



Mr Paul Davies MS
Chair
Economy, Trade and Rural Affairs Committee
Welsh Parliament
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By e-mail

**EDF Renewables' views on the priorities for the Economy, Trade
and Rural Affairs Committee over the next 12-18 months**

Dear Mr Davies MS,

Thank you for the opportunity to express our views on the priority issues for the Economy, Trade and Rural Affairs Committee.

EDF is the UK's largest producer of low carbon electricity. We are actively supporting Wales' transition to achieving net zero by building a smarter energy future using our growing portfolio of renewable generation including onshore and offshore wind, solar generation, and energy storage.

EDF Renewables currently operates 2 onshore wind farms in Wales; Cemmaes in Machynlleth (15 MW) and LLangwyrfron near Aberystwyth (9 MW). Furthermore, we are in the process of developing Garn Fach in Powys which will have a capacity of approximately 85 MW; we have recently bought a 50 MW consented solar farm in Wales; and, we have secured two 50 MW grid connections near Swansea and Newport due to be used for battery storage, with the potential to support electric vehicles.

This demonstrates our strong commitment to renewable energy development in Wales. We are also developing a significant pipeline of future projects including 500 MW of onshore wind and 500 MW of solar power. We estimate this work will create and sustain more than 2,000 jobs, unlock more than one billion pounds of investment in Wales with our Community Strategy, and support local businesses and supply chains.

Ensuring net zero should be an overarching economic and environmental policy priority for Wales. As you mention in the Introduction with The Royal Welsh Agricultural Society, the Committee has a very large remit to contribute to and we have provided feedback on selected priorities for which we have expertise.

Again, thank you for the opportunity to respond with our views to this consultation and EDF Renewables looks forward to working with you and your colleagues on the important work of this Committee throughout the Sixth Senedd.

Yours sincerely,



David Acres

Head of Renewable Policy & Regulation

Cc Committee Members

Mr Hefin David MS

Mr Luke Fletcher MS

Mr Samuel Kurtz MS

Ms Vikki Howells MS

Ms Sarah Murphy MS

Climate Change

Continued reporting of progress against climate targets and objectives will be imperative to ensure Wales stays on track to meet its net zero target by 2050 through the delivery of key decarbonisation actions. The Climate Change Act provided Welsh Ministers with powers with regards to public bodies and their response to climate risk. Given the importance of delivering net zero, we believe that the Welsh Government must use these powers in practice, to ensure public bodies implement the necessary actions to mitigate climate change.

Energy

We welcome the Welsh Government's recognition that the UK energy system is facing a period of significant change, and that the years ahead will be challenging. We support the commitment to reduce the use of fossil fuels. However, in order to meet increasing future demand requirements, this reduction will require a corresponding expansion of low carbon energy sources. To deliver this, significant investment in both onshore and offshore renewable technologies will be needed in the near term. Onshore wind and solar are very low cost, mature technologies which can be deployed at pace, and can therefore contribute to Wales achieving its 2030 climate targets. Therefore, a direct reference to these technologies should be included in the priorities, as these will be vital to ensure Wales can meet its target for renewables to generate an amount equivalent to 70% of Wales' electricity use by 2030.

Whilst we agree that the ending of UK Government incentives contributed to the decline in the pace of renewable deployment in Wales, the long standing challenge of electricity grid constraints is also a significant contributing factor. Whilst we are aware that grid infrastructure does not fall under the jurisdiction of Welsh Government, a lack of sufficient grid capacity for new renewable electricity generation is a key barrier currently preventing further deployment of renewables in Wales. We therefore recommend that this issue is included as a key priority for the committee in the next 12-18 months. It is important that Welsh Government works closely with UK Government, Ofgem and National Grid to ensure sufficient priority is given to address current grid constraints in Wales.

Net Zero

Many of the other priorities identified will be crucial in order for Wales to meet its net-zero target by 2050, and its 2030 decadal target for 63% reduction against the baseline. Therefore, we believe that net zero should be an overarching policy priority, as achieving net zero will rely on the success of many other priorities identified such as energy, tree planting and transport.

Nature and biodiversity

We are pleased that biodiversity has been identified as a priority for the committee, as the current rate of biodiversity loss is unprecedented and solutions to tackle biodiversity loss will often also mitigate climate change.

We would draw the committee's attention to the recent steps made to make biodiversity net gain mandatory in England, by amending the Town & Country Planning Act, which is likely to become law in 2023. This is a major shift in the priority that is given to biodiversity. We recommend that the Welsh Government applies a similar mandatory biodiversity net gain requirement through the Nature Recovery Action Plan, to reflect an increased priority for positive action on biodiversity.

One helpful consequence of this, given that many renewable developers will operate in both England and Wales, will be to provide a consistency in biodiversity requirements for developers. It is encouraging that work is being undertaken to develop indicators to measure progress. We suggest that these take account of the biodiversity metric 3.0 developed by Defra in England, as consistency in the detailed assessment of biodiversity will ensure developers are clear on the requirements that they must meet.