

24 November 2025

Dear

Request for information - ATISN 26311

Thank you for your request which I received on 28 October 2025. You asked for:

1. The total number of solar panels installed for energy use using a Welsh Government fund (funding schemes that are both fully and partly funded) to the following buildings in the last 5 financial years (including the current year):
 - a. Residential homes
 - b. Commercial properties
 - c. Public and Community buildings
2. The total number of solar panels installed for heat generation using a Welsh Government fund (funding schemes that are both fully and partly funded) to the following buildings in the last 5 financial years (including the current year):
 - d. Residential homes
 - e. Commercial properties
 - f. Public and Community buildings
3. The total percentage of Welsh Government buildings, both owned, and agency owned, currently have solar panels fitted. (PV or thermal)
4. The total number of Welsh Government owned car parks and what percentage of those owned car parks currently have solar panels fitted onsite.

Our response

In the first instance, I am of the view that the information you want me to search for is environmental information and as such I have considered your request under the Environmental Information Regulations 2004 (EIRs). 'Environmental information' is defined in the Regulations as (inter alia) 'information on measures (including administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect the state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites, and also factors such as substances, energy, noise, radiation or waste likely to affect the state of the elements of the environment above'.

Answer - 1a, b, c and 2d, e, f:

I have concluded that your request is both voluminous and complex and will be very time consuming to deal with. Under the EIRs, there is no appropriate costs limit above which public authorities are not required to deal with requests for information. However, Reg 12(4)(b), manifestly unreasonable request, can apply if the cost or burden of dealing with a request is too great. This position was confirmed in the Upper Tribunal case of *Craven v The Information Commissioner* and the Department of Energy and Climate Change [2012] UKUT442 (AAC).

"Taking the position under the EIR first, it must be right that a public authority is entitled to refuse a single extremely burdensome request under regulation 12(4)(b) as "manifestly unreasonable", purely on the basis that the cost of compliance would

be too great (assuming, of course, it is also satisfied that the public interest test favours maintaining the exception). The absence of any provision in the EIR equivalent to section 12 of FOIA makes such a conclusion inescapable."

Public Interest Test

Reg 12(4)(b) is subject to the public interest test. I have considered the public interest in disclosing the information. The Welsh Government recognises the public interest in openness and transparency and that releasing the information would help the public gain a better understanding of how many Welsh Government funded schemes supported the installation of solar panels for electricity and heat generation on residential homes, commercial and public and community buildings. The Welsh Government also recognises the public has an interest in how their money is to be, or has been, used to ensure Government gets the best value from the public purse.

I have also considered the broad phrasing of your request which asks for 'The total number of solar panels installed for energy use / heat generation using a Welsh Government fund (funding schemes that are both fully and partly funded) to the following buildings in the last 5 financial years (including the current year).'

A substantial volume of the information requested is stored on our Electronic Document and Records Management System, known as iShare, and within Outlook e-mail accounts for individual officials. iShare is the corporate repository for most of the information created and received by Welsh Government Officials in the course of their duties that must be retained for business or historical purposes. Further information about iShare can be found under Section 7 of our Information and Records Management policy, which is available on the Welsh Government [website](#).

Documents are saved on iShare using naming conventions appropriate to the effective recording of information for our own purposes. Setting our systems in this way, and in line with our Records Management policy, enables effective delivery and will not necessarily lend themselves to being easily interrogated for generic requests for information. Where the Welsh Government believes providing such information would involve tasks that would be time consuming to deal with, in line with our obligations under the section 45 Code of Practice, we inform the requester of that fact and invite them to narrow down or re-focus their requests.

An initial iShare search for "solar panels" yielded 128,521 items. Searching for "solar panels, residential homes" yielded 31,937 items, "solar panels, commercial properties" yielded 34,095 items and "solar panels public and community buildings" yielded 51,636 items. On average, we estimate it will take one minute per result to check whether it is relevant to your request and then to extract the relevant information. The time it will take to search for all the information you have asked for, and from 2020 to date, will be substantial.

The Welsh Government therefore considers the balance of the public interest lies in favour of refusing your request. This is because it is believed your request would place a substantial and unreasonable burden on Welsh Government resources which are already stretched and on balance, it is considered the public interest would be better served by not deploying our resources in undertaking core work. As part of these considerations, we have applied the statutory presumption in favour of disclosure under Reg12(2) of the Regulations but our view is that the significant burden that this request would impose outweighs the public interest in releasing this information.

Your request is therefore refused under Reg 12(4)(b) – manifestly unreasonable, of the EIRs, for the reasons outlined above.

You may wish to refine your request by narrowing its scope by being a lot more specific about what information you particularly wish to obtain, including by reducing the period of time relevant to the information required. If you do refine your request in this way, this will be treated as a new request.

Answer 3

Welsh Government Admin Estate = 63%
CADW – Whole portfolio (2.75%) or Manned sites (6.6%)

Answer 4

Welsh Government Admin Estate = 13%

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: Freedomofinformation@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