

Dear

ATISN 27307 Agricultural Land Classification

Information Requested

Thank you for your request received on 05 August. You asked for:

1 a. What were the dates, times and durations of all soil, subsoil and land testing for the 2 sites of DNS CAS-03107-C5X9W1?

1 b. How many personnel were involved to take samples of soils and subsoils on the 2 sites?

2 a. Please state the climate data contemporaneous with taking samples and up to one week in advance of soil/subsoil sampling. Please include photographs of the land and soils conditions before and during sampling activities.

2 b. Please state the soil wetness rating for all samples taken with the grade according to the Hodgson 2022 grading system.

3 a. What was the crop in the fields at the time of sampling?

3 b. What species or range of species of crop were present at the time of sampling?

3 c. What were the root depths of crops present at the time of sampling? Please show photographic evidence.

3 d. If the soil type and water logging, drought or pollution produced areas of plants more suited to those conditions at the time of taking samples, please supply details of the species in such areas and the area of each land grade so affected. I would respect sight of photographic evidence of such patches.

4. The method of sampling - what was used to take soil and subsoil samples? For examples: auger, spade, machine. Please supply details of depths of both topsoil and the full pit depth from which samples were taken per grade of land assessed. Please supply photographic evidence of the sampling method, photos to include the soils upon or within the sampling tool and the soil profile condition surrounding the depths of the sampled pit areas. For clarity, photographs of the pit walls and base of the pit are required.

5. Please supply the name of the company used to take soil samples, together with their accreditation.

6. Please state the accurate positions of each sample taken, either by map coordinates or a physical map of the site showing all sample positions.

7. Please describe accurately the topography of 2 sites, showing gradient and aspect details.

8. Please describe the on-site subjective soil texture determination reports including pictures of how the result was obtained.

9. Please describe the smell of both soil and subsoil at time of sampling for each sample dug.

10. Please describe evidence of earthworm activities in each topsoil and subsoil samples as taken.

11. Please describe under what climatic and ground conditions LQAS consider it unsuitable to take soil and subsoils samples whereby to assess agricultural land classification.

12. Please supply the complete laboratory analysis data of the mechanical analyses of the soil samples. I would respect sight of all soil constituents listed as percentages of the sample analysed.

Please note that as the LQAS letter of 01 July 2026 mentions 2 grades of land classification. I would respect that you disclose as a minimum the mechanical analysis for each soil and subsoil type stated in that letter. Should the lower ALC grade land be excessively stoney I require discovery of the percentage of stone cover and the size range of those stones. I would respect sight of contemporaneous evidence in the form of photographic records of such stoniness. Please make the position very clear within each of the 2 sites where each different soil type was taken.

13. Please supply the complete laboratory analysis data of the chemical or nutrient analyses of the soil. I would respect sight of all soil constituents listed. I expect you to disclose professionally conducted soil sample analysis data of:

Nitrogen (all oxidation states), phosphorus (all oxidation states), potassium (as chloride and sulphate). Plus pH, soil moisture content, ammonia content and soil oxygen content.

14. Please supply the complete laboratory analysis data of trace elements in the soil samples, especially metals including iron, nickel, cadmium, sodium and magnesium. Plus trace elements selenium, molybdenum and sulphur. Please disclose evidence of other concerning ions, molecules or compounds if found during analysis - e.g. asbestos, arsenic, mercury, methane, hydrogen sulphide, cyanide, VOCs etc.

15. How many samples were analysed in the laboratory? Please quote the number of both mechanical analysis and chemical/nutrient analysis.

16. What was the weight of each soil sample presented to the laboratory?

17. Please disclose the laboratory names and addresses.

18. What were the soil type descriptions of each soil type analysed?

19. With reference to the LQAS letter of 01 July 2026 mentioned above in para 1, that letter describes the ALC grading of the land areas with 2 decimal places of accuracy.

Please therefore disclose an accurate map of each ALC grade as described in that letter.

For the avoidance of doubt that is 22.00ha (sic) of ALC Grade 3B land and 30.00ha (sic) of ALC Grade 5 land.

20. With reference to question 1b, please demonstrate how many personnel were utilised to determine and then delineate the areas described as 22.00ha of ALC Grade 3B land and 30.00ha of ALC Grade 5 land.

21. With reference to question 20 please describe the LQAS procedures whereby the areas of land classification were mapped to 2 decimal places accuracy on the 2 sites.

22. The land under planning consideration via DNS CAS-03107-C5X9W1 is typical of much farmland in South Pembrokeshire. Is the Welsh Government's policy to have LQAS downgrade all such land to Agricultural Land Classification Grade 5?

23. With reference to question 22, as ALC Grade 5 land is worth about half the monetary value of Grade 3Ab and Grade 3B land, will the Welsh Government, PEDW and LQAS compensate farmers for all such farmland downgraded?

24. Please disclose the site visit logs by all LQAS personnel to DNS CAS-03107-C5X9W1 since the application was submitted to PEDW.

25. With reference to all of the questions above, please disclose the qualifications and experience of Mr A W Williams and Mr R J Cooke of LQAS.

26. How many times has LQAS downgraded farmland intended for solar and wind energy sites from its previous BMV status to ALC Grade 3B or lower grades?

27. How many times has LQAS downgraded farmland from ALC Grades 3A and 3B to ALC Grade 5?

28. How many previous complaints have LQAS received regarding downgrading Agricultural Land Classifications from Best and Most Versatile land to ALC Grade 3B and below? For the avoidance of doubt, this means farmland downgraded from previous grades of ALC Grade 2 or 3A.

29. LQAS, PEDW and the applicant are fully aware of the presence and positions of abandoned coal mine workings and the 3 pipelines which exist under the 2 sites under consideration. I would respect discovery of any and all soil and subsoil testing systems utilised on the sites during 2025 or earlier, to accurately measure the proximity of the pre-existing infrastructure.

30. Please supply clear evidence of the risk assessments apropos the land and soils data from the questions above with regard to the proposed solar array infrastructures and their substations, inverters, wiring harnesses and cabling, Battery Energy Storage Systems etc.

For the avoidance of doubt I require disclosure of evidence of consideration of potential chemical interactions between the soils and land as tested with the water table and solar array infrastructure materials.

31. Please, under Freedom of Information legislation, disclose evidence from the ground and land sampling work that those soil and subsoils, if built upon by the proposed solar arrays, would have zero risks to human life and wildlife with an absolute guarantee that there will be no further pollution of watercourses - the latter to include the local shallow aquifers and shallow mine workings.

Our response

For the following questions, the information is not held:

1a, 1b, 2a, 3a, 3b, 3c, 3d, 9, 10, 11, 13, 14, 16, 20, 21, 22, 24, 25, 26, 27, 28, 29, 30 & 31.

The Agricultural Land Classification system is the only approved system for determining agricultural land quality in the planning system. The [Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land - JP069](#) explains the approach to questions 2a climatic data and soil / site interactive climatic limitations; 2b soil wetness assessment; 3c soil depth; 3d soil texture, wetness and workability and drought calculations; and, 13 & 14 chemical limitations¹.

¹Page 21 The chemical status of a soil does not affect ALC grading where nutrient levels can be maintained or corrected by normal applications of fertiliser or lime. Chemical factors will only affect grading where they have, or are likely to have, a detrimental long- term effect on the physical condition of the soil, the crop yield, the range of crops that may be safely grown, stocking rates or grazing management.

In relation to question 22, the approach outlined is not government policy.

For the following questions please refer to information already in the public domain:

2b, 4, 5, 6, 7, 8, 12, 15, 17, 18, 19, 25 & 26 held within:

- [Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land - JP069](#).
- [PEDW Planning Casework Portal](#) “2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026)

22, 23 & 26 - the approach to using ALC grades in the valuation of farmland, the use of the Predictive ALC Map and need for surveys is dealt with in standing advice held within:

- [Agricultural land classification: predictive map guidance](#)
- [Agricultural land classification: frequently asked questions | GOV.WALES](#)

30 & 31 - information relating to the planning application may be found on the [PEDW Planning Casework Portal](#). Further information on the general assessment of solar PV sites may be found at:

- [The impact of solar photovoltaic sites on agricultural soils and land quality: literature review | GOV.WALES](#)
- [The impact of solar photovoltaic sites on agricultural soils and land quality: industry overview | GOV.WALES](#)
- [The impact of solar photovoltaic sites on agricultural soils and land quality: solar photovoltaic sites | GOV.WALES](#)
- [The impact of solar photovoltaic sites on agricultural soils and land quality: review of impacts | GOV.WALES](#)
- [The impact of solar photovoltaic sites on agricultural soils and land quality: summary | GOV.WALES](#)

You may also find insightful:

- [tan6-sustainable-rural-communities.pdf](#)
- [Agricultural land classification: technical review \(part 1\) | GOV.WALES](#)
- [Agricultural land classification: technical review \(part 2\) | GOV.WALES](#)
- [Agricultural land classification: technical review \(part 3\) | GOV.WALES](#)
- [Agricultural land classification: technical review \(part 4\) | GOV.WALES](#)
- [Agricultural land classification: technical review \(part 5\) | 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: 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,