

13 August 2025

Dear

Request for information - ATISN 24958

Thank you for your request for information which I received on 17 July 2025. You asked for any information the Welsh Government holds on:

- 1) The proposed plans regarding the currently closed site of Oakwood Theme Park
- 2) The official reason, if given, for Aspro declining the plans
- 3) Any liaison between Welsh Government and Aspro since the 1st of January, 2025

Our response:

- 1) The Welsh Government does not hold this information.
- 2) The Welsh Government does not hold this information.
- 3) The only liaison between Welsh Government and Aspro was in March 2025 following the closure of Oakwood Theme Park. They advised that any disposal or development of the site would be a commercial decision for them to make with partners of their choosing. **Annex A** contains the recorded information we hold in relation to this.

I have decided that some of the information is exempt from disclosure under section 40 (Personal Information) of the Freedom of Information Act and is therefore withheld. Consequently, personal details have been redacted. The reasons for applying these exemptions are set out in full below.

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.ofinformation@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,

Application of exemptions/exceptions

The Freedom of information Act/Environmental Information Regulations provide a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

I have decided to withhold the following information:

- *Personal details including any names/email addresses/telephone numbers or any information which could possibly identify a person(s)*

This Annex sets out the reasons for the engagement of section 40(2) of the Freedom of Information Act and our subsequent consideration of the Public Interest Test.

Section 40(2) – Personal Data

Section 40(2) provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

‘Personal data’ is defined in sections 3(2) and (3) of the Data Protection Act 2018 (‘the DPA 2018’) and means any information relating to an identified or identifiable living individual. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

We have concluded that, in this instance, the information requested contains third party personal data.

Under Section 40(2) of the FOIA, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

“processed lawfully, fairly and in a transparent manner in relation to the data subject”

The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f). This states:

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”.

In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test:-

- The Legitimate interest test: Whether a legitimate interest is being pursued in the request for information;
- The Necessity test: Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question;
- The Balancing test: Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

1. Legitimate interests

The personal data includes the names/email addresses/telephone numbers or any information which could possibly identify a person(s) captured by this request. The legitimate interest lies in the information held, and in understanding the context of that information, and where any decisions are made.

2. Is disclosure necessary?

Disclosure of the personal data is not necessary for the legitimate interest where those included are not senior or public facing and were acting in an administrative capacity and would not expect their personal data to be made public.

3. The balance between legitimate interests and the data subject's interests or fundamental rights and freedoms

Because the disclosure meets the legitimate interest with the personal information redacted, disclosure of the personal data is not necessary. There is no need to further consider the balance of interests, and the information is withheld.

Annex A

From: Head Office < @asprouk.com>
Sent: 13 March 2025 13:54
To: < @gov.wales>; Head Office < @asprouk.com>
Subject: RE: Oakwood investors

Good afternoon

We have received your email below and can also advise has been in touch to the same email.

We will respond to in due course. From our perspective we are not in any need to move forward quickly and will therefore respond when we are at the relevant point in terms of future plans.

Regards

Oakwood Theme Park

Sent on behalf of Oakwood Leisure Limited

Oakwood Leisure Limited is registered in England and Wales at Blue Planet Aquarium, Cheshire Oaks, Ellesmere Port, CH65 9LF. Our company number is 2042378

From: @gov.wales
Sent: 13 March 2025 10:49
To: Head Office < @asprouk.com>
Subject: Oakwood investors

Please see below investors that have approached us regarding contact details for Aspro. They have emailed you on this email address but had no response so have subsequently approached us to see if we have a direct contact. As per your advice we are to direct any emails from interested parties to this email address.
Many thanks

I would be grateful if you could reply to any email just to reassure us that this mailbox is being monitored.

Below is the email that was sent to you should you wish to acknowledge it.

Dear Sir

I sent a letter by first class, registered post last Thursday to your head office.

I am working with an investor, a private, cash buyer interested in purchasing the Park who is able to move forward quickly.

I hope that a meeting to this end can be arranged as soon as possible.

I look forward to your response.

Yours faithfully

Many thanks,

Croeso Cymru / Visit Wales
Llywodraeth Cymru / Welsh Government