

Our Ref: 5076-01

16 December 2025

By email only: LQAS@gov.wales

CORRESPONDENCE REGARDING AGRICULTURAL LAND CLASSIFICATION SURVEY REPORT REF. P252121/ALC UNDERTAKEN IN SUPPORT OF DNS REF. CAS-03107-C5X9W1

This letter relates to correspondence between LQAS (Land Quality Advice Service), Oracle Environmental Experts Ltd (author of the ALC survey reports) and Axis (acting on behalf of GSC White House Farm Ltd) regarding the differences between two ALC survey reports submitted in support of DNS ref. CAS-03107-C5X9W1. The initial report was submitted to PEDW in July 2025 in support of a request for a Scoping Direction, and an amended report was later published online in October 2025 in support of the statutory Pre-Application Consultation (PAC) process.

On 19 August 2025, PEDW provided the Applicant with a compilation of statutory consultee responses relating to the Proposed Development, including a response from LQAS dated 15 August 2025.

LQAS advised that the ALC survey appended to the request for a Scoping Direction could not be accepted as an accurate assessment of land quality at the Site, citing insufficient information. They therefore recommended that Land and Soils be scoped into the Environmental Impact Assessment (EIA). The specific matters requiring clarification were set out in Annex 1 of the LQAS letter. Oracle Environmental Experts Ltd reviewed these comments and amended the ALC survey report accordingly. The revised report was published online in October 2025 in support of the PAC process.

On 2 December 2025, LQAS, as a specialist consultee, provided a PAC response. They noted that the revised report contained significant changes to soil textures, soil properties and grade distribution when compared to the initial report. As such, the revised report was not validated by LQAS.

As a result of this, Axis requested a meeting between LQAS and Oracle Environmental Experts Ltd to discuss the differences in the report and confirm methodology and location for any further site investigation considered necessary to support the conclusions of the revised ALC report.

This meeting took place on Thursday 11 December 2025. Within the meeting Oracle Environmental Experts Ltd set out their approach to the revised report and the reasons for the differences between the initial and amended versions. Oracle Environmental Experts Ltd explained that following feedback on the initial report, the simplest approach to address LQAS's comments regarding wetness assessment was to take a conservative approach and assign Wetness Class I to the soils. Given the very high interpolated Field Capacity Days (230) for the site, and the results of the lab analysis confirming the textures as Sandy Clay and Clay, the grade would default to Sub-grade 3b regardless of other field observations. Oracle Environmental Experts Ltd also stated that the grading was not dependant on the presence of a Slowly Permeable Layer (SPL), and confirmation of an SPL would only further reduce the grade of agricultural land at the site.

LQAS acknowledged the reasons for the differing reports. LQAS were of the view that, based on the Field Capacity Days and photographic observations of pits and auger profiles, it is likely that the site may all be non-BMV (Best and Most Versatile) land.

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LQAS requested the following be undertaken prior to full submission of the DNS application:

- i) Additional detailed trial pits are completed, with sampling, so that further detail on the presence of an SPL can be included to better justify the grades presented within the amended report.
- ii) Review and confirm the assigned topsoil textures and PSD results.
- iii) Review of the grade units.
- iv) The ALC report to be updated to reflect the actual observations (i.e. approach taken to PAC) rather assigning wetness class I best-case scenario.

Following the meeting, Oracle Environmental Experts Ltd undertook further site investigation on Friday 12 December, including at least four more trial pits across the site to undertake detailed examination of soil profiles and to collect samples. The ALC survey report submitted in support of the full DNS application for ref. CAS-03107-C5X9W1 will be updated to reflect these findings and provide details of the characteristics that do or do not support the presence of an SPL.

LQAS confirmed that the above approach would not require LQAS to undertake their own site investigation at this stage in order to validate the ALC survey report, and that an amended report could be validated if additional site investigations conducted by Oracle Environmental Experts Ltd (as set out above) supported the conclusions of the report published as part of the PAC process.

Yours sincerely

Callum Fairheads

Grade on behalf of Axis

This letter has been reviewed, and the above approach has been agreed with LQAS.

Date: 16 December 2025

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