

29 September 2025

Dear

## **ATISN25116 – GM637 cup-marked stone**

### **Information requested**

Thank you for your request which I received on 11 September and our conversation on 12 September. You asked for the following information regarding GM637 - Prehistoric Rock Art at Tair Waun Isaf.

- Any information that is held on computers, in emails and in printed/handwritten documents as well as images, video and audio recordings.
- Correspondence sent to and/or received by Cadw since scheduling meeting date on 1 September 2022
- Correspondence sent to and/or received by third parties on behalf of Cadw since scheduling meeting date on 1 September 2022

### **Our response**

The information you requested is enclosed. I have redacted personal information of individuals under Regulation 13 of the Environmental Information Regulations 2004 and my reasoning for doing so is set out at Annex A.

I have only included information that you have not previously received. Below is a list of the documents and images captured by your request.

- Doc 01 - Scheduling visit on email to owner 2
- Doc 02 - Results from oblique light investigation
- Doc 03 - Email - Headland Archaeology about proposed wind farm
- Doc 04 - Recommendation for scheduling - requesting endorsement
- Doc 05 - Update on process chaser
- Doc 06 - Endorsement of scheduling
- Doc 07 - Ministerial response letter
- Doc 08 - GGAT scheduling consultation email
- Doc 09 - LPA scheduling consultation email
- Doc 10 - Owner scheduling consultation email
- Doc 11 - RCAHMW scheduling consultation email
- Doc 12 - GGAT consultation response
- Doc 13 - Renaming - inspector's comments
- Doc 14 - GGAT notification letter
- Doc 15 - LLC notification letter
- Doc 16 - LPA notification letter
- Doc 17 - Letter owner 2 notification email
- Doc 18 - RCAHMW notification letter
- Doc 19 - Advice on buffer zone

- Image 01 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - Cup mark detail copy
- Image 02 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - General view from NW copy – edited
- Image 03 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - General view from W copy – edited
- Image 04 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - N corner of stone with greatest profusion of cup marks copy
- Image 05 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View from E copy
- Image 06 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View from N copy
- Image 07 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View from S copy
- Image 08 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View from W copy – edited
- Image 09 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View of cup marks at N 1 copy
- Image 10 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View of cup marks at N 2 copy
- Image 11 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View of land to E from N copy
- Image 12 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View of land to E from S copy
- Image 13 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View of Northern end from SE copy
- Image 14 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View of possible mound edge on W side from NW copy
- Image 15 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View of southern end from E copy
- Image 16 - GM637 - 2022-09-01 - Scheduling visit on 2022-09-01 - View S along turf stone boundary copy

## 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](mailto: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

## Annex A

### 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 including names, email addresses, car registration plates, phone numbers and images that could identify individuals	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 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 individuals 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 individuals concerned to release their personal data. Disclosure would give rise to unfair and unwarranted intrusion on the individuals privacy in the circumstances of this case, and has the potential to cause unnecessary and unjustified harm to the individuals 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 individuals 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.