

Innovate UK

**Regional Energy Strategic Plan policy
framework**

**Consultation response on behalf of the Net
Zero Living Programme**

The views and opinions expressed in this consultation response are those collated from and curated by Regen on behalf of the Net Zero Living programme participants, a collection of 52 local authorities, partners and communities working to deliver net zero projects in their local areas funded by Innovate UK.

Innovate UK does not endorse the content of this consultation response, and the document does not reflect the opinions or views of Innovate UK or its affiliate organisations.

About Net Zero Living

Net Zero Living is a programme of work run by Innovate UK. The programme provides support to local authorities, their partners and communities to overcome non-technical systemic barriers to the scaling and adoption of net zero solutions.

Within the programme there are 52 local authorities, the Net Zero Living participants, or NZL participants, at various stages in the development and delivery of their local net zero plans.

This consultation response brings together views and aspirations of the local authorities' participants and their partners on the areas related to Regional Energy Strategic Plan (RESP) policy framework.

This response has been supported and curated by Regen, which provides expert support on policy and regulation to the Net Zero Living programme. The views in this were collected across a range of stakeholder events, including:

- Policy workshop for all NZL participants about RESP, facilitated by Regen,
- Meeting of the Local Energy and Infrastructure policy working group – set up by Regen within the programme for local authorities with this specific interest.
- Conversations with individual local authorities across the programme.

The draft content has been shared with all NZL participants for review and their feedback has been incorporated into the response.

About Regen

Regen provides evidence-led insight and advice to transform the UK's energy system for a net zero future. We know that a transformation of this scale will require engaging the whole of society in a just transition. We have 20 years' experience in transforming the energy system for net zero and delivering expert advice and market insight.

If you have any questions or feedback about this consultation response, please email thrivingplaces@regen.co.uk

Introduction

Net Zero Living participants welcome the decision by Ofgem to introduce the Regional Energy Strategic Plans (RESP) policy framework. The plans for RESPs mark a significant change in energy governance and offer greater opportunities for local authorities to engage in place-based, strategic, spatial network planning.

“I feel that the RESP would enable us to have a much more strategic and powerful conversation with DNOs. At the moment, we're having individual conversations with the [ESO and with Scottish and Southern] about supply points, and I feel like the RESP would enable us to have a lot more influence in those discussions because I feel at the moment no one has any long-term view as to the investment plans that are right for us as a county, apart from us.” **County council officer**

Energy planning for a just transition

As well as considering the physical spatial needs and impact on carbon emissions of new energy infrastructure, local authorities make plans for their places with a social and economic impact perspective. Local authorities recognise that a more dynamically planned, placed-based energy system that is informed directly by regional needs could accelerate both economic growth and net zero, as well as deliver social value across communities.

Both the output of the RESPs and the process of developing them could be the key that helps unlock this progress, but to further align energy planning processes with place-based local planning processes, Net Zero Living participants agreed that the RESPs should add a fifth guiding principle for the RESP based on delivering a just transition, to ensure that the social value lens is reflected.

Local authority resources

To get the most value out of RESPs, local authorities must also be equipped to engage effectively with new governance and data processes. Currently, local authorities have no clear statutory function on energy or net zero which means that for many authorities – which are often time and resource poor – the ability to engage with RESP processes is limited. There is also a lack of specialised energy knowledge across local authorities which further impacts the ability to engage with the RESP development process.

Ofgem and NESO must therefore consider how local authorities will be resourced to engage with and contribute meaningfully to the RESP process, and how to ensure that what it is asking of local authorities is a reasonable undertaking for under-resourced organisations.

Data: spatial, energy and planning data

One area where this will be critical is how local authorities gather and share their planning and spatial data for RESP development. Local authorities and regions want to articulate the needs and aspirations of their places. To do this effectively, they will need clear data and information about short, medium and long-term projects, and activities being planned or supported by the council. Collecting, presenting and, critically, maintaining this information will be an important part of representing the local area to the RESP.

Alongside this, local authorities are already asked to contribute data on an annual basis to network planning processes like the Distribution Future Energy Scenarios (DFES). Ofgem and NESO must not add further burden to local authorities by asking them to share the same spatial and planning data, for the similar purposes, but in a different format. Our suggestion is for NESO to develop a one-touch data sharing framework and process where local authorities only need to submit their data once per year. NESO and the RESP function will then organise and share the relevant local authority data with the relevant networks for their own planning processes.

Similarly, NESO must also build its understanding of how to incorporate local authority data into its modelling processes. DNOs have existing systems and models that incorporate data like Local Development Plans into the DFES and are increasingly exploring how to improve the data outputs from local area energy plans and other local decarbonisation pathway planning methodologies so that they can become more effective inputs to network and energy system planning. We recommend that NESO works closely with DNOs and local authorities to understand these existing data sources and processes and incorporate them into their own systems.

Innovation in action: Net Zero Living

There are several innovation projects across the UK that are exploring new data, tools and governance systems that could help inform RESP development, and programmes like Net Zero Living which is exploring the non-technical barriers to net zero, of which planning, policy and regulation are all factors.

Through the Net Zero Living programme, Innovate UK has built an active and engaged network, which would be a valuable resource for NESO and Ofgem as it develops the RESP. The programme participants can provide useful advice from the perspectives of local authorities about the current systems that they operate in and their resource challenges, support the co-creation of effective processes that streamline and simplify how data is collected, build a shared understanding local

and regional governance structures and the nuances of individual regions across the UK, and develop NESO's understanding of local planning and spatial data and how to incorporate it into energy system modelling effectively.

Ultimately, it will be shared understanding and collaboration that will help develop a RESP process and outputs that work for people, places and the energy system to enable a net zero future.

Chapter 2 – Guiding Principles

Q1. What are your views on the principles (in paragraph 2.8) to guide NESO's approach to developing the RESP methodology? Please provide your reasoning.

Largely, we support the four proposed guiding principles for the RESP methodology and welcome the focus on place-based approaches to energy system planning. However, throughout our RESP engagement process we were asked several times by local authorities about incorporating a fifth principle based on enabling a just transition.

Local authorities do not plan in single vectors in the same way as the energy system. They plan for their whole place, considering economic growth and social value impacts alongside net zero goals. Just transition principles are central to the plans of many local authorities and the RESP provides an opportunity to reflect this lens within energy system development. New infrastructure offers new economic opportunities alongside connecting new low carbon technologies – and in several cases can help underrepresented groups and communities that may have high indices of fuel poverty and economic deprivation become a part of the net zero transition.

For example, in **Blackpool**, the Council hopes to boost the economy by encouraging the development of its [Silicon Sands project](#); a data centre that could open new jobs and economic potential. Spatially, the town is well placed for a data centre, being sited near the North Atlantic Loop subsea fibreoptic cable and to the onshore cables from offshore wind farms in the Irish Sea. Blackpool also has high indices of social deprivation and so to get social value from an economic asset like a data centre, the Council wants to develop a heat network to provide access to cheaper, cleaner heat that is taken from the data centre to power communities. Blackpool's heat network ambitions demonstrate how by applying a just transition lens to an energy and economic project, the Council has identified a way to support its communities access cheaper heat, and an opportunity to decarbonise heat in the town.

Adding a just transition principle to the RESP would help crowd social value into the energy planning process and help develop a greater shared understanding of how to distribute the benefits of new energy projects – in turn impacting the development of RESP pathways.

Options that Ofgem and NESO could consider for embedding a just transition principle into the RESP process include:

- Just transition impact analysis when optioneering different pathways – this could include introducing a framework to help map the social and community benefits to different communities based on where infrastructure is sited.
- Adding a just transition element to decision-making frameworks – for example at a strategic board or technical coordination level.
- As a principle for engagement – e.g. who to engage as part of the RESP process to ensure that RESP decisions are inclusive and representative.

The challenge with embedding a ‘just transition’ principle is that RESP stakeholders are likely to have different definitions of just transition which would impact how it is embedded across the RESP process. We would advise that further work is done with RESP stakeholders – particularly at the Strategic Board level – to understand and define how it might translate at different stages of the RESP development process.

Recommendation 1: A fifth principle should be added based on the enabling of a just transition.

Recommendation 2: Ofgem and NESO work with RESP stakeholders to co-create a framework for how to embed a just transition at different stages of the RESP process including:

- Engagement
- Modelling – including modelling the impacts and benefits across different communities and stakeholder groups
- Decision making – at a Strategic Board and NESO hub level

Chapter 3 – Building blocks

Q2. Do you agree that the RESP should include a long-term regional vision, alongside a series of short-term and long-term directive net zero pathways? Please provide your reasoning.

Yes, we agree that RESPs should feature a long-term regional vision alongside short-term and long-term directive net zero pathways. Throughout our stakeholder engagement, we explored the benefits, complexities and asks of local authorities for the vision and pathways.

Short-term and long-term pathways

Local authorities in the Net Zero Living programme agreed that the short-term pathways should be five years rather than ten. A ten-year period risks significant changes to governments, technologies and technological capability, all of which may impact the rate at which a ten-year plan is delivered.

The same risks lessen over a five-year period – and there is often certainty in what local authorities and networks are planning within a five-year period – whether this is through Local Development Plans or network business plans, respectively. A five-year period would encourage the development of RESPs that both local authorities and networks could confidently deliver.

Recommendation 3: short-term pathways are set at a five-year period and long-term pathways track a 10-25 year horizon.

Regional vision

There is a strong benefits case for setting a collaborative regional vision. Benefits that local authorities have identified include:

- **Shared ownership of a clear-unified pathway:** Encourages collective commitment to regional goals.
- **Cross-boundary collaboration:** Essential for tackling energy challenges and exploring energy solutions across political and geographic boundaries.
- **Reduced duplication:** Less redundant efforts among local authorities.
- **Stability for network planners:** Provides clarity for long-term planning and helps harmonise distribution and transmission networks.
- **Stronger regional voice:** Consensus can influence in decision-making processes and regions can push faster toward net zero if they collectively agree. Regions can also confidently explore key areas of strategic importance

when it comes to low carbon technologies and the systems that work to help adopt them across places.

- **NESO advocacy:** Cohesive, shared plan can help NESO represent local authorities in technical discussions.
- **Crowd in investment:** The regional vision can provide a clear, long-term signal for investors to encourage place-based investment and support the development of local supply chains.

However, to achieve those benefits, local authorities have identified several possible challenges that could interfere with the process of developing a shared long-term regional vision. These include:

- **Consensus:** Finding consensus across regions with different political landscapes, geographies, net zero targets and ambitions, and demographics.
- **Inconsistent data and modelling complexities:** Ensuring reliable, unbiased data across regions is a complex challenge when energy planning is not consistent or mandated across local authorities. Some local authorities may have more developed plans, leading to unequal representation when it comes to modelling supply and demand needs.
- **Applying RESPs across scales:** Balancing regional vision with both national vision and local needs and ensuring that RESPs can be aggregated down to local levels for delivery when also aligning with national pathways.
- **Urban-rural divide:** Differing needs and opportunities in various areas within the region and potential for backlash in rural communities who don't want to host infrastructure for urban needs.
- **Engaging stakeholders:** Difficulty engaging landowners, farmers, and hard-to-reach groups who all have critical role to play in spatial energy planning.
- **Skillset gaps:** Local authorities may lack expertise to engage in complex energy discussions.
- **Flexibility over the long-term:** Plans must account for demographic shifts, technological advances and uncertainties. Changes in leadership or policy direction could impact the progress of RESPs. There was some optimism that by involving all stakeholders in the planning process, some of these political barriers could be mitigated.

It is also not clear from the consultation whether the regional vision should be a set of specific targets for an area, or whether it is a high-level overview of the technologies and systems that will deliver in way that meets the local needs and physical geographies of a place. E.g. would a regional vision set a MW/GW target for onshore wind, or state that the place intends to be an onshore wind hub without specifying the capacity of that technology?

Recommendation 4: NESO clarifies whether regional vision is expected to include targets for specific technologies and vectors, or whether shared vision is a high-level collection of ambitions for a place based on local needs and physical geographies.

Recommendation 5: NESO engages local authorities – particularly combined authorities and county councils – to better understand the processes for producing shared visions.

Q3. Do you agree there should be an annual data refresh with a full RESP update every three years? Please provide your reasoning.

Yes, we agree that an annual data refresh is necessary and agree with the suggestion of a full RESP update every three years – however clarity would be needed on how this 3-year refresh would work with a 5-year cycle. Local authorities would also like clarity on what would be expected of them in RESP-refresh years compared to annual data refresh years.

It will be critical to ensure that there is a smooth and simple process by which local authorities are asked to submit their data. Currently, local authorities are asked to submit data to DNOs for an annual DFES process. For some authorities, this means submitting the same data, through different process for different DNOs.

Oxfordshire County Council, for example, and several of its local districts submit data to UK Power Networks, Scottish and Southern Electricity Networks and National Grid Electricity Distribution to contribute to the networks' annual DFES process. The format, timing and process for sharing this data changes network-to-network based on differences in how each DNO produces its DFES. This is a painstaking process for the Councils.

To streamline this process and as part of a new RESP process, NESO and DNOs should jointly collect data from the local authorities via a single framework. This would mean just one touchpoint for local authorities to submit data in a consistent way – and could support better data consistency across local energy planning, networks planning and RESPs.

Recommendation 6: NESO and DNOs develop a one-touch process and framework to gather data from local authorities to support both RESP and network planning processes – rather than adding another framework and process by which local authorities must submit the same data as they do for existing network processes like DFES.

Q5. Do you agree technical coordination should support the resolution of inconsistencies between the RESPs and network company plans? Please provide your reasoning.

Yes, there needs to be a mechanism for NESO to ensure accountability and compliance with vision and pathways set out in the RESP.

We suggest that as part of the technical coordination process, NESO tracks and measures progress against the short-term and long-term pathways, in the goal of realising the regional vision. Ofgem should therefore clarify what it sees as appropriate accountability mechanisms that might be applied during the technical coordination process.

Local authority role in technical coordination

It's not clear the specified technical coordination would happen between NESO and networks, or whether local authorities have a role in technical coordination. Local authorities would like to feel represented in these conversations – but recognise that there may be a level of technicality beyond the understand of their organisations.

Ofgem should provide clarity on whether it expects NESO to represent local authorities in resolving technical inconsistencies, based on the outcomes of the long-term vision and strategy, or if expects local authorities to play a role in the technical coordination conversations.

It is likely that this will be case by case basis – but local authorities should be offered the option to join technical coordination discussions as a starting point, and then given the option for NESO to advocate on their behalf.

Recommendation 7: Ofgem and NESO set clear framework for technical coordination decision making to ensure that the process is transparent and include options for local authorities to be part of technical coordination conversations if required.

Q7. Do you agree with the framework of standard data inputs for the RESP? Please provide your reasoning.

We asked local authorities to score how easy or difficult it would be for them to provide the various data inputs suggested from local governments in the RESP consultation – where 10 is most difficult to provide and 1 is the easiest to provide. The average scores were:

| Data input | Difficulty score |
|---|------------------|
| Local area energy plans | 7.5 |
| Investment plans | 6.9 |
| Local and community energy projects | 5.7 |
| Heat network data | 5.5 |
| Local heat and energy efficiency strategies | 5.4 |
| Regional energy and industrial strategies | 5 |
| Housing stock data | 3.9 |
| Local transport plans | 3.1 |

The data we gathered highlights that where the plans and data are statutory functions of a local authority to gather and produce (e.g. local transport plans or local plans) the data is easy to provide because it's available – a local plan might be complex to produce but its production is funded and resourced and would therefore be available to feed into RESP development processes.

There is a challenge for NESO to understand and reconcile the different sources of local authority data into its RESP methodology. Because several of the data sources are statutory, the format for the data is set in a certain way. NESO will have experience in working with national data to develop the Future Energy Scenarios but may be less experienced with the formats used at a local authority level. We would suggest that NESO establishes a 'local data' working group with both local authorities and DNO DFES data teams who are experienced in working with local and regional datasets as part of its forecasting processes. This working group can help develop NESOs understanding of regional data and steer its processes for incorporating local authority data into RESP modelling processes.

Recommendation 8: NESO should establish 'local data' working group with local authorities and DNOs experienced in gathering and incorporating local authority data into its modelling processes. This working group can help steer the RESP methodology for local data inputs.

Challenges with local area energy plans

Local area energy plans (LAEPs) were scored as being one of the most difficult sources of data to provide from a local authority because they are both complicated to produce, but also their production – or production of any version of energy planning – is not mandated for local authorities, and so development of energy plans is dependent on the political will and available resources of individual authorities.

The challenge in correcting the imbalance between local authorities with LAEPs and those without might suggest that LAEPs – or a version of – could be mandated for local authorities to produce. However, we would advise the current LAEP process and the typical LAEP outputs should be reviewed ahead of this. Current challenges with LAEPs include:

- The data in a LAEP isn't a measure of confidence that the projects suggested in the output will go ahead. LAEPs lack a focus on deliverability and should evolve to focus on project pipelines rather than scenario/pathway modelling.
- There is no standard format for a LAEP – making them inconsistent based on which organisation produced them. The same area could have entirely different LAEPs if they were developed by different consultancies. This inconsistency means that even across the same RESP areas – the LAEPs may have been developed with different methodologies and NESO may struggle to reconcile these modelling differences to create a consistent output from inconsistent inputs.
- LAEPs and LAEP data is owned by the consultancies that develop the LAEPs, rather than the local authorities. DNOs have faced challenges when accessing LAEP data as part of its DFES processes. Data governance will be critical to ensure that regional data is consistent, open and transparent.

The Welsh Government commissioned a LAEP for each Welsh local authority which are now being fed into **National Grid Energy Distribution's** annual DFES process. The DNO found the LAEP process in Wales improved its engagement with local authorities, found challenges with the LAEP outputs and data and aligning them with its DFES process. Some of the challenges included:

- **Format:** The networks provided the consultancies with a data template that would match to the DFES data, but only one of the three consultancies filled this out. There was also a variety of referencing systems used to index the data. Some consultancies were also reluctant to answer questions about the LAEP data because they were no longer under contract with the LA
- **Targets vs ambition:** Many LAEPs noted that the outputs were "ambitions" rather than a targets. It is therefore put into question how feasible the data is and whether there is enough confidence in it to contribute to network modelling scenarios

There are currently several innovation projects focused on developing better data, processes and outputs for LAEPs. We propose that NESO works closely with organisations like Innovate UK, the Net Zero Hubs and DESNZ to learn from innovations in energy planning and consider how this may reflect in both RESP processes and future local and national policies when it comes to energy planning.

The **West Midlands Combined Authorities** Planning Regional Infrastructure in a Digital Environment (PRIDE) project is an innovation project exploring how new digital planning tools and innovative governance structures can facilitate better regional planning at a local and combined authority level and support the development of regional infrastructure.

Leicestershire County Council's Leicestershire CAN innovation project is also working to produce a LAEP but is developing it specifically in a way that is focused on identifying and delivering a project pipeline within communities in Leicestershire, rather than the LAEP becoming a static document.

Recommendation 9: NESO should learn from projects exploring innovations in the data and tools and systems used for energy planning and work with DESNZ on policy development and implementation for advice on energy planning methodologies.

Q9. Do you agree with the framework for local actor support? Please provide your reasoning.

The framework of support suggested in the consultation looks positive, however lacks the detail and clarity of how that support will materialise and be embedded into the RESP development process.

Local authorities have no clear statutory function on energy or net zero, and those with a net zero or energy planning remit to their role struggle to compete with statutory functions for time and resources. There is also a lack of specialised energy knowledge across local authorities – either because the knowledge doesn't exist within the organisation or is sat with particular individuals in siloed directorates.

In the case of Net Zero Living, many net zero officers and managers have been funded through the programme but will cease to have a role at the end of the project. This churn is inefficient and risks losing those with energy system knowledge who could meaningfully take on RESP coordination roles.

Ofgem and NESO must therefore consider its framework of support and ensure that it accessible and provides value across their organisations.

The RESP process will see local democratic representatives have a far greater role in exercising that influence and directing network investment to meet regional needs. With this greater responsibility comes a need for to build up knowledge about the energy system – from officers up to councillors and leaders – so that authorities can contribute meaningfully to discussions and decisions to support RESPs.

Several local authorities have identified this knowledge gap already, and have taken or are taking steps to upskill and build knowledge across their organisations – both to ensure that net zero is embedded across all local authority teams and departments, but also critically to ensure that local authorities are equipped to have the right discussions with the right people to drive forward their ability to deliver their energy and net zero ambitions.

Oldham Council, as part of its Green New Deal Delivery Partnership programme, is undertaking an internal review to identify and diagnose the knowledge gaps and skills across different council departments in relation to delivering successful net zero energy projects, explore what functional knowledge can help fill those gaps and design a comprehensive training plan to upskill council officers and managers to make more confident decisions about net zero.

Dorset Council recently undertook a ‘grid enquiry’ which gathered evidence on the challenges of network constraints. Through a series of workshops with internal council staff, local stakeholders and energy networks operating across Dorset, the elected members and councillors at Dorset gained a deeper understanding of the energy system challenges, and solutions that can help Dorset meet its infrastructure ambitions to support economic growth and net zero.

Ofgem and NESO should learn from projects like Oldham’s and Dorset’s to develop training programmes that are fit for purpose.

Local authorities also highlighted that the ‘bank’ of energy planning good practice would be particularly valuable – within which it would be valuable to spotlight governance practices across different RESP regions so that authorities can understand different working group arrangements and explore what could work in their areas.

Furthermore, the providing access to common digital tools and improving data consistency will be vital to encouraging local authorities to engage with RESP systems and processes. The more accessible and useful that NESO can make this

support, the increased likelihood of local authorities engaging meaningfully with RESP development. Common digital tools and data consistency can also help facilitate Recommendation 7 to provide a one-touch data gathering process for local authorities. We suggest that NESO takes on board Recommendation 9 to continue its involvement and build understanding of various energy planning innovation projects to develop the common digital tools.

While we understand it is not within the scope of this consultation to explore this issue, we would advise NESO and Ofgem to consider what they will be asking of local authorities and how easy it will be for local authorities to provide this ask without additional resource. Recognising that this is an issue for central government, we do advise Ofgem and NESO to engage DESNZ to consider local authority responsibilities for energy and net zero.

Recommendation 10: NESO should work collaboratively with local authorities to co-create and test and embed the framework of support, particularly exploring:

- How it can provide the most value in the most accessible way to resource-poor local authorities.
- What proportionate technical advice on local energy plans would look like in practice.
- What materials and case studies local authorities would most value in the bank of information.
- What training could support cross-council upskilling – learning from projects like that at Oldham Council to inform RESP training packages.
- Learning from existing innovation projects to inform development of digital tools and improving data consistency (see Recommendation 9).

Chapter 4 – Regional governance

Q10. Do you agree with the purpose of the Strategic Board? Please provide your reasoning.

Q11. Do you agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?

Q12. How should actors (democratic, network, cross-sector) be best represented on the board? Please provide your reasoning, referring to each in turn.

Yes, we agree with the purpose of the strategic board. But the purpose and representation on the board are interdependent. For the board to meet its purposes, the representation on it must be fit for purpose.

Navigating trade offs

Navigating trade-offs will be a particularly critical functions of strategic boards. Trade-offs are an inevitable part of the strategic energy planning process – local authorities expect that trade-off discussions are likely when it comes to exploring heat pumps vs heat networks, rural vs urban needs and land use challenges, competing for new industries like gigafactories and hydrogen vs electrification, to name a few.

Not everywhere can have everything at once so deciding what, where and when will be an important challenge to overcome. In order to have these conversations, members of the board must have a grounded understanding of the energy system, local energy plans and the needs of their areas – both practical needs and political needs. There is a risk of the board becoming overly politicised and struggling to reach consensus on trade-off discussions.

Governance challenges within local authorities

For the strategic board to fulfil its proposed purpose, it requires both democratic accountability and technical knowledge. However, within a local authority, these often do not exist in the same role. Elected members and councillors at local authorities that have a democratic mandate are unlikely to have the knowledge to contribute to technical conversations about energy systems and planning.

The technical knowledge needed to engage with the RESP process is more likely to sit within local authority operational teams – however because net zero and energy planning are not statutory functions for local authorities, these responsibilities often sit within different functions or departments depending on the organisational structure and tier of local authority. In some cases, the responsibilities don't exist at all.

This makes for a disjointed landscape when it comes to building both internal and external governance structures around energy, net zero and growth planning. The RESPs will need inputs from many existing functions for local authorities including spatial planning, economic development, environment, health, housing, transport, waste, regeneration and business engagement – and currently these are often siloed directorates that do not view their function with an energy lens. This means that there is no consistent governance process for bringing the key information from these directorates together to support RESP development.

Tier 1 authority representation challenges

Local authorities also recognise the need for a lean and effective strategic board but disagree that representatives should be only from tier 1 authorities. Only having tier 1 authorities at the strategic board could create unfair representation e.g. in scenarios where a whole combined authority area has the same number of representatives as a unitary authority with a much smaller population.

If district tier authorities are removed from the conversation, they could feel like the RESPs are being done unto them rather than with them – this has been the case in some places where LAEPs have been commissioned and developed by a tier 1 authority and without engagement with the districts.

The RESP cannot become something that is done unto district tier authorities rather than with them – particularly because district tier authorities are responsible for spatial planning. Historically, district authorities, as the planning authorities, are priority stakeholders when it comes to DFES engagement and data gathering. They will be a critical partner when it comes to both gathering data to support the development of, and delivering the infrastructure modelled by the RESP. They must be brought along the journey for RESP and be able to meaningfully contribute.

“So there's a little bit of a disconnect there that in our area, the LAEPs will be district level, but the representation will be at a county level. And I think for us we can make that work because we've got a governance structure which will take account of that, but I'm not so sure it might work well in other places.” **County Council officer**

Working groups

Working groups offer opportunities to represent necessary voices from within local authorities and across regions.

The working groups may be different in each area, depending on the existing governance structures and relationships across the region. E.g. working group structures could include:

- Net zero officers/energy officers/planning officers to represent local authorities at a technically functional level
- Local authority elected members
- Local authority directors of energy/environment/planning
- Network representatives and infrastructure investors
- Community energy organisations
- NHS trusts across a region
- Industrial areas & large energy users in a region
- Energy and housing developers operating in a region

Strategic Board

The strategic board should contain the necessary democratic representation, but it will need the technical knowledge alongside this to fulfil its functions.

It is therefore difficult to propose a standard format for a strategic board across different regions when the required skills or accountability are sat within inconsistent governance structures across local authorities.

There is also a need to establish the strategic boards quickly so that they can begin to feed into network planning processes – in particular electricity network planning processes for RIIO-ED3 which will begin in 2025.

Recommendation 11: Ofgem drops recommendations for standardised representation on strategic boards and works within regions to develop structures unique for each area, exploring how governance structures can be based on working groups, rather than working groups developed to meet a fixed strategic board structure.

Recommendation 12: Ofgem and NESO accelerate the development of strategic boards and working groups in 2025 to feed into network planning processes and be a steering board for wider RESP detailed design development.