

**From:** [Gary Brine](#)  
**To:** [NDE](#)  
**Subject:** Response to consultation on the draft National Development Framework  
**Date:** 14 November 2019 19:55:58

---

I hope you will accept my comments without them being submitted on the form. They relate to the Priority Areas identified for wind and solar developments:

1. The priority areas for wind energy are far too extensive and unnecessarily large. The strategy for renewable energy should be built around:
  - a. The capacity of the **grid infrastructure** and the minimum extension possible to cross-country grid connections – because the longer the transmission routes, the more transmission losses there are.
  - b. The most **productive** and cost-effective technologies ie. offshore rather than onshore wind.
  - c. The presumption that a **REDUCTION in consumption** should be prioritised over increases in production of energy – with the associated gain (using insulation) that this reduces fuel poverty and also lessens the need for bill-payers to subsidise energy production.
  - d. The presumption that the productivity of **existing developments should be maximised** – using energy storage and re-powering with more efficient turbines – before any new wind development areas are considered.
  - e. Opportunities to combine much-needed **flood prevention measures** with energy production through the use of carefully-scaled micro-hydro projects which can hold back water during periods of heavy rain.
2. Where counties **already have sufficient** renewable energy output in development to meet/exceed their energy consumption, they should not be expected to host further energy developments.
3. The excessively large and widespread proposed priority areas will unnecessarily **blight** those areas – trapping residents in properties that become difficult to sell and lose up to 25% value, leaving people in negative equity and unable to sell and move. Those areas will also become less attractive for inward investment and become economically damaged. Experience has shown that wind farm developments do NOT bring the promised local employment or meaningful investment into local communities, and instead contribute to rural decline. Identifying such wide areas means that some areas will have been needlessly blighted.
4. The priority areas show **no respect** for the work carried out (at taxpayers' expense) by Local Planning Authorities using Landscape Capacity Studies to identify which parts of the countryside are suitable for wind farm or solar park developments. This undermines local democracy.

It is especially disappointing to see that Carmarthenshire has been disproportionately covered by the priority areas – which will rob the county of its USP “The Garden of Wales”.

Mrs G Brine



Scanned by [McAfee](#) and confirmed virus-free.