

14 September 2026

Dear

ATISN 27385 - White House Farm

Information requested

Thank you for your request received on 20 August.

You asked for:

1. The Report was dated 24 December 2025, it was acted upon by LQAS and PEDW on 29 December 2025. Please explain why the delay to add the report to the PEDW portal, which was on 12 May 2026.
2. A comprehensive report regarding the same land areas was undertaken by the same company, Oracle, on 06 February 2025. Please explain why the second survey and updating of the "Final" report was necessitated on 12 December 2025.
3. Please name who commissioned the second survey of 12 December 2025 and its subsequent report of 24 December 2025.
4. Please state exactly how many samples were taken during the 06 February 2025 survey, please separate test pits from augured samples.
5. Please show the positions of the samples from question 4 on an accurate map.
6. Please state exactly how many samples were taken during the 12 December 2025 survey, please separate test pits and augured samples.
7. Please show the positions of the samples taken from question 6 on an accurate map.
8. Please state how many samples should be taken per hectare to make an accurate agricultural land classification assessment.
9. On Page 19 of the Report, Table 7 states that 57.7%, or 30.00ha of the 2 sites was assessed to be of ALC Grade 5 and 42.3% or 22.00ha was assessed to be of ALC Grade 3B. Please show the precise positions of the 2 grades of land on a map.
10. With reference to question 9, please describe how the precise boundaries of the 2 ALC grades were mapped.
11. The total area of the 2 sites of DNS CAS-03107-C5X9W1 is stated to be 52.00ha of farmable land within a 57ha total area. With reference to the Defra and Welsh Government Joint Publication – 069 'Agricultural Land Classification of England and Wales – Guidelines for grading the quality of agricultural land' (2025), please state how many samples should be taken to accurately assess 57ha to achieve precise land classification grades.

12. Please supply accurate rainfall data for the 2 sites of DNS CAS-03107-C5X9W1, White House Farm and Middle Hill Farm from 06 January 2025 to 06 February 2025 and 12 October 2025 to 12 December 2025.

13. Please supply the actual rainfall data for the 2 sites (White House Farm and Middle Hill) for the period 12.00, 11 December 2025 to 12.00, 12 December 2025.

14. Please state the recommendations for practical soil and subsoil sampling techniques as referenced by Oracle on Page 19, Para 7 "References" of the report dated 24 December 2025, please include when the Handbook states that sampling should not take place; i.e. please refer to: Hodgson, J.M. (ed.) (2022). Soil Survey Field Handbook, Technical Monograph No. 5. Soil Survey and Land Research Centre, Silsoe.

15. On page 13 of the Report, stones described as "Cobbles", taken from TP08 (trial pit 08) are shown in photograph 6 with a tape measure alongside for scale. For information please describe what geologists understand by the term "Cobbles"?

16. On Page 14 of the Report, Table 3 describes stones found on the sites according to size to determine the Agricultural Land Classification. TP08 is described as having 17% of the trial pit soil/subsoil consisting of stones of greater than 2cm across. Table 3 also states that 0% of TP08 were stones of greater than 6cm across. Please explain why the stones in TP08 shown in Photo 6 on Page 13 were mainly between 10cm to 16cm across, i.e. for clarity please explain the contradiction with the data stated in Table 3.

17. The position of test pit TP08 is shown on an aerial photo also in the Report as the second graphic of Appendix A - Figures. Please describe what may have caused the straight lines of the witness marks in the grassland on that aerial photo immediately to the North of TP08.

18. With reference to Hodgson, J.M. (ed.) (2022). Soil Survey Field Handbook, Technical Monograph No. 5. Soil Survey and Land Research Centre, Silsoe. Please explain why a test pit was dug next to a potentially buried previous building or that building's foundations with reference to the Handbook's recommendations.

19. With reference to Questions 17 and 18, please explain why the contents of Test Pit 08 were described as natural stoniness of the soil/subsoil thereby to downgrade the agricultural land classification assessment. It may help to clarify the confusion if you could explain why such stones were found nowhere else on the 2 sites.

20. Please describe the current status of Henneb's involvement with the buried site immediately North of TP08 at Middle Hill Farm, as shown on the aerial photo in Appendix A. For the avoidance of doubt, is there concern at PEDW that archaeological remains may be found at this site?

21. Has PEDW, in the full knowledge that dry weather has revealed the presence of a site underground site again in 2026, asked questions of Henneb regarding the provenance or history of the potential Middle Hill site's archaeological importance?

22. Photo 6 in the Report shows stones described to be from test pit 08. Photo 9 also shows TP08, but without sign of any stones. Please explain why no stones are visible in photo 9. (I

respectfully suggest that you do not try to insult my intelligence by stating that all stones were removed as in photo 6).

23. Photo 9 is undated, what date was this photo taken?

24. Photo 9 shows water at the base of the test pit, please disclose the precise rainfall data for the 24 hours prior to the taking of photo 9.

25. Photos 31 to 34 are labelled as TP08, taken on 12 December 2025. The photos are described as being at White House Farm, but the aerial photo in Appendix A shows TP08 to be at Middle Hill Farm. Please explain why the labelling is incorrect.

26. In Appendix B, photos 11 to 30, displaying test pits, show very few stones. On Page 12, para 5.3.1.1 and Page 14 para 5.3.1.8 state the ALC grades are reduced due to stoniness. Please explain these anomalies.

27. Page 6, Para 2.6 states "due to the presence of 2 no. gas pipelines". Please state how many pipelines actually cross the 2 sites of White House Farm and Middle Hill.

28. Pages 16 and 17 display Table 4, which shows Agricultural Land Classification Grades based upon soil and subsoil wetness. The data within Table 4 is not dated, please disclose the dates when each wetness assessment was undertaken in the field for each line of Table 4.

29. On Page 15 para 5.3.1.13 states "Beyond the perched groundwater there was little evidence of groundwater present in the sub-soils, with the exception of TP08, which encountered a seepage at 0.80 m bgl as shown in Photograph 9". Please explain the clear contradiction of the above statement with the whole of Table 4.

30. With reference to Question 28, please refer to rainfall data in the 24 hours prior to the sampling routines in February and December 2025. How much rain fell in the 24 hours prior to each sampling session?

31. On Page 10, para 4.2.3 states: In addition to the above resources a Soil Site Report (3 km x 3 km) was obtained from Cranfield University which details the Soil Associations mapping units present on site. The majority of the eastern parcel is mapped as NEATH (541h) with a thin strip of BRICKFIELD 3 (713g) along the southern boundary. The central and eastern areas of the western parcel comprise the NEATH unit with the northern, western and southern extents mapped as BRICKFIELD 3. Para 4.2.4 then states: NEATH is described as 'well drained fine loamy soils often over rock'. Please explain why the Report claims via Table 4 that "waterlogging" was used to assess 32.00ha of the 2 sites as ALC Grade 5 land and why that assessment contradicts that of the named Neath soil description.

32. Regarding question 31, Please be advised that the Soil Survey of England and Wales maps of 1973 previously described the same areas of DNS CAS-03107-C5X9W1 to be soils of the Dunsford series, which were also described as "fine loamy or fine silty residuum or drift over Carboniferous shales and sandstones". The Dunsford series soils were described as having good to moderate drainage and occupied about 55% of the soils of the 2 sites under consideration as planning application DNS CAS-03107-C5X9W1. Those very accurate 1973 maps also equate to the land shown as ALC Grade 3A on the Welsh Government's predictive land classification maps. Please therefore explain in intricate detail

how a single, commercial ALC report, can contradict the Soil Survey of England and Wales from 1973 evidence and the Cranfield University/Soil Associations 2021 evidence. In your response please reference the rainfall volumes prior to the practical sampling as described in the Report as of 06 February 2025 and 12 December 2025.

33. Table 4 of the Report on Pages 16 and 17 concludes that 31 of 48 samples in total should be classified as ALC Grade 5 land. However Table 6 on Page 18 of the Report defines the land where all of the Test Pits were dug to be of ALC Grade 1. The late Springs and Summers of 2025 and 2026 have been of very dry conditions, with 2026 declared as a drought over the whole of Wales. As PEDW inspector, Mr Richard Duggan has been shown contemporaneous photographic proof that the land at DNS CAS-03107-C5X9W1 is growing good crops of grass in 2026. Please justify the decision by LQAS and PEDW to accept that the land should be assessed as mainly ALC Grade 5 and the remainder Grade 3B.

34. The Report uses data collated from samples taken from the sites in February 2025 and December 2025. Why were no samples taken during the Spring, Summer or Autumn months of 2025 by which to obtain an accurate and realistic assessment of the actual Agricultural Land Classification?

35. Finally, the Report by Oracle Ltd states on Page 19, Table 7 that 57.7%, or 30.00ha of the 2 sites is ALC Grade 5. However in Table 4, 31 of 48 samples using the declared grid system within the Report, are described to be of ALC Grade 5 land. By my simple mathematics, that represents just over 65.58% has been assessed as ALC Grade 5. Please clarify what percentages of the areas we layman are expected to believe.

Our Response:

The Environmental Information Regulations, 2004, provide a right of access to what is held as recorded information at the time a request is made. Valid EIR requests can include questions that can be answered by providing what is already held as recorded information. The EIRs do not require a public authority to create new information in order to respond to a request. The response has been made with this in mind.

1. The Report was dated 24 December 2025, it was acted upon by LQAS and PEDW on 29 December 2025. Please explain why the delay to add the report to the PEDW portal, which was on 12 May 2026.

Welsh Government does not hold the requested information.

Additional Information:

An Agricultural Land Classification Report produced by Oracle was submitted to PEDW on 29 December 2025 as Appendix 6.1 of the Environmental Statement (ES) accompanying this application.

- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report.

In this case, the examination started on 5 June 2026, with a consultation period up to 10 July 2026. According to PEDW's casefile management system, Appendix 6.1 was published on the portal on 12 May 2026, well in advance of the start of the examination.

PEDW does not usually make documents available on the Casework Portal until the examination has started, as representations are not accepted outside the formal consultation periods.

This document is published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large to be sent by email.

2. A comprehensive report regarding the same land areas was undertaken by the same company, Oracle, on 06 February 2025. Please explain why the second survey and updating of the “Final” report was necessitated on 12 December 2025.

Welsh Government holds the requested information, and it is contained within:

- **Annex 1:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-2 - ALC Survey Report Correspondence
- **Annex 2:** 2025-12-29 - Appendix B.4 of Appendix L - Response from Welsh Ministers Land Quality Advisory Service
- **Annex 3:** 2025-07-04 - EIA Scoping Request - Appendix B - Agricultural Land Classification Report.
- **Annex 6:** 2025-10-14 - EIA Scoping Direction

These documents are published and may be located on the PEDW Planning Casework Portal. They have been included in the cover email for ease of reference.

Additional Information:

There are 3 versions of the ALC survey report. The documents listed above should be taken together as a sequence. Annex 2 and then Annex 1 confirm why further survey work was necessitated. To be read in sequence of:

Annex 3 is the original ALC survey.

Annex 6 page 52 provides the LQAS Screening Consultation representation and page 56 (Annex 1 of the LQAS letter) provides the technical assessment of the March (v1) 2025 survey (referenced above as February due to the fieldwork).

Annex 2 section 1 sets out LQAS's technical conclusions to the revised report (v2).

Annex 1 sets out the sequence between the reports and summarises the queries and requests made LQAS in relation to the additional survey work conducted by the Applicant's surveyor in December 2025. The v3 report was submitted in the same month.

3. Please name who commissioned the second survey of 12 December 2025 and its subsequent report of 24 December 2025.

Welsh Government holds the requested information, and it is contained within:

- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

This document is published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large to be sent by email.

4. Please state exactly how many samples were taken during the 06 February 2025 survey, please separate test pits from augured samples.

Welsh Government holds the requested information, and it is contained within:

- **Annex 3:** 2025-07-04 - EIA Scoping Request - Appendix B - Agricultural Land Classification Report.

This document is published and may be located on the [PEDW Planning Casework Portal](#). It has been included in the cover email for ease of reference.

5. Please show the positions of the samples from question 4 on an accurate map.

Welsh Government holds the requested information, and it is contained within:

- **Annex 3:** 2025-07-04 - EIA Scoping Request - Appendix B - Agricultural Land Classification Report.

This document is published and may be located on the [PEDW Planning Casework Portal](#). It has been included in the cover email for ease of reference.

6. Please state exactly how many samples were taken during the 12 December 2025 survey, please separate test pits and augured samples.

Welsh Government holds the requested information, and it is contained within:

- **Annex 1:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-2 - ALC Survey Report Correspondence
- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

These document are published and may be located on the [PEDW Planning Casework Portal](#). The file size for Annex 4 is too large to be sent by email.

7. Please show the positions of the samples taken from question 6 on an accurate map.

Welsh Government holds the requested information, and it is contained within:

- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

This document is published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large to be sent by email.

8. Please state how many samples should be taken per hectare to make an accurate agricultural land classification assessment.

Welsh Government holds the requested information, and it is contained within:

Annex 5: [Agricultural land classification: frequently asked questions](#)

This document is published and has been included in the cover email for ease of reference.

9. On Page 19 of the Report, Table 7 states that 57.7%, or 30.00ha of the 2 sites was assessed to be of ALC Grade 5 and 42.3% or 22.00ha was assessed to be of ALC Grade 3B. Please show the precise positions of the 2 grades of land on a map.

Welsh Government holds the requested information, and it is contained within:

- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

This document is published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large to be sent by email.

10. With reference to question 9, please describe how the precise boundaries of the 2 ALC grades were mapped.

Welsh Government does not hold the requested information.

11. The total area of the 2 sites of DNS CAS-03107-C5X9W1 is stated to be 52.00ha of farmable land within a 57ha total area. With reference to the Defra and Welsh Government Joint Publication – 069 ‘Agricultural Land Classification of England and Wales – Guidelines for grading the quality of agricultural land’ (2025), please state how many samples should be taken to accurately assess 57ha to achieve precise land classification grades.

Welsh Government holds the requested information, and it is contained within:

- **Annex 6:** 2025-10-14 - EIA Scoping Direction (Published 2025-10-14)

This document is published and may be located on the [PEDW Planning Casework Portal](#). It has been included in the cover email for ease of reference.

12. Please supply accurate rainfall data for the 2 sites of DNS CAS-03107-C5X9W1, White House Farm and Middle Hill Farm from 06 January 2025 to 06 February 2025 and 12 October 2025 to 12 December 2025.

Welsh Government does not hold the requested information.

13. Please supply the actual rainfall data for the 2 sites (White House Farm and Middle Hill) for the period 12.00, 11 December 2025 to 12.00, 12 December 2025.

Welsh Government does not hold the requested information.

14. Please state the recommendations for practical soil and subsoil sampling techniques as referenced by Oracle on Page 19, Para 7 “References” of the report dated 24 December 2025, please include when the Handbook states that sampling should not take place; i.e. please refer to: Hodgson, J.M. (ed.) (2022). Soil Survey Field Handbook, Technical Monograph No. 5. Soil Survey and Land Research Centre, Silsoe.

Welsh Government does not hold the requested information.

15. On page 13 of the Report, stones described as “Cobbles”, taken from TP08 (trial pit 08) are shown in photograph 6 with a tape measure alongside for scale. For information please describe what geologists understand by the term “Cobbles”?

Welsh Government does not hold the requested information.

16. On Page 14 of the Report, Table 3 describes stones found on the sites according to size to determine the Agricultural Land Classification. TP08 is described as having 17% of the trial pit soil/subsoil consisting of stones of greater than 2cm across. Table 3 also states that 0% of TP08 were stones of greater than 6cm across. Please explain why the stones in TP08 shown in Photo 6 on Page 13 were mainly between 10cm to 16cm across, i.e. for clarity please explain the contradiction with the data stated in Table 3.

Welsh Government holds the requested information, and it is contained within:

- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).
- **Annex 7:** [JP069](#)

Annex 4 is published and may be located on the [PEDW Planning Casework Portal](#). The file size is for Annex 4 is too large to be sent by email. Annex 7 is located on the Natural England Website.

17. The position of test pit TP08 is shown on an aerial photo also in the Report as the second graphic of Appendix A - Figures. Please describe what may have caused the straight lines of the witness marks in the grassland on that aerial photo immediately to the North of TP08.

Welsh Government does not hold the requested information.

18. With reference to Hodgson, J.M. (ed.) (2022). Soil Survey Field Handbook, Technical Monograph No. 5. Soil Survey and Land Research Centre, Silsoe. Please explain why a test pit was dug next to a potentially buried previous building or that building’s foundations with reference to the Handbook’s recommendations.

Welsh Government does not hold the requested information.

19. With reference to Questions 17 and 18, please explain why the contents of Test Pit 08 were described as natural stoniness of the soil/subsoil thereby to downgrade the agricultural land classification assessment. It may help to clarify the confusion if you could explain why such stones were found nowhere else on the 2 sites.

Welsh Government holds the requested information, and it is contained within:

Annex 4: 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 – Agricultural

This document is published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large to be sent by email.

20. Please describe the current status of Heneb's involvement with the buried site immediately North of TP08 at Middle Hill Farm, as shown on the aerial photo in Appendix A. For the avoidance of doubt, is there concern at PEDW that archaeological remains may be found at this site?

Welsh Government holds the requested information.

You may find Heneb response to consultation dated 25/06/2026 within the Local Impact Report (LIR) prepared by Pembrokeshire County Council. The LIR is available on [PEDW Planning Casework Portal](#) as of 09/07/2026. It has been included in the cover email for ease of reference as:

- **Annex 8:** Local Impact Report (LIR) prepared by Pembrokeshire County Council

Additional Information:

As explained by PEDW's Head of Operations in the letter to you dated 07 August 2026, matters pertaining planning judgment, evidence or merits of the proposal are to be considered within the examination of the DNS application itself, rather than through other processes. This applies to a Freedom of Information request too.

In the LIR you will find Heneb involvement in the evaluation trenching in the northern area. This evidence is also available to the Inspector. It is for the Inspector to determine the weight to give to evidence and therefore this will not be discussed further by PEDW.

21. Has PEDW, in the full knowledge that dry weather has revealed the presence of a site underground site again in 2026, asked questions of Heneb regarding the provenance or history of the potential Middle Hill site's archaeological importance?

Welsh Government holds the requested information, and it is contained within:

- **Annex 9:** Appendix A of the Examination Notice EXNOTE002

A request for Further Information from the Inspector to the Applicant and other parties can be found in Appendix A of the Examination Notice EXNOTE002. No additional requests have been made.

This document is available on [PEDW Planning Casework Portal](#). It has been included in the cover email for ease of reference as:

22. Photo 6 in the Report shows stones described to be from test pit 08. Photo 9 also shows TP08, but without sign of any stones. Please explain why no stones are visible

in photo 9. (I respectfully suggest that you do not try to insult my intelligence by stating that all stones were removed as in photo 6).

Welsh Government holds the requested information, and it is contained within:

- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

This document is published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large to be sent by email.

Additional information:

Photos 9, 31 and 32 identify stones present.

23. Photo 9 is undated, what date was this photo taken?

Welsh Government does not hold the requested information.

24. Photo 9 shows water at the base of the test pit, please disclose the precise rainfall data for the 24 hours prior to the taking of photo 9.

Welsh Government does not hold the requested information.

25. Photos 31 to 34 are labelled as TP08, taken on 12 December 2025. The photos are described as being at White House Farm, but the aerial photo in Appendix A shows TP08 to be at Middle Hill Farm. Please explain why the labelling is incorrect.

Welsh Government does not hold the requested information.

26. In Appendix B, photos 11 to 30, displaying test pits, show very few stones. On Page 12, para 5.3.1.1 and Page 14 para 5.3.1.8 state the ALC grades are reduced due to stoniness. Please explain these anomalies.

Welsh Government holds the requested information, and it is contained within:

- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

This document is published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large to be sent by email.

27. Page 6, Para 2.6 states “due to the presence of 2 no. gas pipelines”. Please state how many pipelines actually cross the 2 sites of White House Farm and Middle Hill.

Welsh Government does not hold recorded information confirming how many pipelines actually cross the White House Farm and Middle Hill sites.

PEDW confirms that it is for the parties to the examination to provide evidence and for the Inspector to consider and weigh that evidence in reaching a decision. Where parties consider submitted evidence to be inaccurate, those matters may be raised through the

examination process and considered by the Inspector. Accordingly, PEDW does not hold information that would enable it to provide a definitive answer to this question.

28. Pages 16 and 17 display Table 4, which shows Agricultural Land Classification Grades based upon soil and subsoil wetness. The data within Table 4 is not dated, please disclose the dates when each wetness assessment was undertaken in the field for each line of Table 4.

Welsh Government holds the requested information, and it is contained within:

- **Annex 1:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-2 - ALC Survey Report Correspondence
- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

These documents are published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large for Annex 4 to be sent by email.

29. On Page 15 para 5.3.1.13 states “Beyond the perched groundwater there was little evidence of groundwater present in the sub-soils, with the exception of TP08, which encountered a seepage at 0.80 m bgl as shown in Photograph 9”. Please explain the clear contradiction of the above statement with the whole of Table 4.

Welsh Government does not hold the requested information.

30. With reference to Question 28, please refer to rainfall data in the 24 hours prior to the sampling routines in February and December 2025. How much rain fell in the 24 hours prior to each sampling session?

Welsh Government does not hold the requested information.

31. On Page 10, para 4.2.3 states: In addition to the above resources a Soil Site Report (3 km x 3 km) was obtained from Cranfield University which details the Soil Associations mapping units present on site. The majority of the eastern parcel is mapped as NEATH (541h) with a thin strip of BRICKFIELD 3 (713g) along the southern boundary. The central and eastern areas of the western parcel comprise the NEATH unit with the northern, western and southern extents mapped as BRICKFIELD 3. Para 4.2.4 then states: NEATH is described as ‘well drained fine loamy soils often over rock’. Please explain why the Report claims via Table 4 that “waterlogging” was used to assess 32.00ha of the 2 sites as ALC Grade 5 land and why that assessment contradicts that of the named Neath soil description.

Welsh Government holds the requested information, and it is contained within:

- **Annex 4:** 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

This document is published and may be located on the [PEDW Planning Casework Portal](#). The file size is too large to be sent by email.

32. Regarding question 31, Please be advised that the Soil Survey of England and Wales maps of 1973 previously described the same areas of DNS CAS-03107-C5X9W1 to be soils of the Dunsford series, which were also described as "fine loamy or fine silty residuum or drift over Carboniferous shales and sandstones". The Dunsford series soils were described as having good to moderate drainage and occupied about 55% of the soils of the 2 sites under consideration as planning application DNS CAS-03107-C5X9W1. Those very accurate 1973 maps also equate to the land shown as ALC Grade 3A on the Welsh Government's predictive land classification maps. Please therefore explain in intricate detail how a single, commercial ALC report, can contradict the Soil Survey of England and Wales from 1973 evidence and the Cranfield University/Soil Associations 2021 evidence. In your response please reference the rainfall volumes prior to the practical sampling as described in the Report as of 06 February 2025 and 12 December 2025.

Welsh Government does not hold the requested information.

33. Table 4 of the Report on Pages 16 and 17 concludes that 31 of 48 samples in total should be classified as ALC Grade 5 land. However Table 6 on Page 18 of the Report defines the land where all of the Test Pits were dug to be of ALC Grade 1. The late Springs and Summers of 2025 and 2026 have been of very dry conditions, with 2026 declared as a drought over the whole of Wales. As PEDW inspector, Mr Richard Duggan has been shown contemporaneous photographic proof that the land at DNS CAS-03107-C5X9W1 is growing good crops of grass in 2026. Please justify the decision by LQAS and PEDW to accept that the land should be assessed as mainly ALC Grade 5 and the remainder Grade 3B.

Welsh Government does not hold the requested information.

34. The Report uses data collated from samples taken from the sites in February 2025 and December 2025. Why were no samples taken during the Spring, Summer or Autumn months of 2025 by which to obtain an accurate and realistic assessment of the actual Agricultural Land Classification?

Welsh Government does not hold the requested information.

35. Finally, the Report by Oracle Ltd states on Page 19, Table 7 that 57.7%, or 30.00ha of the 2 sites is ALC Grade 5. However in Table 4, 31 of 48 samples using the declared grid system within the Report, are described to be of ALC Grade 5 land. By my simple mathematics, that represents just over 65.58% has been assessed as ALC Grade 5. Please clarify what percentages of the areas we layman are expected to believe.

Welsh Government does not hold the requested information.

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,

Annex 1: 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-2 - ALC Survey Report Correspondence

Annex 2: 2025-12-29 - Appendix B.4 of Appendix L - Response from Welsh Ministers Land Quality Advisory Service

Annex 3: 2025-07-04 - EIA Scoping Request - Appendix B - Agricultural Land Classification Report.

Annex 4: 2025-12-29 - Environmental Statement - Vol 4 - Appendix 6-1 - Agricultural Land Classification (ALC) Survey Report (published 12-05-2026).

Annex 5: [Agricultural land classification: frequently asked questions](#)

Annex 6: 2025-10-14 - EIA Scoping Direction (Published 2025-10-14)

Annex 7: [JP069](#)

Annex 8: Local Impact Report (LIR) prepared by Pembrokeshire County Council

Annex 9: Appendix A of the Examination Notice EXNOTE002