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Planning and Environment Decisions Wales
Crown Buildings
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By Email: PEDW.Infrastructure@gov.wales

Dear Sir

RE: DNS Proposed Solar Farm and Battery Storage
Planning Application: DNS/CAS-03107-C5X9W1

Location: White House Farm Solar & Battery, Freystrop, Pembrokeshire

I wish to formally challenge the LQAS correspondence dated 1st July 2026 submitted by The Department for Rural Resilience and Sustainability in response to Consultation on the above Application (uploaded on the 6th July 2026).

This Department has twice refused to validate the Agricultural Land Classification (ALC) report submitted by the Applicant finding that the original survey 'could not be accepted as an accurate assessment of land quality at the Site, citing insufficient information'.

The revised report was not validated by LQAS due to it containing 'significant changes to soil textures, soil properties and grade distribution when compared to the initial report'.

The position of the LQAS during consultation was therefore no validation of the final survey.

The Freystrop Community Council (FCC) has sought to balance the community response as the Application has generated considerable negative reaction due to the impact on the village. The public consultation provided information to the public based on the lack of validation and the agreed FCC response, as a statutory consultee, to PEDW has been formed in part on the loss of BMV land.

The land was re-graded, being downgraded to remove all BMV land, which appears to be based solely on only four additional trial pits. These additional pits were undertaken on the 12th of December 2025.



The Friends of Freystrop Solar Action Group (FFSAG) have led on a detailed review of proposals as the group is made up of engineers and experts in areas of technical matters relating to the Application.

FFSAG sought to confirm the agricultural quality of the land in question from the contractor (Locke Brothers) who undertook the silage cuts. They stated that in 2025 3nr. very good crops of silage grasses, primarily from perennial ryegrass varieties were all 'about or above 63% digestibility'.

It is understood from FFSAG that 63D is the benchmark for high quality, high sugars silage which facilitates a lactic acid fermentation to lock in the nutrients within the "pickled" grasses of silage.

Methodology by the Applicant

It is concerning that the original survey data was collected in the month of February which is outside of the MAFF recommended period for soil sampling and consequently the Applicant used this approach to downgrade the land which as referred to earlier was not validated by LQAS.

The additional surveys were undertaken in the month of December following a very wet Autumn resulting in soils being tested at its wettest and not characteristic of the average performing state.

It is understood that sampling in December has the following concerns for soil accuracy:

- Under the strict **Agricultural Land Classification (ALC) of England and Wales guidelines** (which the [Welsh Government](#) enforces), taking soil samples when the ground is waterlogged or heavily wet is a known pitfall that can highly distort the land's grade.
- The "**False Positive**" Wetness Class Trap whereby waterlogged ground will affect the Slowly Permeable Layer (SPL) and "gleying" (mottled grey/ochre discolouration)
 - When an auger is dropped into a heavily saturated December field, water instantly fills the hole and the structural "peds" (soil clumps) smear together. A developer's surveyor can easily misidentify a temporary perched winter water table as a permanent, structural Slowly Permeable Layer. This artificially drops the land from Grade 3a down to 3b.
 - Distortion of the sampling due to the wet soil is likely. It is difficult to accurately texturise by hand (the standard field method) and wetness makes medium loams feel heavier and stickier, mimicking clay-heavy, poorly-draining soils. This is not characteristic of the texture under normal spring/autumn conditions meaning the ALC calculations will automatically penalise the land's workability and force a lower grade.
- **Violation of Standard Guidance:** Official Welsh Government Guidance (SFI/Sustainable Farming Actions) explicitly states that surveyors should "**avoid taking soil samples if the soil is waterlogged... because it may reduce the quality of the soil analysis.**" Furthermore, structural assessments like the Visual Evaluation of Soil Structure (VESS) cannot be properly executed if the soil profile is entirely liquid-slicked.



How is it that the LQAS would overturn two separate refusals to validate, but reverse their opinion based on limited trial pits in the month of December given the advice outlined above?

Further it is astonishing that LQAS have supported the classification at Grade 5 having previously being critical. It is my understanding that Grade 5 land is considered mountainous, boulder laden and steep sloping which prevents use of machinery to plough and harvest. There is a contractor statement to the contrary and photographic evidence of the site being used for silage and stated 3nr good crops in 2025 – how have LQAS considered how Grade 4 and Grade 5 is therefore supportable?

FFSAG have provided further evidence of the methodology of the ALC which is appended to the Council's formal response. **This letter is for PEDW to examine the principles and methodology and justification as to how a flawed methodology is sufficient to overturn LQAS previous position.**

Of concern is that the development would result in the loss of a substantial area of Best and Most Versatile (BMV) agricultural land in Freystrop. FFSAG state that this one development would consume over 11.75% of the community's farmland. Referring to the Welsh Government Agricultural Land Classification and the interactive maps; all of the land within the boundaries of the development is Grade 3A or Grade 3B. 60% of the site's areas are classified as Agricultural Land Classification grade 3A farmland, or Best and Most Versatile farmland.

The Council was not properly consulted by PEDW, not receiving the formal notice of the Application until a week into the formal consultation period. As a result, we lost a whole week to organise public consultation of this very emotive Application affecting Freystrop residents. A request for an extension to the consultation period was requested and denied by PEDW.

We now find ourselves in a position whereby a principal matter under scrutiny as been reversed based on limited and potentially flawed methodology regarding the BMV status. It is understood that adjacent owners were to undertake soil sampling of adjacent fields to disprove the Applicants ALC assertion but this was not undertaken due to the LQAS position on two surveys. The Council considers this late move to be prejudicial to considering a challenge to the BMV position taken by the Applicant.

We formally request that PEDW suspends consideration of this Application until such time that LQAS provides a full explanation of the data they consider overwhelmingly changed their opinion on the Applicant's approach based on the December 2025 soil survey and for the Community to consider the potential for its own soil sampling, to challenge the position taken.

Kind Regards

Chris White
Chairman Freystrop Community Council

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