

Soil, Peatland & Agricultural Land Use Planning Unit.
Uned Pridd, Mawndiroedd a Chynllunio Defnydd Tir Amaethyddol.

Yr Adran dros Newid Hinsawdd a Materion Gwledig
Department for Climate Change and Rural Affairs.



Llywodraeth Cymru
Welsh Government

Ref: DNS/CAS-03107-C5X9W1

Alistair Hoyle
Technical Director, Axis
5th Floor, Exchange Station,
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Liverpool,
L2 2QP

By Email: info@gair.energy

2nd of December 2025.

Dear Alistair Hoyle,

Re: Pre-application consultation response under article 10(2) of the Developments of National Significance (Procedure) (Wales) Order 2016 – White House Solar Farm, Land at White House Farm, Moorland Road, Freystrop and Middle Hill Farm, Pembroke Road, Freystrop (DNS/CAS-03107-C5X9W1).

I refer to your letter of 15th September 2025 consulting the Soil, Peatland & Agricultural Land Use Planning Unit on the above, as a statutory pre-application consultee. This substantive response is made in accordance with Article 10 of the Developments of National Significance (Procedure) (Wales) Order 2016 and:

- National Development Framework (NDF) Future Wales: The National Plan 2040¹
- Planning Policy Wales (PPW), Edition 12 – 2024²
- Schedule 5, Paragraph (p) the Developments of National Significance (Procedure) (Wales) Order 2016³
- DCPO letter – ‘BMV agricultural land and solar PV arrays’ – 2022⁴

¹ <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

² <https://www.gov.wales/planning-policy-wales>

³ <https://www.legislation.gov.uk/wsi/2016/55/schedules/made>

⁴ <https://www.gov.wales/best-and-most-versatile-agricultural-land-and-solar-pv-arrays>

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

- Annex B of Technical Advice Note (TAN) 6 – 2010⁵

1. Agricultural Land Classification (ALC) Survey - Technical Assessment and Advice:

Following Departmental advice and comments at EIA Scoping, a revised ALC report for the site has been submitted by Oracle Environmental Experts (Appendix 6-1, Ref: P252121/Version 3, dated 13th of October 2025). A copy of the report is attached for reference.

Departmental surveyors have technically re-reviewed the updated report against the '*Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land*' (MAFF 1988)⁶.

Report Version 3 contains extensive and significant changes to soil textures, soil properties and grade distribution when compared to Version 1. No additional survey work has been undertaken since original site survey in February 2025, and no justification is provided for such changes between reports.

The Department concludes the report, as it stands, does not provide sufficient information to support the grading of the site. The ALC survey report (Ref: P252121/Version 3) cannot, therefore, be accepted by the Department as an accurate assessment of land quality on the site.

The Department requests the opportunity to visit the site to undertake a field validation exercise. Departmental surveyors are available to undertake a site visit in late January / early February 2026 and request the applicant arranges and confirms access permission and dates. This will be the quickest and most efficient way of determining the validity of the submitted reports, soil properties present and the grading distribution. The service is offered free of charge.

As per published Departmental Guidance⁷, if the survey is not accepted by the Welsh Government, the ALC Predictive Map⁸ grade will be taken as the best available information for the site (noting c.32ha of ALC Subgrade 3a, BMV agricultural land on site), and PPW paragraph 3.58 and 3.59 therefore will apply.

2. Substantive Response:

Having considered this proposal in light of the Policy and Technical Advice listed above the Department advises the applicant that, as a specialist consultee, it has concerns. The Department reserves the opportunity to object should the proposal not demonstrate compliance with planning policy and standing advice.

This is on the basis that in the absence of a validated ALC survey, standing advice requires the ALC Predictive Map Grade to be taken as the best available information for the site.

⁵ <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

⁷ <https://www.gov.wales/agricultural-land-classification-predictive-map-guidance>

⁸ <https://www.gov.wales/agricultural-land-classification-predictive-map>

The ALC Predictive Map identifies approximately 32.0ha of BMV agricultural land between both sites (approx. 15ha Middle Hill Farm and approx. 17ha at White House Farm). The proposal therefore is not in compliance with and is contrary to Planning Policy Wales (PPW). Paragraphs 3.58 and 3.59 of PPW are explicitly clear and state [emphasis added]:

*3.58 Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile and **should be conserved as a finite resource for the future.***

*3.59 When considering the search sequence and in development plan policies and development management decisions **considerable weight should be given to protecting such land from development**, because of its special importance. Land in grades 1, 2 and 3a should only be developed **if there is an overriding need for the development, and** either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.*

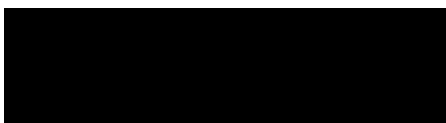
The weight to be given to the desirability of avoiding development of BMV agricultural land is further emphasised by the Minister's letter to Chief Planning Officers of 1 March 2022⁹. Although that letter is focussed on the relationship between solar PV array development and BMV agricultural land, it expressly made the point that development of BMV agricultural land was of concern in Wales, whether that development was temporary or permanent.

The Department has reviewed the pre-application documents and are of the opinion that the proposal has not applied and demonstrated the sequential test as set out in PPW 3.58 and 3.59.

Department would encourage and welcome further discussion with the applicant over the ALC survey report, prior to submission of the planning application.

The advice expressed does not bind any other part of Welsh Government commenting on the proposal. I trust the above comments are clear and unambiguous.

Yours sincerely



Mr A W Williams
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Landscapes, Nature & Forestry Division
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Enc. Copy of ALC Report Ref: P252121/Version 3

⁹ <https://www.gov.wales/best-and-most-versatile-agricultural-land-and-solar-pv-arrays>