



Ministry
of Defence

Planning Statement

Deep Space Advanced Radar Capability – Cawdor
Barracks, Pembrokeshire, Wales

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1.0 Executive Summary

- 1.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the determination of an application for detailed planning permission by the Ministry of Defence (the 'Applicant') and to Pembrokeshire County Council. The application seeks permission for the installation of a radar facility on land at Cawdor Barracks, St Davids, Haverfordwest, SA62 6NN ('the Site').
- 1.2 Pre-application engagement has been pursued with the Pembrokeshire County Council in preparing these proposals, and a summary of these discussions is included with Section 4 of this statement. An EIA scoping opinion has additionally been obtained to ensure the supporting Environmental Statement comprises all relevant elements in respect of the application.
- 1.3 At the point of submission to Pembrokeshire County Council for approval the Proposed Development will have been subject to both statutory and non-statutory consultation with the local community. This will be full detailed with the Pre-Application Consultation Statement.
- 1.4 The Deep Space Advanced Radar Capability proposal will enhance the UK's ability to detect, identify, and track objects in Earth orbit, including satellites, space debris, and potential threats. This capability is vital for ensuring the resilience of UK space systems, enabling the UK to secure attribution, maintain stability and provide information for managing emerging challenges. Fundamentally, the project forms a key site that will support wider international space traffic management and enhance collective international security.
- 1.5 Other material considerations include strategic documents prepared by central government that relate to the use and development of land in the public interest. In this regard The Strategic Defence Review 2025 ("SDSR"), sets out the National approach to military infrastructure and incorporates the strategy for space domain. The SDSR is capable of being given weight as a material consideration in the determination of planning applications. It sets a "whole of society approach" to national resilience and security matters, looking to improve economic outputs by improving growth in defence and associated industries.
- 1.6 For the Proposed Development, the SDSR specifically notes that the ability to operate in and from 'space underpins the UK's security, prosperity, and daily life.' It also identifies a need to invest in Space Domain Awareness through measures such as earth-based sensors. Effective use of space is critical for understanding and communication with space becoming increasingly congested. The relationship between space security and homeland resilience is particularly important given the use of satellites in telecommunications, navigation, finance and emergency services. The SDSR also

recognises the opportunity that the space sector presents for developing UK jobs, skills and economic growth.

- 1.7 UK Government has also published the UK's Modern Industrial Strategy (November 2025) which is a material consideration. This document identifies the Government's plan for change that supports economic growth and development. Space features as an important growth area for UK economy in relation to manufacturing and Research & Development activities, as does Defence
- 1.8 DARC would form the cornerstone of the UK's ability to detect, identify, and track objects in Earth orbit, including satellites, space debris, and asteroids. This capability is essential to ensure the continuity of critical services, prevent collisions, and protect the UK's space-based assets from disruption or loss. The essential need for the proposal is set out in further detail within this Planning Statement.
- 1.9 Planning permission is sought for the development of the Site to deliver the installation of a Deep Space Advanced Radar Capability ("DARC") to support the UK's ability to detect, identify, and track objects in Earth orbit, protecting the day-to-day life of the UK population at large. The description of development for this radar facility is as follows:

"Installation of radar antenna, support buildings, auxiliary power compound, site security, infrastructure, landscaping, extinguishment of the isolated public footpath, and associated works."
- 1.10 The Site subject to this full planning application, is located on areas of disused runway at Cawdor Barracks within the County of Pembrokeshire and extends to an area of approximately 188.99 ha. A Site Location Plan showing the Site in the context of the surrounding area is included within the Application (ref: B5007000).
- 1.11 The Site subject to this application is situated within the secure Cawdor Barracks land area which extends to approximately 300ha ('the Barracks'). The brownfield site includes a redundant airfield (where the proposals are located), with the main buildings and supporting accommodation in the western half of the Barracks providing hangar, storage and barrack accommodation for approximately 400 troops ('Wider Site'). Whilst there are some listed buildings close to the Barracks on the north-west boundary, there are no designated heritage assets on the Barracks, nor is it within or close to a Conservation Area.
- 1.12 The statutory development plan for the Site comprises the Future Wales – National Plan (2021) from which the Welsh Strategic and Local Development Plans have been prepared. Pembrokeshire County Council (PCC) Local Development Plan was adopted in 2013 and will remain in effect until it is replaced by the emerging Local Development Plan 2.

- 1.13 The Second Deposit consultation took place between October 2024 and ended in December 2024 with responses received in respect of this currently being reviewed with submission to the Welsh Government undertaken in July 2025 and adoption targeted for May 2026.
- 1.14 In a letter from the Inspectors on the 2 December, it was confirmed that the examination will be suspended for 12 weeks to allow for the provision of additional information, to be submitted by the 24 February 2026. The suspension period is potentially subject to a further extension pending review of the information and notification of next steps. As the emerging Local Development Plan has yet to be independently examined it has been attributed limited weight as a material consideration, with key emerging policies considered as appropriate.
- 1.15 The current Local Development Plan for PCC comprises a Written Statement which incorporates the policies and a proposals map. Under the adopted PCC policy documents, the Site is subject to the following designations:
- SP.16 – The Countryside.
 - GN.22 – Prior Extraction of the Mineral Resource.
 - GN.25 – Buffer Zones around Mineral Sites.
- 1.16 The emerging Local Development Plan for PCC incorporates updated policies and a proposals map; the Site is subject to the following site-specific designation:
- GN 7 – Cawdor Barracks including the disused Brawdy Airfield.
- 1.17 A suite of technical reports has been prepared and submitted as part of this planning application. The Planning Statement is one of those reports and provides a detailed planning policy analysis, considering the Proposed Development in the light of the relevant policies of the adopted Local Development Plan, as well as other material considerations.
- 1.18 The Proposed Development comprises the following buildings and ancillary infrastructure:
- Six Transmit radar antennas and associated infrastructure.
 - Twenty-one Receive radar antennas and associated infrastructure.
 - Radar antenna operations area, which will incorporate:
 - An auxiliary power compound and fuel storage tanks.
 - System spares building.
 - Operations area.
 - Site-specific sub-station.
 - New highway access (including secondary emergency access point) and associated security infrastructure and buildings.

- Security fencing.
- Ecological / Structured Planting and drainage works.
- Extinguishment of the isolated public right of way.

- 1.19 Further information in respect of these elements is set out within Chapter 3 (Proposed Development) in the supporting Environmental Statement.
- 1.20 The Environmental Statement has been prepared and coordinated by Jacobs with input from SWECO and a wider team of subject matter experts. The Environmental Statement has been prepared in accordance with the requirements of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and covers the key topics that were included in the Council's Scoping Opinion dated 13 March 2023 (ref: 22/1136/SO).
- 1.21 Full consideration of the technical matters has been included in each of the chapters of the assessment, and a Non-Technical Summary of the findings has also been included with the planning application to assist those considering the proposal. Key findings of the assessment are summarised below, with full consideration contained further in this Planning Statement and the Environmental Statement:

Transport and Access

- 1.22 Transport and access considerations are addressed in wider detail within Chapter 5 of the Environmental Statement. This includes undertaking an assessment of potential impacts from transport associated with construction and the operational phases of the proposal. It is concluded that there will be no significant effects for the construction phase of the Proposed Development and the operational impact will be negligible as a result of the low number of trips that will be created from the proposal.

Air Quality

- 1.23 Air quality considerations are addressed in detail within Chapter 6 of the Environmental Statement. This includes undertaking an assessment of the potential air quality impacts of the Proposed Development within the construction and operational phases. Overall, it is concluded that there will be no significant effects arising from construction or operation phases of development.

Noise And Vibration

- 1.24 Noise and vibration considerations are addressed in detail within Chapter 7 of the Environmental Statement. The chapter considers the potential noise and vibration impacts of the Proposed Development on noise sensitive receptors. Construction

impacts can be appropriately mitigated through appropriately designed temporary barriers and programming to minimise the duration of noisy works near noise sensitive receptors. There are not anticipated to be any significant effects in respect of vibration arising from construction activities. Noise effects arising from the operation of the Proposed Development will be sufficiently addressed through the implementation of mitigation including acoustic screening and enhanced plantroom construction. Through the incorporation of this mitigation no significant adverse effects are anticipated.

Biodiversity

- 1.25 The Site has been subject to a series of surveys to identify ecological considerations which identified sensitive habitat areas across the Site, including g1d other lowland acid, h3 dense scrub g3c other neutral grassland; a small area of h1a lowland heath priority habitat; h2a and h2b hedgerows; w1g6 lines of trees; and a small area of w1h other coniferous woodland. Further detail provided within Chapter 8 of the Environmental Statement.
- 1.26 Where possible works will avoid ecologically sensitive locations. Controls will be put in place to minimise construction and operational impacts, including through the use of an appropriately worded micro-siting condition (see Section 8 of this Statement) to confirm the final positioning of equipment. The design of the proposal has considered ecology from an early stage, and has sought to minimise the extent of fungi grassland that is impacted. Areas of grassland outside of the construction area will be maintained in line with the existing management regime.
- 1.27 Habitat creation in the form of new sustainable drainage systems (“SuDs”) features and tree planting will be incorporated within the Proposed Development. Mitigation measures focus on provision, enhancement and where feasible, translocation, of grassland habitats that support fungi.
- 1.28 Enhancement of retained scrub habitats and enhancement of a hedgerow currently in poor condition. With measures to reduce noise and visual disturbance to ground nesting birds incorporated during construction comprising removal of suitable habitat in advance of works and, where necessary, installation of temporary barriers around the works.
- 1.29 Through incorporation of mitigation and enhancements overall the proposal is anticipated to result in a net benefit to biodiversity, from an environmental assessment perspective when mitigation measures are considered the Proposed Development would have no overall adverse significant effect.

Landscape

- 1.30 Due to the nature of the Proposed Development and its surrounding context, there is a likelihood of potentially significant adverse operational-phase effects on landscape and

visual receptors. This includes impacts on parts of the Pembrokeshire Coast National Park and sections of the Pembrokeshire Coast Path National Trail.

- 1.31 Although it is not possible to materially reduce the overall level of effect, a range of options have been carefully considered to identify measures that could minimise landscape and visual impacts as far as practicably possible within operational constraints. In addition, opportunities to deliver landscape and visual enhancements as part of the development have been explored.
- 1.32 The greater part of the study area and areas of the Pembrokeshire Coast National Park fall outside of the Zone of Theoretical Visibility (ZTV) of the Proposed Development and would not be subject to effects arising from the scheme. The assessment has not identified any landscape, seascape or visual effects which would be categorised as “Very Substantial”, falling instead in the “Substantial” or “Moderate” categories.
- 1.33 The significant landscape and visual effects of the Proposed Development would principally be limited to elevated areas and transient views within the Pembrokeshire Coast National Park Landscape Character Areas to the south of the site at distances of less than 8 km.
- 1.34 None of the seascape viewpoints would have a significant effect given the distance from the Proposed Development. The representative viewpoints assessed have a “Slight Adverse” level of effect.
- 1.35 Full considerations of the visual impact is addressed in detail within Chapter 9 of the Environmental Statement (ES).

Heritage and Archaeology

- 1.36 Heritage and archaeological considerations are addressed in detail within Chapter 10 of the ES. Based on the assessment undertaken, and subject to the incorporation of mitigation measures outlined in the Archaeological Management Strategy, the Proposed Development is anticipated to have a negligible to no effect on archaeological resources.
- 1.37 In terms of heritage assets, due to the nature of the development and its proximity to listed buildings, there will be indirect effects on the settings of a number of designated heritage assets. These effects are assessed as ranging from moderate to negligible. It is not considered that any further mitigation would successfully reduce these reported effects. However, the Proposed Development will not result in any significant adverse effect on designated heritage assets.

Ground Conditions and Contaminated Land

- 1.38 Ground conditions and contaminated land considerations are addressed in detail within Chapter 11 of the ES. The study area comprises land associated with the historic operation of RAF Brawdy now Cawdor Barracks. The supporting Phase 1 Land Quality Assessment concludes that significant sources of contamination are unlikely to be present. Localised sources of contamination have been identified in relation to soil and groundwater.
- 1.39 Through the incorporation of appropriate design interventions and further ground investigation and risk assessment in accordance with Land Contamination Risk Management, the Proposed Development is not expected to result in significant effects during construction and operation. Appropriate mitigation is to be secured and implemented prior to and during construction through a Construction Environmental Management Plan.

Water Environment, Flood Risk and Drainage

- 1.40 The water environment, flood risk and drainage considerations are addressed in detail within Chapter 12 of the ES. This considers and undertakes assessment of the impact of the Proposed Development on the water environment, which covers surface water, groundwater and flood risk. The Proposal could affect surface water quality through accidental spillages or leakages during construction, These will be short-term and will be addressed via measures set out in a Construction Environmental Management Plan.
- 1.41 The Proposed Development is at minimal risk of flooding due to its elevated location. It is located largely within Flood Zone 1 with minimal areas of Flood Zone 2 and 3 attributed to small watercourses or surface water, rather than Main Rivers which would not change when the predicted impact of climate change is considered. The Proposed Development includes mitigation in the form of attenuation storage within the proposed surface water drainage network to address these risks, which results in no significant residual effects. The Proposed Development will not increase flood risk for its lifetime.

Socio-Economics

- 1.42 The socio-economic considerations of the Proposed Development are addressed in detail within Chapter 13 of the ES. This considers the potential effects of construction and operation. During the construction phase 90 full time equivalent jobs are expected to be created, and during operation 60 full time equivalent members of staff are required with all staff expected to live locally comprising existing and new residents.
- 1.43 It is concluded that the Proposed Development is acceptable and will have no significant impacts from a socio-economics perspective.

Climate Change and Carbon

- 1.44 The climate change and carbon considerations of the Proposed Development are addressed in detail within Chapter 14 of the ES. This comprises an initial high-level assessment of the potential changes in greenhouse gas emissions. The assessment indicates that such changes are likely to be negligible in comparison to UK and Welsh carbon budgets. Additionally, a number of design interventions and controls will be implemented to reduce the magnitude of greenhouse gas emissions generated as a result of the construction and operation of the Proposed Development. As such the Proposed Developments greenhouse gas impacts are considered to be fully consistent with applicable policy requirements and good practice design standards for projects of this type.
- 1.45 As such the impact of the Proposed Development on climate is considered to be a minor adverse not significant effect.

Heat and Radiation

- 1.46 Chapter 15 of the Environmental Statement provides a comprehensive evaluation of radiation hazards associated with the project and concluding that the proposals are safe to humans. The Proposed Development is compliant with the relevant provisions of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines.
- 1.47 As such there are no likely impacts on human health arising from the Proposed Development.

Lighting

- 1.48 The lighting considerations of the Proposed Development are addressed in detail within Chapter 16 of the ES. Following the implementation of design interventions, it is expected that there will be a neutral effect. The Proposed Development will comply with dark skies guidance, and the nighttime view of the landscape will not be significantly altered.

2.0 Introduction

- 2.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the determination of an application for detailed planning permission by the Ministry of Defence (the 'Applicant') for the installation of a radar facility on land at Cawdor Barracks, St Davids, Haverfordwest, SA62 6NN ('the Site').
- 2.2 Planning permission is sought for the development of the Site to deliver the installation of a Deep Space Advanced Radar Capability ("DARC") to support the day-to-day life of the UK population at large. The description of development for this radar facility is as follows:
- "Installation of radar antenna, support buildings, auxiliary power compound, site security, infrastructure, landscaping, extinguishment of the isolated public footpath, and associated works."*
- 2.3 The Site, subject to this full planning application, is located on areas of disused runway at Cawdor Barracks within the County of Pembrokeshire and extends to an area of approximately 188.99 ha. A Site Location Plan showing the Site in the context of the surrounding area is included within the Application (ref: Site Location Plan - B5007000).
- 2.4 The Site subject to this application is situated within the secure Cawdor Barracks land area that extends to approximately 300 ha ('the Barracks'). The brownfield site includes a redundant airfield (where the proposals are located / 'the Site'), with the main buildings and supporting accommodation in the western half of the Barracks providing hangar, storage and barrack accommodation for approximately 400 troops ('the Wider Site'). Whilst there are some listed buildings close to the Barracks on the north-west boundary, there are no designated heritage assets on the Barracks, nor is it within or close to a Conservation Area.
- 2.5 For the purpose of this Statement, the land that is not subject to this planning application will be referred to as the "Wider Site". More information on the existing site condition and the Wider Site can be found in the Design and Access Statement ("DAS"), prepared by Montagu Evans. In summary, on the Wider Site the main operational area is located in the western part of the Barracks with this being occupied by the 14th Signal Regiment who are due to vacate the Barracks in 2028.
- 2.6 With regard to the Site's planning history, the Site and the Wider Site benefit from a long and extensive planning history in relation to its use as a military barracks.
- 2.7 The A487 is located to the south of the Barracks, providing access to surrounding roads, towns and the City of St David's. The Barracks is almost wholly surrounded by mixed (pasture and arable) agricultural land, under separate, private ownerships. The only

other uses abutting the Barracks are a small industrial estate (Brawdy Business Park - located at the southern, main entrance to the Barracks) and a caravan park (Park Hall Village) located on the western flank.

- 2.8 Full details of the proposals are set out within the Design and Access Statement (“DAS”) prepared by Montagu Evans and Application Drawings, prepared by Power Engineering (now WSP) which form part of this Application.

Overview of Proposed Development

- 2.9 The Proposed Development comprises of the following elements:

- Six Transmit radar antennas and associated infrastructure.
- Twenty-one Receive radar antennas and associated infrastructure.
- Radar antenna operations area, which will incorporate:
 - An auxiliary power compound and fuel storage tanks.
 - System spares building.
 - Operations area.
 - Site-specific sub-station.
- New highway access (including secondary emergency access point) and associated security infrastructure and buildings.
- Security fencing.
- Ecological / Structured Planting and drainage works.
- Extinguishment of the isolated public right of way.

Purpose and Format of the Planning Statement

- 2.10 The purpose of this Planning Statement is to provide an assessment of the Proposed Development against relevant planning policies and all other material considerations to support the determination of the application. It demonstrates how the Policies of the development plan have been taken into account in the evolution of the proposal, and the extent to which the proposal is compliant with the Development Plan when taking into account all relevant material considerations. The Planning Statement helps inform the overall consideration of the planning balance when assessed against the benefits arising from the Proposed Development.
- 2.11 The Planning Statement forms part of the information which has been submitted with this application, and is to be read in conjunction with the following documents:

REF.	DOCUMENT TITLE	AUTHOR
Documents		
1.	Application Form	Montagu Evans
2.	Covering Letter	Montagu Evans
3.	Document Schedule	Montagu Evans
4.	Drawing Schedule	Montagu Evans
5.	Planning Statement (this Document)	Montagu Evans
6.	Design and Access Statement	Montagu Evans
7.	ICNIRP Declaration	United States Space Force
8.	Green Infrastructure Statement	Jacobs
9.	Pre-application Consultation Report	Cascade
Drawings		
10.	Site Location Plan	Jacobs
11.	Existing Plans	Power Engineering
12.	Proposed Plans	Power Engineering
13.	Proposed Site Sections	Power Engineering
14.	Landscape and Ecology Proposals Plan	Sweco
Environmental Statement		
15.	Environmental Statement Volume 1	Jacobs / Sweco
16.	Environmental Statement Volume 2 (Technical Appendices)	Jacobs / Sweco
17.	Environmental Statement 3 (Technical Figures)	Jacobs / Sweco
18.	Environmental Statement (Non-Technical Summary)	Jacobs

Need for the Development

- 2.12 The Ministry of Defence has a duty to protect the UK national interest around the world. This includes the Space Domain, which offers both the UK and its Allies an important strategic advantage, but also emerging threats and vulnerabilities that need to be monitored. Further information on the MoD's approach to this Domain can be found within the Defence Space Strategy (February 2022¹), which emphasises the importance of space to Defence and how the UK needs to work with Allies to develop its operational space capability.
- 2.13 As part of the ongoing investment into this domain, the UK has been working with its Allies to identify a location for a new deep space monitoring facility to protect and defend both military and civilian infrastructure that supports our way of life. An area of brownfield land at Cawdor Barracks has been identified as the preferred location for the delivery of the installation following a nationwide search of suitable land.
- 2.14 The proposed development will deliver a range of international, national and local benefits. Many of these stem from the way that space infrastructure supports the day-to-day operation of the economy (e.g. banking data and information transfer), communications (e.g. internet and telecommunications), and critical civilian infrastructure (e.g. blue-light service support and day-to-day GPS navigation including "sat-nav").
- 2.15 All these services are supported by satellite technology located in geosynchronous ("GEO") orbit, but in addition there are a significant number of other objects orbiting the

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1051456/2022_0120-UK_Defence_Space_Strategy_Feb_22.pdf

globe. As of December 2024, there were 29,921 registered space objects in orbit, presenting significant risk of collision and damage. In 2024, the monthly average collision risks to UK-licensed satellites was 2,250, however collisions in space could result in Kessler Syndrome a chain reaction of collisions resulting in dangerous clouds of space debris.

- 2.16 At an international level this could substantially increase the risk that communications are impossible. At a national and local level collisions could impact mobile phone and GPS signal and other financial services, impacting everyday life – as of July 2025, an estimated 18% of UK GDP (c£454 billion)² is delivered through satellite services.
- 2.17 This presents a summary of the civilian importance of satellite technology; in addition, there is the strategic importance of secure communication for command-and-control activities undertaken by the UK military. This not only serves to support operations for and with our Allies across the globe, but also the day-to-day security of the Nation.
- 2.18 The importance of this infrastructure cannot, therefore, be underestimated as it is critical to the way of life and undertaking of every person in the United Kingdom and beyond.
- 2.19 At present there is no system that monitors equipment in space to ensure it is protected from accidental damage caused by uncontrolled space debris/collision or deliberate actions caused by State intervention. The Proposed Development is part of an international network of 3 installations to manage and identify risks in space. In essence, the network of installations will operate in the same way as air traffic control to monitor risk and direct satellite operators (civilian and military) to make decisions that minimises the risk of collisions. It also provides the ability to identify and attribute ownership for any deliberate actions.
- 2.20 The proposed DARC project will form a cornerstone of the UK's ability to detect, identify, and track objects in Earth orbit, including satellites, space debris, and asteroids. This capability is critical to protect and defend the services provided by satellites, ensuring continuity and resilience against collisions or debris-related incidents.
- 2.21 Without DARC, the UK faces a significant risk of losing access to these vital services, which would have severe consequences for national security, economic stability, and public safety. For context, the economic impact of losing GPS services alone is estimated at £1.422 billion per day, highlighting the scale of potential disruption.
- 2.22 To address these challenges several options have been considered and assessed by the applicant, with DARC being the optimum solution.

² <https://www.gov.uk/government/news/spaces-influence-on-economy-and-security-grows-as-new-projects-announced-in-manchester>

- 2.23 As a radar facility, the purpose and technology of DARC is only to monitor and report actions. It will deliver a real-time, global space traffic management system, enabling the UK to:
- Detect, identify, and track satellites, debris and asteroids to prevent collisions and ensure the continuity of critical civil and military services.
 - Protect and defend in-orbit critical national infrastructure, which supports UK Armed Forces operations at home and abroad.
 - Enhance national security by providing decision-level information to regional and national authorities.
- 2.24 Through the UK National Space Operations Centre, DARC will provide previously unavailable data that will be distributed amongst all branches of UK government, through the UK Meteorological Office and the UK Space Agency, to better inform national and regional decision-making, improve planning and identify resilience priorities.
- 2.25 The DARC infrastructure, including its 21.5-metre-high antennas, is modest in scale compared to other commonly consented infrastructure, such as wind turbines and TV masts. The Site at Cawdor Barracks has been identified as the most appropriate location following a robust assessment of alternatives from across the United Kingdom. In considering environmental, operational and military requirements, Cawdor Barracks was selected as the location for these proposals. Further discussion on site selection is included within Section 6, paragraphs 6.63 - 6.78 (Employment) of this statement and Chapter 4 of the Environmental Statement

3.0 THE APPLICATION SITE

The Application Site

- 3.1 Cawdor Barracks (“the Barracks”) is located within the County of Pembrokeshire, directly between the villages of Penycwm, Trefgarn Owen, Llandeloy and Whitchurch, to the south, east, north and west respectively. The Barracks themselves are situated roughly 2.25km to the Northeast of St Brides Bay, and c 2km from the boundary of the Pembrokeshire Coast National Park.
- 3.2 The towns of Haverfordwest and Milford Haven are located roughly 14km and 19km away to the southeast and south, with St Davids and Swansea otherwise being the nearest larger settlements, being circa 10km and 86km away to the west and southeast, respectively. The immediately surrounding hamlets and villages offer little by the way of amenities, with most services provided in the nearby City of St Davids that provides local schooling, pubs, hotels, community facilities and retail stores.
- 3.3 The A487 is located to the south of the Barracks, providing access to the surrounding road network.
- 3.4 The Site does not lie within a Conservation Area, nor are there any statutorily listed buildings or other designated heritage assets. The nearest assets include the built form of Rickeston Hall in Brawdy that are adjacent to the Site to the west and comprises a Grade II* listed building and three Grade II listed buildings. To the north is the Grade II listed Church of Saint Teilo, and the Grade II listed farm buildings at Llethr to the south. To the east of the Site is the Grade II* Church of St David, located on Erw Lon. Heritage assets within the wider area have been considered as outlined within Chapter 10 of the ES.
- 3.5 The Site is not at risk of flooding from River or Sea sources, however there are small areas across the Site and Wider Site that at a low to high risk of surface water.
- 3.6 The Barracks is almost wholly surrounded by mixed (pasture and arable) agricultural land, under separate, private ownerships. The only other uses abutting the Barracks is a small industrial estate (Brawdy Business Park - located at the southern, main entrance to the Barracks) and a caravan park (Park Hall Village) located on the western flank.
- 3.7 The totality of the Barracks extends to approximately 300 hectares (741 acres), with the majority of the landholding comprising the disused airfield. Supplementary and supporting accommodation and facilities is located in the western half of the Site, providing hangars, storage and barrack accommodation for approximately 400 troops.

- 3.8 The proposed development is located on an area of the existing runway, consisting of significant areas of hardstanding and associated verges, extending to 188.99ha (467 acres). It is predominantly flat and free of structures given the nature of its former use. The proposal is to be wholly sited within the boundary of the Barracks and located in an area that will ensure that existing operations within the Barracks and those outside of the proposed secure boundary remain unaffected by this installation in the long-term.
- 3.9 Access to the Site is to be via the C3010 on the eastern boundary of the Site that joins the A487 at Penycwm. An existing access point located approximately 1.25 km from the junction with the A487 is to be upgraded to serve the day-to-day functions of the facility on a permanent basis, with a new emergency access point created approximately 950m from the junction which will also be used for construction purposes.

Planning History

- 3.10 A planning history search of PCC's online records has been undertaken as part of this Planning Application and the results included in Appendix 1. The Site and the Barracks benefits from a long and extensive planning history in relation to its military use, demonstrating the established support for this function.

4.0 DEVELOPMENT PROPOSALS

4.1 As set out in Section 3.0 of this statement, the Application proposes:

- Six Transmit radar antennas and associated infrastructure.
- Twenty-one Receive radar antennas and associated infrastructure.
- Radar antenna operations area, which will incorporate:
 - An auxiliary power compound and fuel storage tanks.
 - System spares building.
 - Operations area.
 - Site-specific sub-station.
- New highway access (including secondary emergency access point) and associated security infrastructure and buildings.
- Security fencing.
- Ecological / Structured Planting and drainage works.
- Extinguishment of the isolated public right of way.

Layout and Scale

4.2 The Deep Space Advanced Radar Capability system comprises six Transmit antennas and twenty-one Receive antennas with the two arrays set approximately 726m apart at the nearest point. The Proposed Development will consist of construction and installation of the radar antennas, support buildings, auxiliary power compound, site security, infrastructure, landscaping and associated and ancillary works.

4.3 Each array will consist of a 15.6 m diameter dish with a maximum height of up to 20.5 m. The Tx Array has 6 Transmit antennas, each with the same specifications of height, foundations, internal roads and layout approach as the Rx Array.

4.4 The built form proposed will be of an industrial and military nature aligned with the wider built form of the wider Cawdor Barracks site.

Relationship to Wider Site

4.5 The proposal will not utilise existing buildings as it cannot be integrated into the existing structures. However, the development will make use of the existing hardstanding layout of the disused runway, ensuring efficient land use.

4.6 The Site will be separately secured from the Wider Site through the incorporation of fencing and other security measures. Dedicated points of access for construction / emergency access and day-to-day activities will be provided to avoid disruption to existing military operations and allow the Site to operate unencumbered.

Access and Movement

- 4.7 New access points will be provided via the eastern boundary of the Site, connecting to the existing access point for crash gate 21 on to the C3010. The main gate will be controlled by the operator at the entry control point, with the gate itself automated and secured via a card reader system.
- 4.8 During construction, to avoid disruption to existing military operations and to minimise impact upon the local highway, construction traffic will access the Site along the eastern boundary via a new entrance that will facilitate a one-way route onto the C3010 that connects to the A487 to the south at Penycwm. Once construction has finished, this new access point will be retained and reserved for emergency use only.
- 4.9 The proposal will not be accessible to the public and will be secured through fencing, controlled gates, and security patrols.
- 4.10 Due to the remote location of the Site and its limited public transport connectivity, it is anticipated that travel to and from the Site will primarily be undertaken by private vehicles.

Employment

- 4.11 As set out within the Socio-Economics Chapter 13 of the ES, the Proposed Development is anticipated to result in the creation of 90 full time equivalent construction jobs. When operational the Proposed Development will result in the creation of 60 full time equivalent jobs including operation, maintenance and security staff.
- 4.12 Whilst it is noted that the Barracks is due to be vacated by operational forces in 2028, the Proposed Development will maintain an element of ongoing use that delivers a public service.

Landscaping

- 4.13 The proposal will incorporate areas of highly targeted tree and hedgerow planting to visually soften and partially screen the Proposed Development. Careful consideration has been given to the precise siting of the proposed planting to introduce it into more elevated positions and around the periphery of the site. The planting has been carefully located to limit impacting fungi grassland which will be enhanced on site where not impacted by the Proposed Development.
- 4.14 The targeted tree, hedgerow and scrub planting will soften local visual effects from the surrounding area and reintegrate the Site into the surrounding landscape. Within the

Landscape and Visual Impact Chapter of the ES it is anticipated that proposed tree planting would likely achieve a maximum height of approximately 8 metres in the longer term. The tree planting will additionally support a range of species including bats and tree nesting birds.

- 4.15 The Green Infrastructure Statement confirms that areas of fungi grassland to be permanently lost as a result of construction will be translocated to areas of scrub cleared grassland in the northwestern area of the application. Areas of the Site that are temporarily affected will be immediately reinstated after works are complete.
- 4.16 In addition, areas of dense scrub to the north of the eastern arm of the air strip will be enhanced to provide habitat for reptiles, amphibians, hedgehogs and bats. Whilst sustainable drainage systems on site will provide habitat suitable for amphibians and grass snake as well as invertebrates.

Micro-Siting

- 4.17 The application proposes a degree of controlled flexibility in respect of the micro-siting of the radars, on site access tracks and associated infrastructure. The proposed approach aligns with that taken by wind turbine permissions, allowing a 40m tolerance for infrastructure positioning to assist in the mitigation of any potential environmental effects and to be able to respond to ground investigations. A proposed draft condition is included in Section 8 of this Planning Statement.
- 4.18 The micro-siting of infrastructure would not encroach into environmentally constrained areas but could, for example, assist in responding to the final technical, operational and ground condition design matters that would only be known following the grant of permission.

Pre-Application Engagement and Public Consultation

- 4.19 Pre-application engagement has been undertaken in respect of the Proposed Development through discussions with Officers at PCC. This engagement has involved both informal meetings to discuss progress and principles of the application, as well as seeking formal pre-application advice obtained in May 2023 in parallel with the EIA Scoping Opinion (received 15th May 2023, Ref: 22/1136/SO). The Proposed Development presented for formal consideration reflects officer comments and feedback, ensuring that key aspects of the proposal are robustly considered and assessed as part of the Environmental Statement.
- 4.20 In addition to engagement with PCC, the Applicant has engaged with key stakeholders including members of the public.

- 4.21 Non-statutory public consultation events were undertaken in Solva Village and St Davids, with in person consultation exhibition events taking place on the 13th and 14th September 2024. The purpose of these events was to inform the local community on the need for the Proposed Development, and to hear their views and opinion on the project and areas of concern.
- 4.22 This information has been used to refine the proposal and ensure that the Environmental Statement responds appropriately to the issues raised by the local community. Full details this consultation is summarised in the submitted Pre-Application Consultation Statement.
- 4.23 Additionally, this application will be subject to a period of statutory Pre-Application Consultation as required by section 61z of the Town and Planning Act 1990 (as amended by section 17 of the Planning (Wales) Act 2015), which commences on 23 February 2026 and undertaken for a period of 28 days.
- 4.24 Full details of the Pre-Application Consultation and how the application has been able to respond to comments received will be contained within the Pre-application Consultation Report.

Proposed Development Benefits

- 4.25 The Ministry of Defence has a duty to protect the UK national interest around the world. This includes the Space Domain, which offers both the UK and its Allies an important strategic advantage, but also emerging threats and vulnerabilities that need to be monitored. Further information on the MoD's approach to this Domain can be found within the Defence Space Strategy (February 2022³), which emphasises the importance of space to Defence and how the UK needs to work with Allies to develop its operational space capability.
- 4.26 Space is a critical national infrastructure sector as identified within the Strategic Defence Review 2025⁴, and identified as an important growth area of the UK for manufacturing and research and development activities within the UK's Modern Industrial Strategy 2025⁵. Assured access for operation in, from and through spaces is crucial for the UK's security prosperity and continuity of daily life.

³ <https://www.gov.uk/government/publications/defence-space-strategy-operationalising-the-space-domain> ISBN 978-1-5286-2899-0

⁴ <https://www.gov.uk/government/publications/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad>

⁵ https://assets.publishing.service.gov.uk/media/69256e16367485ea116a56de/industrial_strategy_policy_paper.pdf ISBN 987-1-5286-6109-6

- 4.27 At present there is no system that monitors equipment in space to ensure it is protected from accidental damage caused by uncontrolled space debris/collision, or to identify and attribute any deliberate actions caused by State intervention.
- 4.28 The Proposed Development will play an important role in shaping and supporting the UK space market and further enhance the position of the UK within NATO and internationally by helping to build relationships with allies and partners.
- 4.29 The Proposed Development forms part of an international network of 3 installations across the UK, US and Australia, enabling 360-degree coverage of the sky at all times of day and under any weather conditions. The UK's contribution to this project is crucial to the overall networks' success.
- 4.30 In essence, the network of installations will operate akin to air traffic control, monitoring risk and direct satellite operators (civilian and military) to make decisions that minimises the risk of collisions. It also provides the ability to identify and attribute ownership for any deliberate actions. The Proposed Development will support and significantly enhance space-based resilience in an increasingly nationally and internationally important sector.
- 4.31 DARC will form the cornerstone of the UK's ability to detect, identify and track objects in Earth orbit, including satellites, space debris, and asteroids. This is essential for ensuring our continued ability to safely and securely operate space-based services. This includes satellites which are used to provide critical infrastructure support in the UK (such as coordinating emergency services, national security, weather forecasting, agriculture, environmental monitoring, and logistics support) as well as everyday user services (such as navigation, broadband internet, satellite cellular, and supply chain handling).
- 4.32 The Applicant is proposing to house the main UK contribution to DARC at the Cawdor Barracks site in Pembrokeshire. This would see the site remain operational beyond the original planned closure date of 2028. DARC's presence will provide employment and upskilling opportunities within the local community across all sectors. These will include operations and operations management, information technology and high-performance computing, HR, logistics, and facilities.
- 4.33 The Proposed Development will support the creation of construction phase employment opportunities that draws on local suppliers and skills. There will also be a primarily civilian workforce employed on site during the Proposal's operation.
- 4.34 The proposal will play a key role in the wider strategic approach to the space domain at a national and international level.

- 4.35 The proposal utilises an existing brownfield developed location and comprises an appropriate use in keeping with the Wider Site.
- 4.36 The Proposed Development will help to ensure continuity of daily life, locally nationally and internationally.
- 4.37 The Proposed Development will allow for the detection, identification, and tracking of satellites, debris and asteroids to prevent collisions and ensure the continuity of critical civil and military services.
- 4.38 The Proposed Development will protect and defend in-orbit critical national infrastructure, which supports UK Armed Forces operations at home and abroad.
- 4.39 The Proposed Development will enhance national security by providing decision-level information to regional, national and international authorities.
- 4.40 The proposals will provide previously unavailable data that will be distributed amongst all branches of UK government, through the UK Meteorological Office and the UK Space Agency, to better inform national and regional decision-making, improve planning and identify resilience priorities. The data sets would also be made available to private sector business enterprises, supporting the Space Industry.
- 4.41 The proposal incorporates ecological and landscaping enhancements as part of the proposal.

5.0 Planning Policy Framework

5.1 This section of the Statement provides a summary of planning context, and Section 7.0 provides an assessment of the Application against the policies, guidance and other material considerations summarised within this section.

Statutory Framework

5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise. Part 6 of the Act specifically relates to Wales and confirms the requirements for the preparation of planning documents that form the Statutory Development Plan.

National Planning Policy

5.3 Future Wales – the National Plan (2021) prepared by the Welsh Government – Is a spatial plan and is the National Development Framework for Wales to the year 2040. This is the overarching plan upon which Welsh Strategic and Local Development plans have been based and has full status as a development plan document.

5.4 Planning Policy Wales (PPW) (12th Edition) was published in February 2024 and supersedes previous national planning policy. The document sets out the Assembly's guidelines and policy for land use of the Welsh Government. This is supported by Technical Advice Notes, Welsh Government Circulars and policy clarification letters.

The Development Plan

5.5 The statutory development plan for the Site comprises:

- Future Wales – National Plan (2021).
- Pembrokeshire County Council (PCC) Local Development Plan (2013) 2013.

5.6 The current Local Development Plan for PCC comprises a Written Statement that incorporates the policies and a proposals map.

5.7 It is recognised that the Welsh National Marine Plan (2019) also forms part of the statutory development plan for Pembrokeshire. Paragraph 4 of the Marine Plan notes that the scope of the plan only covers up to the mean high water spring tide line. The application Site is located inland and a significant distance from the mean high water spring tide line, and as such have no impact upon the marine environment. Accordingly, it has not been considered further in the assessment of these proposals.

Emerging Planning Policy

- 5.8 PCC are in the process of preparing a new Local Development Plan which has been delayed since December 2021. Local Development Plan 2 was formally submitted to the Welsh Government for examination on the 17th of July 2025, with dates for the Examination in Public yet to be published. The appointed Inspectors have requested additional detail and changes to support the plan that are due to be submitted by 24 February 2024, after which they will review and provide an update on next steps and the associated timetable. Subject to the outcome of the Inspectors review and the EiP commencing, the most recent Delivery Agreement targets adoption of LPD2 by May 2026.
- 5.9 Given the stage reached in the plan process and the scope/significance of the information requested by the examining Inspectors, the emerging plan is a material planning consideration of limited weight as the policies have yet to be subject of an Examination in Public and have the potential to change. However, given the age of the adopted Local Plan the emerging policies do provide a more up-to-date position of planning considerations, and there is the prospect that the emerging policies may be adopted during the course of determination. Therefore, for the purposes of this proposal, the policies of both plans have been considered where relevant to do so to provide a robust assessment of planning matters.
- 5.10 PCC has published a draft Supplementary Planning Document on Landscape, referred to as the draft Landscape Character Assessment, which was consulted upon in April - May 2023 and forms part of the evidence base for the Local Development Plan Review. This provides developer guidance on the range and diversity of landscapes in Pembrokeshire (outside of the National Park) and the elements which contribute to them. Landscape Character Area 1 (Treffynnon) incorporates Cawdor Barracks and recognises the military operations on the Site and how these influence this part of the landscape. The document recognises that the closure of the Barracks would likely lead to pressure for redevelopment and cultural and economic change, anticipating this would result in residential redevelopment and intensification. As this document remains in draft after 2 years it is afforded limited weight as a material planning consideration.

Other Material Considerations

- 5.11 Other material planning considerations can include strategic documents prepared by central government that relate to the use and development of land in the public interest. In this regard The Strategic Defence Review 2025 (“SDR”), sets out the National approach to military infrastructure and incorporates the strategy for space domain. The SDR is capable of being given weight as a material consideration in the determination of planning applications. It sets a “whole of society approach” to national resilience and

security matters, looking to improve economic outputs by improving growth in defence and civil industries.

- 5.12 For the Proposed Development, the SDR specifically notes that the ability to operate in and from 'space underpins the UK's security, prosperity, and daily life.' As such, effective use of space is critical for understanding and communication with space becoming increasingly congested. Space Domain Awareness, such as Earth-based sensors, is identified as an important area of investment. The relationship between space security and homeland resilience is particularly important given the use of satellites in telecommunications, navigation, finance and emergency services. The SDR also notes the opportunity that the space sector presents for developing UK jobs, skills and economic growth.
- 5.13 UK Government has also published the UK's Modern Industrial Strategy (November 2025) which is a material consideration. This document identifies the Government's plan for change that supports economic growth and development. Space features as an important growth area for the UK economy in relation to manufacturing and Research & Development activities, as does Defence.
- 5.14 At the national level, Welsh Government has adopted the following Technical Advice Notes which are afforded full weight as a material consideration:
- Dark Skies Planning Guidance (2025).
 - Technical Advice Note (TAN) 5: Nature Conservation and Planning 2009.
 - Technical Advice Note (TAN) 11: Noise 1997.
 - Technical Advice Note (TAN) 12: Design 2016.
 - Technical Advice Note (TAN) 15: Development Flooding and Coastal Erosion.
 - Technical Advice Note (TAN) 23: Economic Development 2014.
 - Technical Advice Note (TAN) 24: The Historic Environment 2017.
- 5.15 The Welsh Government Circular WGC 016/2014: The Use of Planning Conditions for Development Management (October 2014) provides national guidance in respect of preparing appropriate planning conditions and is a material consideration.

6.0 Planning Assessment

6.1 This section of the Statement assesses the component parts of the Proposed Development against the Local Plan and other material considerations as outlined in **Section 5.0**.

Site Specific Designations

6.2 The Site is not subject to any Site-specific allocations within the Local Development Plan, however, the following designations are adjacent to the Site under the adopted Development Plan:

- SP.16 – The Landscape.
- GN.22 – Prior Extraction of the Mineral Resource.
- GN.25 – Buffer Zones around Mineral Sites.

6.3 Under the emerging Local Development Plan the Site is subject to a Site-specific designation:

- GN 7 – Brawdy Barracks including the disused Brawdy Airfield.

6.4 The following statutory designated sites are present within 2km of Cawdor Barracks:

- St. David's Peninsula Coast Site of Special Scientific Interest ('SSSI') (0.6km southwest).
- St. David's Special Area of Conservation ('SAC') (0.7km Southwest).
- Ramsey and St David's Peninsula Coast Special Protection Area ('SPA') (0.7km Southwest).
- Pembrokeshire Marine SAC (0.8km southwest).
- Northwest Pembrokeshire Commons SAC and Cleddau Rivers SAC.

6.5 For the Local Planning Authority to come to a decision, consideration of the prevailing development plan and determination in accordance with that plan, unless material considerations indicate otherwise, is required by Law. This exercise involves the evaluation of how the application complies with the development plan and whether on balance, the proposals are considered to be appropriate having regard to the benefits arising from the Proposed Development and other material planning considerations.

6.6 This Section undertakes this assessment considering the proposals against the following headings which are considered to be the key matters.

Principle of Military Development

- 6.7 The adopted Development Plan does not include any specific policies relating to development at existing military barracks, either in terms of new development, expanded facilities, or alternative uses. However, at the national level Future Wales does note the importance of such installations to local economies and communities, as well as the roles they play socially and culturally to local communities.
- 6.8 Accordingly, Future Wales seeks to protect military assets against impacts arising from development (page 51) and, by association, it can be read that development at military establishments which continue the operational requirements of the UK's Armed Forces are acceptable in principle but subject to the detailed policies of the Development Plan.
- 6.9 Emerging Development Plan Policy GN7 (Cawdor Barracks including the disused Brawdy Airfield) confirms the operational use of the existing base will continue in the early part of the plan period. Upon the cessation of the current posting, the Site is to remain in military ownership and capable of future use as required by operational needs into the future. Emerging Policy GN7 has yet to be examined or adopted, and as such is given limited weight as a material consideration. Notwithstanding this, the policy relates only to a scenario whereby the operational use has ceased which has yet to occur. The principle of the proposed is considered to align with planning policy at all levels.

Principle of Brownfield Redevelopment

- 6.10 Paragraph 3.55 of the Planning Policy Wales confirms that wherever possible brownfield land should be used in preference of greenfield sites. Paragraph 3.43 confirms that priority should be given to suitable and sustainable previously developed and underutilised sites.
- 6.11 Whilst there are no specific policies within the adopted Local Plan relating to the development of brownfield land, Paragraph 3.34 does note that Pembrokeshire has a range of previously developed sites, including disused airfields which may not be suitable for development because of their location and/or scale. The plan goes on to note that brownfield land that is suitable for development should be prioritise over greenfield land in accordance with national planning policy.
- 6.12 Under the emerging Development Plan Policy GN7 (Cawdor Barracks including the disused Brawdy Airfield) allocates the Site and identifies a series of potentially appropriate uses for the two distinct parts of the site, namely the airfield and the area of the Barracks should the military use of cease and the establishment comes forward for development. The Barracks has not been released from military use and, as such, the requirements of this unadopted policy are not triggered.

- 6.13 The Site comprises previously developed land and the proposed use aligns with existing military uses and as such is considered suitable previously developed land.
- 6.14 Adopted Policy GN.1 (General Development Policy) of the Local Development Plan confirms that development will be permitted where it complies with the 9 criteria points set within the Policy, as assessed below:

"The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located."

- 6.15 The Site comprises previously developed land and the proposed use aligns with existing military function of the Wider Site. This is characterised by its position as a secure establishment with industrial-designed buildings. The location of the disused airfield is a product of its function – it had to be a large, unrestricted and secure area in a prominent location.
- 6.16 The same is true of the Proposed Development, requiring an unrestricted larger area in a location which meets the technological requirements of being able to monitor the equator. Cawdor Barracks is a known and established military location that forms part of the character of this area. The proposals are compatible with the nature, capacity and character of the military site and adhere to this part of the criteria in this regard.
- 6.17 The proposals will not generate any material impact upon the local highway network or pressure on local services. There would be, therefore, no impact upon the capacity or character of the area to accommodate the development.

"It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels;"

- 6.18 Supporting Paragraph 6.3 of the adopted local plan defines "amenity" as: "...those elements in the appearance and layout of settlements and the Countryside which make for a pleasant life." In relation to those matters listed in the policy criteria, the proposals would have no material impact upon the local amenity in terms of loss of light or privacy, odours, smoke, fumes, dust, air quality or vibration levels. As confirmed within Chapters 6, 7 and 16 of the ES, any noise arising from the proposal is capable of being mitigated to a level that would not give rise to any significant detrimental amenity impacts.
- 6.19 A detailed discussion on visual impact is included in paragraphs 6.79-6.97 of this assessment of planning policy and planning balance, and Chapter 9 of the ES. It is accepted that there are a number of high-sensitivity receptors in the area, including the National Park and users of the coastal path. It is also accepted that the proposals sit on the skyline, affecting the backdrop seen by users of the area. Whilst there is a high

degree of change compared to the existing position, the scale of the openness and focus of views towards the coastline itself means that views are affected in a small number of locations and the impact diminishes with distance. In planning terms, the degree of visual impact is assessed as being less than significant and, on consideration of the need for the proposal and its benefits, deemed to be acceptable. Accordingly, the proposals comply with criteria 2.

"It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities".

- 6.20 This is separately assessed within the sub-section of this Report which assesses the Pembrokeshire Coast National Park (Paragraphs 6.98 – 6.120). Detailed assessment has been undertaken within the ES, which has acknowledged that the Proposed Development would result in an adverse impact on the National Park and identifying this at the moderate to substantial end of significance.
- 6.21 The conclusion reached is that, on balance, whilst there are limited or moderate impact in a localised area on the special qualities sensitive to visual change, overall the proposals give rise to limited harm to the Pembrokeshire Coast National Park..
- 6.22 Any impact to the character of the landscape would be localised to the Site and reduces over distance resulting in a localised impact in short-medium views. This conclusion is reached using professional judgement in completing the Environmental Statement. Consideration has also been had to the Council's evidence base for the emerging local plan which includes the "Brawdy Airfield - Landscape and Visual Appraisal of Potential Wind Energy Development (2021)⁶". At paragraph 7.19 of this document, the assessment confirms that turbines up to 35m would be apparent on the skyline, but their effect would reduce over distance.
- 6.23 On balance, when considering the need for the development and its resulting benefits, any departure from criteria 3 in relation to impact on landscape character is deemed acceptable. This is considered further in Section 7 – Planning Balance of this report.

"It respects and protects the natural environment including protected habitats and species."

- 6.24 The Proposed Development has been carefully designed to minimise the impact upon the natural environment. The proposal has been revised throughout the design process to maximise the extent of hardstanding that is used for both the permanent and temporary aspects of the proposal.

⁶ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

6.25 Where works are proposed away from the hardstanding, it is acknowledged that there are impacts to grassland with fungi assemblage priority habitat. This is compensated through the inclusion of an area of the site to deliver translocation of fungi grassland. In addition to this, the proposals will incorporate other areas of habitat creation that entails the enhancement of existing lower quality fungi grassland through management, habitat enhancement to include scrub management and creation of reptile hibernaculum and areas of proposed tree planting.

6.26 The Proposed Development therefore respects and protects the natural environment, complying with criteria 4 of the Policy.

"It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network."

6.27 The Proposed Development is located in an accessible location and is an existing hub of military activity. It is well connected to local settlements and public transport, with the nearest bus stop located to the south at Penycwm. The Proposed Development will be supported by 20 car parking spaces including four visitor car parking spaces maximising accessibility for users of the Site and meeting the day-to-day operational requirements.

6.28 The Proposed Development will not result in any significant transport or local highways effects, with no significant residual effects anticipated for vehicle and non-motorised users during the construction and operation of the Proposed Development.

6.29 Construction traffic will access the Site via a new junction from the C3010, minimising impacts on the wider Site and avoiding the use of minor roads wherever possible. Traffic movements will also be managed to limit effects at nearby junctions. These measures will be secured and further controlled through a Construction Traffic Management Plan, imposed by an appropriately worded planning condition, ensuring no detrimental impact on the highway network.

6.30 The opportunity for incorporating sustainable transport measures is limited however where possible trips by cycle and car sharing will be encouraged, as will the use of public transport where it is practical to do so. Further detail will be controlled through a Construction Traffic Management Plan, imposed by an appropriately worded planning condition. Further detail is provided within Chapter 5 of the ES (Transport and Access).

6.31 The proposals accord with criteria 5 of the Policy, being in an accessible location and a scheme that can be accommodated by the existing capacity of the highway network.

"Necessary and appropriate service infrastructure, access and parking can be provided."

- 6.32 The proposal incorporates the provision of new permanent access points located on the eastern boundary of the Site. The gate house for operational access to the site utilises the existing arrangements for crash gate 21 from the C3010.
- 6.33 A new construction access is to be created from the C3010 on the eastern boundary of the site to facilitate safe construction routing and minimise any impact upon the highway. This will be retained following completion of the works and used as a secondary emergency access.
- 6.34 There are no requirements for offsite upgrades to the local road network to accommodate the construction or operation of the Site.
- 6.35 Due to the limited availability of public transport, it is anticipated that the majority of trips will be undertaken by private vehicle. The Proposed Development will be supported through the delivery of 20 car parking spaces to ensure the day-to-day needs of users are met.
- 6.36 The proposals accord with criteria 6.

"It would not cause or result in unacceptable harm to health and safety."

- 6.37 The issue of public safety and health was discussed at the non-statutory public engagement in September 2024, and Chapter 15 of the Environmental Statement provides a comprehensive evaluation of radiation hazards associated with the project and concluding that the proposals are safe to humans.
- 6.38 The International Telecommunication Union (ITU) regulations includes a series of definitions of different technologies that utilise forms of telecommunication. A range of technologies fall within the definition of telecommunications, including radar as a radiodetermination system, as are "stations" for one or more transmitters or receivers necessary at one location for carrying on a radiocommunication or radio astronomy service.⁷
- 6.39 Established through the Communications Act 2003, Ofcom represents the United Kingdom in the ITU, managing and coordinating telecommunication services. These are defined as a transmission system for the conveyance, by the use of electrical, magnetic or electro-magnetic energy, of signals of any description under Section 32(1) of the Act.
- 6.40 The proposals are therefore classed as a telecommunications services, and associated planning policies are applicable. This includes Planning Policy Wales (Edition 12, 2024) which states that:

⁷ International Telecommunication Union Regulations Article 1 - Terms and Definitions <https://life.itu.int/radioclub/rr/art1.pdf>

“5.2.18 Provided that the development meets the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, planning authorities should not consider the health aspects of mobile telecommunication equipment. All new base stations are expected to meet the ICNIRP guidelines.”

6.41 Whilst the proposals are for not for mobile telecommunication equipment, the technology falls within the same categorisation and the proposal is ICNIRP compliant⁸, certification for which is included in the application submission as evidence. Furthermore, there will be security fencing which restricts access by the public to the Site, ensuring that there will be no unacceptable harm to health and safety as a result of these proposals.

6.42 Accordingly, the proposals accord with Criteria 7 of this policy as the scheme does not give rise to any unacceptable harm to health and safety.

“It would not have a significant adverse impact on water quality.”

6.43 The Proposed Development would incorporate water quality monitoring as part of construction works, with a monitoring strategy to be secured within the Framework Construction Environmental Management Plan (CEMP). Through the incorporation of the appropriate mitigation, it is considered that there will be a negligible impact on water quality.

6.44 Accordingly, the proposals accord with Criteria 8 of this policy.

“It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development.”

6.45 The Proposed Development will sit within the existing built form of the barracks and is considered to contribute to the coalescence of distinct settlements or consolidate ribbon development. The proposals would therefore accord with Criteria 9 of this policy.

6.46 The proposal has carefully considered, and been informed by, key operational and technical considerations, including the ability to provide a secure environment and technical specification of the proposed use. The development will form part of the wider Cawdor Barracks site and is compatible with the character of the military Site within which it is located. The proposals do not give rise to any matters that would be incompatible with the capacity of the local road network or facilities. The Proposed Development does give rise to visual impact on a small number of views, and whilst the majority of the criteria of adopted Policy GN.1 is complied with, conflict with Policy GN1(2) and (3) should be considered against the need and benefits of the Proposed Development in the planning balance.

⁸ ITU Radio Regulations, Article 1, No. 1.3 <https://www.itu.int/hub/publication/r-reg-rr-2024/>

6.47 Emerging Local Plan Policy GN 1 (General Development Policy) retains the core principles of the existing policy but introduces additional matters on light pollution, waste minimisation and agricultural land. It also provides greater clarity regarding unacceptable adverse effects, defining these as impacts that cannot be appropriately or satisfactorily mitigated.

6.48 Turning to these additional areas for completeness:

“It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on soils and for unallocated sites of 1 hectare or more outside Settlement Boundaries is accompanied by an agricultural land classification survey”

6.49 The Site is subject to a draft allocation within the emerging Local Plan and, once adopted, would therefore not require an agricultural land classification survey. Chapter 11 of the Environmental Statement (Ground Conditions and Contaminated Land) identifies the potential for some localised soil contamination; however, investigations have not found any widespread or significant contamination. The assessment concludes that no significant (moderate or above) residual effects are likely during either the construction or operational phases. These matters will be further managed through a Construction Environmental Management Plan, secured by an appropriately worded planning condition. On this basis, the proposals accord with the criteria of the emerging policy.

“Any light pollution must be necessary and fully justified and proposals with significant light pollution must include a lighting scheme. Proposals must minimise their light impact through appropriate mitigation wherever possible.”

6.50 The Proposed Development is supported by Chapter 16 (Lighting) of the ES, as part of an integrated design process, there have been opportunities to embed mitigation, reduce lighting in the design and avoid adverse effects. The Chapter concludes that the Site is not expected to experience any substantive change in artificial lighting and baseline night-time light levels are predicted to remain effectively unchanged. This will be further controlled through a Specific External Lighting Strategy, secured through an appropriately worded planning condition. On this basis, the proposals accord with the criteria of the emerging policy.

“It minimises the generation of waste during implementation and manages any waste generated.”

6.51 Chapter 11 of the Environmental Statement (Ground Conditions and Contaminated Land) undertakes an assessment of the impact of waste and resources arising from the Proposed Development. The assessment concludes that there would be a negligible impact, on resources and a not significant impact overall on waste matters. These will be

further managed through a Construction Environmental Management Plan, secured by an appropriately worded planning condition, and operational waste dealt with by way of standard refuse and recycling practices. On this basis, the proposals accord with the criteria of the emerging policy.

- 6.52 Adopted Local Development Plan Policy SP 1 (Sustainable development) of the Local Development Plan states that all development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.
- 6.53 Cawdor Barracks is situated approximately 6.9 miles from St David's and approximately 11.9 miles from Haverfordwest, the latter being designated as a Hub Town within the settlement hierarchy of Policy SP12 (whilst St David's is not featured at all). Penycwm, approximately 0.3 miles to the south is the closest Small Local Village. Whilst by its very nature the proposals need to be in a remote secure location such as this, the connectivity of the Site to the local road network and settlements means that it is a sustainable location for the civilian staff who will work at the facility.
- 6.54 Adopted Policy SP15 (Rural Settlements) sets out that development will encourage sustainable communities and a thriving rural economy by promoting:
- Development of a scale and nature identified as being appropriate for the settlement.
 - High quality accommodation of tenure(s) appropriate for the settlement.
 - Opportunities for new commercial, retail, tourism, leisure, and community facilities.
 - Appropriate land uses which are well-related to a Settlement Boundary.
 - Greater accessibility to existing and new services.
- 6.55 Future Wales notes the positive and significant contribution that military establishments make to local communities and local economies. This investment at Cawdor Barracks will ensure that there is a continued military presence in the area, and thus contribution to the local economy. Additionally, there is the potential to develop space-related technologies through the sharing of data that will be made available to businesses, allowing a national capability to be built through local benefits. In principle, this will deliver economic benefits both during construction and operational phases that will support local facilities and employment opportunities.
- 6.56 Furthermore, the proposals are required to safeguard infrastructure that forms the backbone of the daily lives of the populus and general economy. Not being able to adequately monitor satellites (akin to air-traffic control) puts these at risk. For context, the resulting economic impact arising from losing GPS services alone is estimated at £1.42 billion per day⁹. The proposals therefore comply with Policies SP1 and SP15.

⁹ <https://www.gov.uk/government/publications/report-the-economic-impact-on-the-uk-of-a-disruption-to-gnss>

Design

- 6.57 Adopted Policy GN.2 (Sustainable Design) provides a criteria that is to be used to assess proposals, many of which relate to publicly accessible urban residential and commercial development projects. These are provided below followed by an assessment of the proposal, noting the limited aspects where this policy is relevant and applicable to this form of development:
- *It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context.*
 - *It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout.*
 - *It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions.*
 - *It achieves a flexible and adaptable design.*
 - *It creates an inclusive and accessible environment for users that addresses community safety.*
 - *It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces.*
 - *It contributes to delivering well designed outdoor space with good linkages to adjoining streets, spaces, and other green infrastructure.*
- 6.58 Points 4-7 of adopted Policy GN.2 are not relevant to this application as such are not assessed further. The specific local context for this site found in its military use which is reflected in the existing buildings on the Barracks site. The proposed ancillary support buildings have been designed in a manner that responds to the military context, both in terms of design and materiality. The Proposed Development will respond to the military character of the Site, wider Barracks and the operational/technical requirements in terms of form, function and design.
- 6.59 The layout, scale, form, siting, massing and height of the buildings and equipment are governed by the technical requirements of the installation. Where possible, buildings have been sited in locations which minimise their visual appearance, balancing this against the need to locate buildings on the existing hardstanding. The dish arrays are located in a manner which meets the technical requirements of the system whilst again maximising the use of existing hardstanding, and the location has been moved by 310m in response to comments from the public on visual impact.
- 6.60 The proposals have been designed in a manner that responds positively to climate change and resource efficiency. The Proposed Development creates a functional and accessible environment within the confines of this specific form of development. Safety

is an inherent feature of the proposals and as a secure site, the general community will not be able to access the Proposed Development. Notwithstanding this, the proposal is ICNIRP compliant, the standard by which this technology is considered to be safe under the town planning process.

- 6.61 Alongside Local Policy, TAN 12: Design sets the national design objectives which comprises character, community safety, environmental sustainability, movement and access. These topics have been considered within the above paragraphs and within the Design Access Statement prepared by Montagu Evans.
- 6.62 As such it is considered that the proposals are compliant with the relevant sections of GN.2 and TAN 12 in respect of design.

Employment

- 6.63 The Proposed Development does not fall within Class B, with Cawdor Barracks being Class C2a Secure Residential Institutions. However, the Site and Proposed Development does give rise to civilian employment opportunities both during the construction and operation phases of development, and can be considered akin to such uses as the Policies of the development plan are silent on military developments.
- 6.64 Adopted Local Development Plan Policy GN.6 (Employment Proposals) confirms that employment proposals (B1, B2 and B8) on unallocated land will be permitted:
- *On sites within Settlement Boundaries.*
 - *On sites well-related to a Settlement Boundary if no sites within the same Settlement boundary exist to serve the development.*
 - *In countryside locations only if no other suitable sites exist and the enterprise requires such a location; and in all cases provided no allocated sites can reasonably accommodate the proposed development.*
- 6.65 Cawdor Barracks falls outside of the defined settlement limits of any town or village, and thus it is technically within the Countryside. Adopted Policy GN.6(3) requires consideration of whether allocated sites can reasonably accommodate the Proposed Development. TAN 23: Economic Development notes that one of the key considerations when weighing the economic benefit of development is the consideration of alternatives and also notes that the economic benefits associated with a proposal may be spread over a much larger area.
- 6.66 The technical requirements of the Proposed Development require a significant land ownership in a single ownership that has minimal on-site constraints and is, or is capable of, being secure and operational on 24-hour basis. Whilst Wales has a number

of disused airfields, these are not secure and suitable for the requirements of this proposal.

- 6.67 As confirmed in Environmental Statement Chapter 4, the alternative locations within the UK were considered from a technical, operational and environmental perspective.
- 6.68 Using desk-based criteria such as technical feasibility, environmental considerations, and long-term supportability, seven candidate sites were shortlisted for further evaluation:
- Benbecula, Scotland.
 - West Freugh, Scotland.
 - Fylingdales, England.
 - Cawdor Barracks (Formerly Royal Air Force (RAF) Brawdy), South Wales.
 - RAF Portreath, Cornwall, England.
 - Chivenor, Devon, England.
 - Macrihanish/Campbeltown, Scotland.
- 6.69 From a desk-based assessment, four of the sites were discounted for technical conflicts with existing operations. The remaining 3 – West Freugh, RAF Fylingdales and Cawdor Barracks – were taken forward for further consideration.
- 6.70 These three sites were surveyed and assessed against criteria such as radar system performance, land availability, and environmental considerations.
- 6.71 RAF Fylingdales was excluded due to the radio frequency interference with its Early Warning Radar System. West Freugh had insufficient geostationary belt coverage due to its latitude, and the need to vacate national test range activities. Furthermore, both RAF Fylingdales and West Freugh are located directly within multiple statutory environmental designations, including Special Areas of Conservation (SAC) and Special Protection Areas (SPA).
- 6.72 Although Cawdor Barracks has environmental constraints such as its proximity to the Pembrokeshire Coast National Park, it was selected as the preferred site due to its strategic location offering full coverage of the geostationary belt, existing infrastructure, and no on-site statutory environmental designations.
- 6.73 There are no alternative sites, allocated or not for development by PCC, which could meet the needs of the Proposed Development. In considering the points raised in TAN 23, the applicant has looked for alternative sites, but Cawdor Barracks remains the most suitable option. Development in this countryside location is therefore required.

- 6.74 Adopted Policy GN.9 (Extensions to Employment Sites) sets out that proposals to diversify or intensify employment uses and/or extend them onto adjacent land will be permitted where the scale and nature of the original development together with the extension is compatible with its location.
- 6.75 The Site comprises part of the wider Cawdor Barracks site and active military site, which will be retained in military use following the vacation of the 14th Signal Regiment in 2028. The Proposed Development will support the provision of civilian jobs over the course of construction and once operational as such facilitating the diversification of the employment use. The Proposed Development will comprise a secure facility that is of a scale and nature that is appropriate with the wider use of the location.
- 6.76 Adopted Policy SP16 (The Countryside) states that the essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas. Development which minimises visual impact on the landscape and relates to one of the following will be promoted:
- *Enterprises for which a countryside location is essential.*
 - *Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment.*
 - *The re-use of appropriate existing buildings.*
- 6.77 The proposals relate to military operations which are akin to those on the wider Barracks and thus falls within the first category of development of adopted Policy SP16 and category 3 of adopted Policy GN.6, i.e. those for which the countryside location is essential and there are no other alternatives. The remote and secure location provides an essential part of the Proposed Development and wider military context and thus is acceptable here in accordance with adopted Local Planning Policies GN.9 and SP 16.
- 6.78 As the proposals are intrinsically linked to the wider Barracks and are compatible in scale and kind, they comply with Policy GN.9 where extensions to existing employment opportunities will be supported.

Heritage, Landscape Visual Impact Assessment

- 6.79 The adopted Local Development Plan recognises the importance of the unique landscape of the County, imbedding consideration of the impact that development could potentially have across planning policy. As noted already, the Proposed Development adheres to the requirements of GN.1 and GN.2 and GN.6 in landscape terms, the benefits of the proposal supporting its acceptability in the planning balance.

Heritage Impacts

- 6.80 Adopted Policy GN.38 (Protection and Enhancement of the Historic Environment) outlines that development affecting sites and landscapes of architectural and/or historical merit or archaeological importance, or their setting, will only be permitted where it can be demonstrated that it would protect or enhance their character and integrity.
- 6.81 A detailed consideration of the impact upon heritage assets has been undertaken in Chapter 10 of the Environmental Statement. At the scoping stage of the process, 5 designated heritage assets were identified for assessment in relation to indirect effects to their significance as a result of changes to their setting. Other assets in the area are either located sufficient distance from the Site or be appropriately screened by mature landscaping
- 6.82 The impact to the significance of the identified assets as a result of changes to their setting has been concluded to be as follows:
- Grade II listed Church of St Teilo – Minor adverse.
 - Grade I listed Roch Castle – Moderate adverse effect.
 - Brawdy Promontory Fort Scheduled Monument – Moderate adverse effect.
 - Pointz Castle Scheduled Monument – Negligible effect.
 - St David's Peninsula and Ramsey Head Registered Historic Landscape – Negligible effect.
- 6.83 The level of harm attributed to these assets is based upon best practice, professional judgement, and discussions with Cadw. Should the Proposed Development be seen within the setting of heritage assets, the unique and modern form of development will be a juxtaposition that allows the general public to distinguish between historical assets and modern military development.
- 6.84 There will be no physical impact to any designated heritage asset. In terms of setting, there are no significant effects upon designated heritage assets, with the impacts identified ranging from negligible to moderate adverse. Where such an impact occurs, adopted Policy GN.38 requires applicants to demonstrate that schemes will continue to protect or enhance their character and integrity.
- 6.85 The assessment undertaken on the three assets with a moderate adverse impact confirms that the magnitude of impact is minor and limited to select viewpoints of the assets. As such, the overall impact is not of a level which would compromise their significance and the heritage assets can still be understood within the changing context.

- 6.86 As the significance of assets is still capable of being fully understood despite the minor harm to the setting, there is less than substantial harm to the heritage assets. Their character and integrity is protected and adopted Policy GN.38 has been complied with.

Landscape and Visual Impact

- 6.87 The Environmental Statement includes an assessment of the landscape and visual impact of the Proposed Development upon the surrounding area. This has been undertaken in consultation with Pembrokeshire Coast National Park and Pembrokeshire County Council to identify the representative viewpoints and Theoretical Zone of Visual influence. The methodology for assessment is based upon the guidelines for Landscape and Visual Impact Assessment issued by the Landscape Institute and Institute of Environment Management and Assessment.
- 6.88 Adopted local plan Policy SP16 relates to the Countryside, seeking to minimise development in this location unless, inter alia, this is an essential location – which is the case for the proposals at Cawdor Barracks. Such proposals also need to minimise visual impact on the landscape of Pembrokeshire and adjoining areas. Visual impact matters are also considered under General Development Policy GN.1 (also discussed in paragraphs 6.14 – 6.51 of this planning statement).
- 6.89 This approach is reiterated in emerging Policy SP11, and is to be read alongside emerging Policy GN 49 (Landscape) which requires all proposals to be well integrated into the landscape in terms of scale, siting and design and have an acceptable visual impact in relation to the characteristics and qualities of the landscape. The emerging policy also requires mitigation of any impact upon heritage assets and if there is to be a significant visual or landscape character impact, to demonstrate how the development can be acceptably mitigated.
- 6.90 Emerging Policy GN 49 is also to be read alongside emerging Policy SP12 (Maintaining and Enhancing the Environment), both of which aim to protect the landscape from materially harmful development.
- 6.91 The Environmental Statement has undertaken a robust assessment of the landscape and visual impact arising from the proposal (Chapter 09 and associated appendices). The review has concluded that across the 33 viewpoints that have been selected by PCC and the National Park as being representative, 64% (21) of the views are affected to slight and negligible extent, and 15% (5) are impacted to a moderate extent. 7 views (21%) are impacted to a substantial level, and none to a very substantial level.
- 6.92 Those viewpoints that are substantially impacted are principally in close proximity to the application site (viewpoints 1: Treffynnon, 2: Llandeloy, 3: Trefgarn Owen, 12 & 16: Penycwm), or in elevated positions looking down on to the Site (5: Rhyndaston

Mountain). Viewpoint 12: Haroldston Chins on the coastal path is also a prominent location.

- 6.93 Whilst these viewpoints are substantially affected by the development, the impact is localised with the effects diminishing further away from the Site due to the increased distance and by moving location along the highway or footpath network. Tree planting on the boundary of the Site is proposed as part of the scheme, helping to provide a degree of mitigation as it matures over time.
- 6.94 The Site is in a prominent location on the ridgeline and is currently void of buildings or structures, thus most forms of development would result in a high level of change and impact in localised views. The proposal has been designed to minimise the visual impact as much as possible, moving the proposed array in response to public feedback which has improved the scheme.
- 6.95 The proposal has taken efforts to mitigate visual impact through design interventions. This has included revising the layout of the scheme to minimise its prominence in views whilst balancing ecological and technical considerations. The scheme has also included areas where landscaping is to be enhanced, assisting with softening the Proposed Development and limit its impact in the number of views where it can be seen.
- 6.96 Appropriate measures have been taken to ensure that there is not a significant detrimental impact on local amenity in terms of visual impact. The Proposed Development has taken measures to keep the degree of impact to a negligible or slight adverse level for the majority of views, and in this regard it complies with adopted Policy SP16 and the general development criteria of adopted Policy GN.1.
- 6.97 Notwithstanding this, it is acknowledged that within the area surrounding the site there is harm to local views as a result of the Proposed Development, and to a moderate or substantial level in 12 of the 33 representative viewpoints. The Policies of both the adopted and emerging development plan seek to protect local views from materially harmful development, and for them to be acceptable in relation to the characteristics and qualities of the landscape. For 12 of the selected views the proposals do not accord with policy in this regard; whilst mitigation is proposed where possible, a negative impact is still caused to local views. Accordingly, there is a need to undertake an assessment of the planning balance to determine whether the benefits arising from the scheme outweigh this departure from planning policy. This is undertaken in Section 7 of this Planning Statement.

Pembrokeshire Coast National Park

- 6.98 Section 11A(2) the National Parks and Access to the Countryside Act 1949 places a duty of relevant authorities including the relevant Local Planning Authority and National

Park Authority to have regard to the purposes of the National Park and applying appropriate weight where conflict is identified. In this case, the relevant authority is Pembrokeshire County Council acting as the local planning authority as the Site is located wholly within their administrative area. It is recognised that Pembrokeshire Coast National Park Authority are a consultee on the proposed development.

- 6.99 Pembrokeshire Coast National Park Authority issued a scoping opinion consultation response dated 04 May 2023 which has been used to inform the preparation of the application material, including the Environmental Statement. Within this, there was a request for an assessment of the effects of the Proposed Development on the special qualities of the Pembrokeshire Coast National Park. These special qualities are defined as the characteristics and features of the National Park which, individually or in combination, contribute to what makes the area unique.
- 6.100 The special qualities of the National Park are set out in the Pembrokeshire Coast National Park Local Development Plan 2 (2020) within Priority A. Consideration has been had¹⁰ of the special qualities of the National Park, taken as a whole and in relation to the specifics of the site.

Coastal Splendour

- 6.101 An assessment of the impact of the Proposed Development on the coastal splendour special quality is undertaken within Chapter 9 of the ES. It has been identified that there would be some localised adverse effects to the coastal splendour within the context of the overall extent of the National Park. The greatest impact would be experienced within St Brides Bay in proximity of Newgale Sands, where in this location the antennas would appear as large-scale skyline features, albeit these would appear small in comparison to the cliff formations along the coastline.
- 6.102 The impact is reduced as views from the coast path would typically be out towards the sea and along the coast rather than towards the Proposed Development. Views of the Proposed Development close to the coastline would be prevented in the majority of areas due to the antennas being set back from the coastline and the intervening cliffs would prevent visibility from sea level.
- 6.103 The effect of the Proposed Development on this special quality is acknowledged to be adverse and permanent in nature during the life of the development. This quality is harmed to a small degree within a specific localised location, but the Proposed Development would not directly impact important areas of coastal splendour within the Pembrokeshire Coast National Park when taken as a whole. As such the level of harm is limited.

¹⁰ As taken from the Pembrokeshire Coast National Park Authority EIA Scoping Consultation Response dated 04 May 2023, and assessed in full in Chapter 9, Table 9.35 of the Environmental Statement

Diverse Geology

- 6.104 As the Proposed Development is not located within the Pembrokeshire Coast National Park there will be no direct impacts upon its geology. As such, the effects on this quality are neutral with no duration of effect and the quality is conserved. This quality is further considered within Chapter 11 of the ES (Ground Conditions and Contaminated Land).

Diversity of Landscape

- 6.105 An assessment of the impact of the Proposed Development on the diversity of landscape special quality is undertaken within Chapter 9 of the ES. The Pembrokeshire Coast National Park comprises a range of diverse landscapes, each of which have a strong sense of place and distinctiveness. The Proposed Development would not alter the existing diversity of landscape; however it would add additional modern built form within a localised area.
- 6.106 This would result in an adverse effect due to the contrast of the Proposed Development against the natural beauty of the existing diverse landscapes within the wider visual setting of this area of the National Park. As such, the quality is harmed to a small degree within a localised area of the overall Pembrokeshire Coast National Park, ensuring that the diversity of landscape is retained.

Distinctive Settlement Character

- 6.107 An assessment of the impact of the Proposed Development on the distinctive settlement character special quality is undertaken within Chapter 9 of the ES. The Proposed Development does not physically affect any of the settlements within the National Park but does appear within the setting of the settlements of Newgale and Solva.
- 6.108 The Proposed Development would introduce new engineering features within the wider setting of Newgale which would form a skyline backdrop to the settlement and views from St Brides Bay. This would result in an adverse effect upon this quality within the wider visual setting of Solva and Newgale. The duration of this impact would be permanent during the life of the Proposed Development, but the impact on the quality harmed is limited to a small degree within a localised area of the wider Pembrokeshire Coast National Park.

Rich Historic Environment

- 6.109 The Proposed Development lies outside the boundary of the Pembrokeshire Coast National Park; therefore, there is no potential for direct impacts on the National Park's rich historic environment. An assessment of effects on this Special Quality is provided in Chapter 10 of the ES, which confirms that the Proposed Development will not give rise

to any significant adverse effects on designated heritage assets, including their settings. Accordingly, the Special Quality relating to the historic environment is assessed as experiencing a neutral effect, remaining conserved and unchanged.

Cultural Heritage

6.110 The Proposed Development is sited outside of the National Park, therefore there is no potential for direct impacts on any cultural heritage assets within Pembrokeshire Coast National Park. As reflected under the rich historic environment quality there is therefore concluded to be a neutral effect with the cultural heritage of the National Park remaining conserved and unchanged.

Richness of Habitats and Biodiversity

6.111 The Proposed Development is sited outside of the National Park, therefore there are no direct impacts upon habitats or biodiversity within Pembrokeshire Coast National Park. In addition, as set out within Chapter 8 of the ES through the incorporation of ecological mitigation measures, the habitat and grassland fungi mitigation are expected to deliver a net benefit to biodiversity. As such, the effect upon this quality are considered to be neutral with quality conserved and supported by on-site enhancement undertaken as part of the Proposed Development.

Islands

6.112 The Proposed Development will have no impact upon this special quality. As such there would be no change resulting in a neutral effect with the existing quality conserved and unchanged.

Accessibility

6.113 An assessment of the impact of the Proposed Development on the accessibility special quality is undertaken within Chapter 5 of the ES. The construction and operation of the Proposed Development will not result in significant effects on transport and access. As a result, there will be no impact upon accessibility to the Pembrokeshire Coast National Park from the Proposed Development. The effect is therefore concluded to be neutral with the quality conserved and unchanged.

Space to Breathe

6.114 This special quality relates to the experience of the coastline when encountering the sea and openness of the landscape experienced in combination with the coastal weather. Given the Site's location away from the coastline, the Proposed Development will have

no impact upon this special quality. As such, there would be no change resulting in a neutral effect with the existing quality conserved and unchanged.

Remoteness, Tranquillity and Wildness

- 6.115 An assessment of the effects of the Proposed Development on the Special Quality relating to remoteness, tranquillity and wildness is presented in Chapter 9 of the ES. The greatest areas of perceived remoteness, tranquillity and wildness within the study area are located at a considerable distance from the Site, particularly around St David's Head and Ramsey Island. These areas would not be affected by the Proposed Development.
- 6.116 The Proposed Development would give rise to a limited, localised reduction in perceived visual tranquillity in areas closer to the antennas due to the introduction of new engineering features into the landscape. At locations such as Solva and Newgale, existing tranquillity levels are already influenced by seasonal tourist activity, meaning any additional effects would be less perceptible during the summer months.
- 6.117 Overall, the assessment concludes that the Proposed Development would have a localised adverse effect on this Special Quality, arising from the introduction of an uncharacteristic feature within the immediate visual setting of the Site. This effect would be permanent but confined to a small geographic area, with any harm limited to a moderate degree given the nature and scale of the Proposed Development.

The Diversity of Experience and Combination of Individual Qualities

- 6.118 The Proposed Development would have a localised moderate adverse impact landscape and visual impact qualities in particular relation to coastal splendour, diversity of landscape, distinctive settlement character and remoteness, tranquillity and wildness. This is due to the nature of the Proposed Development comprising the creation a fixed manmade engineering feature that is out of place in the natural landscape. However, this is in all instances limited to the localised area however an adverse effect is acknowledged in respect of these elements and result in a permanent impact on these qualities.
- 6.119 It is however pertinent to note that in respect of the majority of special qualities there will be a neutral effect with the existing quality conserved and unchanged.
- 6.120 Overall, It is acknowledged that the proposals would give rise to some adverse impacts on a small number of the special qualities of the Pembrokeshire Coast National Park, the degree of which would be limited to localised areas; the overall purpose of the National Park would not be undermined as a result of the Proposed Development.

Biodiversity

- 6.121 Local Development Plan Policy GN.37 (Protection and Enhancement of Biodiversity) confirms that all development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity. Development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures.
- 6.122 TN5: Nature Conservation and Planning provides advice which seeks to ensure that the planning system contributes to the protection and enhancing biodiversity and geology conservation. The application is supported by Chapter 8 of the ES (Biodiversity) and its supporting appendices. This has comprised extensive surveys being undertaken to establish the habitat baseline of the Site. The assessment of significant effects on ecological receptors has been undertaken in adherence to CIEEM guidelines for Environmental Impact Assessment.
- 6.123 The Proposed Development has been carefully designed to minimise the impact upon the natural environment. The proposal has been revised throughout the design process to maximise the extent of hardstanding that is use for both the permanent and temporary aspects of the Proposed Development. Where works are proposed away from the hardstanding, it is acknowledged that there are impacts to grassland with fungi assemblage priority habitat.
- 6.124 As detailed within the Environmental Statement, the step-wise approach to achieving Net Biodiversity Benefit in line with PPW has been used, whilst also incorporating the DECCA (Diversity, Extent, Condition, Connectivity and other Aspect of ecosystem resilience) Framework. The key steps can be summarised as follows:
- **Step 1 – Avoid** – Environmental Statement Chapter 4 (Alternatives and Design Evolution) describes the UK Site Selection Process for the proposed development. Once the Cawdor barracks were chosen, a number of alternative design iterations are shown, all of which incorporate biodiversity in the process.
 - **Step 2 – Minimise** – Section 8.5 of the Environmental Statement details the design interventions and control measures implemented to further avoid and/or reduce potential impacts on habitats and species.
 - **Step 3 - Mitigate/Restore** – Section 8.7 of the Environmental Statement details the proposed mitigation which focuses on a Grassland Fungi Mitigation Plan (comprising protection, translocation and enhancement), enhancement of scrub habitats and protection of ground nesting birds. The Biosecurity Management Plan would focus on control/treatment of INNS.

- **Step 4 - Compensation on site / off-site.** The proposed mitigation is considered sufficient such that compensation is not required. The mitigation shown on the Landscape and Ecology Proposals Plan (ES Figure 3.4) also includes a suite of tree planting across selected locations across the application site boundary having combined landscape and biodiversity benefits.
- **Step 5 - Long term management.** The Grassland Fungi Mitigation Plan would include a plan for long-term management of grassland within the application site, while the post-consent detailed Landscape and Ecology Management Plan (LEMP) would specify monitoring requirements (including intervention requirements, if needed) for successful establishment of tree and scrub planting and hedgerow enhancement.

6.125 The Proposed Development will deliver a net biodiversity benefit, as outlined in Chapter 8 of the Environmental Statement. This will be achieved through the enhancement and ongoing management of intrinsic grassland plant diversity, alongside measures to support improved faunal assemblages. Further detail on the proposed biodiversity enhancements is provided within the Landscape and Ecology Proposals Plan.

6.126 Through the implementation of appropriate design intervention and controls, the ES Chapter confirms that the Proposed Development will have no significant effect in respect of Biodiversity matters with exception of the loss of fungi grassland. This is proposed to be appropriately addressed through an appropriately worded condition securing a detailed Fungi Mitigation Strategy.

6.127 Where the permanent loss of fungi grassland is anticipated (1.82 ha) this will be subject to translocation to an appropriate on-site receptor and the Mitigation Strategy will assist with improving and maintaining conditions that are supportive of fungi grassland. In addition to this, the proposals will incorporate other areas of habitat creation which entail the enhancement of existing lower quality fungi grassland through management, habitat enhancement to include scrub management and creation of reptile hibernaculum and areas of proposed tree planting.

6.128 With the incorporation of mitigation and enhancement, the Proposed Development would have no overall adverse significant effect and the habitat and grassland fungi mitigation plan would result in a net benefit to biodiversity. As such the Proposed Development is considered to be in accordance with Local Policy GN.37 and TN5.

Energy and Sustainability

6.129 Local Development Plan GN.4 (Resource Efficiency and Renewable and Low-carbon Energy Proposals) sets out that development should seek to minimise resource demand and improve resource efficiency and is supportive of the utilisation of renewable

sources. This aligns with the national approach set out within Planning Policy Wales which supports the reduction of energy demand and supports energy efficiency.

- 6.130 The Application is supported by ES Chapter 14 (Climate Change) which considers potential impact of the Proposed Development on climate and, in addition, the potential vulnerability of the Proposed Development to future changes in climate. The Applicant acknowledges the significant threat climate change poses and is committed to adapting its strategies to meet the legal commitment of achieving net zero by 2050.
- 6.131 The proposed buildings will be designed with energy and water efficiency as a priority where this does not impact mission capabilities. As a result of constant operation, the radar system will require a consistent supply of electricity and water for cooling at the Transmit array. Where toilet fixtures are incorporated, they will use low flow fixtures. Proposed lighting will utilise LED to ensure maximum light output with minimal energy usage and wider impact upon the sensitive nighttime environment.
- 6.132 As such the Proposed Development is considered to be compliant with Local Planning Policy GN.4.

Amenity

- 6.133 Policy GN.1 (General Development Policy) provides a criterion which includes a requirement that proposals should not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels.
- 6.134 ES Chapter 7 (Noise and Vibration) considers the potential noise and vibration impacts of the proposal on nearby sensitive noise receptors. The assessment of the construction phase confirms that through the incorporation of appropriate mitigation (such as temporary barriers and following careful programming to minimise the duration of noisy works near sensitive receptors), effects may be avoided. No significant effects are expected to arise from construction vibration, or construction traffic. The assessment of operational noise confirms that through the incorporation of mitigation no residual adverse noise effects are anticipated.
- 6.135 Air quality considerations are addressed in wider detail within Chapter 6 of the Environmental Statement. This includes undertaking an assessment of the potential air quality impacts of the Proposed Development within the construction and operational phases. Overall, it is concluded that there will no significant effects predicated as part of construction or operation.
- 6.136 As such the Proposed Development is considered to be compliant with Part 2 of GN.1 in respect of amenity.

Archaeology

- 6.137 Planning Policy Wales discusses archaeology at Paragraph 6.1.23, recognising the need to conserve archaeological remains. Paragraph 6.1.26 sets out that applications should be accompanied by sufficient information such as a desk-based assessment or field evaluation to gain a full understanding of the archaeological impacts of proposals.
- 6.138 Local Plan Policy GN.38 (Protect and Enhancement of the Historic Environment) requires proposals to demonstrate that they will protect or enhance the character and integrity of sites and landscapes of architectural or historical merit or archaeological importance. This is further supported by TN24: The Historic Environment in defining archaeological sites as historic assets with archaeological remains a material consideration.
- 6.139 This application is supported by ES Chapter 10 (Archaeology and Built Heritage) with the Chapter supported by an archaeology desk-based assessment prepared by Wessex Archaeology. The Proposed Development seeks to secure further archaeological works to be secured through an appropriately worded condition with the scope and extent of works to be discussed and agreed with the relevant statutory bodies. The incorporation of an appropriate proposal of archaeological mitigation the Proposed Development is compliant with Local Policy GN.38 and TN24.

Flood Risk and Drainage

- 6.140 Within Local Policy GN.2 (Sustainable Design) the supporting text requires design to incorporate responses to the impacts of climate change such as storms and flooding, which requires developments to incorporate sustainable urban drainage where relevant. A key monitoring outcome of the Local Development Plan is that no significant additional flood risks arise from development. This is further supported by TAN15: Development, Flooding and Coastal Erosion, which provides a framework for assessing the risk associated from fluvial, tidal, and surface water flooding. .
- 6.141 This application is supported by ES Chapter 12 (Water Environment and Flood Risk). The Site is located within Flood Zone 1 which would not change when incorporating predicted climate change. The Proposed Development is at minimal risk of flooding as a result of its elevated location; however, the proposal could result in impacts upon other parties as a result if an increase in impermeable areas. This will be appropriately mitigated through the incorporation of attenuation storage as reflected in the SuDS design and SAB approval process.

6.142 Through the incorporation of sufficient and appropriate design interventions the proposal is not likely to give rise to significant effects in either construction or operational phases and is therefore fully in accordance with Policy GN.2 and TAN15.

Planning Policy Conclusions

6.143 The Proposed Development has been developed in light of the planning policies of the statutory development plan. Consideration has also been given to the emerging local development plan, with due weight attributed to policy given the stage of plan production.

6.144 In considering the proposal against policy, the proposals accord with the policies of the plan in relation to the principles of development and ensuring that local amenity and natural environment are sufficient protected.

6.145 The Proposed Development does have a significant visual impact, but this is limited to a select number of views (7 of 33) and is limited predominantly to areas close to the Site. The overall landscape impact for the wider area is minimal, and the special features of the National Park remain protected when considered as a whole. Accordingly, the proposal is deemed to have an acceptable level of visual impact according with the requirements of Policy GN49.

6.146 The Proposed Development does give rise to significant economic and societal benefits which accord with the policies of the plan and are capable of being weighed in the planning balance. Accordingly, the proposals are consistent with the strategy, objectives and policies of the development plan when taken as a whole.

7.0 Assessment of Planning Balance

- 7.1 Planning legislation requires decision makers to assess applications in accordance with the development plan unless material planning considerations indicate otherwise. This is to ensure that social, economic, cultural and environmental issues are balanced and integrated so that the whole of society can be best served and represented in the decision-making process.
- 7.2 Planning Practice Guidance Wales (Paragraphs 2.26 – 2.28 and associated bullet points) provide guidance on the key factors to be considered in the assessment process covering the 4 strands of sustainable development. Each are considered in turn as follows and whilst it is for the decision maker to attribute weight to each element in the planning balance, a view is offered to assist with the planning process.

Social Considerations

- 7.3 Social considerations relate to community cohesion and the way society operates. These seek to ensure that proposals do not have a detrimental impact upon the daily lives of communities and deliver benefits that support and enhance the way communities interact.
- 7.4 The Proposed Development will not have a detrimental impact upon the local community's way of life – the Proposed Development will not have any material impact upon local society, the local highway network nor will it place any pressure on local services. It will, however, support satellite technologies which are used for day-to-day functions including connectivity in rural areas, economic functions, emergency service coordination and aspects such as GPS for personal navigation.
- 7.5 This presents a summary of the civilian importance of satellite technology to society; in addition, there is the defence case for protecting society at large.
- 7.6 There is significant strategic importance of secure communication for command-and-control activities undertaken by the UK military. This not only serves to support operations for and with our Allies across the globe, but also the day-to-day security of the Nation.
- 7.7 The importance of this infrastructure cannot, therefore, be underestimated as it is critical to the way of life and undertaking of every person in the United Kingdom and beyond. At present there is no system that monitors equipment in space to ensure it is protected from accidental damage caused by uncontrolled space debris/collision or deliberate actions. The proposed radar system provides, awareness, resilience and accountability,

providing opportunity to appropriately manage situations. This limits the risk of any impact to society, maintaining and securing the Nation's way of life.

- 7.8 The applicant attributes substantial weight in support of the Proposed Development to these benefits.

Economic Considerations

- 7.9 The Proposed Development does offer a degree of local economic benefit through local employment by using a civilian staff at the facility. During the construction phase this will deliver 90 FTE jobs, with a further 60 FTE jobs once operational which is deemed to be a minor benefit of the Proposed Development within the context of local employment levels. The proposal will also contribute to the local economy during construction through the provision of 90 FTE jobs with associated local expenditure. These are afforded moderate weight by the applicant given the low numbers but are a benefit nonetheless by providing direct local employment opportunities.
- 7.10 As noted in TAN15, economic benefits do not respect local authority boundaries, and that social and environmental objectives are often aligned with growth objectives. The Proposed Development assists in all aspects of sustainable development through the ability to monitor satellites that provide essential daily services and support the economy at large.
- 7.11 As of July 2025, an estimated 18% of UK GDP (c£454 billion)¹¹ is delivered through satellite services. Without DARC, the UK faces a significant risk of losing access to these vital services, which would have severe consequences for national security, economic stability, and public safety. For context, the economic impact of losing GPS services alone is estimated at £1.422 billion per day, highlighting the scale of potential disruption.
- 7.12 Internet/telecommunication systems, banking, emergency services, environmental monitoring, GPS and so forth all require safe and managed space to ensure there is no disruption to services, the consequences for which would be significant to both community and economic functions across Pembrokeshire and the UK as a whole.
- 7.13 The provision of monitoring technology that protects and manages these systems provides assurance and certainty over operations and lessens the risk of negative economic consequences. Furthermore, the establishment of this system will provide significant data that will be made available to business that specialise in the space sector, supporting investment, research and development into the space sector. The global space economy is forecast to reach £1.3tn (\$1.8tn) by 2035, primarily from

¹¹ <https://www.gov.uk/government/news/spaces-influence-on-economy-and-security-grows-as-new-projects-announced-in-manchester>

commercial demand and innovation¹². The UK Space Agency reported that the UK space sector is worth £17.5bn per year, underpinning £370bn of UK GDP – approximately a fifth of the UK Economy¹³.

- 7.14 Wales plays an important role in this sector already, with Welsh companies contributing £345m annually and sustaining over 1,700 jobs across more than 105 organisations. 14 The proposed facility will further support Wales as a key supporter of this important sector, with the ability to cluster innovation firms and investment that will benefit from the data that will be gathered and released.
- 7.15 Space is a significant contributor to the economy through direct industry and supporting operations. The proposals have a direct relationship to these, and thus the economic benefits arising from the Proposed Development are significant to both the Welsh and UK economies, supporting existing operations and providing new opportunities for growth. The economic need and benefits are given significant weight in the planning balance by the applicant.

Cultural Considerations

- 7.16 Consideration of cultural matters is an important aspect that maintains societal cohesion, especially in relation to providing opportunities to enhance the use of the Welsh language.
- 7.17 The Proposed Development has limited opportunities to support cultural matters other than maintaining a military presence in the community which forms part of the local identity given the historical presence of Cawdor Barracks.
- 7.18 The proposals have no adverse impact upon the use of the Welsh language, however, the employment of local residents to staff the facilities provides opportunities for community to use this where suitable to do so.
- 7.19 These cultural benefits are afforded limited weight by the applicant in the planning balance.
- 7.20 The proposal does have the potential to impact upon the setting of designated heritage assets located in the vicinity of the Site. The assessment of harm undertaken within the Environmental Statement has identified that whilst there is an indirect effect on heritage significance through a change in setting, there would no significant adverse effect to these assets. This conclusion has been reached on the basis of best practice,

¹² DSR 2025, Section 7.5, paragraph 6

¹³ <https://www.gov.uk/government/publications/uk-space-agency-annual-report-and-accounts-2023-2024/uk-space-agency-annual-report-2023-2024>

¹⁴ <https://space.blog.gov.uk/2025/10/06/uk-space-agency-funding-for-growing-welsh-space-sector/>

professional judgment and agreed in consultation with Cadw. Accordingly, when considering the planning balance the applicant has attributed limited weight against the scheme to heritage matters and no heritage benefit..

- 7.21 The issue of tourism has been considered within the socio-economic chapter of the Environmental Statement, in terms of local benefit to the economy through the use of accommodation for workers and local expenditure. Equally the impact upon tourism arising from the completed Proposed Development has been considered, with evidence drawn from the Yorkshire Moors which includes visible military installations and continues to receive high levels of tourism.
- 7.22 The relationship with the tourism industry has been considered and the socio-economic assessment of the proposal has concluded that there are no residual significant effects upon tourism, and thus any impact arising from the proposal is afforded limited weight in the planning balance.
- 7.23 The Proposed Development gives rise to both cultural benefits and disbenefits which are equally attributed limited weight in the planning balance by the applicant.

Environmental Considerations

- 7.24 The environmental impacts arising from the proposal on fungi habitat is mitigated through the use of existing hardstanding and compensated through translocation to other areas of the Site. This is afforded limited weight by the applicant as it mitigates a direct impact to a protected habitat.
- 7.25 The wider landscape and habitat enhancements across the Site do mitigate the visual impact but would also result in improved habitats for a range of mobile species and reptiles. The proposal will result in a net benefit to biodiversity, which is afforded limited weight in favour of the Proposed Development by the applicant.
- 7.26 The most notable environmental aspect of the Site is how it features within the landscape character of the area and the relationship with the special qualities of the National Park. The current position is that the Site presents a landscape and visual detractor within the rural context. The proposals would introduce additional built form and engineered features into an elevated and visually open position within the context of the military base and thus are read together.
- 7.27 The Landscape and Visual Impact Assessment chapter of the environmental statement has concluded the change to the views, noting that these would fall within the substantial or moderate categories of adverse impact. The applicant is of the opinion that over distance the degree of harm lessens, and that within the key views the harm is quickly diminished due to the transient nature of the viewpoints, i.e. travelling along key coastal

paths and redirecting interest towards the coastal features. The harm is also localised to a small section of the 420km of coastline that falls within the National Park.

- 7.28 In relation to the special qualities of the National Park, the proposals' impact is limited to matters relating solely to visual impact – there is no physical harm to the National Park. It is recognised that this gives rise to a moderate adverse harm upon a localised area of the National Park.
- 7.29 When taken as a whole, the special qualities of the National Park are retained for the majority of the designated area. The impact is also fully reversable in that the views would be restored at a time when the installation comes to the end of its operational life. The overall impact to the National Park is therefore limited.
- 7.30 Having considered the visual impact of the proposal within the context of the County and National Park as a whole, the impact arising is afforded moderate weight against the Proposed Development in the planning balance by the applicant.

Concluding Balance

- 7.31 It is acknowledged that elements of the Proposed Development do give rise to localised harm, specifically in relation to landscape and visual impact matters which are given moderate weight in the planning balance by the applicant. These are offset by the need for development and the economic benefits arising from the proposal for society as a whole which are given substantial weight by the applicant.
- 7.32 As set out in this Statement and the accompanying application documents, extensive work has been undertaken to consider alternative sites for the Proposed Development, with the Site identified as the most appropriate location from both an operational and environmental perspective. The Proposed Development is strongly supported at a national level, aligning with the strategic priorities set out in the Government's Strategic Defence and Security Review (SDSR), the UK's Modern Industrial Strategy, and reflecting the critical and growing importance of the space industry as a whole to all part of the UK.
- 7.33 The substantial weight for defence, economic and societal benefits significantly and demonstrably outweigh the harm that has been found arising from the landscape and visual impact of the Proposed Development, and the applicant's position is that the planning balance rests in favour of granting permission. Consequently, this important project should be granted permission without delay for the benefit of the United Kingdom.

8.0 Proposed Conditions

8.1 It is expected that any permission issued by PCC will be subject to conditions that control the final detail, implementation and operation of the proposed facility, in line with best practice and the requirements of Circular WG 016/2014: the Use of Planning Conditions for Development Management Conditions are subject to six tests:

- Necessity – Are the conditions necessary or are they a duplication of other controls.
- Relevant to Planning – Are there other controls available, either through the planning system (such as s106 / s278 agreements) or other legislation.
- Relevant to the Development – Do they cover aspects of the proposed development and/or issues directly arising that need to be controlled.
- Enforceability – Are they specific in their wording and practical to enforce.
- Precise – Are the requirements clear.
- Reasonable – Is it reasonable to expect control over these matters.

8.2 If all six tests are met, then conditions can be used to secure further details of the proposal that would normally only be available once planning permission has been granted.

8.3 To support the Proposed Development the below list of suggested conditions is put forward for the consideration officers at PCC and to serve as the basis for future discussion.

Micro-Siting Allowance

8.4 Akin to wind-turbine schemes, there is a need for a micro-siting allowance for the proposed radar dishes. This is required to ensure that the technology is appropriately calibrated, and to allow for physical surveys to take place on ground conditions, archaeology and fungi mitigation so that the detailed design considerations can be undertaken.

8.5 The wording of the proposed condition meets the respective tests set out within Planning Conditions Circular - The Use of Planning Conditions for Development Management (2024) and is commonly applied to wind turbine applications within Wales, including the Dragon LNG Terminal, Waterston, Milford Haven (ref. CAS-01859-K1M7Y6) which includes turbines.

8.6 To assist in the consideration of matters it is suggested that a similar approach is employed with this application via the following wording.

'The final location of radar(s) may be adjusted by micro-siting from the locations shown in Proposed Plan (Reference: Sheet ID CS101) in accordance with a micro-siting protocol to be submitted and approved in writing by the Local Planning Authority prior to the commencement of construction of the first radar dish. The micro-siting protocol shall ensure that:

- Any variations to the indicated position of any radar(s) shall not exceed 40m in any direction.*
- The micro-siting appropriately considers the constraints identified in ES, including a compliance assessment against the findings of the LVIA.*
- A plan showing the position of the radars as built shall be submitted to the Local Planning Authority within one month of the first use date.'*

Construction Environment Management Plan

- 8.7 It is standard to expect a pre-commencement condition relating to the detailed construction methodology of major schemes, providing the ability for additional detail to be provided on the approach to be taken and ensuring activities are undertaken with minimal impact upon the local area. It is therefore expected that a condition worded similar to the below would be added to any permission issued by the Council:

'Prior to the commencement of development, a Construction Environment Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local Planning Authority. All works shall be undertaken in accordance with the approved CEMP.'

- 8.8 Such a condition would be in the interests of highway safety, water quality and pollution control, and to secure measures for the conservation and enhancement of biodiversity in accordance with adopted policies GN.1 and GN.37 of the LDP Part 1 Section 6 of the Environment (Wales) Act 2016, Planning Policy Wales (February 2023) and TAN 5 Nature Conservation and Planning (2009).

Construction Traffic Management Plan

- 8.9 Similar to the CEMP condition, it is expected that additional detail would be requested on how construction traffic would be managed. This would include details of the routing of deliveries and the time of day for when they would arrive, ensuring that any impact upon the local network is minimised and to comply with adopted Policy GN.1 of the LDP.

'Prior to the commencement of development, a Construction Traffic Management Plan (CTMP) shall be submitted to, and approved in writing by, the Local Planning Authority. All construction work, including any offsite mitigation, shall be undertaken in accordance with the approved CTMP.'

Materials

- 8.10 Whilst materials are indicated within the submitted drawings pack this is subject to detailed design, in the interest of visual amenity and compliance with adopted Policy GN.1 of the LDP.

'Prior to the commencement of development, details shall be submitted to, and approved in writing by, the local planning authority of the colour specification of all structures and buildings. The development shall accord with the details so approved.'

Contamination

- 8.11 Whilst the site assessment has not identified a high risk of contamination, it is suitable to have a condition on contamination that monitors work and seeks a remediation strategy should unforeseen contamination be discovered. This would ensure compliance with adopted Policy GN.1 of the LDP.

"If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved."

Landscape and Ecological Management Plan

- 8.12 This condition is necessary to ensure the appropriate protection of wildlife and supporting habitats and secure opportunities for enhancing the Site's nature conservation value in line with local and national policies GN.37 of the LDP Part 1 Section 6 of the Environment (Wales) Act 2016, Planning Policy Wales (February 2023).

'A Landscape and Ecological Management Plan prepared in accordance with Landscape and Ecological Proposals Plan incorporated within the ES shall be submitted to, and approved in writing by, the Local Planning Authority.'

The Landscape and Ecological Management Plan shall be based on the Biodiversity ES Chapter and including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas. The scheme shall include the following elements:

- *Details of any new habitat created on site.*
- *Details of boundary treatments.*
- *Details of management responsibilities.*

The development shall be undertaken in accordance with the approved details (or such updated document as submitted and approved by the Local Planning Authority).

Fungi Mitigation Strategy

- 8.13 This condition is considered in the interest of ensuring suitable ecological protections being applied to grassland with fungi assemblage priority habitat identified on the Site, to secure measures for the conservation and enhancement of biodiversity in accordance with policies GN.1 and GN.37 of the LDP Part 1 Section 6 of the Environment (Wales) Act 2016, Planning Policy Wales (February 2023) and TAN 5 Nature Conservation and Planning (2009).

'Prior to the Commencement of any development, a translocation and mitigation strategy shall be prepared, submitted and approved in writing by the Local Planning Authority. The Strategy shall incorporate relevant details in respect of programme, timing and the scope of works. All works shall be undertaken in accordance with the approved Strategy.'

External Lighting Strategy

- 8.14 In the interest of minimising light pollution, safeguarding biodiversity reduce energy and carbon, and maintain the quality of the night sky, having regard to the Welsh Dark Skies Guidance (2025).

No external lighting (including, but not limited to, security lights, path lighting, architectural lighting, car park lighting, or temporary lighting) shall be installed or operated until an External Lighting Strategy has been prepared and submitted to the Local Planning Authority (LPA) and approved in writing. The Strategy must:

- *Be prepared by a competent lighting engineer/designer.*
- *Demonstrate regard to the Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales (2025).*
- *Articulate the principle of "the right light, at the right time, in the right place.*

Development should then be carried out in alignment with the approved details'

- 8.15 Further conditions may be discussed over the course of the determination of the application and will be subject to negotiation between Statutory Consultees, the Local Authority and the Applicant.

9.0 Summary and Conclusion

- 9.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application for full planning permission by the Secretary of State for Defence (the 'Applicant') for the installation of a radar facility on land at Cawdor Barracks, St Davids, Haverfordwest, SA62 6NN.
- 9.2 This Planning Statement has assessed the proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act (2004). The Proposed Development has been brought forward with due consideration of the Future Wales the National Plan, Planning Policy Wales, Pembrokeshire County Council's adopted Local Plan, and other relevant material considerations.
- 9.3 The proposal seeks to redevelop and optimise a brownfield disused airfield which forms part of the wider Cawdor Barracks.
- 9.4 Planning permission is sought for the development of the Site to deliver the installation of a Deep Space Advanced Radar Capability ("DARC"). The need for this development arises at an international level, with the Proposed Development forming part of a network of installations that, together, will create the ability to monitor satellite technology located in geosynchronous ("GEO") orbit. In turn, this directly supports the day-to-day life of the UK population, ensuring that functions including banking, GPS and communications can be managed safely.
- 9.5 The description of development for this radar facility is as follows:

"Installation of radar antenna, support buildings, auxiliary power compound, site security, infrastructure, landscaping, extinguishment of the isolated public footpath, and associated works."

- 9.6 Planning Policy Wales and the Wellbeing of Future Generations Act requires that authorities ensure that social, economic, environmental and cultural benefits are considered in the decision-making process. It acknowledges that there are occasions when one benefit of a development outweighs other matters and that the merits of a proposal need to be considered in the public interest.

Consideration of Planning Balance

- 9.7 The starting point for the decision maker when assessing planning applications is to determine these in accordance with the adopted policies of the development plan, unless material considerations indicate otherwise.

- 9.8 The policies in the plan are supportive of sustainable development that makes best and appropriate use of brownfield land. The Proposed Development would align with the existing ongoing wider military use of the Site.
- 9.9 It is recognised that the Proposed Development will result moderate adverse harm to a small number of views in the local area, including on parts of the National Park. This weighs against the Proposed Development and needs to be considered against the benefits arising from the proposals.
- 9.10 By way of summary, the Proposed Development will deliver a series of planning benefits which include the following:
- The Proposed Development will support the creation of jobs in both the development and operational phases which will be accessible to the local population.
 - The proposal will form an intricate role in the strategic approach to space domain at a national and international level.
 - The proposal utilises an existing brownfield developed location and comprises an appropriate use in keeping with the Wider Site as a military establishment.
 - The Proposed Development will help to ensure continuity and security of daily life both locally and nationally by supporting technologies that enable telecommunications, navigation, finance and emergency service operations.
 - The SDSR also recognises the opportunity that the space sector presents for developing UK jobs, skills and economic growth.
 - The Proposed Development will allow for the detection, identification, and tracking satellites, debris & asteroids to prevent collisions and ensure the continuity of critical civil and military services.
 - The Proposed Development will protect and defend in-orbit critical national infrastructure, which supports UK Armed Forces operations at home and abroad.
 - The Proposed Development will enhance national security by providing decision-level information to regional and national authorities.
 - The proposals support the wider Space Industry which is an important growth area for the economy in relation to manufacturing and Research & Development activities.
 - The proposals will provide previously unavailable data that will be distributed amongst all branches of UK government, through the UK Meteorological Office and the UK Space Agency, to better inform national and regional decision-making, improve planning and identify resilience priorities.
 - The proposal incorporates ecological and landscaping enhancements as part of the proposal.

- 9.11 The list of benefits arising from the Proposed Development are significant and are beneficial at local, national and international levels. Of these benefits, the contribution to the economy and security of society's way of life for Pembrokeshire, Wales and the United Kingdom is afforded significant weight in the planning balance by the applicant.
- 9.12 Having considered the harm arising from the Proposed Development on a small selection of views and associated departure from policy, it is clear that economic and societal benefits of the Proposed Development significantly and demonstrably outweigh the harm caused.
- 9.13 Accordingly, the applicant requests that these proposals should be granted planning permission by Pembrokeshire County Council without delay to allow this nationally important proposal to be delivered for the benefit of the Nation.

APPENDIX 1.0

Planning History for Cawdor Barracks

The list below comprises the online records held by PCC in respect of the Site:

1. 97/1013/PA - D O E Circular 18/84 - Provision of An Obstacle Course and Sports Facility at Brawdy Cawdor Barracks, Brawdy, Haverfordwest, Pembrokeshire. This application was approved on the 8 May 1998.
2. 98/0531/PA - Siting of New U B R E Compound and Associated Lighting at Cawdor Barracks, Brawdy, Haverfordwest, Pembrokeshire. This application was approved subject to conditions on the 13 November 1998.
3. 02/0461/PA - Proposed Extension to the Guardroom. Cawdor Barracks, Brawdy, Haverfordwest, Pembrokeshire. The application was determined on the 31 July 2002.
4. 02/1130/PA - Welsh Office Circular 37/84 - Electrical Infrastructure, upgrade and overhaul at Cawdor Barracks, Brawdy, Haverfordwest, Pembrokeshire. This application was approved on the 28 February 2003.
5. 07/0949/PA - Industrial building for workshop and portacabins for toilets/lockers. Adjacent to Building 161, Cawdor Barracks, Brawdy, Haverfordwest, Pembrokeshire. This application was approved on the 5 December 2007.
6. 08/0077/PA - Two industrial storage buildings. At Cawdor Barracks, BRAWDY, Haverfordwest, SA62 6NN. This application was approved on the 13 June 2008.
7. 15/0327/PN - Demolition of radar tower. Disused Radar Tower, Cawdor Barracks, Brawdy, Pembrokeshire, SA62 6BH. This application was approved on the 24 July 2015.
8. 22/0132/PA - Construction of a Strength and Conditioning Facility (in retrospect). Cawdor Barracks, BRAWDY, Haverfordwest, Pembrokeshire, SA62 6NN. This application was approved on the 20 July 2022.
9. 22/0902/DC - Discharge of condition 2 (Biodiversity enhancement) of planning permission 22/0132/PA (Construction of a Strength and Conditioning Facility (in retrospect)). This condition was discharged on 17 March 2023.
10. 22/1136/SO - Request for scoping opinion for proposed satellite monitoring station at Cawdor barracks, St Davids. This scoping advice was issued on the 15 May 2023.

11. 24/0700/PN - Demolition of single storey masonry building with metal sheet pitched roof. The Bowling Alley, Cawdor Barracks, SA62 6NN. An objection from the Council to this prior notification was issued on the 28 November 2024.
12. 24/0949/PA - Demolition of bowling alley at Cawdor Barracks, Brawdy, Pembrokeshire, SA62 6AY. The application was refused on the 7 March 2025.
13. 25/0529/PN - Demolition of single storey pitched roof building constructed from a mixture of brick and block elevations with a corrugated sheet roof. Cawdor Barracks, BRAWDY, Haverfordwest, Pembrokeshire, SA62 6NN. An objection from the Council to this prior notification was issued on the 8 October 2025.
14. 25/0689/PA - Demolition of single storey pitched roof building constructed from a mixture of brick and block elevations with a corrugated sheet roof. Cawdor Barracks, BRAWDY, Haverfordwest, Pembrokeshire, SA62 6NN. This application was approved on the 16 December 2025.

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