

From: EIR
Sent: 09 June 2025 15:40
To: [REDACTED]
Subject: [REDACTED]

Dear requester

Requested information is exempt from disclosure

Thank you for your request for information about Buckingham Water Recycling Centre, which we received on 12 May 2025. Your request has been considered under the Environmental Information Regulations 2004.

1. Who authorised the email dated 28/02/2025 (from Graham Mansfield and Mark, respectively) which claimed "Funding has now been confirmed for Buckingham WRC"? In this respect, I would like to see any information (written, visual, aural or electronic) which led to this email being written, agreed and then distributed.
2. Who authorised the Planning Report for applications 24/03426/AOP and 25/00705/PIP? In this respect, I would like to see any information (written, visual, aural or electronic) which led to this Report being agreed and submitted to Buckinghamshire Council.

The information requested at items 1 and 2 by way of 'Who..?' is considered third-party personal data. Disclosure of names and associated opinions would contravene the data protection principles under data protection legislation.

The Data Protection Act 2018 defines personal data (section 3) as:

- 3(2) "*Personal data*" means any information relating to an identified or identifiable living individual.
3(3) "*Identifiable living individual*" means a living individual who can be identified, directly or indirectly, in particular by reference to –
- (a) An identifier such as a name, an identification number, location data or an online identifier, Or
 - (b) One or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

In addition to the provisions of the Data Protection Act 2018 and UK GDPR, personal data is exempt from disclosure under the Environmental Information Regulations 2004 (EIR) by way of Regulation 12(3) and Regulation 13(1). The latter states:

'To the extent that the information requested includes personal data of which the applicant is not the data subject and as respects which either the first or second condition below is satisfied, a public authority shall not disclose the personal data'.

The 'first condition' referred to above is further explained in Regulation 13(2)(a):

'...in a case where the information falls within any of paragraphs (a) to (d) of the definition of 'data' in the Data Protection Act 2018, that the disclosure of the information to a member of the public otherwise than under these Regulations would contravene –

any of the data protection principles...'.

It is the view of Anglian Water that the information requested is personal information and its disclosure would contravene the Data Protection Act 2018.

The information requested at items 1 and 2 for 'information (written, visual, aural or electronic)' relates to internal communications within Anglian Water. All internal discussions and dealings prior to the publication of Anglian Water's responses would be classed as 'internal communications' and, subject to the public interest test, are exempt from disclosure under EIR Regulation 12(4)(e).

We have carried out a public interest test in respect of this request and have determined that internal communications, deliberations and decision-making processes needs to be a private thinking space. Making such information publicly available would have a chilling, counter-productive effect on the work our employees are required to perform in this context for the benefit of the public in a more broader sense. It has been concluded that on this occasion the public interest falls on the side of maintaining the exemption.

If you are unhappy with the service you have received in relation to your request and wish to request an internal review, you can email EIR@anglianwater.co.uk or write to:

Legal Director, Anglian Water Services, Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon PE29 6XU

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

If you have any queries about this email, please contact **us**.

Yours faithfully

EIR Team

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire PE29 6XU

Email EIR@anglianwater.co.uk