

4 November

Dear

## **ATISN 26226 – Pumpsaint Roman Fort**

Thank you for your request which I received on 7 October 2025. You asked for:

- 1. The full Scheduled Monument Consent decision letter and conditions issued in 2025 for the revised road junction affecting Pumpsaint Roman Fort (CM226).*
- 2. All associated documentation submitted in support of that application (including plans, method statements, heritage impact assessments, or archaeological mitigation strategies).*
- 3. The full archaeological evaluation report(s) carried out under the 2023 SMC consent for Pumpsaint Roman Fort, including results, conclusions, and any subsequent monitoring reports.*  
*I understand redactions may apply for personal data, but I request that the substantive content be disclosed in the public interest.*

## **Our response**

This Environmental Information Regulation disclosure contains material created by third parties outside of the Welsh Government.

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.

Two Scheduled Monument Consents (SMC) have been granted in connection with the revised road junction. Both final consent letters are provided. As the documentation was identical for each application, only one set has been included.

Doc 2 cites the Ancient Monuments and Archaeological Areas Act 1979. This consent is now being reissued pursuant to the Historic Environment (Wales) Act 2023. I can confirm that the content remains unchanged.

- Doc 01 - Scheduled Monument Consent SMC2857 - Final letter - [Redacted - Regulation 13 Personal Data]
- Doc 02 - Scheduled Monument Consent SMC2878 - Final letter - [Redacted - Regulation 13 Personal Data]
- Doc 03 - SMC 02a - Design drawings **[copyright of Pell Frischmann]**
- Doc 04 - SMC 02b - Design detail
- Doc 05 - SMC 02c - Soil analysis and compression review [Redacted - Regulation 13 Personal Data]
- Doc 06 - SMC 03 - Access options appraisal - [Redacted - Regulation 13 Personal Data]

- Doc 07 - SMC 04a - Archaeological evaluation 1 report - [Redacted - Regulation 13 Personal Data]
- Doc 08 - SMC 04b - Archaeological evaluation 2 report - [Redacted - Regulation 13 Personal Data]
- Doc 09 - SMC 05 - Written Scheme of Investigation - [Redacted - Regulation 13 Personal Data]
- Doc 10 - SMC 06a - Preliminary heritage appraisal **[copyright of Hampton Heritage Design & Consultancy Ltd]**
- Doc 11 - SMC 06b - Supplementary archaeological review **[copyright of Hampton Heritage Design & Consultancy Ltd]**

## 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 in their capacity as employees of the said organisations 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 individual 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 individual concerned to release their personal data. Disclosure would give rise to unfair and unwarranted intrusion on the individual's privacy in the circumstances of this case and has the potential to cause unnecessary and unjustified harm to the individual 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 individual 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.