



Llywodraeth Cymru
Welsh Government

2 April 2026

Dear ,

ATISN 26783 - Information Request Godre'r Graig School, Godre'r Graig Tip and documents associated with the NPS Frameworks for South and West Wales regions

Information requested

You asked for:

1. Any correspondence, documents or any other information or records relating to Godre'r Graig School, in the Swansea Valley, Neath Port Talbot since 1st October 2025.
2. Any correspondence, documents or any other information or records relating to the Tip named Godre'r-Graig Quarry / Cilmaengwyn L44A / T37552 since 1st January 2025.
3. All documents relating to the NPS South West and Mid Wales Framework (consisting of Carmarthen CC, Ceredigion CC, Pembrokeshire CC, Neath Port Talbot CBC, and Powys County Council & City & County of Swansea) that was implemented in 2017 and expired at the end of March 2021, and the subsequent new SW&MW Regional Engineering Services Framework managed by Carmarthenshire County Council from 1st April 2021.

Our response

1. I have made enquiries across several teams within Welsh Government in relation to your request and the timeframe it involves. I have not been able to identify any recorded information related to this request.
2. A summary list of the information available related to these coal tips is provided in Appendix A and each document is attached within the response email.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

3. I have not identified any recorded information relating to the framework agreements outlined above concerning Godre'r Graig School or tip sites. These frameworks have been developed and are managed by Local Authorities. Carmarthenshire County Borough Council may be able to provide you with information relating to this framework agreement.

I have decided that some of the information within the correspondence and accompanying documents is exempt from disclosure (Regulation 13 (1) Environmental Information Regulations) and is therefore withheld due to it relating to personal information. The reasons for applying these exemptions are set out in full at Annex B within 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.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 – Information for Disclosure

Document 1- ESP Godre'r Graig Interpretive Report R2 20/2/25
Document 2- ESP Godre'r Graig Combined Figures & Plates 20/2/25
Document 3 – RE T37552 - Map Data
Document 4 - FW T37552 – Map Data
Document 5 – Coal Tip Safety Technical Working Group Meeting – minutes 15/10/25
Document 6 – 6608 - Godre'r Graig Tip – NPTBC – 7234E.05 30.04.2025_redacted
Document 7 -- 6699 - Godre'r Graig Tip – NPTBC – 7234E.05 30.06.2025_redacted
Document 8 -- 6621 - Godre'r Graig Tip – NPTBC – 7234E.0530 sept 2025_redacted
Document 9 - CTS Grant Scheme – Quarter 3 claim_redacted
Document 10 - 6654 - Godre'r Graig Tip – NPTBC – 7234E.05 30.05.2025_redacted
Document 11 - 6865 - Godre'r Graig Tip – NPTBC – 7234E.05 Oct.2025_redacted
Document 12 – Climaengwyn -IDP – Invoice INV -8129_redacted
Document 13 – 6959 - Godre'r Graig Tip – NPTBC – 7234E.05 Dec 2025_redacted
Document 14 - 6731 - Godre'r Graig Tip – NPTBC – 7234E.05 July 2025_redacted
Document 15 – FW – CTS – Quarterly Progress Report & Claim Q2_redacted
Document 16 - 6775 - Godre'r Graig Tip – NPTBC – 7234E.05 Aug 2025_redacted
Document 17 - 6775 - Godre'r Graig Tip – NPTBC – 7234E.05 Aug 2025_redacted 1
Document 18 – NPT - Q1 – Coal Tip Safety Grant Programme 2025-26 Grant Claim form redacted
Document 19 - NPT - Q2 – Coal Tip Safety Grant Programme 2025-26 Quarterly progress redacted
Document 20 – NPT - Q3 – Coal Tip Safety Grant Programme 2025-26 Grant Claim form redacted
Document 21 - Neath Port Talbot – Application Form – Coal Tip Safety Grant FY2025/26 -redacted
Document 22 - NPT –Q2 Coal Tip Safety Grant Programme 2025-26 Grant Claim form 002 redacted
Document 23 - NPT – Q1 -Coal Tip Safety Grant Programme 2025-26 Quarterly progress 002 redacted
Document 24 – NPT – Q3 – Coal Tip Safety Grant Programme 2025-26 Quarterly progress redacted

Annex B – Exceptions – Environmental Information Regulations

Regulation 13 – Personal data

Regulation 13(1) together with the conditions in Regulation 13(2)(a)(i) and 13(2)(a)(ii) 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 Regulation 13(1) of the EIRs, 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

Welsh Government acknowledges the general public interest in openness and transparency that release of the information would engender. However, we cannot identify any particular legitimate interest in the provision of personal data for individuals working in this area. We do not believe it is necessary to release the names of individuals for the discussions and exchange of information to be understood. The request asked for information that has passed between two named organisations, and release of the redacted information would not add to this. The provision of this data would not add to the understanding of the information provided or provide any additional context.

2. Is disclosure necessary?

Based on the arguments set out above, we do not believe that disclosure of the information is necessary in this context.

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

As we do not believe disclosure would further the understanding of the information released we do not believe any interest in accessing these details outweigh the data subjects’ interests, fundamental rights or freedoms.

As release of the information would not be legitimate under Article 6(1)(f), and as no other condition of Article 6 is deemed to apply, release of the information would not be lawful within the meaning of the first data protection principle. It has therefore been withheld under Reg13(1) of the Environmental Information Regulations. Reg 13 is an absolute exception and not subject to the public interest test.

