



# **Norfolk County Council Response to: Regional Energy Strategic Plan policy framework consultation**

## **Introduction**

Thank you for consulting Norfolk County Council on the Regional Energy Strategic Plan framework. Energy is vital to our county in achieving economic growth and decarbonisation. Norfolk County Council has started scoping a Whole Systems Resilient Energy Plan for Norfolk taking a whole systems approach including climate adaption and water.

This response contains officer level comments only and these are made on a without prejudice basis and the County Council reserves the right to make further additional comments in relation to any future consultation. Where a question has not been answered in this response, it can be assumed that Norfolk County Council has no comment to make.

As a County Council we are on track to meet our 2030 Net Zero target and have reduced our carbon emissions by 61% since our baseline year 2016/17. Measures we have taken include improving energy efficiency in our buildings, switching from gas to electric heating and installing energy-efficient LED street lighting.

In June 2023, Norfolk County Council launched its Climate Strategy. This set out the council's approach to addressing its own emissions but also how it can support Norfolk's development as a low carbon and climate resilient place to live, visit and do business. The council have published over 130 actions outlining the practical steps being taken to meet their climate ambitions of which some relate to energy.

The introduction of the RESP has meant that delivering a successful and collaborative Energy Plan is not only vital to the county, but now also to the region.

## **Chapter 2: Laying the RESP foundations**

### **Question 1**

**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.**

Norfolk County Council believes that energy has no boundaries and so supports regional accountability.

A placed based whole systems approach provides a more joined up, collaborative and strategic approach to accelerate our energy resilience, security and climate targets. This also ensures

that systems outside of energy are considered to avoid any ripple affect challenges in the future which may present as barriers. Climate adaptation must be a key area of consideration.

NCC are aligned with the principles of the RESP methodology as they synergise with our own Energy Plan methodologies and principles.

### **Areas for clarification**

The consultation states: “There will be no requirements on local government to follow the direction of the RESP, but we would expect there to be a strong incentive to, as outcomes will be better aligned across energy system and spatial planning.” What incentive will there be, other than influencing the RESP?

A whole systems approach has a wide definition, it would be beneficial to understand exactly what this means to Ofgem. Ofgem should consider adopting a whole system approach as laid out in our below recommendations.

Would Ofgem and NESO’s support and include alternative off grid solutions in the RESP where they are unable to upgrade the grid system in an adequate and timely manner to support growth areas?

Where there are no local energy plans available, will they become mandatory to feed into the RESP, and if so, will there be funding or resource available to support data gathering for the RESP?

### **Recommendation**

The principles need to address a more holistic joined approach to delivering sustainable green energy across the UK. The transition to green energy and decarbonisation of the grid to date has been piecemeal and disjointed. It’s important to engage effectively with local communities about proposals that may affect them, this may include new renewable energy projects and transmission upgrades. The current approach to energy project planning frequently leads to a clustering effect of projects which disproportionally effects certain areas, the RESP provides an opportunity to take a more strategic approach to mitigate these effects.

The RESP should include but not be limited to:

- **All things energy** – Consumption and generation including electricity, heat networks, gas, alternative energy sources, transport, building fabric, storage and charging infrastructure. Community energy co options and smart energy should also be considered.
- **Whole system approach** – Infrastructure, water, industry, commerce, domestic, public sector, market innovation, agriculture, digital (data and comms), transport, waste, land use and climate adaptation.
- **Co – benefits** – Such as reduced costs, health and wellbeing, skills and employment and community investment opportunities.

The RESP needs to set out a clear vision and spatial plan for delivering renewable energy; and provide the framework for a new transmission network which is fit for purpose and aligned to not only regional characteristics and national priorities as set out in the consultation, but also local needs and sensitivities. Norfolk County Council is well placed to support the NESO to make sure such local needs and sensitivities are embedded in the RESP.

## **Chapter 3: Key building blocks of the RESP**

### **Question 2**

**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.**

Significant growth is already planned across Norfolk. Should the changes to national planning policy proposed by the Government come into effect, Norfolk, like many other areas are expected to host significant additional housing growth, which will need to be accompanied to sustained local economic growth. This means a further demand in Energy. Currently 7% of our substations are overloaded with 60% less than 5% capacity. In 2030, 31% of our substations are predicted to be overloaded and 49% with less than 5% headroom.

Norfolk hosts several National Strategic Infrastructure Projects (NSIP's) which are related to energy infrastructure including Offshore wind farms making landfall and Grid connection in the County; National Grid Transmission upgrades; and more recently and solar farms. All of which have significant local impacts but do not bring any immediate energy benefits to the County.

A fairer system of renewable energy generation is needed that takes a strategic approach to the distribution of energy generation, distribution and transmission projects, which better manages cumulative impacts on individual communities; and provides real benefits for host communities through comprehensive national planning, including:

- Local job opportunities and training
- Supply chain opportunities
- Appropriate compensation for residents and business adversely affected by project
- Community decarbonisation projects

The RESPs also need to address appropriate compensation and mitigation for those communities impacted by new energy projects.

There needs to be a recognition that there is currently no direct strategic benefit to the counties who have their own energy challenges, including areas of fuel poverty and deprivation, but are required to host them. Particularly in terms of funding and connections.

It is hoped that Great British Energy working along the RESP can deliver sustainable green energy that benefits host communities as well as the country at large.

In addition to the energy challenges, Norfolk also sits in one of the driest regions in the UK. Most energy technologies require water for cooling, although some more than others. Producing hydrogen is water and energy intensive. Infrastructure water and climate adaption needs to be considered ensuring that infrastructure can withstand sea level rises and flooding.

Understanding the relationship between energy and water for Norfolk and ensuring that any plans and strategies align is imperative.

The Long-term and short-term visions and directive are welcomed, and it is agreed that both are important in a fair and stable transition to address Norfolk and the regions whole systems challenges. This approach enables better prioritisation and focus and aligns with the principles of Norfolk's emerging Energy Plan.

NCC agree that an adaptive approach is required considering the pace of change and investment within public and private sectors. This allows for variation in government direction, policy and regulation, pace of innovation and technology, variations in area needs within the region and both residential and economic growth.

Shorter 5-year pathways would be preferred to ensure better alignment with government and local authority targets. Shorter milestones ensure better flexibility through change.

NCC agree that a long term 25-year pathway aligning with overall 2050 Net Zero targets is a sensible approach to take within the RESP.

### **Areas for clarification**

Norfolk County Council would like assurance that the short-term pathway must benefit the long-term vision and pathways, not just create temporary solutions to challenges while a long-term vision or pathway is delivered.

When planning for investment, regionally and nationally, this needs to be fair and balanced. Norfolk's economic growth makes a significant contribution to the UK as a whole. This growth benefits from our natural capital and is supported by expansion in rich energy intensive sectors such as tourism, manufacturing and agriculture. In addition, Norfolk is host to a significant number of energy NSIP's. Despite this, historically Norfolk has been overlooked for investment and opportunity.

Norfolk is a predominantly rural county which creates infrastructure, connectivity and capacity challenges. Will the focus lie on more urban areas or will there be an appetite to also seriously address the rural challenges that counties like our face.

Consideration must also be made for key political dates which may drive a change in direction, policy and regulation. This includes at a local authority level.

### **Recommendation**

Ensure that energy related NSIPs are embedded into the short and long-term vision and pathways, including measures to ensure that there is more direct strategic benefit to the counties impacted.

Short term pathways should be delivered to compliment the long-term vision and pathways.

A fairer system of renewable energy generation is needed which does not cluster all projects in one area; and provides real benefits for host communities through comprehensive national planning.

RESP's must not discriminate when planning for regions on a national basis.

Develop a RESP that considers both urban and rural challenges.

Include key political dates in timelines to pre-empt possible change in national and local direction, policy and regulation.

Consider a longer-term approach than 2050 for a climate change adaption piece particularly in terms of infrastructure. Even if we meet our 2050 net zero targets the impacts such as sea level rising will continue.

### **Question 3**

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

An annual data refresh and 3-year full update sounds adequate to ensure that the plan remains as live as possible and aligned with the pace of a changing demand in energy requirements.

### **Areas for clarification**

Presumably it would be recommended for Local Authorities to update and align their energy plans accordingly. The data ask and support from Local Authorities would require additional resource and funding.

### **Recommendation**

To lobby central government for resource and financial support to Local Authorities to ensure consistent and adequate bottom-up support in the way of local energy updates in line with RESP. This would also ensure that localised energy plans remain live and up to date.

### **Question 4**

**Do you agree the RESP should inform the identification of system need in the three areas proposed? Please provide your reasoning, referring to each area in turn.**

Norfolk County Council is concerned with regards to common assumptions across areas and regions when forming the RESP. The identification of need in the regional plan must not be detrimental to what we are trying to achieve locally. This would negate the bottom-up approach.

### **Question 5**

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

Yes, Norfolk County Council agrees that technical co-ordination would help resolve inconsistencies between RESPs and network company plans. Norfolk Council agrees that this will also help resolve issues with the lack of clarity and transparency about where whole system issues are considered, and trade-off decisions made. To ensure that the RESPs have the maximum benefit in this regard is important that they are also accessible and inclusive to non-technical skill sets within the regions. This will ensure that the plans are meaningful to a wide audience and enable better coordination for implementation across different levels of

government, different professional specialism and with the different sectors of society, including local communities.

### **Question 6**

**What are your views on the three building blocks which come together to form the RESP in line with our vision? Are there any key components missing?**

A transparent engagement process should also be a key building block for the RESP, particularly when considering the bottom-up approach if the NESO has the final say on decision making.

### **Question 7**

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

NCC welcomes the proposed to standardise data inputs for the RESP, this will help local actors provide clear and effective evidence to support the RESP process, and also that it would encourage more local area energy plans.

### **Areas for clarification**

Norfolk County Council is concerned that there is a risk of duplication of work if a RESP planner must unpick and join back all the plans with RESP favoured data, data sources and methodologies if there is no region-specific consultation when deciding on standardisation of data.

Resource within the local authorities needs to be taken into consideration when asking for input.

### **Recommendation**

Further localised consultation is required at the regional level to agree data sources. This will ensure that the standardised data sources align with emerging evidence being prepared as part of local energy plans and does not unduly compromise the content of current energy plans.

The early alignment and asks of data must be considered in the process to avoid Local Authorities having to revisit emerging Energy Plans.

Where historic energy plans don't align with RESP's, then the NESO should work with local authorities, central government and other relevant actors to ensure resources are made available for Local Authorities to close this gap.

A central database accessible to Local Authorities with the combined data collected for the RESP would assist in development and updating of local energy plans.

Norfolk County Council considers that the NESO should work alongside local government to lobby central government for resource and financial support to ensure consistent and adequate bottom-up support.

In addition to the inputs identified in the framework, it will be necessary to collect (and update periodically) information on the progress of development sites, including those identified local plans and other windfall schemes to ensure that there is a clear picture of future, locational specific demand. There is also the potential for significant changes in local plans and significant

additional windfall development occurring as a result of planned changes to national planning policy. This will need to be considered in the context of any long terms understanding or projections of demand.

### **Question 8**

#### **Do you have any suggestions for criteria to assess the credibility of the inputs to the RESP?**

Norfolk County Council would recommend that the NESO work closely with the regional DNO's and Local Authorities to understand current common ground on existing credible data sources. This will provide the NESO with a wide and accurate view of this. From this point, NESO will be much better placed to develop a standardised template as a recommendation.

For example: UKPN developed a tool for Local Authorities to share and collect datasets and NODA provide Norfolk data based on social information. Other areas may have similar.

For the purposes of assessing the certainty of new development, Norfolk County Council would recommend that information on development sites is captured within an uncertainty log, which assesses the likelihood of a development coming forward in a prescribed period based on its planned status.

### **Question 9**

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

NCC welcome the support of the RESP. The key element here is coordinating and collaborating, ensuring that areas need within the region are respected and considered. The NESO has the final decision, but this must not be detrimental to what we are trying to achieve locally. This would negate the bottom-up approach.

## **Chapter 4. Regional Governance**

### **Question 10**

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

Norfolk County Council agrees with the purpose of the Strategic Board, which aligns with the long-term approach proposed within Norfolk's emerging energy plan. Norfolk County Council agrees that this board will help embed democratic representation in the RESP process. It is however important that there are wider opportunities for other stakeholders, including local communities, to engage in the development of the RESP. This is particularly important if the RESPs conclusions will set a clear framework for the delivery of infrastructure that impact on particular sub-regional areas or localities. It will be of little comfort to local actors and communities to be engaged on individual schemes, if the in-principal acceptability of those schemes has already been established in a strategy that was not similarly subject to consultation and engagement. Norfolk County Council can support the RESP by playing a key role in supporting bottom-up engagement in the development of the Strategic Plan.

### **Question 11 and 12**

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

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

Norfolk County Council agrees that the representation should include a variety of relevant actors on the Strategic Board. Norfolk County Council supports the proposal for upper tier authorities to form part of the Board and can play a key role in supporting the development of appropriate representation arrangements with lower tier authorities.

Norfolk County Council recommends close consultation with Local Authorities within the areas to develop this board as they are familiar with stakeholders within the region.

Cross sector and Industry should be represented as well as experts in alternative energy solutions to work truly collaboratively, particularly when facing rural challenges where alternatives may take pressure off the grid.

Consideration should be taken to include research institutions such as University of East Anglia and Water such as Water Resource East to ensure whole systems approach. Water Resource East could also knowledge share between the Economic Heartland, East and East Midlands areas. The East of England is the driest region in the country which is why it is vital that water and energy work alongside each other.

## **Chapter 5. Boundaries**

### **Question 13 and 14**

**Do agree with the adaptations proposed for Option 1? Please provide your reasoning.**

**Do you agree with our assessment that Option 1 is a better solution than Option 2? Please provide your reasoning.**

Norfolk County Council are generally satisfied with the proposed region following the Blended STB and ITL1 regions, provided there is still a way of connecting with other regions as and when appropriate. Part of this has been explain in Q11/12 response.