negative evidence).
Oct 2019	Site shielded as a "private home" under Section 32 secrecy.	Internal Email (10 Oct 2019): Environmental Protection Manager designates site for "current commercial use" (see Appendix 3)	Aarhus Convention: Violation of "informed participation" by misrepresenting site status.

July 2020 - Aug 2023	Council maintains "no knowledge" of Councillor development interests.	Agent Email (15 July 2020): Planners formally notified of Cllrs Jones-Roberts' ownership and development intent.	Constitution Appendix E, Clause 6.1: Failure of officers to maintain the integrity of the Register of Interests.
May 2021	Cllr LJ-R participates in Policy Committee without full commercial declaration.	Companies House (26 May 2021): Termination of LJ-R's directorship of CCH Milton Manor Park Ltd. filed 24 hours prior to meeting, backdated by 9 months (see Appendix 4)	Nolan Principle of Integrity: Tactical filing to mask active commercial interest during site selection – see Appendix 4
Jan 2023	Cllr LJ-R votes to "Assent" to site; claims to press to have received Monitoring Officer (MO) advice.	FOI 22260: Council confirms it holds no record, minutes, or emails of the advice LJR claims to have received.	Constitution Appendix E, Clause 14.2: Failure to maintain a mandatory audit trail for planning advice.

Feb 2023	MO grants S.32 secrecy extension citing a "fresh consideration" of safety risks.	FOI 21914: Council confirms " no documented file was retained " for this investigation. Granted same-day as press inquiries.	Procedural Perversity: Tactical use of secrecy to gag press inquiry (Case 21037-EIR/FOI).
9 Sept 2024 (Local Government & Social Care Ombudsman [LGSCO] Complaint)	The Council's formal response to the LGSCO (Case 090824) and the public maintained a narrative of " regularity " and " no wrongdoing. "	The Council issued these assurances to the Ombudsman while the 2019 technical bundle (PRE/19/00262) was withheld from the case file, violating the duty of candour by omitting the technical finding that the site was 'unsustainable'.	Maladministration: Misleading a statutory auditor (LGSCO) by providing a sanitised evidence base that omitted material technical rejections.
May 2026 (Consultation Finale)	Council maintains that the Regulation 19 process is "open and transparent," providing a fair opportunity for	Active Refusal to Publish: The refusal to publish the withheld PRE/19/00262 bundle on the Planning	Aarhus Convention Article 6 & NPPF Para 35: Failure to provide a transparent and proportionate evidence base. (See Note 1 below).

	informed public comment.	Portal violates the statutory requirement for a transparent evidence base. Consequently, this technical evidence remains hidden from the wider public	
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Note 1: Rebuttal of the Council’s Refusal to Publish (May 2026) – see Appendix 7

On 13 May 2026, the Council formally refused to publish the PRE/19/00262 bundle on the public Planning Portal after an email request from Alderman Nick Eden-Green, stating:

"It is not our practice to publish pre-application documents on the website as they do not form part of a planning application."

This is a false equivalence and a fundamental misunderstanding of Planning Law. While confidential pre-application advice is "standard practice" for private planning applications, it is **wholly inappropriate** when that same site is being promoted for a **Local Plan Allocation**. Under **NPPF Paragraph 35**, the "Tests of Soundness" mandate that Local Plan allocations be **Justified** by a **transparent and proportionate evidence base**.

By withholding a technical finding of "unsustainability" from the general public during the Regulation 18 and 19 consultations, the Council has effectively **sanitised the Sustainability Appraisal (SA)**. Routine administrative practice regarding private applications cannot override the statutory requirement for the Local Plan evidence base to be candid and complete. The ongoing refusal to publish this bundle—even after its contents were forced (after a 100 day delay) into the public domain via FOI - proves an active attempt to restrict informed public participation and shield Site C14 from legitimate scrutiny.

APPENDIX 2 INTERNAL TECHNICAL REJECTION (PRE/19/00262) – see page 8

Case Officer: [REDACTED]
Telephone: Contact Centre 01227 862178
Email: planning@canterbury.gov.uk
Website: www.canterbury.gov.uk/planning
Date: 18 November 2019



Dear [REDACTED],

TOWN AND COUNTRY PLANNING ACT 1990 PRE-APPLICATION ENQUIRY

Our Ref: PRE19/00262
Proposal: Proposed care home.
Location: Milton Manor House, Milton Manor, Ashford Road, Thanington, CT4 7PH

Thank you for your pre application enquiry which I received on 11/09/2019. Your pre-application submission involves two schemes, the first being the erection of a care home providing approximately 40-60 bed spaces and the retention of the existing dwelling house and the second being the erection of 47 housing units to form a 'retirement village' and 40-60 bed space care home. What follows is a preliminary advice based on the amount of information that has been provided within your submission and as such, our response focuses on the broad issues that are relevant to your proposals.

Principle

The Canterbury Local Plan set out strategic approach to the location of development within sustainable locations, such as Urban Areas and identified settlements. Isolated developments in the countryside as proposed should be avoided. The Local Plan is also supportive of social care infrastructure, for which there is a known need. Your application was not accompanied by a Need Assessment, which would clearly demonstrate that the construction of a care home in this countryside location can be justified and outweighed by the need. I raise concerns whether the location of the care home within the proposed site is appropriate, as The Canterbury Housing, Homelessness and Rough Sleeping Strategy 2018-2022 recognises that older people should not be isolated to ensure their wellbeing.

It is unclear from your submission what specific needs (mental health needs, dementia and for autistic spectrum disorder) the proposed accommodation would serve. Officers direct you to the adopted Kent Accommodation Strategy, which sets out the strategy to reduce the reliance on care home setting and highlights that there is an over-provision of residential care homes within the region and an unmet need for more supported accommodation and mixed-tenure models of extra care housing. You may wish to liaise with KCC Social Care Services as their comments will be a material consideration in determining the need for such accommodation. This could also address policy HD8 of the Local Plan relating to the loss of housing accommodation.

Whilst the 'extra care' units are suggested in Option 2, the indicative site layout submitted suggests that these would form dwellinghouses. The size of houses proposed, where the majority are three, four and five-bed properties would fail to meet the identified trend of older people wanting to down size would not take the opportunity to provide older people with safer and easier to maintain homes, as identified in the Housing Strategy. Such houses as indicated would be treated as residential dwelling houses outside of a settlement identified as being suitable for development, which location is contrary to policies SP4 and HD4 of the Local Plan. At the application stage, you will need to demonstrate that the proposed extra care units have a functional relationship with the proposed care home and how the accommodation provided would fall within Use Class C2 and not C3. I also note that you will need to demonstrate that any cafes/restaurants are ancillary to the care home use, otherwise they could undermine the vitality of the City centre and conflict with the policy TCL6 of the Local Plan 2017.

As such, it is considered that without any clear evidence of the need for care home accommodation and demonstration that the availability of sites in more sustainable locations within the urban area has been explored in the first instance, the proposal is unlikely to be supported.

The Council has started its Local Plan Review and you may consider putting the site forward as part of the Council's call for sites. This is planned to take place next year. The corporate aim of the Council is to finalise the review of the Local Plan by the end of 2022.

Design

The locality where the proposed scheme would be situated is of a rural character, separated from residential ribbon development by approximately 300 metres. The proposed development on the site would lead to an extension of the urban area and appear isolated, albeit in the long-term Cockerling Farm housing development will adjoin the site. The 'Housing for older and disabled people' PPG states that inclusive design should not only be specific to the building but should also consider the setting of the building in the wider built environment. For example, this includes the location of the building in the plot; the relationship of adjoining buildings and the transport infrastructure. Additionally, the PPG states that design principles such as integration with the surrounding context, social spaces that link with the community and priority for pedestrians in outdoor spaces are applicable to housing for older people and age-friendly places. With such principles in mind, I question the suitability of the provision of a care home set within the countryside and whether it would result in the isolation of its occupants from the wider community and would urbanise the site.

Notwithstanding the above, the landscaping section of the submitted reports presents a clear methodology which was followed to propose the buildings within the least sensitive area. You acknowledge that the character of the site changed recently with majority of trees along Ashford Road being removed due to Ash Dieback. This will have to be investigated in the Landscape Visual Assessment, which should be submitted with any future application. Given the location of the site in the open countryside, Officers raise the following points in respect of both schemes:

- The density of the Retirement Village appears too high with individual dwellings set too close to each other.
- Retirement Village is not integrated well with the Care Home.
- Questions are raised with respect to the proposed scale and massing applied to both options.
- The internal layouts are unknown at this stage. Particular care should be taken to ensure that there is a sufficient separation distance between each building to avoid overlooking, overshadowing and loss of privacy.

- Private amenity area should be provided for each extra care unit.
- If an application is to be submitted, details of refuse and cycle storage should be provided. To ensure the development includes sufficient cycle storage, one cycle space per 10 beds should be provided.
- The development should meet the highest standards of access and inclusion and concerns are raised that this is not feasible on this site.

Other considerations

Highway safety and parking

Notwithstanding the concerns outlined above, the application should be accompanied by a Travel Plan and Transport Statement to demonstrate how vehicle movements to and from the site to can be accommodated within the local highway network and how the objectives of the Canterbury Transport Strategy, including sustainability of the site, as set out in policy T1 of the Local Plan can be met. Information regarding the potential number of employees on-site was not provided and as such Officers cannot advise on the adequacy of the parking provision proposed, however, I refer you to Local Parking Standards in Appendix 4 to the Local Plan. You may consider liaising further with KCC Highways on highways matters, however, I acknowledge that KCC Highways was satisfied in principle with the access off Ashford Road as proposed.

Ecology and trees

The site is located near the Larkey Valley Wood SSSI and Great Stour, Ashford to Fordwich Local Wildlife Site. As such, your proposal will need to assist in establishing coherent ecological networks and will need to investigate the effects of the proposal on these designated sites. The southern part of the site is designated as Ancient Woodland. You will need to assess any potential impact on Ancient Woodland which may arise from the proposed development including residential pressure and contamination. Deterioration or loss of the Ancient Woodland will only be acceptable in wholly exceptional circumstances.

The site presents habitats and features including buildings, trees, woodland, hedgerows, rough grassland, scrub and shrubs, which indicate an ecological value and the potential for protected species within and/or around the site. This includes (and is not limited to) the potential for bats, reptiles, breeding birds, dormice, badgers, invertebrates and botany. You are therefore advised that any forthcoming development will need to be submitted with an Ecological Impact Assessment detailing all surveys, their outcomes, along with the details of any necessary mitigation.

Any future development on site should seek to provide ecological enhancement measures such that net gains for biodiversity are secured.

Sustainability

The Council would expect you to submit a Sustainability Statement to demonstrate how the proposal would respond to the objectives of sustainable development in line with policy DBE1 of the Local Plan. Non-residential developments should meet a 'very good' BREEAM rating and provide evidence as to why an 'excellent' rating cannot be achieved.

Drainage

The proposed scheme would be classified as major development where the built form ratio will be highly increased, as such a Drainage Strategy needs to accompany the application as per policy CC4 of the Local Plan.

Archaeology

The site has the potential to include buried archaeological deposits and features. In accordance with paragraph 189 of the NPPF and Policy HE11 and HE12 of the Local Plan, an archaeological desk-based assessment of the application site will be required to support any future proposals for the development of this site. Dependent on the results of this assessment, and the nature of development proposals, further pre-determination work including evaluation may be required.

Air quality

Due to the size/location of this development, the impact of the proposal on the air quality needs to be considered as part of the application, along with any mitigation measures that may be required. It is recommended that in the first instance, you read the Council's Air Quality Mitigation Measures Guidance Note. A report detailing any findings along with any proposed mitigation measures and/or Emissions Mitigation Assessment should be prepared by an air quality specialist and submitted to the local authority for approval.

Affordable housing

Should the proposal be for dwellinghouses, the affordable housing at 30% will be required.

Conclusion

Officers acknowledge that the Local Plan supports the social care infrastructure, subject to the need being demonstrated. The Need Study has not been submitted with this submission and **so the proposed development in this unsustainable location is unlikely to be supported.**

The advice contained in this letter is based upon the information that you have provided, and matters that you have drawn to my attention, and is given without prejudice to the Council's normal decision-making process.

Yours sincerely



Planning Services

APPENDIX 3 – COMMERCIAL DESIGNATION EMAIL (10 Oct 2019) – see page 9



CCC Planning <planning@canterbury.gov.uk>

Milton Manor House, Milton Manor, Ashford Road, Thanington, CT4 7PH - POL/19/01796

1 message

@canterbury.gov.uk>

10 October 2019 at 14:45

To: CCC Planning <planning@canterbury.gov.uk>, Anite Mail <AniteMail@canterbury.gov.uk>

PRE19/00262/PREM - Proposed re development

Environmental Health have no objection in principal to this proposal but would require the following to be added as conditions to any permission granted

Construction Environment Management Plan (CEMP)

A Construction Environment Management Plan (CEMP) should be submitted for approval showing how the effects of noise, dust, etc will be controlled and mitigated during demolition and construction phases. Burning waste on site during demolition and construction should not take place. All demolition and construction work should be carried out in accordance with the approved CEMP.

Hours of Work, Deliveries, etc

Noisy work, deliveries, etc should not take place outside the following times without the prior written agreement of the Council or unless in association with an emergency:

07:30 to 18:00 Monday to Friday

08:00 to 13:00 Saturday

No such activity should take place on a Sunday or public holidays

Asbestos

A survey into the presence of asbestos should be carried out by an appropriately qualified contractor and the results submitted for approval. If the survey shows that asbestos is present, a scheme for its safe removal and responsible disposal in accordance with relevant legislation should be submitted to the Council for approval. Any asbestos should be removed in accordance with the approved scheme and a completion report should then be submitted for approval showing that it has been removed and responsibly disposed of.

Contaminated land

Due to the current commercial use of the site we will need a contaminated land risk assessment to be carried out.

If remedial works are needed, a scheme for these will have to be submitted for approval, and the work must be carried out in accordance with the approved scheme. Upon completion of such works, a closure report should be submitted for approval confirming that the works have been carried out and the contaminating materials have properly been disposed of.

Air Quality

Due to the size/location of this development air quality is likely to be an issue which needs to be assessed, along with any mitigation measures that may be required. It is recommended that in the first instance the applicant refers to the Council's [Air Quality Mitigation Measures Guidance Note](#). A report detailing any findings along with any proposed mitigation measures and/or Emissions Mitigation Assessment should be submitted by an air quality specialist to the local authority for approval.

Regards

10/10/2019

EKS Partnership Mail - Milton Manor House, Milton Manor, Ashford Road, Thanington, CT4 7PH - POL/19/01796


Environmental Protection Manager

Please note my working week is Monday, Tuesday, Thursday & Friday

APPENDIX 4 – COMPANIES HOUSE TERMINATION – see note page 3



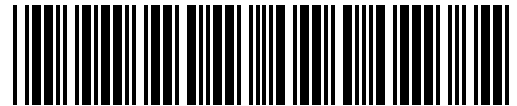
Companies House

TM01_(ef)

Termination of a Director Appointment

Company Name: **CCH MILTON MANOR PARK LIMITED**

Company Number: **11540395**



XA5CDHDC

Received for filing in Electronic Format on the: **26/05/2021**

Termination Details

Date of termination: **01/09/2020**

Name: **MRS LOUISE ANN JONES-ROBERTS**

Authorisation

Authenticated

This form was authorised by one of the following:

Director, Secretary, Person Authorised, Liquidator, Administrator, Administrative Receiver, Receiver, Receiver manager, Charity Commission Receiver and Manager, CIC Manager, Judicial Factor.

Summary of Filing Inconsistency: Termination of Directorship (CCH Milton Manor Park Ltd)

1. **Filing Date vs. Effective Date:** On 26 May 2021, a formal notification was submitted to Companies House terminating the appointment of Louise Jones-Roberts as a director of CCH Milton Manor Park Ltd. Although the document was filed in May 2021, the resignation was back-dated to an effective date of 1 September 2020.
2. **Proximity to Statutory Meetings:** The termination was filed approximately 24 hours before the Policy Committee meeting on 27 May 2021, which was scheduled to receive the report on the "Canterbury District Local Plan to 2040 – options consultation".
3. **Procedural Impact:** At the subsequent meeting on 27 May 2021, Councillor Louise Jones-Roberts declared an Other Significant Interest (OSI) in a site submitted in the "call for sites" and abstained from voting. This was a limited disclosure that did not detail the full commercial nature of the interest.
4. **The Prolonged Informational Silo:** Despite the 27 May 2021 declaration, the Council's record indicates a further period of between 32 and 38 months (depending on the conflicting dates provided by the Council) before the Monitoring Officer was fully apprised of the extent of the commercial development interest in the site. This persistent failure of internal communication violates the statutory oversight requirements of the Monitoring Officer's role.
5. **Informational Gap:** The nine-month delay between the claimed resignation date (September 2020) and the actual filing date (May 2021) resulted in a retrospective record of separation from the commercial development vehicle. This filing occurred precisely as the site selection process was transitioning to more formal committee oversight.
6. **Violation of Transparency Standards:** This retrospective filing meant that for a period of nine months, the public record indicated active directorship in a development company, a fact that was only modified on the eve of a pivotal committee meeting where the site's status as a commercial asset remained non-disclosed to the public.

APPENDIX 5 – MILTON MANOR PARK TIMELINE

	Relevant Event / Action	Outcome	Comment
01/2018	Sitting Councillor Louise Jones -Roberts notified CCC of her intent to buy Milton Manor	Intention to acquire property communicated.	
22/03/2018	LJ-R buys Milton Manor for £1.925m	Property acquisition completed.	
28/08/2018	CCH Milton Manor Park Limited incorporated with Louise J-R as a director and Clive Hammond as majority shareholder. Father also a Director.	Commercial development vehicle established.	This incorporation proves the intent was commercial. Failure to notify the Monitoring Officer (MO) of this change (from home to commercial asset) within 28 days violates Constitution Appendix B Clause 4.2.
08/05/2019	New Member declarations to MO following Elections	5 private addresses declared. Withheld from the public register under s.32. Directorships in several companies included but CCH MMP Ltd. was not declared. 25% shareholder after resignation until it was dissolved 14.09.21	Procedural Omission: The EKAP report does not address the failure to register this interest, which violates the Member Code of Conduct. The site's status as a commercial asset remained non-disclosed.
04/06/2019	Louise J-R declared her ownership of MM to CCC but asked for it to be withheld from the public register of interests.	Request granted by the MO.	Procedural Non-disclosure: Request granted by the MO shortly before technical advice was issued identifying the site's unsuitability.
09/09/2019	Pre-planning advice issued for Submission 214704.	Conclusion: "unsustainable location is unlikely to be supported."	Material Non-disclosure: This material technical finding was withheld from the public and the MO during the plan-making process, allowing the allocation to proceed unchallenged.
15/07/2020	Email from Agents to Planning alerting to Cllr ownership of MM.	Received by Planners; not passed to the MO.	Informational Silo: Officers omitted to forward this disclosure to the MO, which violates the statutory gatekeeping requirements of the MO role. Appendix B requires Councillors to inform the MO.
26/05/2021	LJ-R submits resignation as Director from CCH Milton Manor Park Ltd.	Resignation back-dated to 1 September 2020.	Filing Inconsistency: The resignation was filed 24 hours prior to a Policy Committee meeting but was dated retrospectively by nine months.
27/05/2021	Policy Committee receives Local Plan options report.	Cllr LJ-R declared a financial interest and abstained.	Procedural Inconsistency: While an interest was declared, the site's status as a commercial development asset remained non-disclosed to the public.

	Relevant Event / Action	Outcome	Comment
14/12/2022	Overview & Scrutiny receives draft Local Plan report.	Public consultation period (Reg 18) established.	Informational Deficit: Scrutiny was performed without access to the 2019 "unsustainable location" technical finding.
05/01/2023	Council receives Cabinet minutes resolving to consult on Draft Plan.	Minutes received by general assent.	Absence of Audit Trail: Cllr LJR claimed to have received voting advice prior to this meeting, but the MO holds no record of such advice (FOI 22260).
07/02/2023	MO grants Section 32 anonymity for both Councillors.	Home addresses withheld from the register of interests.	Procedural Inconsistency: This action coincided with press inquiries regarding the site (See Appendix 1 below).
20/09/2023	Outline Planning Application CA/23/01766 received.	Validated and commenced processing.	Validation Context: Validation occurred only after public reporting by <i>Private Eye</i> ended the period of non-disclosure regarding site ownership.
22/02/2024	Full Council meeting regarding Local Plan progress.	MO provided briefing on "dormancy" of CCH Milton Manor Park Ltd.	Informational Inconsistency: The briefing claimed the company "always was" dormant, which is contradicted by Companies House filing history.
22/04/2024	Cabinet meeting to review Bevan Brittan (BB) desktop review.	Cabinet voted against an external independent investigation.	Procedural Omission: The MO omitted planning procedures from the BB brief, resulting in an opinion that did not address technical unsuitability.
27/08/2024	Response to FOI 23338 regarding 2019 technical evidence.	Council initially claimed no written reports or technical advice existed for the site.	Violation of EIR: This response was factually incorrect and was only corrected after significant procedural delays.
15/04/2025	Full disclosure of PRE/19/00262 bundle following 100-day delay.	2019 technical rejection made available to the requester.	Breach of Transparency: The 100-working-day delay in providing environmental information violates the statutory timelines of the EIR 2004.
01/05/2026	Formal request by Hon. Ald. Eden-Green to publish 2019 bundle on Portal.	Request to include technical rejection in the public record.	Duty to Inform: Request made to ensure the Regulation 19 consultation was based on a complete evidence base.
13/05/2026	Council's Formal Refusal to Publish PRE/19/00262 bundle.	Technical unsuitability evidence remains excluded from the Portal.	Procedural Violation: This refusal violates the requirement for a "transparent and proportionate" evidence base under NPPF Para 35 and Article 6 of the Aarhus Convention.

Appendix 1: Detailed Assessment of the 7 February “Same-Day” Procedural Decision

The “Statutory Gatekeeper” Violation: The fact that the assessment, decision, and grant of Section 32 anonymity all occurred on the same day (7 February 2023) suggests a procedural irregularity. A standard investigation into a threat to a Member's safety normally requires external evidence (e.g., police reports), yet the Council admits that "no documented file was retained" for this decision (FOI 21914). By acting with such haste without an audit trail, the MO acted as a facilitator of procedural non-disclosure rather than investigating the potential conflict.

The “Retrospective Procedural Shield”: This “same-day” action occurred just one month after the pivotal 5 January 2023 Full Council meeting, where the J-Rs voted to include Milton Manor in the draft Local Plan. By granting secrecy on 7 February, the MO provided a retrospective “shield” for a vote that had already taken place without a public declaration of the site’s commercial nature.

Intersection with Press Inquiries: The local press (Kent Messenger) was seeking information on Milton Manor around this time, leading to the FOI 21037-EIR response on 1 March 2023. Given that the FOI request asked for information up to 31 January 2023, it is highly probable that the receipt of the press FOI triggered the “same-day” assessment on 7 February to ensure the Council could **violate** the principle of transparency by "neither confirming nor denying" ownership in its upcoming response.

Contradiction with Councillor Claims: While the MO was regularising secrecy on 7 February, Councillor LJR later claimed publicly that she had received voting advice prior to the January 5 meeting. However, the MO’s response (FOI 22260) denies any record of such advice exists, further isolating the 7 February “same-day” action as a procedural attempt to control the narrative.

The same-day regularisation on 07/02/2023 is thus the anchor for the argument of **Procedural Inconsistency**, as it shows the MO acting to restrict information the moment the press began to ask questions.

APPENDIX 6: ANALYSIS OF PROCEDURAL NON-DISCLOSURE IN FOI / EIR RESPONSES

The following analysis demonstrates how FOI/EIR requests were systematically used to withhold details regarding the Milton Manor site. This obstruction is characterised by a '**Dual-Track Reality**': the Council internally designated the site as 'Commercial' in 2019 for environmental charging, yet externally utilised Section 32 'Private Home' secrecy to block transparency until 2025. Most significantly, this conduct directly contradicts the Council's public assertions to the national press that it takes transparency 'incredibly seriously,' revealing a pattern of bad faith and institutional dishonesty.

Date of Response	FOI Number	Page Number of EIR/FOI if full evidence is required	Statutory Basis for Non-disclosure	Reason for Incorrect Use / Key Context
1 March 2023	21037-EIR	1-3	r12(3) & r13(5A)(a) (NCND)	Inappropriate Application of Personal Data Exemption: The Council refused to confirm to newspaper Kent Messenger the date the site was put forward for the Local Plan. As the site was promoted by a commercial vehicle (CCH Milton Manor Park Ltd.), its status was a matter of public planning interest.
18 Sept 2023	21641-FOI	8	No Info Held	Factually Incomplete Determination: The Council stated no action was taken because the councillors declared their interest. This was incomplete as they failed to update the 'nature' of the interest from a home to a commercial asset.
19 Sept 2023	21643-EIR	19, 45	r12(3) & r13	Failure to Recognise Change of Circumstances: Relied on original Section 32 safety rulings to hide land ownership details. By July 2020, agents had already notified planners of the councillors' ownership 'to ensure disclosure'.
19 Dec 2023	21914-FOI	42,43	r12(4)(a) (Information Not Held)	The "Phantom Investigation": This request sought evidence of the safety audit or investigation that supposedly justified the 7 February 2023 Section 32 grant. The Council responded that no information was held, a fact later confirmed by the by

				an internal review, which admitted that "no documented file was retained" for the evidence considered. This proves the secrecy grant was a procedural phantom, issued without a verifiable evidence base to circumnavigate press inquiries.
7 Feb 2024	22013-FOI	106–107	r12(4)(a) & r12(4)(e)	Absence of Mandatory Audit Trail: Claimed no records existed for meetings between planners and councillors despite public claims to the contrary by LJR.
5 April 2024	22260-FOI	114–115	r12(3), 13, 12(4)(e) & 12(5)(d)	The 'Audit Gap': This response confirms the Council holds no record of the voting advice Cllr LJR publicly claims she received for the 5 January 2023 meeting. Utilising exemptions to hide a non-existent audit trail is a breach of Appendix E of the Constitution.
23 July 2024	22641 Part 1	1-2	r12(3) & r13	Redaction of Accountability: Redacted officer names and claimed no documentation of actions taken after receiving the Icen disclosure in 2020. Admitted a 'missed opportunity' to inform the Monitoring Officer at that time.
4 April 2025	23338 Part 2	1	Denial of records	Logical Fallacy and Constitutional Obfuscation: The Council's response is internally inconsistent. They claim officers alone selected the site and the Leader 'took no part,' yet they justify the absence of a mandatory notification letter by stating 'no such notification was submitted by the former Leader'. This is a fundamental misinterpretation of Appendix E, Clause 6.2a, which places the duty on the individual

				councillor with the interest (LJR), not the Leader. By focusing on the Leader's failure, the Council uses a 'not held' response to shield the actual interested party from an admitted, incurable breach of the Planning Code.
23 April 2025	23338 Part 4	1	s39 FOIA / Not held	Refusal to Assist: Refused to provide notification documents under FOIA, asserting EIR precedence. Reiterated that no notification was submitted by the former Leader.
27 June 2025	23338 Part 7	1–2	Initial 'not held' then released	The 100-Day Procedural Delay: This 'discovery' followed years of the Council explicitly denying the existence of the 2019 'unsustainable' finding to multiple requestors. This was not a 'genuine error' but a systemic effort to shield the evidence base from the public during the formative stages of the Local Plan.

GENERAL GROUNDS FOR PROCEDURAL NON-COMPLIANCE

Ground 1: Withholding of Material Technical Evidence The Council failed to disclose the internal technical rejection of the Milton Manor site (**PRE/19/00262**) for over five years. By excluding the finding that the location is “unsustainable” from the Regulation 18 and 19 consultations, the Council **violated** the requirement under **NPPF Paragraph 35** for a “proportionate and transparent evidence base.” This material non-disclosure effectively sanitised the Sustainability Appraisal (SA), rendering the site allocation unjustified.

Ground 2: Inconsistency in Property Designation and Statutory Secrecy A “Dual-Track Reality” was maintained where the Council internally designated the site for **commercial use** in October 2019 (for environmental charging purposes) while externally maintaining a **Section 32 secrecy shield** portraying it as a “private home.” This inconsistency prevented the public from understanding the site’s true status as a commercial development asset, **violating** the transparency standards required for Local Plan evidence.

Ground 3: Inappropriate Application of Statutory Exemptions The Council repeatedly applied personal data and “Neither Confirm Nor Deny” (NCND) exemptions to block press and public inquiries regarding the date the site was promoted for the Local Plan. This constitutes an **inappropriate application of statutory exemptions**, as the site was being promoted by a commercial vehicle (**CCH Milton Manor Park Ltd**), creating a high degree of public interest that overrode the private interests of the Councillors involved.

Ground 4: Procedural Delays and the Creation of Informational Silos The 100-working-day delay in responding to **FOI 23338** and the 38-month failure of Planning Officers to notify the Monitoring Officer of documented commercial interests **violated** the statutory timelines of the **EIR 2004** and internal data management standards. These delays created a significant **informational deficit**, ensuring that critical technical data was only made public after the formative stages of the Local Plan had concluded.

Ground 5: Inconsistency in Public Representations regarding Statutory Transparency The Council's public assertion (4 March 2026) that it takes FOI/EIR obligations "incredibly seriously" is factually contradicted by the documented record of technical denials and procedural delays. This divergence between public claims and administrative performance constitutes **Material Maladministration**. By failing to provide environmental information in a timely manner, the Council **violated Article 6 of the Aarhus Convention**, which mandates that the public must have access to all relevant information for participation to be "effective."

Ground 6: Undocumented Statutory Determination and the Failure of Audit Trails The Council maintains that the grant of Section 32 anonymity on 7 February 2023 followed a "fresh consideration" of safety risks. However, the Council has formally admitted in **FOI 21914** that it holds no records, minutes, or evidence files associated with this determination. The issuance of a statutory non-disclosure shield in the absence of a documented evidence base **violates** the mandatory audit trail requirements of **Appendix E** of the Constitution and constitutes a material failure of the Monitoring Officer's gatekeeping function.

APPENDIX 7 - Request for Portal Publication (1 May 2026) & Refusal (May 13th)

Procedural Note for the Inspector:

This appendix documents the final administrative attempt in May 2026 to have the 2019 technical rejection bundle (PRE/19/00262 falling out of FOI 23338) published on the active Local Plan portal.

A critical chronological inconsistency is documented herein. On 1 May 2026, a precise technical planning demand was submitted to the Head of Planning. The "Planning Team" issued a perfunctory refusal. Subsequently, a formal corporate escalation was submitted on 5 May 2026.

The Monitoring Officer's final response on 13 May 2026 explicitly targets a 5 May corporate complaint submission rather than the 1 May technical request. By processing this matter exclusively under a generic standards heading, the Council has systematically conflated a spatial planning evidence-base requirement (NPPF Paragraph 35) with an internal corporate dispute framework to avoid correcting a known informational deficit.

Item 1: The Technical Demand to the Local Plan Team

URGENT DEMAND FOR PUBLICATION OF PRE/19/00262 BUNDLE

Nick Eden-Green <nick.edengreen@gmail.com> 1 May 2026 at 13:16 To: "Simon.J. Thomas" <Simon.thomas@canterbury.gov.uk>

Cc: Jan Guyler <jan.guyler@canterbury.gov.uk> Bcc: Tim Carrington <timjcarrington@gmail.com>

Dear Mr Thomas

Following the advancement of Site C14 to the Regulation 19 stage on 18 March 2026, I formally demand the immediate public disclosure of the full PRE/19/00262 bundle, specifically the technical finding from September 2019 that the location is "unsustainable".

The Council can no longer rely on EIR Regulation 12(5)(f) to withhold this information. A formal planning application for the site (CA/23/01766) has been on the public register since September 2023. As per established planning practice, the public interest in maintaining confidentiality for pre-application advice ceases once a formal application is made, as the public requires the full evidentiary history to make meaningful representations on the site's suitability.

Furthermore, internal Council records from 10 October 2019 (FOI 23338) confirm that the Council's own Environmental Protection Manager had already identified the "current commercial use of the site". Withholding a technical finding of "unsustainability" while simultaneously inviting the applicant to use the "Call for Sites" process (letter dated 18 Nov 2019) represents a fundamental failure of the Local Plan's evidence base. I require these documents to be published on the planning portal by Tuesday 4 May 2026.

I look forward to your acknowledgement. Nick Eden-Green
01920 421186

Item 2: The Perfunctory Refusal from the "Planning Team"

On Wed, 13 May 2026 at 09:55, Planning <planning@canterbury.gov.uk> wrote:
Dear Mr Eden-Green

Thank you for your email of 1st May 2026 addressed to Mr Thomas.

You have asked whether the 2019 documents relating to the pre-application advice for the land at Milton Manor will be published on the Council's website.

It is not our practice to publish pre-application documents on the website as they do not form part of a planning application. However, I understand that you have now been provided with these documents as you requested.

Kind regards
Planning Team

Planning Services



Find us online at canterbury.gov.uk

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Observation on the Council's Response: The response provided by the "Planning Team" is procedurally inadequate. It completely ignores the valid legal and technical arguments regarding the cessation of confidentiality and the requirement for a "proportionate evidence base" under NPPF Paragraph 35. By refusing to publish the PRE/19/00262 bundle on the Planning Portal, the Council has made an active choice to restrict informed public participation and maintain an informational deficit. This failure to engage with a formal request from an Honorary Alderman further demonstrates the procedural non-compliance that characterises the allocation of Site C14.

Item 3: The Monitoring Officer's Downstream Evasion

Factual Discrepancy Note: *The Monitoring Officer explicitly opens by stating, "Thank you for your email dated 5th May 2026." This confirms she is reviewing the corporate complaint track to declare the matter closed, leaving the substantive planning arguments raised on 1 May email (above) entirely unaddressed by the authority's leadership.*

Jan Guyler

2026 at 13:07 To: "

13 May

Dear Mr Eden-Green,

Thank you for your email dated 5th May 2026.

The issues you are raising have already been extensively considered through the Freedom of Information act and the Environmental Information Regulations (EIR) process within the council, including internal reviews.

- 22260 - FOI submitted 01/03/2024
- 22413 - Review submitted 15/04/2024

- 22641 - EIR submitted 09/07/2025
- 23338 - EIR submitted 13/02/2025
- 24795 - EIR submitted 1/05/2026

I am also aware that you have progressed EIR as a complaint to the Information Commissioner's Office (ICO), which is the appropriate independent body to assess your concerns regarding information handling.

You have also raised previous formal complaints, the most recent of which I responded to as a Stage 2 response in January of 2025. I have attached a copy of our previous Stage 2 complaint response for your reference.

Please note that the Local Plan evidence library is available publicly here: [Local Plan Evidence Library | Have Your Say](#).

I would like to advise you that the Local Plan is currently subject to the Regulation 19 consultation process until the 18th May. This provides the appropriate route for you to formally submit any representations regarding site allocations or planning matters. Please use the following link to provide your representations about the Local Plan: [Draft Canterbury District Local Plan: Regulation 19 consultation | Have Your Say](#)

If the ICO or LGSCO requires any further information from us, we will of course cooperate fully with their investigation. In the meantime, we will limit further responses to genuinely new matters that have not previously been considered.

Yours
sincerely,
Jan
Guyler

Head of Legal Services & Monitoring
Officer Canterbury City Council

Item 4: Consolidated Technical Analytical Note on Appendix 7

This complete correspondence chain demonstrates that the Council's ongoing refusal to publish the **PRE/19/00262 bundle** (from FOI 23338) on the active Local Plan portal is a deliberate, contemporary administrative policy rather than a historical oversight. Four critical procedural failures are documented across these entries:

1. **Failure of Professional Engagement:** The initial response provided by the generic "Planning Team" is perfunctory and procedurally inadequate. It completely ignores the valid planning and legal arguments presented regarding the cessation of pre-application confidentiality once a live application (CA/23/01766) enters the public domain.
2. **Chronological and Track Conflation:** The Monitoring Officer's 13 May response addresses the 5 May complaint framework rather than the 1 May planning portal demand. By diverting a material planning challenge into an internal standards track, the Council has failed to provide a rational, policy-led justification for why key environmental data remains excluded from public view.

3. **Reliance on an Incomplete Record:** The Council cites historical external legal advice and audit reviews to assert that the matter is concluded. However, those prior reviews were conducted *before* the April 2025 disclosure of **FOI 23338**, which exposed the 2019 expert technical finding of "unsustainability." The Council is therefore relying on past clearances that were themselves generated from an incomplete record.
4. **The Structural Soundness Consequence:** The formal statement that the Council has "*nothing further to add*" confirms a definitive closure of local administrative remedies. It proves that the Council intends to present the Local Plan for examination while knowingly excluding a vital technical rejection from its public portal, directly **violating the Aarhus Convention** mandate for effective and informed public participation.

The response (below this note) was:

Observation on the Council's Response: The response provided by the "Planning Team" is perfunctory and procedurally inadequate. It completely ignores the valid legal and technical arguments

regarding the cessation of confidentiality and the requirement for a "proportionate evidence base" under NPPF Paragraph 35. By refusing to publish the PRE/19/00262 bundle on the Planning Portal, the Council has made an active choice to restrict informed public participation and maintain an informational deficit. This failure to engage with a formal request from an Honorary Alderman further demonstrates the procedural non-compliance that characterises the allocation of Site C14.

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Kind regards
Planning Team

Planning Services|



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APPENDIX 8: EVALUATION OF SUSTAINABILITY AND STRUCTURAL CONNECTIVITY DEFICITS (SITE C14)

1.

Primary Sustainability Objections

(Sourced partially from the formal representations of Honorary Alderman Nick Eden-Green regarding Outline Planning Application CA/23/01766)

- **Car Dependency:** The site layout is completely car-dependent and fails to comply with Department for Transport guidelines governing acceptable walking and cycling thresholds to essential localised services.
- **Deficit of Social Infrastructure:** The application boundaries contain zero localised social infrastructure, community facilities, or retail provisions.
- **Pedestrian Safety Hazards:** There are no pedestrian footways constructed on the south side of Ashford Road or along Milton Manor Road. Consequently, pedestrian access is physically hazardous and highly unlikely to be utilised by residents.
- **Speed and Topography Constraints:** Ashford Road features a 40mph speed limit and a pronounced geometric bend, which severely escalates risks for active travel modes. Furthermore, accessing the nearest dedicated cycle infrastructure (the Great Stour Way) requires negotiating a steep gradient and crossing the active flow of the A28.
- **Public Transport Deficiencies:** The localised bus network is poor, lacking any accessible bus stops on the south side of the A28 or continuous lit footways leading to transit points. Additionally, there are no bus services operational on Sundays.
- **Isolation from the Strategic Development Area (SDA):** The allocation is entirely disconnected from adjacent growth sites within Thanington. This lack of integration underscores a total absence of comprehensive masterplanning, forcing complete reliance on private vehicular transport to access education, healthcare, employment, and leisure.
- **Cumulative Spatial Pressures:** Existing planning permissions and current allocation proposals will collectively triple the total number of residential dwellings situated within Thanington Parish.
- **Flawed Traffic Modelling:** The traffic survey data fails to account for the cumulative impact of established consents that have not yet been built out, alongside significant new localised allocations such as Merton Park.

- **Canterbury Congestion Axis:** The primary vehicular desire line flows directly into Canterbury city centre, which acts as the sole provider of proximal infrastructure.
- **A28 Capacity and Environmental Breach:** The A28 corridor is currently operating well beyond its designed capacity, experiencing chronic delays. It stands as the most polluted roadway within the district, flanked by high-density residential properties whose frontages sit immediately adjacent to the carriageway without protective setbacks.
- **Inadequate Structural Mitigation:** There are no viable infrastructure plans to resolve these bottlenecks. The proposed highway modifications—specifically the Wincheap gyratory system—introduce sharp 90-degree turns into Cow Lane and Simmonds Road, which are projected to exacerbate structural delays rather than mitigate them.
- **A2 Trunk Road Impacts:** The proposed fourth slip road configuration at the A2/A28 intersection will directly compound congestion at the junction.
- **Environmental Demolition Omission:** The masterplan requires the demolition of perfectly functional, serviceable residential buildings, which represents an environmentally unsound approach to site preparation.

2.

Isolation and Lack of Inter-Site Connectivity

There is no stated policy intention or developer obligation to deliver a vehicular connection between Site C14 (Milton Manor) and the adjacent 400-dwelling strategic development at Cockering Farm.

- **Policy Contradictions:** Draft Local Plan Policy C8 (now designated C14) explicitly mandates the provision of "new and improved walking and cycle connections to the adjacent Cockering Farm development," but completely omits any requirement for a vehicular connection.
- **Access Directives:** The developer's formal Transport Statement confirms that all primary vehicular access will be strictly confined to a single upgraded point of ingress and egress on Milton Manor Road.
- **Resulting Isolation:** Future occupiers will be structurally blocked from utilising the internal estate roads or accessing the community facilities of the Cockering Farm scheme by car. To reach the adjacent site by vehicle, residents must first exit onto Milton Manor Road and navigate back onto the over-capacity A28. This insulates Site C14 as an isolated "vehicular island" cut off from the wider strategic expansion area.

3.

Technical Performance Review of Proposed Mitigations

The developer and the authority have proposed minor interventions to satisfy sustainability policies, which have been heavily criticised by the Council's own internal specialists.

Points Raised in Evidence	Proposed Mitigation (Policy C8/C14)	Expert Technical Critique (Ruth Goudie, CCC Transportation Team Leader)
Wholly car dependent	Provision of secure, covered cycle parking spaces and the enforcement of a residential "Travel Plan".	"Disappointing" : The submitted masterplan fails to promote the specific requirements of the policy to provide credible alternatives to the private motor car.
Dangerous walking/cycling access	Formation of a new pedestrian and cycle access point linking to Ashford Road and the Great Stour Way.	"Unlikely to walk/cycle" : Residents are highly unlikely to utilise these active travel routes given that the baseline offer forces navigation along the dangerous, unlit A28 corridor.
Bus stops too far away	Policy requirement to secure and construct new bus stops directly on the A28 Ashford Road.	"Inconvenient" : Existing bus stops are situated at distances that discourage use; proposed new stops require continuous lit footways and safe crossing infrastructure which are completely absent from the design layout.
Lack of Masterplanning	Requirement to deliver a "comprehensive masterplan" for the Strategic Development Area.	"No Links" : There are currently no functional walking or cycling links to the Cockering Farm site provided within the actual layout of the development.

4.

Technical Analysis of Procedural and Planning Omissions

Internal technical consultation records from the Council's own highway experts reveal critical structural failures in the evidence base supporting this allocation:

- **Failure of the "Vision and Validate" Framework:** The overarching Transport Strategy relies on the "Vision and Validate" methodology to claim future success. However, because the developer has omitted the core infrastructure required to deliver safe active travel corridors to the Great Stour Way and Cockering Farm, the necessary baseline "Vision" is entirely missing. This rendering makes the strategy un-validatable and the allocation fundamentally **Unsound**.
- **Omission of Traffic and Environmental Modelling Data:** The Transport Statement submitted by the developer explicitly admits that it applied "**no allowance**" for mode switching or green travel plan variations within its technical modelling. This omission invalidates their traffic impact projections, rendering their conclusions overly optimistic and mathematically unreliable for an urban corridor already verified as over-capacity and heavily polluted.
- **National Planning Policy Conflicts:** The requirement to demolish serviceable residential buildings to establish a car-dependent enclave stands in direct contradiction to the environmental objectives set out in **NPPF Paragraph 8**, which legally mandates the planning system to protect and enhance the built, natural, and historic environment.
- **Omission of Cumulative Traffic Impact:** The baseline traffic assessments fail to account for the combined spatial impact of existing unbuilt consents and proximal strategic allocations such as Merton Park. This structural modelling omission violates the statutory requirement for a "proportionate and transparent evidence base" as dictated by **NPPF Paragraph 35**.

5.

Conclusion

The ongoing inclusion of Site C14 within the Regulation 19 Consultation represents a clear **informational deficit** where documented policy requirements have been systematically ignored by the site promoters.

Given that the Council's own Transportation Team Leader has formally determined that the masterplan is deficient and structurally incapable of promoting sustainable integration or safe active travel, the site cannot satisfy the statutory tests of soundness. The Inspector is respectfully requested to find the allocation **Not Justified** and excise Site C14 from the final Plan.

APPENDIX 9 – PRIVATE EYE CUTTINGS (2023 – 2026)

CANTERBURY TALE

VALUABLE land zoned for housing in Canterbury city council's local plan, drawn up in secrecy last year by the council's Tory leader at the time, Ben Fitter-Harding, is owned by Louise Jones-Roberts, nightclub owner, personal friend of Cllr Fitter-Harding and, until May, a fellow Conservative councillor.

With canny foresight, Cllr Jones-Roberts paid £1.95m for a six-bed Georgian-style house and 14 acres of land at Milton Manor Park in 2018. It is now the subject of a planning application for 100 new homes.

As a director of developer CCH Milton Manor Park Ltd, Jones-Roberts stands to net a cool £20m from the completed scheme. Fitter-Harding agreed to put the site into the plan without anyone else knowing about the ownership. Cllr Jones-Roberts and her councillor husband Matthew declared no pecuniary interest when they voted the plan through at a subsequent full meeting of the council.

Cllrs Jones-Roberts both stepped down at the May elections. Job done!

■ ROTTEN BOROUGH ■

MARSHALL PLAN

CANTERBURY city council's "corporate services director and head of paid service" Tricia Marshall emailed councillors following *Eye* 1604's revelation that former Tory councillor Louise Jones-Roberts stands to make around £20m should a development of 100 homes go ahead on land she owns.

The site was earmarked for housing in the council's local plan, drawn up by Jones-Roberts's chum, former council leader Ben Fitter-Harding, without other councillors being aware of the connection. Neither Jones-Roberts nor her husband, fellow ex-councillor Matthew, declared an interest when voting in favour of the plan.

Marshall declared: "The *Private Eye* article contains factual errors" – although in time-honoured manner, she did not identify any. "The comms advice is not to respond to it as that would generate more publicity." That would never do, would it?

She went on: "The property was declared as an interest by the cllrs Jones-Roberts [but] the address was withheld from the register of interests under section 32 of the Localism Act 2011 (disclosure of details of the interest could lead to the member... being subject to violence or intimidation)."

Curiously, Marshall did *not* quote the very relevant paragraph in the council's constitution which states: "Where you have a Disclosable Pecuniary Interest, it is a criminal offence if, without reasonable excuse, you fail to disclose the interest at meetings where the interest is not entered in the authority's register". Just fancy that!

OFF PLAN

IN AUGUST *Eye* 1604 revealed that former Canterbury city councillor Louise Jones-Roberts had bought a £1.925m house and land in March 2018 and then formed a development company the following August to build 100 houses on it – potentially netting her millions of pounds. No

pecuniary interest was declared on this site and it was put into Canterbury's draft local plan, overseen in secrecy by fellow Tory and council leader Ben Fitter-Harding. In this year's May elections he lost his seat and she stood down from the council.

Since then local residents have had to rely on social media and rumour for any news, with the council apparently hoping the story will just go away. Former councillor Fitter-Harding has wiped most of his historical Facebook posts. For six weeks Jones-Roberts said nothing, until telling *Kent Online* on 21 September that all was above board and she had not realised when she bought it that her property could be a development site – well, not for more than two or three houses, anyway. "It was a doer-upper" she said. Er, right.

The council's press officer has told councillors not to comment. An audit has been launched which is unlikely to be finished until next year. It will only look at procedural matters, not councillor conduct – the very stuff that needs investigating. No wonder locals are not happy.

DEVELOPING STORY

AMURKY controversy has resurfaced for a council debate in Canterbury. In 2023, the *Eye* revealed former city councillor Louise Jones-Roberts bought a £1.925m estate in 2018, later forming a development company to build on the land, potentially netting her millions (*Eye* 1608). She did not publicly declare a pecuniary interest and the land was put into the draft local plan for development, overseen by fellow Tory council leader Ben Fitter-Harding. Fitter-Harding lost his seat and Jones-Roberts stood down.

Jones-Roberts said all was above board and she had not realised, on purchase, that the property could be a development site. A 2024 independent audit found processes were followed, noting Jones-Roberts had pre-existing permission to withhold her home address on security grounds, but some

In es st d s
councillors argued the review was inadequate, demanding a re-investigation. Back then, the ex-councillor's law firm, Carter-Fuck, said Jones-Roberts had done "absolutely nothing improper and followed the council's advice and procedures at all times", *Kent Online* reported. Jones-Roberts said she would participate in any further investigation if commissioned, which would "once again demonstrate that her conduct was unimpeachable".

Now, with the draft plan coming to two forthcoming council meetings, several current and former Lib Dem, Independent and Green councillors want Canterbury, which has no single party controls, to reject the Jones-Roberts proposal. They have complained to the Information Commissioner's Office (ICO) about Canterbury's inadequate record-keeping and freedom of information (FoI) delays. The ICO is to investigate. A council spokesman said it "prides itself on being open and transparent", takes FoI "incredibly seriously" and welcomes and will co-operate with ICO scrutiny.