

**From:** [Diana Hulton](#)  
**To:** [NDE](#)  
**Subject:** NDF Response to Consultation  
**Date:** 15 November 2019 16:41:12  
**Attachments:** [Response to NDF from Diana Hulton.docx](#)


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Dear NDF Team,

Please find attached our Response to the NDF Consultation.

Yours sincerely,

Diana Hulton

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**Response to Consultation on the draft National Development Framework (NDF)**

**Names: Diana Hulton B.Com, B.A.F.A, M.A., RBSA**

**Craig Hamilton B.Arch, RIBA**

**Address:**



**Preferred contact details:**



**On behalf of the following Enterprises:**

**Coed Mawr Farm**

**Craig Hamilton Architects Ltd**

We live and work at Coed Mawr a historic Grade 2 listed farmhouse overlooking the upper reaches of the Edw valley in the Radnorshire hills. For almost a quarter of a century it has been the headquarters of the influential and environmentally conscious consultancy Craig Hamilton Architects Ltd which despite its rural location has acquired an international reputation. The business has recently moved some of its operations to Builth Wells where it has acquired the former Post Office in this iconic market town, the location of the Royal Welsh showground and associated interest in the rural environment.

The wider mid-Wales landscape is thus of pivotal relevance to both the ethos of the firm and to our professional and personal lives, as reflected in the professional reputation of Diana Hulton as a well-known landscape painter who specialises in and draws inspiration from the local rural landscape.

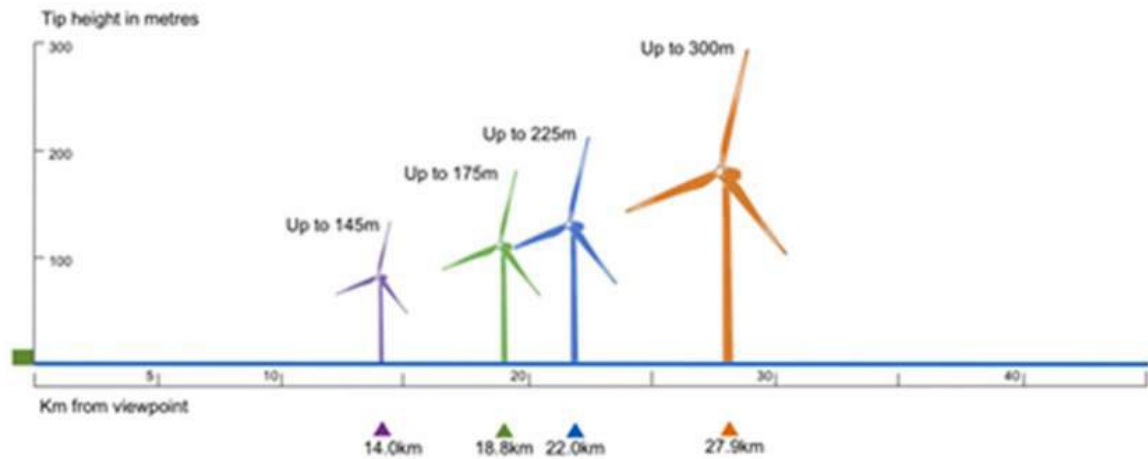


More locally and to the north, the distinctive and charismatic crown of Llandegley Rocks outcrops from the rounded curves of the Radnor Forest hills, and forms a pervasive feature, lending great interest and distinction to the views from Coed Mawr and the locality in general. To the west we see a panorama of rolling moorlands at Gilwern Hill crested by limestone outcrops, while to the south the horizons are formed by the bracken and heather outlines of the Aberedw and Glascwm commons. Running through the lower patchwork of fields and farmlands are narrowing valleys lined with natural woodlands – recognised by top tier ecological designations. The whole is a characteristic Radnorshire countryside which repays its locals and visitors alike with interest and joy throughout the seasons.

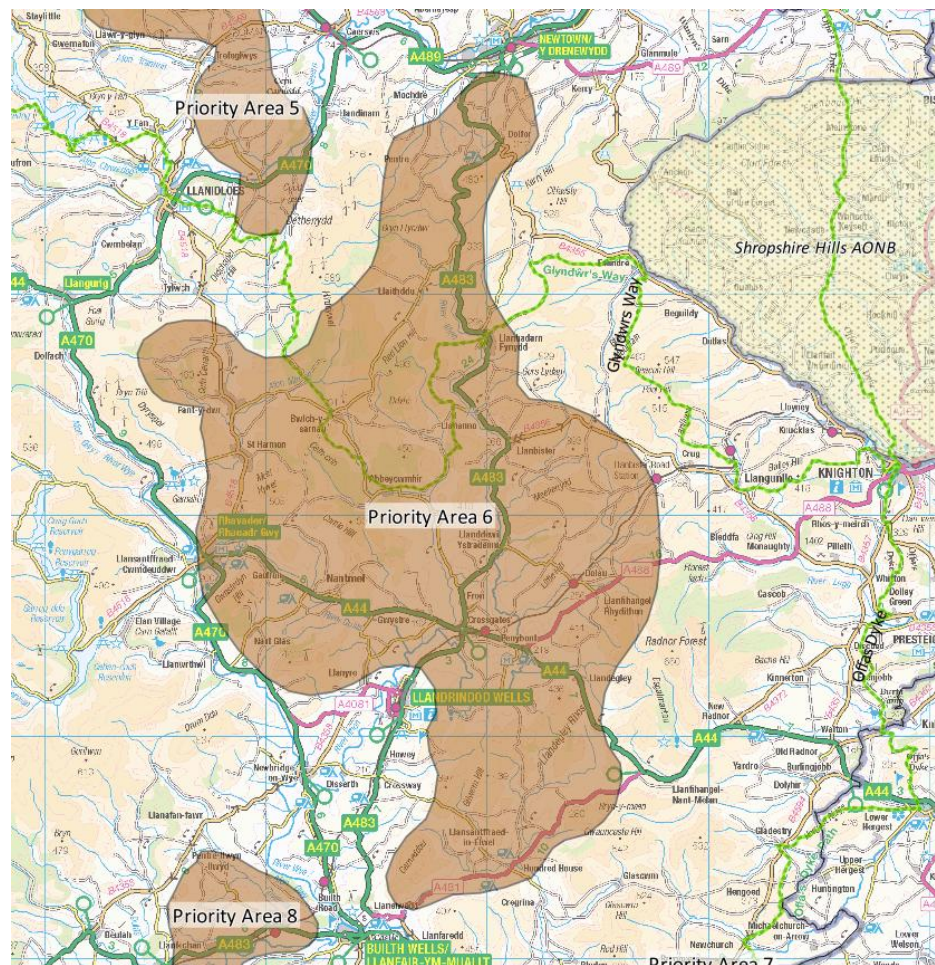
Over the last decade we have become increasingly depressed at the inability of the local planning authority and the Welsh Government to fully recognise the value, vulnerability and sensitivity of this increasingly recognised landscape 'brand'. A recent example has been the overturning by the Welsh Government of the Planning Inspectorate's Appeal decision to deny consent for the construction of 7 x 110m (361ft) turbines at the Hendy windfarm some 3km to the NE. However, following an effective public backlash to the attempt in Powys County Council's LDP to establish wind energy Search Areas in the locality, we began to live in hope that the Hendy decision would come to be seen as an aberration. It seemed that a more balanced national policy would emerge in which the value of the landscape and environment of mid Wales would be recognised and a more appropriate means would be found of addressing the need to increase the use of renewable sources in generating electricity.

We then studied the Welsh Government's draft National Development Framework (NDF) in the hope that such a view might prevail. Sadly, we found little reassurance. On turning to the detailed material presented to respond to the 'climate emergency' by increasing the renewable proportion of electricity generated in Wales from the present 50% to 70% by 2030 it is no exaggeration to say that we were dumfounded - for the reasons set out below.

- a) There is no clear factual statement of the amount of renewable generation required to achieve this aim, which represents an increase of two-fifths;
- b) This is to be produced solely by two technologies – onshore wind and solar photovoltaics panels;
- c) No mention is made of the increasingly viable and effective offshore wind resource and other marine technologies as indicated in the Wales Marine Plan which was finalised on 12<sup>th</sup> November 2019;
- d) The onshore wind and solar installations necessary to produce this amount are to be concentrated in 15 'Priority Areas' (PAs) representing 20% of rural Wales;
- e) The PAs are defined by the avoidance of the some obviously sensitive locations, but there is no cogent description of them as residual areas or any assessment of the impacts on their environments, landscapes and rural communities;
- f) Projects are to on a huge scale and almost all planning decisions will be made directly by the Welsh Government on the basis that extensive landscape change is an inevitable result of the process;
- g) The NDF suggests that a range of wind turbines with an unprecedented maximum tip-height of 250m may be used. This a size only suitable for deployment far offshore and would dwarf the already excessive 110m machines destined for Hendy - as graphically set out at p14 of the wind & solar assessment (where the Hendy machines would be to the left of the size-sequence):



- h) As shown below in a more realistic-scale map than provided in the NDF, our neighbourhood is to be subsumed within the southern part of Priority Area 6 – which at c43,000ha is the third largest PA, and represents 10% of the total.



- h) The only tangible reference to the likely results of this policy is to found In an obscure table in the far recesses of Stage 2 of the NDF wind and solar assessment dealing with the need for grid extensions to cope with the proposed increase in output (Appendix E). This states that in the lowest of four scenarios that PA6 is destined for a mix of wind turbines and extensive solar farms totalling 377MW capacity, almost all of which would require new pylons to export the output to distant consumers.

Based on a roughly equal split between the two technologies and using a range of specifications as cited in the NDF we are advised that this would require between 20 – 80 wind turbines and 354ha of solar panels (or any combination of the two) using generic specifications as follows:

<b>Wind Target 200 MW</b>		Hendy 110m 2.5 MW	Medium Large 5 MW	Large 250m 10 MW
MW		2.5	5.0	10.0
Number of turbines		<b>80</b>	<b>40</b>	<b>20</b>
Tip height		110m	181m	250m
Rotor radius		41m	70 m	90m
Swept Area m2		5281m <sup>2</sup>	15394m <sup>2</sup>	25447m <sup>2</sup>
Distance of Medium magnitude impact		10km	18km	24km
<b>Solar Target 177 MW</b>	177			
Average ha / MW	2.0			
<b>Total ha</b>	<b>354</b>			

Calculations by Geoffrey Sinclair of Environment Information Services

## Conclusion

Our initial astonishment has now turned to outrage as we realise that this misconceived proposal (riddled with errors and muddle) is an inadequate and counter-productive way of responding to Wales' 'climate emergency' when more suitable and effective marine technologies are recommended in the Welsh Government's Marine Plan.

We therefore call for the renewable energy part of the NDF to be withdrawn for a fundamental re-think and re-consultation. Only then can it lead to a rational and effective set of policies capable of addressing the climate emergency and becoming part of the National Development Framework.