

2 February 2026

Dear

**ATISN 26544 - Buckland Hall**

**Information requested**

Thank you for your request which I received on 5 January 2026. You asked for:

- All correspondences between the Welsh Government and Robin Filmer Wilson or any representatives from Buckland Hall since 2015

**Our response**

The information you requested is enclosed. I have redacted personal information of individuals under Regulation 13 of the Environmental Information Regulations 2004. My reasoning for doing so is set out at Annex A.

The information you requested is enclosed. A number of documents mention the Landscape Management Plan which is included at Document 1.

The owner did not reply to the consultation or notification letters at documents 8 and 9.

Below is a list of the documents captured by your request:

- Doc 01 - Email from Landscape Agency to Cadw about Landscape Management Plan (LMP)
- Doc 01 Attachment - Buckland Hall brief for LMP
- Doc 02 - Email from Landscape Agency to Cadw with LMP
- Doc 03 - Email chain to arrange site meeting between Cadw and Landscape Agency
- Doc 04 - Emails arranging site visit with Cadw
- Doc 05 - Emails with Cadw comments on LMP and postpone site visit
- Doc 06 - Email to Cadw about boundaries from Landscape Agency
- Doc 07 - Emails from Cadw with boundaries
- Doc 08 - Cadw - RHPG - Statutory Register consultation letter Buckland House
- Doc 09 - Cadw - RHPG - Statutory Register notification letter Buckland House

- Doc 10 – Pre-planning email to Cadw
- Doc 10 Attachment 1 – Pre-planning letter to Cadw
- Doc 10 Attachment 2 - Pre-app notice - SCHEDULE 1C Article 2D
- Doc 11 - Email response and reply re pre-planning application
- Doc 11 Attachment - Stat pre-app - Cadw further information required letter
- Doc 12 - Email chain with clarification of works in pre-application
- Doc 13 - Revised Cadw response
- Doc 13 Attachment - Stat pre-app - Cadw no objection 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 the 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

## Regulation 13 of the Environmental Information Regulations 2004 (EIR)

I have decided to withhold the following information:

Information being withheld	Section number and exception name
Personal information including names, email addresses, and phone numbers that could identify individuals. This includes Welsh Government officials.	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 provides an exception 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.

I have concluded that, in this instance, the information requested contains 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**

I recognise that there may be legitimate interests in the disclosure of environmental information. In line with ICO guidance, such interests can include general principles of transparency and accountability, ensuring public authorities can be scrutinised, as well as any case-specific interest put forward by the requester. These are valid considerations and have been taken into account when assessing this request. However, in this case the legitimate interest is general in nature and does not require the disclosure of identifiable personal data in order to be met.

## **2. Is disclosure necessary?**

I have considered whether disclosure of the personal data is necessary to meet any legitimate interests in transparency or accountability. The information requested includes personal data relating to identifiable individual(s) who would have a reasonable expectation that their personal details would remain confidential and would not be released into the public domain.

Disclosure of the identifiable personal data is not necessary to meet any legitimate interest, as the aims of transparency and accountability can be met through less intrusive means—such as the provision of redacted or anonymised information, or by describing the action taken by the authority without identifying the individuals concerned. ICO guidance makes clear that disclosure under EIR/FOIA must be the least intrusive means of achieving the legitimate aim. In this case, that aim can clearly be met without releasing personal data.

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

I have weighed any legitimate interest in disclosure against the interests, rights and freedoms of the data subject(s). The individual(s) concerned would have a strong and reasonable expectation that their personal data would be kept private and not disclosed to the world at large under the EIR. Disclosure would be unfair to the individual(s) and would result in an unwarranted intrusion into their private life.

I also consider that disclosure has the potential to cause unnecessary and unjustified harm or distress to the individual(s) concerned. Releasing the information would be contrary to their reasonable expectations and would interfere with their right to respect for private and family life under Article 8 of the European Convention on Human Rights. ICO guidance states that where an individual would not reasonably expect public disclosure, and/or where disclosure would cause unjustified harm, their rights are likely to outweigh any legitimate interest in disclosure.

In this case, the rights and freedoms of the individual(s) clearly outweigh the general legitimate interests in transparency. Disclosure would therefore be unlawful and unfair, and would breach the first data protection principle. As a result, the personal data is exempt from disclosure under Regulation 13 of the Environmental Information Regulations 2004.

Therefore, disclosure of the personal data is not necessary for any legitimate interest and would be unfair and intrusive, so the information is exempt under Regulation 13(1) EIR.