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**From:** South East Planning <southeastplanning@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 17 April 2023 08:40  
**To:** Simmons, Mike  
**Subject:** 22/1136/SO - Cawdor barracks (Scoping) - NRW Response NRW:01960482  
**Attachments:** 221136SO Cawdor Barracks Scoping.pdf

**EXTERNAL EMAIL – Exercise care with links and attachments E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.**

Dear Mike,

My apologies for the delay in getting you this response. We are short staffed at the moment. Please find attached our response to the above Scoping request, if you have any queries please do not hesitate to contact me.

Kind Regards  
Eleanor Sullivan

Tîm Cynllunio Datblygu / Development Planning Team  
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**Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.**

**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.**

Mike Simmons,  
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17/04/2023

Annwyl Mike / Dear Mike,

**TOWN AND COUNTRY PLANNING ACT 1990 THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016**

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT (WALES) REGULATIONS 2017**

**BWRIAD / PROPOSAL: SATELLITE MONITORING STATION**

**LLEOLIAD / LOCATION: CAWDOR BARRACKS, ST DAVIDS, HAVERFORDWEST**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 15<sup>th</sup> March 2023.

We are commenting because we consider the proposals are likely to give rise to significant effects. We advise the likely significant effects are assessed by the applicant and we consider they should be 'scoped in' to any future Environmental Statement (ES).

**Based on the information submitted we provide the following advise in relation to ecology, landscape and visual amenity, and ground conditions.**

**Ecology**

Ecology should be scoped in and included in the ES. In general, the ES should include sufficient information to determine the extent of any environmental impacts arising from the proposed scheme on designated sites and legally protected species, including those which may also comprise notified features of designated sites affected by the proposal.

Within the ES, the proposed scheme should be described in detail in its entirety. This description should cover construction, operation and decommissioning phases as appropriate and include detailed, scaled maps and drawings.

We would expect the description to include:

- The purpose and physical characteristics of the proposal
- Location, development size and configuration of the development including flexibility of the site layout
- Procedures for good working practices
- Identification of appropriate pollution contingency and emergency measures for watercourses on site
- Timing of all works and contingency plans should slippage in the programme occur
- Maintenance requirements of structures
- Arrangements for maintenance and management of any habitats within the site
- Artificial lighting requirements, including likely intensity and location of light spill on green infrastructure.

Any maps, drawings and illustrations that are produced to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections of the EIA such as biodiversity.

Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

### Protected Species

We advise that the site and where necessary land adjacent to the site is subject to assessment to determine the likelihood of protected species being present and affected by the proposals. Targeted species surveys should be undertaken for all species scoped in which:

- i. are undertaken by qualified, experienced and where necessary, licensed ecologist(s) and,
- ii. comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the EIA.

We have reviewed the following documents submitted to support of this EIA scoping opinion:

- EIA Scoping Report - Project DARC - Cawdor Barracks, Rev. P02, Doc ref: "65208061-SWE-XX-XX-T-J-0002- Cawdor Scoping Report", dated 10/03/2023, by SWECO UK Ltd
- Appendix A of the EIA Scoping report - Preliminary Ecological Appraisal Report - Project DARC - Cawdor Barracks, Doc ref: "65208061-001-SWE-XX-XX-T-J-0001- Cawdor PEAR", January 2023, by SWECO UK Ltd

We note that the siting of the project within the barracks boundary is not yet defined, with the intention that the layout of the DARC can be refined taking consideration of features through the ES process. We note this and advise that any changes to designs and plans between this consultation and future applications may affect the outcome of our advice.

If the development is likely to affect nationally fully protected species protected under the Wildlife and Countryside Act, we advise that you consult with your ecologist as to whether surveys are required.

### *Great Crested Newts (GCN)*

We note the presence of four waterbodies on the barracks site, and a further five within 500m of the barracks site boundary. The four waterbodies on site scored “poor” in Habitat Suitability Index (HSI) assessments, the other off-site waterbodies were not accessible. Grassland, woodland, and scrub habitats on site provide suitable terrestrial habitats for GCN.

GCN are known to use fire ponds and other old water tanks at airfield sites in Wales, similar to the OWIs on site. The report recommends eDNA survey for accessible water bodies during 2023 to support and inform the EIA. We advise, where undertaken, these are ideally completed by the end of May.

### *Bats*

The EIA states that the site is likely to support foraging and commuting bats with woodland, heathland, scrub and neutral grassland habitats on site. We note the buildings and mature trees on site are not currently anticipated to be impacted by the works and therefore no impacts on roosting bats are anticipated. We welcome the recommendations that, if development proposals evolve to include impacts to buildings and/or trees, then assessment for bats would be required. We advise that impacts on bats from construction and operational phase lighting should also be taken into account.

### *Dormouse*

We note the barracks supports areas of woodland, trees, hedgerows and scrub which could have potential to support dormouse. We recommend you seek the advice of your in-house ecologist to determine if there is a reasonable likelihood of dormouse, a European Protected Species, being present within the application site. If so, in accordance with Technical Advice Note 5: Nature Conservation and Planning (paragraph 6.2.2) survey may be required. Please consult us again if any survey undertaken finds that dormouse is present at the site and you require further advice from us.

### *Otter*

We note that the River Solva and the wet woodland on site provide suitable habitat for otter, and otter have previously been recorded using this woodland at the barracks. We note the survey did not identify positive signs of otter however, the documents do not detail

the methodology used to survey for otter. We note currently the proposals are anticipated to be located within grassland. As proposals develop, consideration of potential direct and in-direct impacts, including lighting, on otter should be taken into account.

### *Impact Assessment*

The advice for individual species above should be followed when finalising the content of the ES. In the absence of any ecological information about the site and the extent to which protected species may be using the site, and details of the proposals, it is difficult to assess the likely impacts of the proposals including whether the impacts may be significant or not.

The EIA should include the species-specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed to offset the impacts identified. Should potential impacts be identified, we advise that the EclA set out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility.

### EPS Licence

Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The EIA must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).

Where a European Protected Species is present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- (a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
- (b) There is no satisfactory alternative and
- (c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2021, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The local planning authority will take them into account when considering the EIA where a European Protected Species is present.

## Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan and are that are considered important for the conservation of biological diversity in Wales. NRW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (E.g., bat groups, mammal groups).

Finally, we advise that the development incorporates robust green infrastructure that will remain unlit to allow protected species to continue to inhabit the site and move through it. It is vital that the design of the development avoids narrow green infrastructure corridors through it and avoids breaks in those corridors.

## Protected Sites

The site is within approximately 700m of St David's, Pembrokeshire Marine and West Wales Marine SACs, as well as the St David's Peninsula Coast SSSI and Ramsey and St David's Peninsula Coast SPA.

With regards to terrestrial impacts, we agree with the scope set out within the submitted report.

With regard to the marine impacts, we agree the receptors that have been identified (11.3.1, pp122). Please note that NRW's 2018 indicative condition assessments found some of Pembrokeshire Marine SACs features to be in unfavourable condition due to water quality; this will need to be considered.

We agree that both contamination of surface water runoff due to drainage and contamination of surface water runoff due to accidental spillages are scoped in for construction (Table 11.1, pp123). We request that the makeup of the contamination of surface water runoff is clarified within the final ES (e.g. contaminants such as chemicals or sediments).

We agree that accidental spills should be scoped in for operation (Table 11.2, pp125), and recommend the applicant take note of the guidance within the [Guidance for Pollution Prevention documents](#).

We recommend use of [Water Watch Wales](#) which provides information on all WFD water bodies for cycles 1, 2 and 3 and also further detailed information such as Reasons for Not Achieving Good (RNAG).

We agree that a WFD assessment will be needed (11.4.21, pp130). We recommend taking note of the guidance in the Environment Agency's 'Clearing the Waters for All' webpage, which also provides useful templates too.

We note that a CEMP (Construction Environment Management Plan) is mentioned at various points throughout the document, but not in relation to the Water Environment. We recommend any management measures associated with water quality are included in the CEMP.

## **Landscape and Visual Amenity**

Landscape and visual amenity should be scoped into the ES. We have reviewed the relevant parts of the submitted Scoping Report, including:

- Chapter 2 – Cawdor Barracks Site and Proposed Development
- Chapter 8 – Landscape and Visual Impact
- Figure – Proposed Representative Viewpoints (page 177)
- Chapter 17 – Cumulative Effects Assessment

We consider that the LVIA methodology and description outlined in Chapter 8 is generally acceptable. We advise that particular consideration should be given to the visual impacts of the proposed development on the special qualities of the National Park, due to the unusual (and therefore conspicuous) nature of the development.

### *Study Area*

Paragraph 8.2.1 of the Report states that a 5km study area is being proposed and a ZTV has been prepared for this area. We agree that the study area is appropriate, and we will expect the ZTV to be refined when the positioning of the antennae has been determined.

### *Methodology*

Paragraph 8.5.4 states that GLVIA3, LANDMAP and the L.I. Visual Representation TGN will be used as basis for establishing the methodology. We agree that the methodology proposed is appropriate.

### *Landscape Assessment*

We agree that the landscape character review should include the PCNP's Landscape Character Areas within the 5km study area. This should take into account the special qualities of the National Park in relation to its intervisibility with the site.

### *Visual Assessment*

Although each of the antenna structures will not be particularly high, their unusual (if not unique to Britain) shape and purpose, their colour (white) and total number of 27 will add considerably to the likely perception of their visual impact. Due to the topography, it is also likely that they will usually be seen above the skyline. These facts need to be taken into account in the visual assessment and we consider that there may be significant visual impacts on the National Park.



## *Viewpoints*

The Proposed Representative Viewpoints figure shows the extent of the ZTV and 11no. proposed viewpoints. Table 8.1: Proposed Representative Viewpoint Locations list ten viewpoints and there is not a correlation between some of these listed and shown on the figure.

The following proposed viewpoints relate to the National Park:

- VP2. On the coast path between Pen Dinas and Dinas Fach
- VP3. At Penycwm, relating to the houses, nearest point of National Park and on main road
- VP4. Listed as being at Brawdy on edge of the National Park but shown on map as being on minor road, some 600m. to west. We advise that Brawdy is the appropriate location.
- VP5. On footpath just north of Roch Castle
- VP8. Listed as being on bridleway at Trefaner (sic) Farm but shown on map as being on Welsh Road near road to Trefrane. We advise that the appropriate location would be at the nearby car park (Grid ref. E:8580 N:2015)
- VP11. Proposed Representative Viewpoint Locations. Shown on the map as located on the Wales Coast Path on the headland immediately west of Solva. But this is not listed in Table 8.1. As this is a popular location for those enjoying the coast and views into Solva harbour and is likely to have views directly ahead to the proposed development, we advise that this viewpoint is included for assessment.

We note that there are no proposed viewpoints within the inland area of the National Park to west of the site. We advise that a viewpoint should be considered at Waun Caerfarchell (approximate grid ref.E:7965 N:2525), an area of common and open access land traversed by several PROWs and the NCR 4. This would be representative of views from 4-5km away on the western and northwestern plateau.

## *Cumulative Effects Assessment*

We note that Chapter 17 considers the methodology and scope of cumulative effects, and that these will be assessed in the LVIA chapter of the ES.

## **Ground Conditions**

With regards to Section 10 and 11 of the Scoping Report, we note that commercially available material, such as third-party data for the site may be highly redacted and inaccurate due to the use of the land by the Ministry of Defence (MOD). This sort of information cannot therefore be solely relied upon for an accurate understanding of the sites historic use. In order to establish and inform an accurate baseline, we strongly recommend the applicant seeks specialist records and approaches the landowner for historic site records as part of the EIA process, to supplement existing information.

We agree with the summary of scoping set out within Table 10.1 (Potential Ground Conditions and Contaminated Land Impacts – During Demolition and Construction) and



Table 10.2 (Potential Ground Conditions and Contaminated Land Impacts – During Operation).

### *Methodology*

We welcome the methodology set out within Section 10.5.3, however we advise that the identification of risk associated with the introduction of SuDS is also included.

### *Climate Change Adaptations and Resilience*

We would advise that the implications of climate change with regards to land contamination are scoped into the assessment. This may influence remediation strategies to ensure they are resilient to the impacts of climate change.

### *Ground/Surface Water Abstractions*

Please note that the Local Authority hold data for private water supplies which may not be licenced (and as such registered with NRW). We therefore strongly recommend the identification of these are scoped into the EIA, as well as the associated risks.

### *Contaminates*

We note that the scoping report does not appear to consider the risk of PFAS (Per-and Polyfluorinated Substances) (for example, within the Phase 1 Land Quality Assessment, prepared by SWECO January 2023). NRW consider this to be a contaminant of concerns given the history of the site. We therefore advise that this is scoped into the assessment.

Furthermore, the supporting Scoping Report does not fully explore the potential for the presence of radioactive substances. We would advise that where site investigations are required, further radiological investigations are considered. We note that a non-intrusive investigation was undertaken by DSTL in 1987 however it can be assumed that the technology for these surveys have improved significantly since 1987 and the area investigated may have been limited.

We advise that within any future EIA, full reports should be provided so that details such as sampling methodologies, frequency and/or targeting of sampling, analysis and the assessment criteria used can be understood. This detail is important to decipher the validity of previous desk top studies and/or investigations. Additional site investigations may be required to validate and/or inform previous investigations and background information.

### **Other Matters**

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](https://www.naturalresourceswales.gov.uk). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

**Eleanor Sullivan**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning  
Cyfoeth Naturiol Cymru / Natural Resources Wales