



Decision and Reasons for Decision

Citation:	<i>Zone Planning Group Pty Ltd and Council of the City of Gold Coast [2020] QICmr 57 (6 October 2020)</i>
Application Number:	314876
Applicant:	Zone Planning Group Pty Ltd ACN 607 362 238
Respondent:	Council of the City of Gold Coast
Decision Date:	6 October 2020
Catchwords:	ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL TO DEAL - EFFECT ON AGENCY'S FUNCTIONS - request for information concerning changes to flood overlay mapping in an amendment of Council's city plan - whether the work involved in dealing with the application would substantially and unreasonably divert the resources of the agency from their use by the agency in the performance of its functions - section 41(1)(a) of the <i>Right to Information Act 2009 (Qld)</i>

REASONS FOR DECISION

Summary

1. The applicant applied to the Council of the City of Gold Coast (**Council**) under the *Right to Information Act 2009 (Qld)* (**RTI Act**) for a range of information about amendments to Council's 2016 City Plan which relate to changes in the Q100 flood level.¹
2. Council did not make a decision within the timeframe prescribed by the RTI Act.² However, Council did provide the applicant with a copy of a report presented to a meeting of Council's City Planning Committee on 20 July 2016 concerning Agenda Item 10 '*Update of the Flood Overlay Map City Plan Major Update 1*' (**Confidential Report**).³
3. The applicant applied⁴ to the Office of the Information Commissioner (**OIC**) for an external review of Council's deemed refusal of access decision. On review, the applicant

¹ Application dated 8 August 2018. The documents requested included all technical reports containing the justification or methodology for the new flood levels; internal Council reports, memos and emails; and communications between Council and the Queensland Government. The specified date range of the application is '*all dates*'.

² Therefore, Council was deemed to have made a decision refusing access to all requested documents under section 46 of the RTI Act.

³ The resolution made in respect of this Agenda Item, without its supporting report, can be accessed on Council's website (at <https://www.goldcoast.qld.gov.au/documents/ma/planning-20160720-adoptedreport_Part7.pdf>). Council also provided the applicant with a link to a partially redacted copy of a flood review report, prepared for the Mayoral Technical Advisory Group (**MTAG**), which it had made accessible on its website (<<https://www.goldcoast.qld.gov.au/documents/bf/mayoral-advisory-committee-flood-review-report.PDF>>). MTAG is a committee of Council that was established to provide technical advice to Council regarding the development of the new planning scheme. The Terms of Reference for MTAG can be accessed at <<https://www.goldcoast.qld.gov.au/documents/bf/tor-rmayoral-technical-advisory.pdf>>.

⁴ On 1 October 2019, attaching a copy of the Confidential Report.

has narrowed its request to particular categories of information. However, Council's position is that dealing with the application would be a substantial and unreasonable diversion of its resources under section 41(1)(a) of the RTI Act.

4. For the reasons set out below, I set aside Council's deemed refusal of access decision and find that dealing with the Further Narrowed Application (as defined below) would constitute a substantial and unreasonable diversion of Council's resources under section 41(1)(a) of the RTI Act.⁵

Background

5. Council's City Plan commenced on 2 February 2016. The City Plan amendments relevant to the application are known as '*Major Updates 1 and 1B*', which commenced on 20 September 2018 as part of Council's City Plan Version 6.⁶
6. After considering the contents of the Confidential Report, the applicant notified Council⁷ that it was seeking to access 12 categories of information which it considered fell within the scope of the application:
 - a) any correspondence between Council and the State '*specifically relating to amendments to the Cityplan relating to flooding*'
 - b) Council's expert advice on the 50% wave set up
 - c) a file series relating to the process of Council's '*City Natural Hazard team undertaking continuous flood modelling and mapping for statutory planning purpose*'⁸
 - d) a file series relating to the peer review process for '*the four stages of Councils [sic] flood modelling series being externally reviewed*'
 - e) a file series relating to a 2012 GHD report⁹
 - f) a file series relating to an internal Council investigation of Tallebudgera Creek
 - g) a file series relating to the '*economic and social impacts of the various options and alternative means of dealing with the flooding issue other than increasing the Q100 flood level*'
 - h) a file series relating to '*consultation with the development industry, insurance industry and any other stakeholders with regard to the proposed changes*'
 - i) a file series relating to '*investigations regarding the wave setup at the mouth of Tallebudgera and Currumbin creeks*'
 - j) a file series relating to the peer review reports concerning four '*peer review stages for the adoption of the current flood mapping contained in reports prior to July 2016*'
 - k) a file series relating to a 2011 GHD storm tide study;¹⁰ and

⁵ Standing in the shoes of Council, as decision maker, I refuse to deal with the application on that basis.

⁶ <<https://www.goldcoast.qld.gov.au/planning-and-building/city-plan-2015-19859.html>>. The submissions report relevant to these amendments can also be accessed on Council's website.

⁷ By email dated 15 February 2019.

⁸ This request category was removed by the applicant on 16 December 2019.

⁹ This request category was removed by the applicant on 12 March 2020.

¹⁰ This request category was removed by the applicant on 12 March 2020.

- l) a file series relating to 'new IFD tables to be released in late 2017 issue' and 'the extent to which this issue was taken into consideration in the new flood level mapping adopted in September 2018'.
7. Council elected to not disclose any further information to the applicant in response to the above inquiry.
8. On external review, the applicant confirmed the scope of the application as set out in paragraph 6 above and explained that its request for a 'file series' encompasses all correspondence and other documents relevant to the specified subject matter, which it believes Council would have saved into a file specifically created for the particular subject matter.¹¹ By way of example, the applicant's request for:
- the file series related to four peer reviews¹² is a request for all correspondence and other documents relevant to each of those four peer review processes and the peer review reports that were produced; and
 - the file series concerning how updated Intensity-Frequency-Duration design rainfalls (IFDs) released by the Bureau of Meteorology were taken into consideration in the new flood level mapping¹³ is a request for all correspondence and other documents relating to how Council considered any updated IFD's and any changes that were, as a result, made to Council's flood overlay map between the 26 July 2016 resolution and commencement of the relevant City Plan amendments on 20 September 2018.
9. Council submitted that it was entitled to refuse to deal with the application under section 41 of the RTI Act, on the basis that the work involved in dealing with it would substantially and unreasonably divert Council's resources from their use in the performance of Council's functions.¹⁴ Council also identified that it would be able to process the application if it was limited to one or two of the specified information categories.
10. The RTI Act requires the Information Commissioner to identify opportunities for early resolution and to promote settlement of external review applications.¹⁵ In accordance with this obligation, I provided the applicant with details about the basis of Council's claim that it was entitled to refuse to deal with the application under section 41 of the RTI Act and invited the applicant to consider limiting the scope of the application.¹⁶ In response, the applicant proposed a narrowed application scope by removing one category (**Narrowed Application**).¹⁷
11. Council then provided further submissions outlining why it would still be a substantial and unreasonable diversion of its resources to deal with the Narrowed Application.¹⁸ I wrote to the applicant enclosing Council's submissions and invited the applicant to consider further limiting the scope of the application to specific documents and/or to one or two categories of requested information.¹⁹ The applicant proposed to further narrow the scope by removing an additional two categories of requested documents (**Further Narrowed Application**).²⁰

¹¹ In a conversation with the applicant's representative on 5 November 2019.

¹² Categories d) and j) in paragraph 6.

¹³ Category l) in paragraph 6.

¹⁴ Council submissions dated 3 December 2019.

¹⁵ Section 90(1) of the RTI Act.

¹⁶ On 13 December 2019, I provided the applicant with a copy of Council's submissions.

¹⁷ By email dated 16 December 2019, the applicant agreed to remove category c) in paragraph 6.

¹⁸ Council submissions dated 18 February 2020.

¹⁹ By letter dated 27 February 2020.

²⁰ By email dated 12 March 2020, the applicant agreed to remove categories e) and k) in paragraph 6.

12. Council maintains that dealing with the Further Narrowed Application, as a whole, would constitute a substantial and unreasonable diversion of its resources.²¹ On 18 June 2020, I wrote to the applicant enclosing Council's submissions and conveying a preliminary view that Council was entitled to refuse to deal with the Further Narrowed Application under section 41 of the RTI Act.²² The applicant does not accept that Council is entitled to refuse to deal with the Further Narrowed Application on this basis.
13. Significant procedural steps relating to this review are set out in the Appendix.

Reviewable decision and evidence considered

14. The decision under review is the decision refusing access to all requested information which Council is deemed to have made under section 46 of the RTI Act.
15. The evidence, submissions, legislation and other material considered in reaching this decision are referred to in these reasons (including footnotes and the Appendix).²³

Issues for determination

16. The issue for determination is whether the Further Narrowed Application may be the subject of a refusal to deal decision under section 41 of the RTI Act.

Relevant law

17. The RTI Act requires an agency to deal with an access application unless this would not be in the public interest.²⁴ One of the circumstances in which it would not be in the public interest to deal with an access application is where the work involved in dealing with the application would, if carried out, substantially and unreasonably divert the agency's resources from their use by the agency in the performance of its functions.²⁵
18. In deciding to refuse to deal with an application on this basis, an agency must:
 - (a) not have regard to any reasons the applicant gives for applying for access or the agency's belief about what are the applicant's reasons for applying for access;²⁶ and
 - (b) have regard to the resources that would be used for:²⁷

²¹ Council submissions dated 27 May 2020.

²² By letter dated 18 June 2020.

²³ The application in this matter was made on behalf of a corporate entity. While individuals in Queensland have human rights under the *Human Rights Act 2019* (Qld) (**HR Act**), Kingham J in *Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors* [2020] QLC 33 at [90] recently confirmed that where section 58(1) of the HR Act applies, there need be no mover to raise human rights issues because that section requires the relevant public entity to properly consider engaged human rights and to not act or make a decision that is not compatible with human rights. In making this decision I have observed and respected the law prescribed in the RTI Act. Doing so is construed as '*respecting and acting compatibly with*' the rights prescribed in the HR Act (*XYZ v Victoria Police (General)* [2010] VCAT 255 (16 March 2010) (**XYZ**) at [573]; *Horrocks v Department of Justice (General)* [2012] VCAT 241 (2 March 2012) at [111]). I have therefore satisfied the requirements of section 58(1) of the HR Act, in accordance with the following observations of Bell J about the interaction between the Victorian analogues of Queensland's *Information Privacy Act 2009* (Qld) (**IP Act**) and RTI Act and HR Act would apply: '*it is perfectly compatible with the scope of that positive right in the Charter for it to be observed by reference to the scheme of, and principles in, the Freedom of Information Act*' (*XYZ* at [573]).

²⁴ Section 39 of the RTI Act.

²⁵ Section 41(1)(a) of the RTI Act. Before making a decision to refuse to deal with an application under section 41(1)(a), an agency must satisfy certain procedural prerequisites set out in section 42 of the RTI Act, for the purpose of allowing the applicant an opportunity to narrow the scope of the application, so that the agency can manage processing of the application. However, in this case, as the issue of substantial and unreasonable diversion of resources was raised by Council on external review, I am not required to make any determination regarding Council's satisfaction of the procedural requirements in section 42 of the RTI Act.

²⁶ Section 41(3) of the RTI Act.

²⁷ Section 41(2) of the RTI Act.

- identifying, locating or collating the documents
- making copies, or edited copies of any documents
- deciding whether to give, refuse or defer access to any documents, including resources that would have to be used in examining any documents or conducting third party consultations; or
- notifying any final decision on the application.

19. Whether the work involved in dealing with an application would, if carried out, substantially and unreasonably divert the resources of an agency is a question of fact in each individual case.²⁸ It is therefore necessary, in each case, to assess the work required to deal with the application in the context of the agency's other functions.

Procedural matters

20. External review by the Information Commissioner is merits review and the Information Commissioner has the power to decide any matter in relation to an application that could have been decided by the agency, under the RTI Act.²⁹ However, in circumstances where the issue of substantial and unreasonable diversion of resources is raised on external review, the RTI Act does not expressly address the procedural requirements to be met by the Information Commissioner before making a decision to refuse to deal with an application under section 41 of the RTI Act. Generally, the RTI Act provides that the procedure to be taken on external review is, subject to the RTI Act, at the discretion of the Information Commissioner.³⁰

21. As outlined in the Background section of this decision, the applicant was given opportunities during the review to respond to OIC regarding the diversion of resources issue. I consider that the steps that were taken by OIC represent those outlined in section 42 of the RTI Act and therefore, have afforded procedural fairness to the applicant.³¹

22. The applicant provided OIC with submissions in support of their case.³² I have addressed them below to the extent they are relevant to the issue for determination.

23. The applicant has raised a number of concerns about Council's record keeping systems and practices. Specifically, the applicant submits that:³³

... Council does not have an efficient record keeping system, nor has a protocol for the saving of important documents to form Council's corporate memory, and the officers from which Council's RTI officers need to source the documents in question, are not saving documents at all, or alternatively are not saving documents in a transparent manner allowing easy retrieval.

24. During the review, I conveyed to the applicant³⁴ that making determinations about the adequacy of Council's record keeping systems and practices is not within the Information Commissioner's external review jurisdiction. Therefore, the applicant's concerns in this regard are not addressed in these reasons for decision.

²⁸ *Davies and Department of the Prime Minister and Cabinet* [2013] AICmr 10 (22 February 2013) at [28].

²⁹ Section 105(1) of the RTI Act.

³⁰ Section 95(1)(a) of the RTI Act.

³¹ As noted in paragraphs 8-10 above, the applicant was given three opportunities to narrow the scope of the application and the applicant's proposed narrowing of the application was considered during the review. I note that this process has exceeded the prerequisites in section 42 of the RTI Act that apply to agencies.

³² As set out in the Appendix.

³³ Applicant's submissions dated 12 March 2020.

³⁴ On 18 June 2020 and 14 July 2020.

25. On external review, the applicant has asked to be provided with details of the enquiries made of, and responses received from, Council's Natural Hazard Unit regarding the application and confirmation that the requested documents exist and/or that a relevant file series exists within which the requested documents have been saved.³⁵ Council's submissions, which have been provided to the applicant, generally summarise the responses it received to its preliminary enquiries about what documents in Council's possession and control are potentially relevant to the Further Narrowed Application. As stated above, the issue for determination in this review is whether the work involved in dealing with the application would, if carried out, substantially and unreasonably divert Council's resources from their use in the performance of Council's functions. Records of Council's internal inquiries and/or statements about the existence (or otherwise) of documents/file series, are not relevant to the issue for determination.

Findings

26. I have not had regard to the factors referred to in paragraph 18(a) above.

What work would be involved in dealing with the access application?

27. On external review, Council submits that information relevant to the Further Narrowed Application will be stored in both hard copy and electronic files.³⁶
28. The applicant contends that Council has a '*sophisticated and recently introduced record keeping system*' and would be able to easily retrieve information relevant to the Further Narrowed Application.³⁷ The applicant also asserts that '*it is reasonably safe to assume*' that the requested documents could be found within the file number referenced in the Confidential Report.³⁸
29. Council submits that not all of the requested documents are stored within the file referenced in the Confidential Report but will instead will be located across a number of Council files.³⁹ Council also confirmed that, although use of its newer Local Government Platform⁴⁰ commenced in late 2017, records from 2016 (and earlier) are stored on an electronic document records management system known as iSPOT, which stores files generically and does not have a stipulated metadata standard. As the Further Narrowed Application seeks, for the most part, documents that were in existence when Council's City Planning Committee met on 20 July 2016, it is reasonable to expect that the majority of the requested documents, to the extent they have been stored electronically, will be located in Council's iSPOT system, rather than Council's newer Local Government Platform.
30. Preliminary searches conducted by Council on external review have identified a large volume of electronically stored information which is potentially relevant to the Further Narrowed Application (being approximately 20,000 objects).⁴¹ Given there was no stipulated metadata standard applied to the entry of these objects into Council's iSPOT system, Council submits that it would be necessary to consider each located object to

³⁵ Applicant's submissions dated 19 June 2020 and 9 July 2020.

³⁶ Council submissions dated 3 December 2019.

³⁷ Applicant's submissions dated 12 March 2020.

³⁸ Applicant's submissions dated 16 December 2019.

³⁹ Council submissions dated 18 February 2020.

⁴⁰ Which incorporates Pathway and Objective systems.

⁴¹ Council submissions dated 18 February 2020, which explain that an 'object' is an individual entry in the Council's electronic document record system. Council also confirmed that the number of electronic records is not indicative of handwritten notes or emails that may be attached to relevant hard copy files.

determine its relevance to the Further Narrowed Application.⁴² Council submits that its decision-maker would also be required to:

- conduct further searches of Council's 'Directorate' drive to identify any additional relevant information; and
- undertake enquiries with individual officers and Council's Natural Hazard Unit to determine whether additional relevant documents are stored in email folders or other locations.

31. Council estimates that it would take approximately 333 hours to assess the relevance of the information already located.⁴³ Based on Council's explanation about the manner in which documents in Council's iSPOT system are stored, it is reasonable to expect that the decision-maker will need to assess each of the already located documents to determine whether it is relevant to the Further Narrowed Application. Council also submits that additional time would be required to then conduct further searches and enquiries to locate any further relevant information.
32. While an agency is required to consider how much time an access application is likely to take to process, a precise assessment is not required. The applicant has not directly challenged Council's partial estimate of the work involved in dealing with the Further Narrowed Application, however, it contends that the material being sought '*must and should be easily available for the documents in question to be referred to in a Council agenda item in the first instance*'.⁴⁴ I note that, for seven categories of requested information, the applicant is seeking to access a '*file series*'. Accordingly, due to the way the Further Narrowed Application is currently framed, it is not limited to the reports and other documents referenced in the Council's minutes, agenda item or the Confidential Report.
33. In considering whether Council's processing estimate is reasonable, I note that in dealing with the Further Narrowed Application under the RTI Act, Council's decision-maker will need to assess the information identified as relevant, to determine if grounds for refusal apply to any part of it,⁴⁵ and then redact documents and prepare a written decision.
34. On the information before me, it is difficult to reach an estimate regarding the amount of time that would be required to conduct the further searches and enquiries referenced in paragraph 30, determine if grounds for refusal apply to any information, conduct any required third party consultation, complete relevant redactions and prepare a written decision. However, I consider it reasonable to expect that, if Council was to deal with the Further Narrowed Application, some time in addition to the estimated 333 hours would be required to complete these further steps.
35. Based on the material before me, I accept Council's contention that processing the Further Narrowed Application would take in excess of 333 hours.

⁴² Council's submissions acknowledge that, as a result of undertaking this further assessment process, many of the objects may be identified as not relevant to the Further Narrowed Application.

⁴³ Based upon the decision-maker's assessment of each object taking 1 minute. Council confirmed that this estimate presumes the assessment would be completed without opening, reading or printing each located document.

⁴⁴ Applicant's submissions dated 9 July 2020. The applicant made similar submissions on 19 June 2020.

⁴⁵ Grounds for refusal of access are set out in section 47 of the RTI Act.

Would the impact on Council's functions be substantial and unreasonable?

36. Council's Right to Information and Information Privacy Unit consists of two officers⁴⁶ and, in the 2018-2019 financial year, Council dealt with 172 access and amendment applications.⁴⁷
37. Council's 333 hour estimate equates to approximately nine weeks for one full time decision-maker working on the Further Narrowed Application to the exclusion of all other functions of that officer.⁴⁸ This represents more than twice the entire processing time usually allowed under the RTI Act for processing an application.⁴⁹ As noted above, this is a partial estimate, as it relates only to the time required to assess the relevance of the already located information.
38. Taking into account that additional time will be required to undertake further searches and enquiries, determine whether refusal grounds apply to any information, conduct any required third party consultation, redact information and prepare a written decision, I am satisfied that the time required to deal with the Further Narrowed Application will exceed the usual processing period.
39. It is reasonable to expect that taking one of Council's decision-makers offline for such a long period would substantially interfere with Council's ability to attend to its RTI Act and IP Act functions for persons other than the applicant over this period. I consider the consequent delays in processing other applications and attending to other matters would have a considerable and telling detrimental impact on Council's functions. I am therefore, satisfied that the work involved in dealing with the Further Narrowed Application would, if carried out, substantially divert the resources of Council from their use in the performance of its functions.
40. In determining whether the work involved in dealing with an application is unreasonable, it is not necessary to show that the extent of the unreasonableness is overwhelming.⁵⁰ Rather, it is necessary to weigh up the considerations for and against, and form a balanced judgement of reasonableness, based on objective evidence.⁵¹ Factors that have been taken into account in considering this question include:⁵²
 - whether the terms of the request offer a sufficiently precise description to permit the agency, as a practical matter, to locate the documents sought
 - the public interest in disclosure of documents
 - whether the request is a reasonably manageable one, giving due but not conclusive, regard to the size of the agency and the extent of its resources usually available for dealing with access applications
 - the agency's estimate of the number of documents affected by the request, and by extension the number of pages and the amount of officer time
 - the reasonableness or otherwise of the agency's initial assessment and whether the applicant has taken a cooperative approach in rescoping the application
 - the timelines binding on the agency

⁴⁶ Council submissions dated 18 February 2020.

⁴⁷ Council's Annual Report 2018-19 at page 98 (accessible at <<https://www.goldcoast.qld.gov.au/documents/bf/annual-report-2018-19.pdf>>).

⁴⁸ Based on a 5 day working week, at 7.15 hours per day.

⁴⁹ Under sections 46 and 18 of the RTI Act, the usual time allowed for processing an application is 25 business days. Whilst this period can be extended in certain circumstances, it is relevant to have regard to this timeframe when considering whether the time involved in processing a single access application will have a substantial impact on an agency's resources.

⁵⁰ *F60XCX and Department of the Premier and Cabinet* [2016] QICmr 41 (13 October 2016) at [90].

⁵¹ *ROM212 and Queensland Fire and Emergency Services* [2016] QICmr 35 (9 September 2016) at [42], adopting *Smeaton v Victorian WorkCover Authority (General)* [2012] VCAT 1550 (*Smeaton*) at [30].

⁵² *Smeaton* at [39].

- the degree of certainty that can be attached to the estimate that is made as to the documents affected and hours to be consumed; and in that regard, importantly whether there is a real possibility that processing time may exceed to some degree the estimate first made; and
 - whether the applicant is a repeat applicant to that agency, and the extent to which the present application may have been adequately met by previous applications.
41. As the issue of substantial and unreasonable diversion of resources only arose on external review, some of these factors are not relevant in this case.
42. I do not consider work exceeding 333 hours to be reasonably manageable in the current case, particularly in light of the need for Council to process other access applications and complete other functions.
43. The applicant submits that it has used the services of Council's Right to Information and Information Privacy Unit on a regular basis,⁵³ however, there is no information available to me which suggests the applicant has sought access to the same information from Council previously. I also consider that the applicant has been cooperative on external review in seeking to narrow the application and, when doing so, has clearly identified the information to which it seeks access.
44. The applicant considers, on an accountability and transparency basis, that the requested documents should be '*easily available*' to provide elected representatives with the background information used in the drafting of the relevant agenda item.⁵⁴ In terms of the public interest in disclosing documents responsive to the Further Narrowed Application, my views are necessarily qualified, given I have not perused any of the potentially relevant information which Council located on external review. Noting this qualification, I consider that disclosure of the requested information may enhance Council's accountability and transparency, however, Council's disclosure of its minutes and the Confidential Report have already advanced these factors to some extent. I also note that Council's submissions indicate that it could process the application if it were limited to one or two categories of the requested information and this decision does not prevent the applicant making future applications of a more confined scope in order to access various components of the requested information. For these reasons, I have not placed any significant weight on this factor in my considerations.
45. Taking into account the factors listed in paragraph 40 which are relevant in this case, I am satisfied that taking one full time decision-maker offline for what equates to more than nine weeks to process the Further Narrowed Application would amount to a substantial and unreasonable diversion of Council's resources.

DECISION

46. For the reasons set out above, I set aside the deemed decision. In substitution, I find that dealing with the Further Narrowed Application would substantially and unreasonably divert Council's resources from their use in the performance of Council's functions and therefore, section 41(1)(a) of the RTI Act applies to the application.

⁵³ Applicant's submissions dated 12 March 2020.

⁵⁴ Applicant's submissions 9 July 2020. The applicant made similar submissions dated 19 June 2020.

47. I have made this decision as a delegate of the Information Commissioner, under section 145 of the RTI Act.

K Shepherd
Assistant Information Commissioner

Date: 6 October 2020

APPENDIX

Significant procedural steps

Date	Event
1 October 2019	OIC received the external review application.
17 October 2019	OIC notified the applicant and Council that the external review application had been accepted.
5 November 2019	The applicant's representative confirmed the application scope.
14 November 2019	OIC requested further information from Council.
3 December 2019	OIC received Council's submissions.
13 December 2019	OIC provided a copy of Council's submissions to the applicant.
16 December 2019	The applicant agreed to narrow the scope of the application by removing one category of requested information.
24 January 2020	OIC asked Council whether it as able to process the Narrowed Application.
18 February 2020	OIC received Council's further submissions.
27 February 2020	OIC provided a copy of Council's submissions to the applicant and invited the applicant to consider further narrowing application.
12 March 2020	The applicant agreed to narrow the scope of the application by removing two further categories of requested information.
16 April 2020	OIC asked Council whether it as able to process the Further Narrowed Application.
27 May 2020	OIC received Council's further submissions.
18 June 2020	OIC conveyed a preliminary view to the applicant and invited the applicant to provide submissions
19 June and 9 July 2020	OIC received further submissions from the applicant.