

17 December 2024

Dear

ATISN 23162 CAWDOR BARRACKS

Information requested

Thank you for your information request which I received on 3 December. You asked for:

All communications (both internal and those available on the Cadw website) that have taken place between Cadw and all parties regarding DARC radar proposal at Cawdor Barracks to date.

Our response

The information you requested is enclosed:

- ATISN 23162 – Document 1 - Scoping Opinion EIA - consultation - from Local Planning Authority (LPA) to Cadw.
- ATISN 23162 – Document 2 - Scoping Opinion EIA - response email with Document 2a as attachment - to LPA from Cadw.
- ATISN 23162 – Document 2a - Scoping Opinion EIA - response letter to LPA from Cadw.
- ATISN 23162 – Document 3 - Request for meeting from Wessex Archaeology to Cadw
- ATISN 23162 - Document 4 - Response to Wessex Archaeology from Cadw
- ATISN 23162 - Document 4a - Response to Wessex Archaeology from Cadw - Map attachment
- ATISN 23162 - Document 5 - Meeting arrangements and Listed Buildings / Zone of Theoretical Visibility (ZTV) discussion - Wessex Archaeology and Cadw

I have redacted the personal information of officials from Cadw, Wessex Archaeology, Pembrokeshire Local Authority and Sweco under Regulation 13 of the

Environmental Information Regulations 2004. My reasoning for doing so is set out at Annex A of this letter.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at Information Rights Unit, Welsh Government, Cathays Park, Cardiff, CF10 3NQ or Email: Freedom.of.information@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

Annex A - ATISN 21999 – Regulation 13 of the Environmental Information Regulations 2004

I have decided to withhold the following information:

Information being withheld	Section number and exception name
Personal information of members of: Cadw, Wessex Archaeology, Pembrokeshire Local Authority and Sweco	Regulation (13) of the Environmental Information Regulations: the information requested includes personal data of which the applicant is not the data subject.

Engagement of Regulation 13

Regulation 13 of the EIRs sets out an exception from the duty to disclose if the information requested is personal data protected by the General Data Protection Regulations (GDPR).

Personal data means information which relates to a living individual who can be identified from that data; or from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller.

I consider that information regarding names and emails of individuals in their capacity as employees of the said organisations is personal information.

Guidance from the Information Commissioner's Office states:

- The starting point is to consider whether it would be fair to the data subject to disclose their personal data;
- If disclosure would not be fair, then the information is exempt from disclosure.

I have assessed that the individual concerned would have a reasonable expectation that their personal data would be kept confidential and not disclosed to the world at large. It would be unfair to the individual concerned to release their personal data. Disclosure would give rise to unfair and unwarranted intrusion on the individual's privacy in the circumstances of this case, and has the potential to cause unnecessary and unjustified harm to the individual in this case.

Release of this information may also breach article 8 of the European Convention on Human Rights – a right to respect for one's "private and family life, home and correspondence."

I have thus concluded that in in this case, disclosure would not have been within the reasonable expectation of the individual and the loss of privacy would cause unwarranted distress. It is my view that disclosure of would breach the first data

protection principle, and thus are exempt from release under regulation 13 of the Environmental Information Regulations 2004.