23 November 2026

Dear

ATISN 26-0103 – Designated Historic Assets in Wales

Thank you for your request which was received on 26 October. You asked for:

- A list of the names of Scheduled Monuments in Wales which are also Listed Buildings;

Please see document 1 attached. You may wish to note that some Scheduled Monuments have multiple Listed Building references. This occurs where there is more than one Listed Building within the boundary of a Scheduled Monument.

- In this list identify which of these are at risk and their severity using the latest dated information.

I have withheld information indicating individual levels of risk under Regulation 13 of the Environmental Information Regulations 2004 and my reasoning for doing so is set out in Annex B.

You also asked for (for each year in which data was gathered, from 2012 to present):

- The percentage of Scheduled Monuments in Wales at risk;

Please see document 2 attached.

- The percentage of Listed Buildings in Wales at risk;

Please see document 3 attached.

- The percentage of Listed Buildings which are also Scheduled Monuments in Wales at risk.

The information is not held. Listed Buildings and Scheduled Monuments at-risk are assessed using different methodologies and are not directly comparable. Therefore, we do not collate this data.

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

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Doc 1	A spreadsheet of named Scheduled Monuments in Wales which are also Listed Buildings.
Doc 2	A table recording % of Scheduled Monuments in Wales considered at-risk, 2012-present (by financial year), and explanatory note.
Doc 3	A table recording % of Listed Buildings in Wales considered at-risk, 2012-present (by financial year).

Annex B

ATISN 26-0103 – Designated Historic Assets in Wales

Engagement of Regulation 13

I have decided to withhold the following information:

Information being withheld	**Section number and exception name**
The risk status of named dual designated scheduled monuments and listed buildings.	Regulation (13) of the Environmental Information Regulations: the information requested includes personal data of which the applicant is not the data subject.

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.

1 Releasing the risk data of named dual designated assets can indirectly identify an individual and therefore be capable of constituting personal data.

2 Data about a historic asset is not, by itself, personal data. However, the context is important and the information about the risk status of a historic asset is often linked to an owner, or occupier, where it concerns the poor condition of the asset. Consequently, the data about the asset will be personal data about that individual.

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. I consider the principle being most relevant in this instance as being the First Principle. This states that personal data must be: *"processed lawfully, fairly and in a transparent manner in relation to the data subject."*

- 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 considered the public interest test set out in Regulation 12.1b and I consider 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 not be fair to the individuals concerned to release their personal data.

Disclosure could give rise to unfair and unwarranted intrusion on individuals' privacy in the circumstances of this case and has the potential to cause unnecessary and unjustified harm to the individuals in this case.

I have thus concluded that in in this case, disclosure would not have been within the reasonable expectation of individuals, and the loss of privacy would cause unwarranted distress. It is my view that disclosure would breach the first data protection principle, and so is exempt from release under Regulation 13 of the Environmental Information Regulations 2004.