



REQUEST 18840

I am submitting a Freedom of Information request concerning public consultation responses for the following planning applications:

- A/25/099717/MAJOR – Development at Winstanley Hall
- A/25/099718/LB – Listed Building Consent, Winstanley Hall

Following a review of the published comments on the Council's planning portal, a number of statistical and linguistic patterns have emerged that suggest the "support" submissions for these applications may have been centrally coordinated or submitted by a small number of individuals using identical or templated wording.

Specifically, approximately 80% of the "support" comments were submitted within four short bursts (9–10 Oct, 14–16 Oct, 20–23 Oct, and 23–24 Oct 2025), with many using identical phrases such as "*restore to its former glory*" and "*quality homes for local people.*" Two submissions are exact duplicates, and several contain identical formatting and technical planning terminology.

To ensure the integrity and transparency of the public consultation process, I request the following information under the Freedom of Information Act 2000:

1. Metadata for all public comments received for the above applications between 26th September and 26th October 2025, including (where held):
 - Date and exact time of submission;
 - Method of submission (e.g., online form, email, postal, agent upload);
 - Anonymised or hashed IP address, or equivalent source identifier;
 - Any metadata indicating device type or platform used (e.g., desktop, mobile).
2. Confirmation of whether multiple submissions originated from the same IP address, email address, or device, even if attributed to different names.
3. Any internal correspondence, briefing notes, or officer communications discussing potential clustering, duplicate entries, or coordinated submissions in relation to these two applications.
4. Details of any verification or moderation checks undertaken by the Council to identify or manage duplicate or suspiciously similar submissions.

RESPONSE

1. You requested metadata for all public comments submitted between 26 September and 26 October 2025, including submission time, method, IP address or source identifiers, and device or platform information. The Council can confirm that the date of submission for each representation is held and displayed publicly via the Council's planning website, link below:

[Search and comment on planning applications](#)

Representations can be received via the Council's online planning website, email, and post (the latter two processes are uploaded onto the Council's document management system by Council Officers).

The Council holds some additional technical information generated when representations are submitted through its online planning system. However, information capable of identifying or singling out individuals, including IP addresses (whether full, truncated, anonymised or hashed), device or platform identifiers, and precise submission timestamps beyond those necessary for routine operation, constitutes personal data for the purposes of UK data protection law and is therefore exempt from disclosure under section 40(2) of the Freedom of Information Act 2000, or, where the Environmental Information Regulations 2004 apply, excepted under regulation 13. Disclosure to the world at large would be unfair and unlawful, contrary to data protection principles. This approach reflects the ICO's guidance on section 40/Regulation 13 and the legal position that IP addresses can constitute personal data.

2. You requested confirmation of whether multiple submissions originated from the same IP address, email address, or device, even if attributed to different names. The Council does not hold a routine report or record that identifies or catalogues public representations by IP address, device identifier, or inferred technical source for planning consultation purposes. To the extent that any such information may exist within transient or background system or security logs, confirming or denying whether multiple submissions originated from the same technical source would itself involve the processing and effective disclosure of personal data and is therefore exempt under section 40(2) FOIA or excepted under regulation 13 EIR. The legislation does not require the Council to create new information or undertake bespoke analysis to determine whether submissions may be linked.
3. You requested any internal correspondence, briefing notes, or officer communications discussing clustering, duplicate entries, or coordinated submissions in relation to these applications. The Council has conducted reasonable searches and can confirm that it holds no recorded information specifically discussing pattern analysis, clustering, or coordinated submissions in relation to the public representations on these applications. If any material were to describe the Council's underlying security monitoring, log-retention or cyber-defence posture in a way that would increase the risk of malicious exploitation, that information would be withheld. In that event, the Council would rely on section 31(1)(a) FOIA (prevention or detection of crime), or where the EIR apply, regulation 12(5)(a) (public safety/national security), on the basis that disclosure of such information could be used to facilitate cyber-attacks against the Council's systems. This is a qualified exemption/exception and the Council has considered the public interest.

Whilst recognising the inherent public interest in transparency, the Council considers that the public interest in protecting the security of its information systems and the personal and sensitive data they contain outweighs the public interest in disclosure. Disclosure under FOI/EIR is to the world at large, and releasing details that could be used to target Council systems would be likely to prejudice the prevention or detection of crime and adversely affect public safety.

4. You requested details of any verification or moderation checks undertaken by the Council to identify or manage duplicate or suspiciously similar submissions. The Council's Planning teams do not routinely verify the identity of individuals making representations, nor do they seek to determine whether different representations originate from the same individual or source. Representations are accepted, and their content considered, on the basis of material planning considerations and the exclusion of abusive, offensive, or unlawful content in line

with published moderation practices; each representation is recorded and considered on its planning merits, irrespective of whether similar points are made by multiple respondents. Where the Council prepares information for publication or disclosure, it takes steps to avoid the inadvertent release of hidden personal information (for example, metadata) consistent with the ICO's guidance on secure document disclosure.

5. Public consultation responses form part of a qualitative planning exercise. The planning system does not require statistical weighting of representations, nor does it require verification of whether representations are independently authored. Multiple representations raising similar points does not, of itself, affect their consideration in the planning decision-making process.