

**THE CASE FOR CALLING
IN DARC RADAR**

PARC AGAINST DARC

**PARC
AGAINST
DARC**

Introduction

This document, prepared by PARC Against DARC, provides evidence in support of a calling in of the Deep Space Advanced Radar Capability (DARC) planning proposal currently submitted in Cawdor Barracks, Pembrokeshire.

PARC Against DARC, henceforth referred to as PARC, is a campaign that calls on Welsh Government, UK Government and United States Space Force to cancel the DARC proposal, both in Pembrokeshire as owing to its inappropriateness within its proposed environment, and in general as a global strategic proposal.

In PARC's view, the proposed development involves a number of substantial national and international-level impacts that lie well outside of the appropriate scope for consideration, resources, cross-Wales overview, and relevant powers of the Local Planning Authority, Pembrokeshire County Council. On this basis, and to consider the proposal at a level that evaluates its impact within the overall national economic strategy as well as within the correct framework of security and diplomatic concerns of Wales as a nation in the world, it is believed that the proposal would strongly merit intervention at Welsh Government level.

DARC is a ground-based radar system, comprised of twenty-seven large parabolic dish antennas proposed to track, and provide targeting capabilities against, objects in space. It is a proposal conceived by the United States Space Force and funded entirely by the United States Government, aiming to employ United States personnel at Cawdor Barracks. Intended to be one of three potential DARC sites globally, the proposal's Environmental Statement, fulfilled by the UK Ministry of Defence, claims it would form an 'intricate role in the strategic approach to space domain at a national and international level.'¹

PARC rejects the term 'space domain' on the basis that the 1967 Outer Space Treaty, in legal terms, properly describes space as a commons, the meaning of which carries no connotation of being a militarised domain.

¹ DARC Planning Statement, p. 62, available at https://assets.publishing.service.gov.uk/media/699c3879cd3d70e6c2f12712/5._Planning_Statement_-_PAC_Draft.pdf

As will be detailed in this presentation, the DARC proposal is described as a 'significant escalation' by a rival global military power of both the United States and the AUKUS alignment between the United Kingdom, United States and Australia, with AUKUS itself creating strong strategic concern from the perspective of powers such as China and Russia. DARC's role as a weapons system enabled in the provision of targeting data against international assets in space carries significant political, diplomatic and international law considerations for any and all of its hosting parties. Such considerations are, in PARC's view, outside of the scope for appropriate examination adjudication by a single planning authority in Pembrokeshire, and better elevated for Welsh Government consideration.

The DARC proposal's stated offer for inclusion in, and documented technical optimisation process for the US Trump administration's controversial global 'Golden Dome' missile interception and satellite targeting capability, places the proposal directly inside a set of considerations of unprecedented global significance, and, in PARC's view, is particularly worthy of an appropriate process of national-level examination and adjudication.

It is the analysis of both PARC and legal scholars that proposed developments such as and including DARC could, if used in a hostile context, carry strong potential for the violation of international law provisions within the UN Charter, customary international humanitarian law and other instruments of international law. Such uses, liable to generate volatile orbital debris capable of indiscriminately endangering civilian space infrastructure, could contravene proportionality considerations under the *jus ad bellum* doctrine of international law and multiple rules within international humanitarian law, while public statements claiming an intent towards space domination by the United States implicate DARC in further potential violations of the 1967 Outer Space Treaty. All such considerations, in PARC's view, fall outside of the natural scope of a single LPA for planning evaluation.

Further considerations include the appropriateness of the proposed development site for (a) potential alternative uses, including, for example, a photovoltaic solar array; and (b) potential alternative sitings of the development in Wales or the UK, which in PARC's view are not sufficiently examined within the course of the applicant's Environmental Impact Assessment. Such considerations, naturally, lend themselves to the scope of a decision-making authority with a sufficient overview of the strategic priorities for government in Wales.

The proposed development has been the object of intense local opposition, as well as national opposition. The First Minister of Wales for the 2021-26 Senedd, Eluned Morgan, both publicly

called for a halt to the proposed development,² and explicitly responded to local constituents' communications with the statement that she believed DARC should be called in for appropriate Welsh Government-level evaluation, given the national dimensions of the planning issues it raises.

In a display perhaps unprecedented for a local planning application, 18 Senedd members (one, Elin Jones MS, by verbal statement owing to her Llywydd role) have signed a statement of opinion, proposed by then Mid and West Wales MS Cefin Campbell, expressing concern over the proposal's adverse impacts.³ This national-level opposition was reflected at Westminster level, with 20 MPs signing an Early Day Motion calling for the scrapping of the proposal altogether.⁴

Plaid Cymru voted unanimously, at its 2024 conference, to take action to oppose the proposed development, in terms that significantly acknowledged the national-level considerations inherent within the nature of the proposal.⁵

A petition against the proposal, at over 19,000 signatures at the time of writing,⁶ has attracted signatures from across Wales and the UK. Publicity has grown over the course of the campaign, with the controversy of the proposal appearing in three televised BBC Wales reports, articles in

² 'Stop Welsh space radar station because of Trump's 'contempt', first minister says', BBC News, 15th April 2026, <https://www.bbc.co.uk/news/articles/cgrll78q4z1o>

³ OPN-2025-0460 Opposition to Deep Space Advanced Radar Capability (DARC) in Pembrokeshire, Welsh Parliament, <https://record.assembly.wales/StatementOfOpinion/460>

⁴ 'DARC in Wales - Early Day Motions - UK Parliament, UK Parliament', date, 19th March 2025, <https://edm.parliament.uk/early-day-motion/63346>

⁵ 'Plaid Cymru backs campaign against MOD radar array', Nation.cymru, 13th October 2024, www.parc.d.c.c/nc5

⁶ 'Stop DARC radar. Protect Pembrokeshire's unique landscape!', PARC Against DARC, Change.org, www.parc.d.c.c/p

*The Guardian*⁷ and *The Times*,⁸ and by PARC's records some 169 local and national news articles reporting sympathetically towards the campaign's concerns since its 2024 launch.

It is on these bases, and many more that will subsequently be detailed, that PARC strongly supports a calling in of the DARC planning application as a matter of the highest urgency. PARC suggests that, if appropriate given the tight time circumstances surrounding an application that has been active for several weeks, a holding direction should be applied to the application for Welsh Government to have the sufficient time to consider the call-in request. It is submitted by PARC, however, that the case to call in the application is nonetheless extremely clear, and should, owing to the length of time within which the application has been unable to be determined by Welsh Government due to the 2026 Senedd election, be called in at the most immediate time humanly possible, to ensure that an application of significant national relevance is given the scope of determination that it appropriately deserves.

⁷ 'Wales's first minister calls on Keir Starmer to halt US-UK space defence project', Bethan McKernan, *The Guardian*, 15th April 2026, <https://www.theguardian.com/uk-news/2026/apr/15/wales-first-minister-keir-starmer-space-defence-project-darc-donald-trump>

⁸ 'Block US radar base in Wales, first minister tells Keir Starmer', Aubrey Allegretti, *The Times*, 15th April 2026, <https://www.thetimes.com/uk/defence/article/us-military-base-welsh-minister-trump-kp97kwxkh>

International Significance of Proposed Development

Proposal Described as a Significant Escalation by a Rival Global Power to the United States

The proposed development has specifically been described by what is in PARC's view a closely-aligned Chinese government source as a significant military escalation, and one that threatens to destabilise the international military order.

China's *Global Times*, an outlet run by the People's Daily which is an official newspaper of the Chinese Communist Party, stated, at the editorial level, that DARC is 'a significant escalation that has the potential to further change the direction of global military competition.' It describes the primary purpose of DARC as 'winning a war', adding, '[t]his severely threatens the minimum balance of power needed for global peace. China and Russia must strongly oppose the US' efforts to extend the military competition among major powers into space and oppose its attempt to construct DARC with its allies. China and Russia need to expose the US' shameless practice to further develop space warfare capabilities by hyping the so-called space threat from China and Russia.'⁹

Indications by foreign governments with a global military role that refer to a particular planning proposal, albeit in this case one of three DARC instances proposed globally, are needless to say rare indeed, and should highlight the perception of the proposed installation within an international strategic context that would spotlight the involvement of Wales within that context.

In total, such indicated perceptions of the proposed development as a development with the capacity to affect the strategic parity considered necessary by China for the balance of international power and threat are, in PARC's view, lucid and clear indicators that any decision made concerning the suitability of the proposal within the national and international context of Wales is appropriate for decision-making powers escalated to Welsh Government level.

⁹ 'China and Russia must resolutely respond to arrogant US space goal: Global Times editorial', Global Times, 18th July 2021, <https://www.globaltimes.cn/page/202107/1228977.shtml>

Proposal Made under AUKUS Agreement, Regarded as a Significant Escalation by Rival Global Powers

It is worthy of note that the AUKUS agreement between the US, UK and Australia under which DARC is proposed is a political formation that has provoked strong and adverse responses from the adversaries of its primary driver, the United States. These responses have been made with the perception that the aims of military-strategic expansion inherent to the programme of AUKUS fuel military escalation internationally, again risking destabilising the multipolar balance of power, risks of retaliatory escalation and risks to global security in general.

Chinese foreign affairs department spokesperson Zhao Lijian, for example, said in 2021 that 'China expresses grave concern over the nuclear submarine cooperation between the US, the UK and Australia, which deliberately escalates regional tension, provokes an arms race, threatens regional peace and stability, and undermines international nuclear non-proliferation efforts. China urges the three countries to heed the call of the international community, discard the outdated Cold War zero-sum mentality and narrow geopolitical perspective, revoke the wrong decision, faithfully fulfill international nuclear non-proliferation obligations and do more to contribute to regional peace and stability.'¹⁰

Russia, similarly, opposes the alliance and its goals. Russian Deputy Foreign Minister Sergei Ryabkov argued that AUKUS is 'a great challenge to the international nuclear non-proliferation regime,' expressing concern over 'an attempt to create an Asian NATO.'¹¹

Once again, as a development proposed within the relatively new strategic framework of AUKUS, DARC's role in its natural perception as an escalatory function is liable to impact Wales's role in global affairs, and as such falls, in PARC's view, well outside of the remit and decision-making concerns of a local executive governmental branch, in Pembrokeshire County Council, charged primarily with delivery of development at a local and perhaps semi-regional level.

¹⁰ 'Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on September 22, 2021', Embassy of the People's Republic of China in the Commonwealth of Australia, 22nd September 2021, <https://web.archive.org/web/20211007134958/http://au.china-embassy.org/eng/fyrth/t1908814.htm>

¹¹ 'Why does Russia Care About AUKUS?', Oleg Yanovsky, *The Diplomat*, 29th April 2023, <https://thediplomat.com/2023/04/why-does-russia-care-about-aukus/>

Proposal's Intended Use as a Weapons System and Its Role in the Militarisation of the Global Space Commons

It is first necessary to outline the significant extent to which the proposed development is an asset that is primarily developed, fielded and controlled by the United States.

DARC, in the current United States Government Accountability Office report that assesses its funding and progress, is defined an MDAP (Major Defense Acquisition Program). The report includes MDAPs in its portfolio of weapons systems, stating, '[t]he weapon systems portfolio we assessed continues to grow both in cost and number of programs. It consists of 106 programs: 79 MDAPs, 20 MTA programs, and seven future major weapon acquisitions not currently on an AAF pathway.'¹²

Additionally, the proposed development's EIA materials confirm that DARC is funded by the United States,¹³ and that listed as DARC's 'Project Manager' at Cawdor Barracks is US-based arms corporation, Northrop Grumman.¹⁴

Secondly, the capacity and intention for DARC to be used as a weapons system is clear from the context within which it has been fielded and developed. Its orbital object tracking capabilities, to this end, are confirmed by relevant documentation to play a role in object targeting within a military context.

DARC, as a project that falls under the remit of the US military's SSDP (Space Security and Defense Program) and SDA (Space Domain Awareness) Division,¹⁵ is a piece of surveillance infrastructure that is part of a multi-layered space surveillance architecture designed to provide

¹² Report to Congressional Committees: 'Weapon Systems Annual Assessment', United States Government Accountability Office, June 2025, <https://www.gao.gov/assets/gao-25-107569.pdf>

¹³ DARC Environmental Statement Volume 1, Non-Technical Summary, p. 6, available at https://assets.publishing.service.gov.uk/media/699c3d3a882eb23165f1271d/DARC_ES_Volume_1_Non-Technical_Summary.pdf

¹⁴ DARC Environmental Statement Volume 3, Appendix 1.1-3.1, p. 6, available at https://assets.publishing.service.gov.uk/media/699c3d3d8eef11b95e49c009/DARC_ES_Volume_3_Appendix_1.1-3.1.pdf

¹⁵ 'U.S. defense program seeks next-generation space monitoring tools', Sandra Erwin, Space News, 12th September 2024, <https://spacenews.com/u-s-defense-program-seeks-next-generation-space-monitoring-tools/>

'support to fires.'¹⁶ These space 'fires,' a military term meaning in plain language attacks on space assets such as satellites, are as of recently being discussed openly as a primary aim of the US Space Force, in a significant escalation of stated offensive US intentions in space.

Space Domain Awareness is defined by the US Space Force as involving '[t]he detection, characterization, attribution, prediction, and **targeting** of activities in the space domain to inform decision making [our emphasis].'¹⁷

The US Space Force's 2025 Doctrine Document 1, confirming the newly stated US intentions to expand space into a hostile domain, states, 'Military space forces play a key role in armed conflict and war through the application of force in the space domain and enabling the application of force in all other domains and environments.' These activities include '[c]ompelling an adversary to cease aggressive action in any domain by disrupting, denying, degrading, or destroying the space capabilities they rely on to achieve their military objectives.'¹⁸

"It's time that we can clearly say that we need space fires and we need weapon systems,"¹⁹ says US Space Command's Gen. Stephen Whiting, US Space Command's top priorities for fiscal year 2027 including "space fires" to enable "space superiority."²⁰ "We need orbital interceptors.

¹⁶ 'RFI: Space Security and Defense Program (SSDP), Space Domain Awareness (SDA) Division, Space Domain Awareness Capabilities', Sam.gov, September 11th 2024, <https://sam.gov/opp/25a742567cbe4a19842fa33cae002faa/view>

¹⁷ Space Force Doctrine Document 1: The Space Force, United States Space Force, 3rd April 2025, https://www.globalsecurity.org/space/library/policy/ussf/space-force-doctrine_20250403.pdf

¹⁸ *Ibid.*

¹⁹ 'SPACE SYMPOSIUM NEWS: Space Command Operationalizing First-Ever AI, Experimentation Strategies', Laura Heckmann, National Defense, 4th August 2025, <https://www.nationaldefensemagazine.org/articles/2025/4/8/space-force-operationalizing-first-ever-ai-strategy>

²⁰ "'Space fires' to enable 'space superiority' are top SPACECOM priorities for FY27", Theresa Hitchens, Breaking Defense, 6th August 2024, <https://breakingdefense.com/2024/08/space-fires-to-enable-space-superiority-are-top-spacecom-priorities-for-fy27/>

And what do we call these? We call these weapons, and we need them to deter a space conflict and to be successful if we end up in such a fight,"²¹ says Whiting.

Whiting puts space domain awareness, the program that DARC is a part of, together with space fires in particular comments to the media, stating, 'space fires are supported by "advanced space domain awareness operations" — which in turn require "enhanced battlespace awareness for space operations."²²

DARC is also directly discussed as being actively operationally optimised for contribution towards what is termed 'missile defence', and towards what is likely meant as an inclusion in what will shortly be discussed as the US's 'Golden Dome' system. The US GAO report states: 'We reported last year that the Space Force identified a high risk between how the DARC system operates with a space situational awareness data repository and a missile defense system program. Program officials reported that efforts to resolve system interoperability remain on track for planned completion in June 2025.'²³ The meaning of this confirms the intention to use DARC for space fires, inasmuch as that such fires would involve kinetic interceptors (that is to say specifically payload-carrying missiles), and would be therefore targeted by DARC as an SSA (space situational awareness) system.

These intended escalations of military space capability, and DARC's role within the associated targeting infrastructure, constitute, in PARC's view, a considerable paradigm shift in the global military role and conduct of the United States, United Kingdom, Australia and other NATO member states that carries legal implications under several principles of international law. Wales, the campaign believes, would, were the proposed development passed, play host to a capability whose uses, as will be discussed shortly, place it in potential violation of international laws and norms, both as a constituent part of the UK and ultimately within its potential future as a sovereign state, and the account of its retrospective history under those circumstances.

²¹ 'SPACE SYMPOSIUM NEWS: Space Command Operationalizing First-Ever AI, Experimentation Strategies', Laura Heckmann, National Defense, 4th August 2025, <https://www.nationaldefensemagazine.org/articles/2025/4/8/space-force-operationalizing-first-ever-ai-strategy>

²² 'Space fires' to enable 'space superiority' are top SPACECOM priorities for FY27', Theresa Hitchens, Breaking Defense, 6th August 2024, <https://breakingdefense.com/2024/08/space-fires-to-enable-space-superiority-are-top-spacecom-priorities-for-fy27/>

²³ Report to Congressional Committees: 'Weapon Systems Annual Assessment', United States Government Accountability Office, June 2025, <https://www.gao.gov/assets/gao-25-107569.pdf>

On the basis of such considerations, it is PARC's view that the appropriate scope for matters for consideration, as well as the access to appropriate state resources require to consider the matters, fall outside of the remit for proper examination of and adjudication by the Local Planning Authority in Pembrokeshire.

Proposal's Intended Role within President Trump's Highly Controversial 'Golden Dome' US Missile Interception System

Golden Dome, a controversial project revived recently by US President Donald Trump first as the 'Iron Dome for America' and then 'Golden Dome', is the concept for a global satellite constellation of hundreds of thousands of satellites armed with missiles, designed *prima facie* to give the US the capability to intercept ICBMs (intercontinental ballistic missiles) aimed at the US, but secondarily to arm the US with the offensive capability to quickly destroy satellites in LEO (low earth orbit), MEO (medium earth orbit) or GEO (geostationary earth orbit).

Golden Dome, a revival of a 1980s Reagan administration proposal known as the Strategic Defense Initiative (or, as it was better known pejoratively, the 'Star Wars' programme, after its fantastical nature), is considered one of the most scandalous proposals in US military history, largely because, after its initial and expensive failure to produce an anti-missile system, it was revived by the Bush administration, failed to achieve its aim again due to the over-ambitious technical nature of the concept, and is now opposed by voices across the scientific community on similar bases.²⁴

Subrata Ghoshroy, former Senior Defence Analyst for the United States Government Accountability Office, explains that 'the project spent tens of billions of dollars in the first ten years in R & D and in developing, or trying to develop, fictional technologies that often defied the laws of physics. The Soviets unfortunately took the bait and, per the conventional wisdom, went bankrupt in trying to counter this missile defence system with more of their offensive weapons. The missile shield, however, turned out to be a total waste of taxpayer money, and a bonanza for defence contractors.'²⁵

²⁴ 'Trump's 'Golden Dome' plan has a major obstacle: Physics', Emily Conover, ScienceNews, 22nd May 2025, <https://www.sciencenews.org/article/golden-dome-missile-defense-physics>

²⁵ 'What is Trump's Golden Dome?', Massachusetts Peace Action, 6th January 2025, <https://www.youtube.com/watch?v=m3Z3LONcMsY>

A significant recent report by the American Physical Society, which demonstrated the technical physical infeasibility of stopping any ICBM with ground-based radar tracking and interceptors but a small percentage of the least sophisticated and legacy North Korean nuclear-equipped ballistic missiles and argued similarly of space-based interceptors, is often cited as evidence for the implausibility of Golden Dome.²⁶

After its ten-year spending programme of \$25 billion, the Strategic Defense Initiative failed to produce an anti-missile system.²⁷ As of 2013, it had, according to one report, had spent '\$209 billion while never being tested, even on a limited scale, in the heat of battle.'²⁸

DARC, however, as well as previously clarified to have undergone an optimisation process for missile tracking, is directly confirmed by Northrop Grumman to have a potential for inclusion in Golden Dome.

Kevin Giammo, director of Northrop Grumman's space surveillance and environmental intelligence organisation, 'stressed,' according to media, 'that Northrop Grumman sees DARC as an asset that could contribute to the Trump administration's ambitious, if still embryonic, plan to create an air and missile defense shield over America. "DARC is one of those systems that that really matches well with Golden Dome," he said. "DARC can be like a lookout for the lookouts ... those important systems, like missile warning assets in geosynchronous orbit."²⁹

International reactions to the Golden Dome concept have considered the discussion of it a serious and destabilising development. 'Deeply destabilizing in nature is also the recently announced "Golden (Iron) Dome for America", say Chinese and Russian officials in a joint statement. They state, '[t]he situation is further aggravated by the fact that the "Golden (Iron) Dome for America" program also directly envisages significant strengthening of the arsenal of

²⁶ 'Strategic Ballistic Missile Defense: Challenges to Defending the United States', American Physical Society, February 2025, https://res.cloudinary.com/apsphysics/image/upload/v1741185158/APS_BMD_Report_2025_qzgzaz.pdf

²⁷ 'What is the Strategic Defense Initiative (SDI)?', Michael Anissimov, All the Science, 21st May 2024, <https://www.allthescience.org/what-is-the-strategic-defense-initiative-sdi.htm>

²⁸ 'What is the Strategic Defense Initiative (SDI)?', Michael Anissimov, All the Science, 21st May 2024, <https://www.allthescience.org/what-is-the-strategic-defense-initiative-sdi.htm>

²⁹ 'Northrop Grumman says first DARC test validates radar tracking capability', Theresa Hitchens, Breaking Defense, 15th August 2025, <https://breakingdefense.com/2025/08/northrop-grumman-says-first-darc-test-validates-radar-tracking-capability/>

means to conduct combat operations in space, including the development and orbital deployment of interception systems, turning outer space into an environment for placing weapons and an arena for armed confrontation.³⁰

The potential inclusion of the proposed development in an offensive military plan of unprecedented global and space scale, which has provoked significantly adverse combined diplomatic responses from international military superpowers, carries, in PARC's view, ramifications for Wales's military participation in the international context that cannot be deemed appropriate to remain devolved to the sole consideration of the LPA.

Potential of Proposal to Violate the UN Charter, International Humanitarian Law and Other International Law

In the current context of the space commons, it is by now well-known that the orbits around the earth face a significant build-up of debris, moving at speeds that mean that even very small fragments of debris carry the destructive power of bullets or small bombs, endangering the satellite networks.

Resultantly, when kinetic anti-satellite weapons have been tested against satellites as a proof of capability and generated large amounts of debris within the context of orbits that may soon be approaching an unsustainable debris volume unless significant multilateral coordination is undertaken, the nations engaging in such operations have faced intense international condemnation.

The US had already conducted 12 anti-satellite weapons tests before any other country in the world had, between 22nd September 1959 and 24th May 1963.³¹ In 1985, it was also the first nation to successfully conduct a space fire against a satellite: the US Solwind solar observatory.³² The event, which shattered the satellite into 285 separate tracked fragments of

³⁰ 'Joint statement by the Russian Federation and the People's Republic of China on Global Strategic Stability', Kremlin, 8th May 2025, <http://en.kremlin.ru/supplement/6310>

³¹ 'Global Counterspace Capabilities: An Open Source Assessment', Secure World Foundation, April 2026, available from <https://www.swfound.org/publications-and-reports/2026-global-counterspace-capabilities-report>

³² 'The Death of a Satellite', Dr. Raymond L. Puffer, Edwards Air Force Base (California), 13th September 1985, https://web.archive.org/web/20031218130538/http://www.edwards.af.mil/moments/docs_html/85-09-13.html

space debris as it was destroyed, led to some of the fragments being pushed into an orbit as much as 300 miles higher, producing a debris cloud that continued to orbit the earth for another 20 years. It provoked a significant amount of international condemnation.³³

China's first ASAT test came 22 years later, as a response to what China claimed was the intentional US bombing of its embassy in Belgrade. 'In January 2007,' says one journalist, 'China tested its first anti-satellite weapon, using a converted ballistic missile to hit a weather satellite at a height of 530 miles. The Chinese ASAT test triggered waves of protest from western countries.'³⁴ It was followed by the US's intentional targeting and destruction of satellite USA-193 with a modified SM-3 missile fired from the U.S. Navy warship USS Lake Erie, which also drew intense condemnation, particularly from China and Russia.³⁵

The danger that arises from these anti-satellite capabilities, however, is that as space becomes rapidly more congested and SpaceX for instance plans to at least quintuple the number of satellites in space by planning to launch 42,000,³⁶ the potentiality that a chain reaction, in which debris could rapidly cascade from satellite to satellite in an effect known as the Kessler Syndrome, is rapidly approaching a tipping point that means that it arguably cannot be seen as within the interest of any nation—the United States included—to viably continue to pursue the proactive development of weapons that could cause large and indiscriminately destructive volumes of orbital debris that threaten to make whole orbits unusable, and defeat the purpose of much planned space management activity.

The use of DARC in such anti-satellite operations risks the violation of international law, in the most immediate sense, on the basis that because the resultant orbital debris disproportionately and predominantly endangers civilian satellite infrastructure, a strong argument can be made

³³ 'Deliberate Satellite Fragmentations and their Effects on the Long-Term Space Environment', Nicholas L. Johnson, NASA Johnson Space Center, p. 10, <https://ntrs.nasa.gov/api/citations/20100008966/downloads/20100008966.pdf>

³⁴ 'History of anti-satellite weapons: US tested 1st ASAT missile 60 years ago', Justin Paul George, The Week, 27th March 2019, <https://www.theweek.in/news/sci-tech/2019/03/27/history-anti-satellite-weapon-us-asat-missile.html>

³⁵ 'Arms Race in Space', Marko Beljac and Emily Schwartz, Foreign Policy in Focus, 31st March 2008, https://fpif.org/arms_race_in_space/

³⁶ 'Starlink satellites: Everything you need to know about the controversial internet megaconstellation', Elizabeth Howell and Tereza Pultarova et al., Space.com, 20th February 2024, <https://www.space.com/spacex-starlink-satellites.html>

that attacking satellites violates the parameters of the proportionality allowable for a state to engage in acts of war that would involve damage to civilian infrastructure under the *jus ad bellum* doctrine of international law, which derives originally from the Charter of the United Nations.³⁷

DARC's offensive use, in PARC's view, would similarly violate customary international humanitarian law (IHL). The radar array is intended for actions, notwithstanding extraneous functions whose viability separate planning objection materials by PARC dispute, that would be violations of rules of the International Committee of the Red Cross's Customary International Humanitarian Law Database, a primary source of customary international humanitarian law, and, owing to its use as a reference in international and non-international armed conflicts, including by courts, tribunals and international organisations, a binding source of international law.

Because of the way DARC's orbital debris-causing attacks would act indiscriminately upon civilian and military infrastructure alike, DARC's use would be in violation of rule 9³⁸ (Volume II, Chapter 2, Section A) of ICRC customary international humanitarian law on The Principle of Distinction between Civilian Objects and Military Objectives, rule 14³⁹ (Volume II, Chapter 4) of ICRC customary international humanitarian law on Proportionality in Attack, rule 15⁴⁰ (Volume II, Chapter 5, Section A) of ICRC customary international humanitarian law on the Principle of Precautions in Attack, rule 17⁴¹ (Volume II, Chapter 2, Section C) of ICRC customary international

³⁷ 'Anti-Satellite Weapons and Self-Defence: Law and Limitations', Chris O'Meara, 16th International Conference on Cyber Conflict, 2024, https://ccdcoe.org/uploads/2024/05/CyCon_2024_OMeara-1.pdf

³⁸ Rule 9: The Principle of Distinction between Civilian Objects and Military Objectives, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule9>

³⁹ Rule 14: Proportionality in Attack, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule14>

⁴⁰ Rule 15: Principle of Precautions in Attack, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule15>

⁴¹ Rule 17: Choice of Means and Methods of Warfare, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule17>

humanitarian law on the Choice of Means and Methods of Warfare, rule 18⁴² (Volume II, Chapter 5, Section D) of ICRC customary international humanitarian law on Assessment of the Effects of Attacks, rule 21⁴³ (Volume II, Chapter 2, Section A) of ICRC customary international humanitarian law on Target Selection, rule 43⁴⁴ C (Volume II, Chapter 14, Section A) of ICRC customary international humanitarian law on the Application of General Principles on the Conduct of Hostilities to the Natural Environment, and rule 44⁴⁵ (Volume II, Chapter 14, Section B) of ICRC customary international humanitarian law on Due Regard for the Natural Environment in Military Operations.

In the event the outcomes resulting from the damage in the event of a Kessler Syndrome scenario were catastrophic, DARC's use could even be a potential war crime under international humanitarian law. This would be because it would violate Rule 156⁴⁶ (Volume II, Chapter 44, Section A) of the ICRC summary of ICRC customary international humanitarian law.

Further to this, and owing to the US Space Force's public declarations concerning its intentions for 'control of space,' domina[tion]' of 'the space medium,' and 'an ability to deny others the use of space,'⁴⁷ DARC's offensive use could be in violation of the 1967 Outer Space Treaty's prohibition on 'national appropriation' of the space domain. It could also violate the prohibition

⁴² Rule 18: Assessment of the Effects of Attacks, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule18>

⁴³ Rule 21: Target Selection, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule21>

⁴⁴ Rule 43: Application of General Principles on the Conduct of Hostilities to the Natural Environment, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule43>

⁴⁵ Rule 44: Due Regard for the Natural Environment in Military Operations, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule44>

⁴⁶ Rule 156: Definition of War Crimes, Customary IHL, International Humanitarian Law Databases, International Committee of the Red Cross, <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule156>

⁴⁷ 'Vision for 2020', United States Space Command (now United States Space Force), 1997, parcd.cc/dsm

on the 'harmful contamination' of space by virtue of the targeting use of DARC for space fires constituting a material contribution to increased Kessler Syndrome probabilities.⁴⁸

Lastly in these matters, if DARC was used and caused the aforementioned damages, it would also, in PARC's view, be possible to make the argument, under the 1972 Outer Space Liability Convention, that the proposed development was in violation of Article II, Article III, Article IV, Article V, Article VI, Article VIII, Article XII and Article XXI of that Convention.⁴⁹

Given the potentially serious international law considerations, and given that the Welsh Government as a national government has a role to play in the consideration of its liability with regard to matters of international law, PARC's view is that Pembrokeshire County Council lacks the sufficient breadth of powers, resources, and appropriate and necessary balance and framing of the consideration of matters that concern Wales and its role nationally, to be tasked with the sole consideration of a proposed development of DARC's significance.

⁴⁸ 'International Space Law: United Nations Instruments', Treaty on Principles Governing the Activities of States in the Exploration and Use of Outer Space, including the Moon and Other Celestial Bodies, Article II (p. 4) and Article IX (p. 6), United Nations Office for Outer Space Affairs, May 2017, parcd.cc/sin

⁴⁹ Convention on the International Liability for Damage Caused by Space objects, United Nations, <https://treaties.un.org/doc/Publication/UNTS/Volume%20961/volume-961-I-13810-English.pdf>

Consequences of Proposal's Role in Escalating Wales as a Site of Strategic Military Priority

It is PARC's view that the proposed development, in a unique way within the global context, stands to escalate the risk of attack against Cawdor Barracks, and thereby on a broader level increase the probability of Wales's involvement in global-level armed conflict. This owes to increasing probabilistic evidence that installations of DARC's type may be more attractive targets to the United States' asymmetric adversaries, in comparison to other targetable military assets.

In the recent illegal invasion of Iran by the United States and Israel, it has been noted by media and military analysts that Iran, utilising its well-developed ballistic missile program to retaliate against US assets stationed in Persian Gulf states, selected radar sites as the first-priority grade of military hardware for immediate targeting upon the instigation of the conflict against it.

An initial radar struck by the Iranian Revolutionary Guard Command, primarily for the reason that it constituted the 'first set of eyes' within the multi-layered missile defence envelope developed by the US within the Gulf region, was the \$1.1 Billion AN/FPS-132 Block 5 ballistic missile early warning radar at Al-Udeid Air Base in Qatar.⁵⁰ Following this as Iranian targets were AN/GSC-52B radars in Bahrain, and their associated SATCOM infrastructure.⁵¹ Iran's opening sequence next targeted three buildings at a military installation near Ruwais, and four

⁵⁰ 'Iran strikes AN/FPS-132 early warning radar in Qatar', TurDef, 1st March 2026, <https://turdef.com/article/iran-strikes-an-fps-132-early-warning-radar-in-qatar>

⁵¹ 'Satellite data confirms damage to US military radar and comms in seven countries', 4th March 2026, Harici, <https://harici.com.tr/en/satellite-data-confirms-damage-to-us-military-radar-and-comms-in-seven-countries/>

at an installation in Sader, both in the United Arab Emirates, which destroyed the AN/TPY 2 UAE radars, valued at half a billion dollars each.⁵²

The IRGC then proceeded to strike and destroy several of the eleven US THAAD missile interception radar systems, which were stationed in the Gulf countries. *Al Jazeera* published verifiable evidence that THAAD radar sites at Al Ruwais and Abu Dhabi in the United Arab Emirates were hit, as well as at the THAAD defence site in Riyadh, Saudi Arabia.⁵³

In this context, the context of further Iranian claims, and the context of apparent state censorship within the Israeli regime that bars the media from publishing images of battle damage⁵⁴ and an enforced blackout on battle damage assessment satellite imagery being imposed on satellite operators by the US,⁵⁵ what would ultimately culminate in a significant increase in missile impacts across Israel may well have been due to more than cluster bomb usage or overwhelming Iron Dome and Israel's other defences with larger missile salvos. Further radar damage even beyond what can be undeniably proven, in addition, is very possible.

The relatively high targeting priority given to US military radar infrastructure in this conflict appears to suggest an increase in the priority of radar as a target in the modern warfighting context, which, in the event of the further militarisation of the space commons precipitated by the proposed development, would, in PARC's view, certainly significantly increase and implicate the targetability of Cawdor Barracks versus its present military usage as the base for the 14th Signal Regiment with a focus on low-level electronic warfare.

It is worth noting that in the event of an attack on Cawdor Barracks as a result of the installation of DARC, the spatial spread and range of the two radar arrays (transmit and receive) would mean that a sizeable ballistic missile salvo, wider-ranging drone attack or dispersal of

⁵² 'Radar bases housing key US missile interceptor hit in Jordan, Saudi Arabia, and UAE, satellite images show', Thomas Bordeaux, CNN, 6th March 2026, <https://edition.cnn.com/2026/03/05/middleeast/radar-bases-us-missile-defense-iran-war-intl-invs>

⁵³ 'Blinding US Eyes in the Middle East', Arash Marzbanmehr, Al Jazeera, 10th March 2026, <https://studies.aljazeera.net/en/analyses/blinding-us-eyes-middle-east>

⁵⁴ "'Our coverage is not truthful": How Israel is censoring reporting on the war', Oren Ziv, +972 Magazine, 13th March 2026, <https://www.972mag.com/israel-media-censorship-iran-war/>

⁵⁵ 'Pentagon restricts satellite imagery to hide the cost of is Iran War', Joe Glenton, The Canary, 24th March 2026, <https://www.thecanary.co/global/2026/03/24/pentagon-hiding-the-truth-iran-war/>

cluster munitions may be more likely attack vectors for an adversary. Within this context, it is worth noting further that with the loss of both accident and emergency and now all emergency surgery facilities at local hospital Withybush, civilian and military casualties in the event of a serious attack could easily result in fatalities, given both the residential nature of the site and the proximity of civilian residential areas to the proposed site. The site area also includes no public shelters for civilian protection, and derives much of its primary economic sustenance from tourism, which depends on a perception of the coastal National Park area within which DARC is proposed being a place of sanctuary, and free from reputational damage.

In the context of indications by Russian military figure and former space agency director Dmitry Rogozin that nearby Aberporth could be targeted as a result of the higher-end modern military systems in development at its MOD base,⁵⁶ these realities would be concerning both for Pembrokeshire residents and residents across Wales, whose geography includes a very wide range of MOD military sites. These matters, in terms of their national impact on the perception of safety for the nation of Wales and the increased military awareness of the country as a strategic asset, are, in PARC's view, matters better considered at a national level than a local level.

The impacts of Wales being drawn into a high-level international war as a result of both the escalatory nature of the proposal and its proposed siting on Welsh soil, however, would involve further knock-on consequences for the Welsh economy in addition to national security concerns.

Efraim Benmelech and Joao Monteiro analyzed more than 100 wars in the post–World War II era and found, in all the countries engaged in conflict, that '[r]eal GDP fell by about 13 percent, with no evidence of recovery even a decade after the onset of war. Household consumption declined by about 11 percent. Investment in the countries' structures, technology, and other areas collapsed, dropping by nearly 14 percent. ... Average revenue decreased by around 14 percent.⁵⁷

⁵⁶ 'Three Welsh locations named on list of possible Russian missile targets', Ellen Stewart, Taite Johnson, Will Stewart & Chiara Fiorillo, WalesOnline, 19th December 2025, <https://www.walesonline.co.uk/news/wales-news/three-welsh-locations-named-list-33088535>

⁵⁷ 'The Economic Price We Pay for War', KelloggInsight, 20th November 2020, <https://insight.kellogg.northwestern.edu/article/the-economic-price-we-pay-for-war#!>

“Wars have been financed mostly through money printing and inflation,” Benmelech says. “The reason that we see a decline in real GDP is mostly because of that inflation. And as we all know, inflation has some very adverse consequences for households.” Indeed, price levels rose by nearly 50 percent and remained elevated for years after the start of a war. Inflation, in turn, eroded real debt and depreciated the nominal value of local currency significantly—an effect that persisted 10 years after the start of war.’

Given that it is within the remit of Welsh Government to consider national economic strategy, and thus to factor in any increased risks of war to the economy, it would seem advisable in light of such evidence for determination of a proposed development that may alter the international security balance and implicate Wales in targeting, the Welsh Government would be the better organ of governance than a single local authority to assess and coordinate measures to protect and ensure the economic interests of Wales as a whole.

Unsuitability of Local Pembrokeshire County Council to Evaluate Proposal's Adherence to National- level Legislative Goals and Concerns

While PARC accepts that it is not impossible for local authorities' Local Development Plans to deliver objectives of national priority and importance without a need for Welsh Government approval in each case, the proposed development's unique and unusually globally relevant role within the context of international politics and military strategy introduces concerns that, in PARC's view, make it appropriate for consideration at a national level.

While this may apply to current or future national economic action plans that Welsh Government has in place or may develop, one notable area of Welsh planning law that concerns a specific goal would, in the campaign's view, be difficult to be decided solely from the frame of reference of a local planning authority. In particular, that is the Goal within Section 4, table 1 of the Future Generations (Wales) Act 2015.

The Goal, for a 'A globally responsible Wales', offers as its description, 'A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.' While PARC rejects, and intends to clarify in other contributions to the planning process why it rejects that DARC is a project that does 'anything to improve the economic, social, environmental and cultural well-being of Wales,' the terms of the Goal place a responsibility on the Welsh Government to consider whether planning decisions make a positive contribution to global well-being.

As previous argumentation given establishes, the contribution that would be expected and likely to be made by the proposed development, in light of strong protestations by fellow powers within the multipolar world order, would be an entirely negative one. Indeed, with little further

argumentation, it would be possible to compellingly make the case that DARC as a proposal violates each and every Goal in the Act in myriad ways.

To consider whether and to what extent these claims have merit, however, it is PARC's view that a pan-Wales view of the issues would be necessary, from the perspective of Ministers who represent and offer knowledge of the many interconnected regions and priorities of Wales. By applying a holistic lens to the issue of evaluating DARC's impacts on the need for Welsh infrastructure to deliver jobs at a good scale, Welsh sovereignty, the security of Wales and the security of the Welsh economy, a better formulation of this generationally significant proposal can, in the opinion of PARC, be made.

Suitability of National-level Evaluation of Site for Redevelopment as an Alternative to DARC

Negative Contribution of Infrastructure to National Economic Priorities for Job Creation

In PARC's view, the proposed development would precipitate substantial socioeconomic harms within its proposed environment. These include, broadly, a projected loss of 570-580 native local jobs necessitated by the project,⁵⁸ construction jobs confirmed by the EIA scoping report to

⁵⁸ Figure based on consideration of (a) 600 existing Cawdor Barracks jobs being indicated by the *Pembrokeshire Herald* ['Brawdy's Cawdor Barracks to close in 2024', Tom Sinclair, November 8th 2016, <https://www.pembrokeshire-herald.com/29771/cawdor-barracks-to-close-in-2024>] and a Parliamentary question by Stephen Crabb MP ['Cawdor Barracks', Volume 672, Hansard, 26th February 2020, <https://hansard.parliament.uk/Commons/2020-02-26/debates/36348E4C-F511-42F9-8F03-F151D2E6A49A/CawdorBarracks>]; (b) the operational impossibility of the 14th Signal Regiment occupying the same site as a DARC site spatially; (c) clarification from a Pembrokeshire County Council planning document that 'It is possible that [Cawdor Barracks] will be disposed of, in part or whole, in the future. That could happen during the LDP 2 Plan period or beyond it. It is also possible that it will be retained, in part or whole, by the Ministry of Defence.' ['Initial Questions – Examination: Pembrokeshire County Council Local Development Plan 2', March 2026, https://www.pembrokeshire.gov.uk/objview.asp?object_id=12279&language]; (d) a Freedom of Information request response to St Davids City Council suggesting DARC personnel expected to be US personnel, in saying '[t]he site will not be operated by United States personnel once it is fully operational,' [available by request to PARC at theteam@parcagainstdarc.com]; (e) EIA's claim DARC would create '40 FTE jobs directly, plus a further 10 indirect and induced jobs.' [DARC Environmental Statement Volume 2, Chapter 13: Socio-Economics, p. 406, available at https://assets.publishing.service.gov.uk/media/699c3d3c8eef11b95e49c006/DARC_ES_Volume_2_Chapter_13_-_Socio_Economics.pdf]

consist mostly of out-of-area workers⁵⁹ that the applicant's ES determines to have an insignificant and negligible benefit, and complex cumulative harms evolving from negative visual impact of the proposed development for tourism receptors, a drop in local economic diversity an acceleration of existing socioeconomic problems and vulnerabilities within the proposed local area.⁶⁰

A significant net loss of jobs for its proposed local area would occur under all circumstances as a result of the fact that DARC would necessitate the evacuation of the 14th Signal Regiment, whether the applicant provides (or is able to provide) clear evidence of the coincidental intent for the Regiment to leave upon the implementation of the proposal or not (and the applicant does not, and is not so able).⁶¹ Directly employed personnel are confirmed to be United States personnel as per an FOI response from the applicant, with no timeline for the training of local personnel.⁶² Such incidental employment, whether local employment or not, is conceded to be both of low numbers and insignificant by the planning applicant.⁶³

Further evidence that the conceded substantial adverse visual impact of the proposed development would precipitate harms to the tourism experience of the St Davids peninsula and could undermine long-term job security have an evidence basis. Case study evidence of the potential for out-of-character development impacts to negatively impact tourism, recorded indicative comments from tourism visitors concerning the proposed development directly, and

⁵⁹ For low numbers claim see [DARC Planning Statement, p. 53, available at https://assets.publishing.service.gov.uk/media/699c3879cd3d70e6c2f12712/5._Planning_Statement_-_PAC_Draft.pdf]; for 'not significant' claim see [DARC Environmental Statement Volume 1, Non-Technical Summary, p. 22, available at https://assets.publishing.service.gov.uk/media/699c3d3a882eb23165f1271d/DARC_ES_Volume_1_Non-Technical_Summary.pdf]

⁶⁰ Argumentation from PARC's socioeconomic objections paper, currently not released; please contact theteam@parcagainstdarc.com

⁶¹ As clarified in footnote 49, future retention of Cawdor Barracks and/or 14th Signal Regiment are uncertain rather than confirmed; additionally, such future remains dependent on UK government defence spending review

⁶² As per footnote 49, please contact theteam@parcagainstdarc.com for a copy

⁶³ For low numbers claim see [DARC Planning Statement, p. 53, available at https://assets.publishing.service.gov.uk/media/699c3879cd3d70e6c2f12712/5._Planning_Statement_-_PAC_Draft.pdf]; for 'not significant' claim see [DARC Environmental Statement Volume 1, Non-Technical Summary, p. 22, available at https://assets.publishing.service.gov.uk/media/699c3d3a882eb23165f1271d/DARC_ES_Volume_1_Non-Technical_Summary.pdf]

the opposition to the proposal by a large number of tourism sector businesses in the relevant shop-front areas of St David and Solva within the proposed environment all underline these considerations.⁶⁴

In light of these considerations, it is PARC's view that for the scale, size and negative impact of the proposed development, such unfavourable employment-related socioeconomic impacts should best be considered within a national context. It would, in the campaign's view, be necessary for a regional and inter-regional methodology to be applied to the evaluation of advantages and disadvantages within Welsh Government's overall strategy—which should be driven by an agenda that expects a high standard for job creation for the costs of significant adverse impact across Wales—to create a national jobs strategy that ensures major developments provide appropriate employment benefits within the context of a strong overall plan for the country.

Suitability of Welsh Government Intervention to Reevaluate Site for Development as a Solar Farm (or other use)

Owing to Cawdor Barracks having been earmarked for closure multiple times and in an on-off pattern according to a relatively detailed account in a Parliamentary question delivered in Westminster by former Preseli Pembrokeshire MP Stephen Crabb,⁶⁵ Pembrokeshire County Council has evaluated the proposed site for redevelopment on multiple occasions. In PARC's view, discussions have been positive and have concentrated on a set of potential changes of use that would likely generate substantially more positive national and local economic benefit than would the proposed development.

These include the construction of a solar photovoltaic array on the disused runways, generating a substantial contribution to Pembrokeshire's energy market without creating any adverse visual impact due to the publicly non-visible runway land (covered in policy GN 5 of the Council's emerging Local Development Plan); the release of the existing MOD housing to the market; affordable new-build residential housing to supplement the existing housing; an expansion of

⁶⁴ Argumentation from PARC's socioeconomic objections paper, currently not released; please contact theteam@parcagainstdarc.com

⁶⁵ 'Cawdor Barracks', Volume 672, Hansard, UK Parliament, 26th February 2020, <https://hansard.parliament.uk/Commons/2020-02-26/debates/36348E4C-F511-42F9-8F03-F151D2E6A49A/CawdorBarracks>

Brawdy Enterprise Park; or activity-based and conservation-based tourism,⁶⁶ all of which would, in the context of the relatively isolated and self-contained economic contributions made by the existing site, offer, in PARC's view, a considerably more expansive and widely beneficial use of the land than DARC.

The suitability of wind turbines has been assessed twice in recent years at the site, in 2015 and 2021, and in both cases—of notable relevance to the DARC proposal, whose 21.5 metre structures are comparable vertically to small wind turbines according to the parameters given by the assessments (while also being far more laterally extensive)—wind turbine development was ruled out due to unacceptably adverse visual impact.

According to the 2021 assessment, by White Consultants, '[a] Phase 1 scoping study for future uses of the site was prepared in 2015. This briefly examined the potential for wind energy and considered this as a potential secondary use. In its viability analysis (page 40) the report concluded that the site's proximity to the National Park and the sensitivity of the surrounding natural environment was considered to preclude wind energy generation from further consideration. The option was therefore deemed unviable on planning and consenting grounds. It also considered the proximity of some residential properties with views of the structures as an additional factor limiting potential.'⁶⁷

The 2021 assessment, assessing wind turbines in greater depth, reached similar conclusions. Applying similar visual impact assessment assumptions and methods to Cawdor Barracks as the DARC EIA, including a representative viewpoint photography and a consideration of relevant Landscape Character Assessments as well as National Park Special Qualities, it concludes broadly that 'wind turbine development is likely to conflict with the statutory purposes including conserving and enhancing natural beauty and cultural heritage and promoting enjoyment of special qualities. The level of intrusion depends on the scale and location of potential development.'⁶⁸

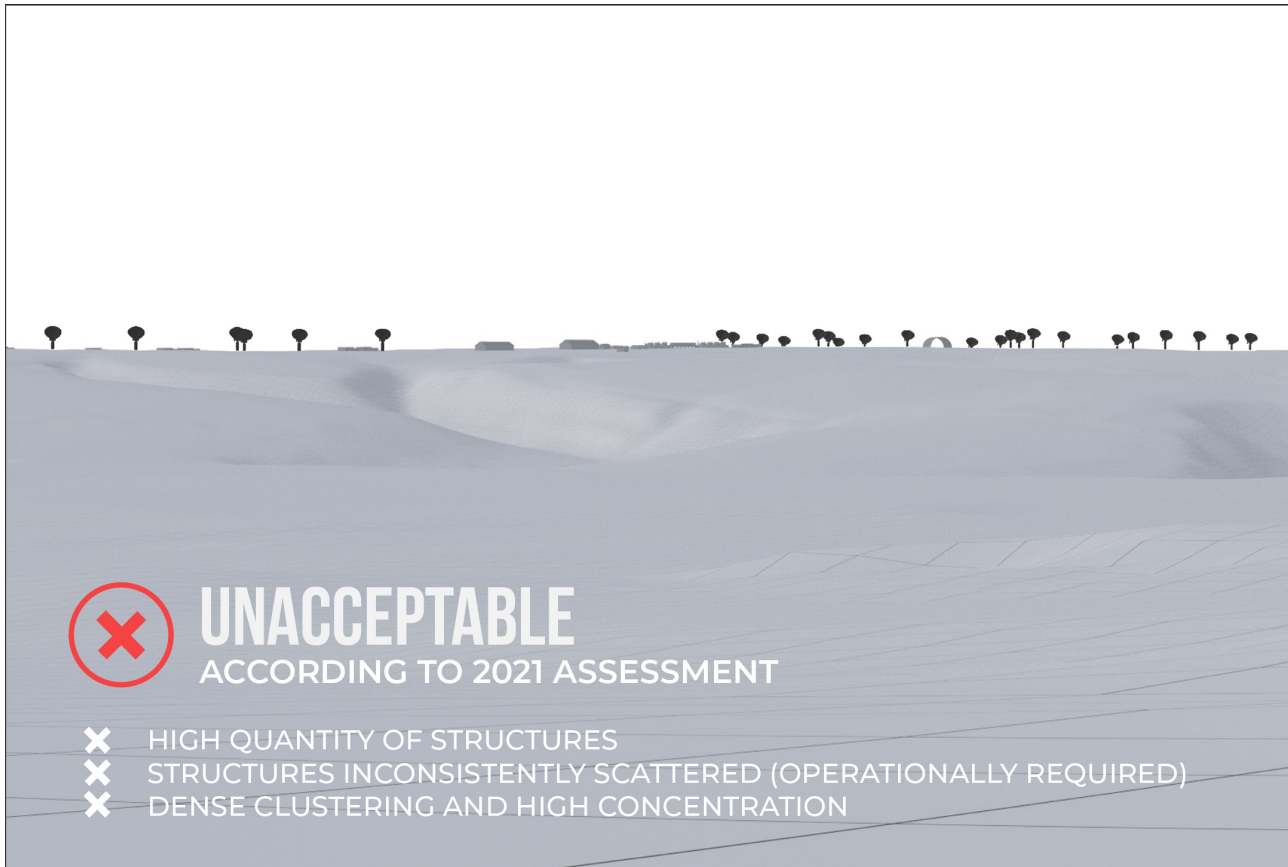
⁶⁶ 'Pembrokeshire County Council Local Development Plan 2 2017-2033: Deposit 2 Plan', September 2024 draft, https://www.pembrokeshire.gov.uk/objview.asp?object_id=11615&language=

⁶⁷ Brawdy Airfield: Landscape and visual appraisal of potential wind energy development, White Consultants, p. 8, https://www.pembrokeshire.gov.uk/objview.asp?object_id=10070&language=

⁶⁸ *Ibid.*, p. 19

As a brief illustration, the following graphical illustrations of representative viewpoint 6 (Roch) summarise the application of the conclusions of the 2021 White Consultants assessment to the current proposed development. The first image projects small wind turbines of the same height as DARC’s antennas, and the second projects DARC’s antennas, as taken from the software-generated visual assessment conduct by the applicant.





Given that potential alternative site uses could include a development of national significance (DNS) in the form of a solar array, national-level consideration of the site under the circumstances is, in PARC’s view, warranted.

Suitability of Welsh Government Intervention to Evaluate Appropriate Siting of Proposal at Alternate Site within a National Context

The applicant, in presenting assessed alternative sites as part of its obligations under Environmental Impact Regulations, includes a small amount of detail on three of seven assessed alternatives in the form of West Freugh (Scotland), RAF Fylingdales (Yorkshire, England) and Cawdor Barracks (Pembrokeshire). The applicant includes no detail on why Benbecula (Scotland), RAF Portreath (Cornwall, England), Chivenor (Devon, England) or Macrihanish/Campbeltown (Scotland) were not selected.

The applicant’s Environmental Statement, however, also states that, ‘[w]ilst Wales has a number of disused airfields, these are not secure and suitable for the requirements of this

proposal.⁶⁹ Providing, again, no technical detail or cost-benefit analyses as to why this would be the case, or why Wales only is discussed as a potential for an evaluation of further disused airfields, the applicant fails to address, for example, an extensive Airfields of Britain Conservation Trust database of some 1,879 major UK airfields (as just one land type for potential assessment).⁷⁰

The applicant's assumptions that either (a) operational requirements would preclude the use of all disused airfield or other potential sites, without any presentation of a rationale as to why not; or (b) security considerations alone justify the rejection of all potential alternative sites, are both rejected by PARC. Firstly, operational requirements are likely to be sufficient in many alternative site cases within large areas of open land across the UK that are within the correct tolerance for observation of the geostationary belt in any case. Secondly, security requirements at the existing Cawdor Barracks, beyond the presence of appropriate personnel and equipment, are relatively minimal. The site is roundly visible and accessible from all sides, with in many cases low-security fencing in place. If the combined budgets of the US Space Force and MOD cannot together accommodate the siting of a proposed development in an appropriate location in which adverse environmental impact does not exceed the given strategic justifications for the development, that is a budgetary problem that is the responsibility of the applicant to resolve, not Welsh Government or a Local Planning Authority, and it is the responsibility of neither of the latter to solve operational or financial problems on the part of a planning applicant.

In the light of the nature of the above considerations, however, it is clear that it would be impossible for a single local planning authority to engage in an appropriately nationally-framed determination process that requires the broad consideration of potential sites across a Wales level, or adjudicate upon an application that is liable to require national-level consideration of alternative sites. On that basis, PARC recommends, once again, that the Welsh Government calls in the application for Wales-level consideration.

⁶⁹ DARC Planning Statement, pp. 37-8, available at https://assets.publishing.service.gov.uk/media/699c3879cd3d70e6c2f12712/5_Planning_Statement_-_PAC_Draft.pdf

⁷⁰ Airfield Finder, Airfields of Britain Conservation Trust, <https://www.abct.org.uk/airfield-results/>

Adverse Impacts upon Welsh National Identity Resulting from Visual Impact in Nationally Important National Park

Aside from the harder concerns of economic and military-strategic considerations, PARC's view is that the proposed development, in view of the inappropriateness of its proposed location, risks adverse impact to Welsh national identity on a cultural level.

As the land of Wales's sixth-century patron saint, the St Davids peninsula is home to Wales's oldest cathedral and Britain's smallest city, cultural artefacts that are amongst the most popular destination for the millions of visitors to Pembrokeshire each year.⁷¹

As mentioned in the writings of Geraldus Cambrensis, St Davids was a sixth-century site of national pilgrimage and mental and religious reflection. Pope Callixtus II said, in 1123, that two visits to St Davids were equivalent to one pilgrimage to Rome, and three were equivalent to a pilgrimage to Jerusalem. St David founded a monastery associated with miracles, including the creation of a well of the boundaries of the proposed Brawdy site that is said to have sprung up in response to the plea of a poor local villager, called Terdi, in a time of drought. Terdi beseeched St David to provide a well as the land was dry: 'starting out, therefore, and opening a little bit of the surface of the soil with the point of his bachall, a most clear fountain gushed forth, which, bubbling up in a continual vein, supplies the coldest water in time of heat.'

As a spiritual home within a nation with a long chapel tradition, and with a national day dedicated to celebrating the saint who is its namesake, St Davids clearly holds a central part in the historic image of Welsh national identity.

⁷¹ '7m tourists add £590m to local economy each year, says Visit Pembrokeshire survey', Fiona Phillips, *Western Telegraph*, 20th July 2021, www.parc.d.c.c/mtp

This was recognised by Plaid Cymru in PARC’s first anti-radar campaign between 1990-91, which resulted in a defeat of the proposed over-the-horizon radar array which, like DARC, would have been in view of the city of St Davids, and posed substantially adverse visual impact. Plaid organised an unprecedented 2000-strong procession and rally (Gorymdaith y Rali), with residents from across Wales, which marched from St Davids Cathedral (after a blessing in Trinity Chapel) to the proposed airfield radar site. At the rally, national icon of Wales Dafydd Iwan himself sung ‘Hen Wlad Fy Nghadau.’

Amongst PARC’s many national-level supporters would include the Archbishop of Wales, the Welsh Chapel Association, the Bishop of St Asaph, and the Bishop of Bangor.

Heritage of this kind, in PARC’s view, stands simultaneously as an indicator of the centrality of St Davids and its nationally important landscapes in the imaginary of Welsh identity, the natural resistance of a community in defence of that value over two generations, and a relatively rare moment of national unity in a location in Wales where Welsh language faces challenges, yet a foundation of national identity remains of profound importance to the people of St Davids, whose City Council has voted unanimously in opposition to the proposed development on both occasions when polled.

Given that the protection of the landscapes of St Davids are of natural importance to the whole of Wales as a primary cultural referent and symbol, PARC’s view is that the cultural impacts of the proposed development offer another contribution to the case for consideration of the protection of the asset of the unspoilt landscapes and seascapes of St Davids at a national level.

Concluding Remarks

To conclude, this document has presented a wide variety of evidence for the suitability of the DARC proposal to be called in at Welsh Government level for appropriate consideration.

PARC has presented evidence regarding the capacity of the proposal to escalate military tensions on a global scale; to play a role in the militarisation of the global space commons; to play a role in a missile interception system liable to deeply destabilise international power balance and threat balance relations; and to violate multiple tenets and principles of international law.

PARC has presented, further, evidence of the liability of Wales to be raised on a priority chain of international military targets as a result of hosting the proposed development.

Further evidence has been presented concerning the proposed development's negative contribution of infrastructure to national economic priorities for job creation, and the suitability of Welsh Government intervention under circumstances pertinent to a reevaluation of the use of the proposed site, for purposes that could support alternative infrastructure of potential national benefit.

Lastly in these regards, PARC has presented argumentation in favour of a national-level examination of the cultural impacts of the proposed development on Welsh national identity.

In all the aforementioned cases, Welsh Government oversight of what would otherwise be a set of considerations that in PARC's view would be impossible for a local planning authority to properly adjudicate upon would be highly appropriate and warranted in the case of this proposed development. As such, PARC strongly recommends that the DARC planning application is called in for Welsh Government-level consideration as a matter of immediate urgency.

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