

7 October 2026

Dear

Request for Information - ATISN 27519

Thank you for your request for information which I received on 11 September. Your request has been logged under reference ATISN 27519, which we note is a refined request to your original request for information (reference ATISN 27322).

I understand that your refined request is seeking the following information relating to Cardiff Airport:

1. Documentation of a meeting which took place between L&G, Keith Brooks, the First Minister, and Edwina Hart, during 2012-2013 regarding Cardiff Airport.

Our Response:

In the first instance, I am of the view that the information you requested 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'.

We have located one document which is captured by your request for information. Please note that all personal information is being withheld under Section 40 of the Freedom of Information Act 2000, personal information. Full reasoning for applying this exemption is outlined in Annex A. A redacted copy of the document has been included in Annex B.

We acknowledge that it is possible that other records may have existed and been held by the Welsh Government, but that these potential records would have by now been disposed of, in line with the Welsh Government's retention policy:

[Welsh Government retention and disposal schedule | GOV.WALES](#)

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

Telephone: 0303 123 1113

Website: www.ico.org.uk

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Personal Information

The request you sent me contains personal information about you - for example, your name and email address. The Welsh Government will be the data processor for this information and, in accordance with the General Data Protection Regulation, it will be processed in order to fulfil our public task and meet our legal obligations under the Act to provide you with a response. We will only use this personal information to deal with your request and any matters which arise as a result of it. We will keep your personal information and all other information relating to your request for three years from the date on which your request is finally closed. Your personal information will then be disposed of securely.

Under data protection legislation, you have the right:

- to be informed of the personal data we hold about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection

For further information about the information which the Welsh Government holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer
Welsh Government
Cathays Park
CARDIFF

CF10 3NQ

Email: DataProtectionOfficer@gov.wales

The contact details for the Information Commissioner's Office are:

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk

Any information released under the Freedom of Information Act 2000 or Environmental Information Regulations 2004 will be listed in the Welsh Government's Disclosure Log (at <https://gov.wales/about/open-government/freedom-of-information/responses/?lang=en>).

Yours sincerely,

Annex A:

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

The 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 subject to the information captured by this request.

2. Is disclosure necessary?

We do not believe it is necessary to release the names and roles of individuals for the discussions and exchange of information to be understood. The provision of this data would not add to the understanding of the information provided or provide any additional context. The individuals would not expect the Welsh Government to release their personal information to the world. Disclosure of the names is not considered reasonably necessary. The remaining information being released to you meets the identified interest of your request.

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.

Annex B:**DC/FM/05578/12**

To:	1. Jason Thomas 2. DS First Minister
From:	[REDACTED] BETS Government Business Your Ext: [REDACTED]
cc:	PS First Minister PS Minister for BETS PS Minister for LGC James Price Jeff Collins PS/Special Advisers [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] BETS Government Business

Date:	23 May 2012
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**Meeting with representatives from LGV Capital, Vista Retail
Support and Airport Investment & Enterprise LLP**

Date:	31st May 2012
Timing of Appointment:	10:30 - 11:00
Venue:	First Minister's office, Cardiff Bay
Name & Contact of Official Attending the Event/ Meeting (on the day):	Jeff Collins [REDACTED]

Accompanying Documents – to be flagged with doc. numbers (alter as appropriate)

Doc. 1	Purpose of meeting / Background
Doc. 2	Lines to Take
Doc. 3	List of Attendees / Pen Pictures

Purpose of Meeting

[REDACTED] and Keith Brooks have been looking into potential investment opportunities for Cardiff Airport on behalf of the Welsh Government. The purpose of the meeting is for these potential commercial opportunities to be presented to the First Minister for discussion.

Background

LGV Capital

LGV Capital is a provider of private equity in the UK mid-market. LGV focus principally on transactions with an enterprise value in excess of £25 million. They cover all industry sectors, but have a particular emphasis on Consumer, Healthcare, Leisure and Services.

LGV was established in 1986 as the private equity arm of Legal & General Group plc, a FTSE-100 quoted insurance company. It is a subsidiary of Legal & General Investment Management which manages over £300bn. Since formation, LGV has developed into one of the leading UK mid-market private equity firms with an enviable track record across multiple funds, having successfully invested over £1.6bn in more than 85 companies.

Advice

LGV currently own development land adjacent to the airport, so this opportunity is genuine, and has many possible synergies with their current land holding.

Lines to take

- Interested to hear your vision for the Airport.
- The overall performance of Cardiff Airport remains a serious concern for Welsh Ministers.
- The Airport has suffered a sustained loss of passengers and a diminishing diversity of services.
- Cardiff Airport is integral to the fabric of our national infrastructure. We are committed to making Cardiff Airport realise its true potential as a modern, competitive, thriving and commercially successful airport, which is a key economic driver and source of pride for the people of Wales.
- Last month, I announced the establishment of a Task Force to look at how we can maximise its potential.
- The Task Force aims to address how the competitive position of Cardiff Airport can be improved through collaboration between its owners, the Welsh Government and the wider public sector and business community.
- Welsh Government would be prepared to take a stake – subject to EU rules – with the right partner if they were able to acquire the Airport.

Attendees / Pen Pics

[REDACTED]