

Dear

**ATISN 27391 - Request for information and reconsideration of listing – No. 6
Llawr Gors, Pwllheli – Cadw ref. 4536**

Information requested

Thank you for your request which I received on 21 August 2026. You asked for:

1. Any surviving documentation, reports, photographs, field notes or correspondence from the original 1989 assessment and designation of No. 6 Llawr Gors (ref. 4536), particularly material explaining the nature of the group value relied upon.

Please see documents 1-3. Cadw does not hold any other information from the time of the assessment. Working practice at the time was not to retain material of this nature long-term and the file has since been destroyed as a result.

2. Any surviving documentation concerning the 2019 removal of the former Baptist Chapel (ref. 4542) from the statutory list, including the reasons for delisting and, if available, the assessment of how the alterations affected its integrity and historic character.

Please see documents 4-11b.

3. Any information held by Cadw concerning the subsequent substantial alteration/reconstruction of No. 5 Llawr Gors (ref. 4535), including any consultation, listed building consent or heritage assessment material available to Cadw.

Please see documents 12-14.

4. Any other information held by Cadw which would assist in understanding whether the architectural or historic group which existed when No. 6 was designated in 1989 remains substantially intact today.

Please see documents 15a-c.

5. Any further material relating to the original 1989 designation which is not available through the current online Cadw records.

Inspection photos for No.6 are attached for your records at documents 16a-e.

I have redacted:

- all personal information of Cadw officials, and local government officers, past and present;
- the personal information of the owner from documents 9a and 11a;
- photographs at documents 1, 7a, f, g & h and 16e, where that information can be used to identify people;

- car registration plates from the images in documents 1 and 16e, for the same reason
- sundry other information from documents 12 and 13 that could be used to identify people.

I have made these redactions under Regulation 13 of the Environmental Information Regulations 2004 and my reasoning for doing so is set out in Annex B.

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

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Doc	Date	Title
1	Sept 1988	6-12 Llawr Gors, Pwllheli – Survey photo
2	Undated	6-12 Llawr Gors, Pwllheli - screenshot of listing as a single inclusive listing – undated draft
3	28 July 1989	6 Llawr Gors, Pwllheli – Listing description
4	Sept 1988 and Nov 1991	Capel Bethel y Bedyddwr, Pwllheli. Collage comprises: 1x Survey photo 2x Inspection photos
5	28/07/1989	Capel Bethel y Bedyddwr – listing description
6a	25/03/1998	Capel Bethel y Bedyddwr – inspection photo
6b	02/03/2007	Capel Bethel y Bedyddwr – inspection photo
6c	02/04/2014	Capel Bethel y Bedyddwr – inspection photo
7a-h	12/02/2019	Capel Bethel y Bedyddwr – delisting inspection photos
8	11/03/2019	Capel Bethel y Bedyddwr – delisting enquiry, assessment and endorsement
9a	17/04/2019	Capel Bethel y Bedyddwr – statutory delisting consultation letter to owner ¹
9b	17/04/2019	Capel Bethel y Bedyddwr – statutory delisting consultation letter to LPA
10	30/05/2019	Capel Bethel y Bedyddwr – delisting signoff
11a	30/05/2019	Capel Bethel y Bedyddwr – statutory delisting notification letter to owner
11b	30/05/2019	Capel Bethel y Bedyddwr – statutory delisting notification letter to LPA
12	01/11/1999	4 & 5 Llawr Gors. Cadw to Gwynedd Council re unauthorised works
13	24/07/2000	4 & 5 Llawr Gors. Gwynedd Council Planning & Economic Development Committee minutes
14	17/08/2001	4 & 5 Llawr Gors. Gwynedd Council to Cadw re delisting
15a	20/08/2026	Senior Conservation Officer enquiry re de-listing 6 Llawr Gors
15b	20/08/2026	Cadw Inspector of Historic Buildings' Advice
15c	20/08/2026	Reply to Senior Conservation Officer
16a		Regular inspection photos of No. 6
16b		Regular inspection photos of No. 6
16c		Regular inspection photos of No. 6
16d		Regular inspection photos of No. 6
16e		Regular inspection photos of No. 6

¹ Consultation details would also have been published on the Cadw notices webpage here: [Statutory listed building consultation notices | Cadw](#)

ATISN 27391 – 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 of Cadw officials and local government officers, past and present. Other personal information including names and addresses, photographs of people and circumstances, car registration plates and sundry details 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(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.

After very careful consideration, I have concluded that, in this instance, the information requested contains personal data:

1. The information requested contains identifiers for Cadw and local government officers, past and present. It can be used to directly identify individuals and therefore constitutes personal data.
2. The information requested contains identifiers for members of the public. It can be used to directly identify individuals and therefore constitutes personal data.
3. Photographs of the interior of a property and car registration plates would not normally identify an individual, but in combination with other information e.g. location, it may indirectly identify an individual and may therefore be capable of constituting 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. I 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 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 concluded that 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.