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Dear Sirs

**Re: Regional Energy Strategic Plan (RESP) Consultation**

The Hertfordshire Climate Change and Sustainability Partnership (HCCSP), consisting of the County Council, all ten District and Borough Councils and Hertfordshire Futures, formerly the Local Enterprise Partnership, is broadly supportive of the proposed policy framework for the RESP. HCCSP is a strategic group which acts as the lead partnership organisation for partners to collaborate and identify joint work programmes on environmental, climate change and wider sustainability issues.

One of the key aims of HCCSP is to collaborate across and between public and private sector bodies to achieve carbon reduction goals across the South East of England. We have begun work on a Local Area Energy Plan through an initial project to collate and report data to develop an energy baseline for the county. We have paused further plans for scenario planning, stakeholder engagement and future energy planning until more clarity emanates from Westminster. We are therefore delighted to see the proposal for RESPs and are interested in the opportunities that it may bring about. We look forward to receiving further details on its intersection between varying levels of actors to clarify the flow of information: is the RESP to provide a structure for LAEPs or will the LAEPs be required to feed into a RESP? We are keen to avoid duplication or redundant efforts should the two approaches not align. We therefore look forward to understanding more possible detail, particularly with regard to data interrogation for public and private sector involvement as the approach develops.

To answer the specific [questions under consideration](#):

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.*

HCCSP supports NESO's approach, particularly the balance whole-system and local nuance. This interplay will be crucial to ensure a coherent and flexible approach, so that the system can evolve with developments in technology and changes to energy use.

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.*

HCCSP agrees with embedding both the short-term and long-term pathways within a robust regional vision for net zero. Considering the longevity of the built environment, though, an ambition beyond 25 years to avoid immediate obsolescence or underperformance of strategic infrastructure projects, would seem plausible.

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

We support the requirement for annual data refreshes and three-yearly full updates to align with wider system assessments. However, HCCSP would appreciate clarity on delivery timelines to ensure the process is not too resource intensive and overly cumbersome, taking learning from Local Plan cycles perhaps.

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 (Providing consistent assumptions, setting out the spatial context for capacity needs and informing strategic network investment).*

Consistent assumptions: We support this as long as the acceptable range of variation takes into account regional variations.

Spatial context visualisation: This aligns well with Hertfordshire's ambition for data visualisation.

Strategic investment locations (particularly if in a directive model) must interplay with planning ambition and particularly Joint Strategic Plans to ensure democratic and holistic decision making on land-use eg energy, agriculture, biodiversity, housing.

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

We support the ambition to align and interconnect approaches from different industries (or vectors) to ensure a whole system approach. Clarity is needed on whether network company plans will drive the RESP. It is not clear whether the RESPs will have authority to influence network company plans or if the RESPs will be limited by the companies' capacity for growth or adaptation.

6. *What are your views on the three building blocks which come together to form the RESP in line with our vision (Strategic direction setting: modelling supply and demand, Strategic direction setting: identifying system need, and technical coordination)? Are there any key components missing?*

HCCSP would appreciate clarity on the integration of innovation and technical solutions with the technical coordination. Is there a role for RESP Boards to allow for differences of opinion on solutions to be moderated and approached? Clarity on funding mechanisms will be needed as ambition is likely to be hampered by resources if these are not identified in line with plans.

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

We agree with the framework of standard data inputs for the RESP. Whether these data inputs can be quantitatively included, however, will rely on the format and structure of data sources as well as the resource demands of compiling and sharing that data. Further, LAEPs are being considered in some town and parish areas which could be incorporated, subject to format and structure of the data. Many of the detailed data sources will require policy guidance early on to ensure compatibility and avoid unnecessary additional resource.

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

The Hertfordshire Insights team has provided this response on our behalf:

Whichever sources are chosen, it hopefully goes without saying that within the framework, a standard format of consistent regular, reliable and repeatable data supply is essential. The data should be made available down to the smallest

geographical area possible, and aggregated up to larger comparator geographies, including England as a whole.

If the data proves to be consistent, regular, and repeatable then over time it will prove to be credible. However, expertise from the National Office of Statistics will assist with making this data credible from day one as they will brand the data as Official Statistics. They will also assist with distributing data using an established platform to an established audience.

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

HCCSP supports the place-based engagement principles and the framework of support provided by Ofgem. We note further that the scope of this framework, nor the powers of Ofgem, expand to budgets or funding for local area delivery (ref 3.63). That said, it should be noted that effective engagement (at which Hertfordshire has comprehensive and effective experience) for, for example, the Hertfordshire Nature Recovery Strategy, is budgeted to be over £60,000. This would not currently be possible without central government funding for delivery. Therefore the framework and principles will likely go unused without specific funding to facilitate transparent, accountable, representative and coordinated engagement with a range of actors.

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

HCCSP agrees with the outlined purpose. HCCSP emphasises the need for the Strategic Board to remain 'lean' and focus on oversight - and efficient funnelling of information to - Working Groups, who will deliver the planning, engagement and recommendations.

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

HCCSP agrees with this proposed representation.

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

HCCSP supports the Embedded model to integrate technical and democratic representatives into a single board.

Democratic: partnership bodies such as Climate Change Partnerships or Net Zero Hubs may be a useful mechanism to facilitate broader representation through pre-existing structures without creating an overly large Board.

Network: No specific comments on this sector.

Cross-Sector: Working Groups (with defined Terms of Reference) seem the best format for cross-sector engagement, ensuring relevant expertise is applied at the right time in the process, with a focus on avoiding silos or 'group think'. Subject matter experts on e.g. data, energy, net zero and spatial planning, without 'skin in the game' may be useful should conflict resolution be required.

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

HCCSP has no specific comments on Option 1, as there has been no change affecting our area.

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

HCCSP prefers Option 1 over Option 2 (Norfolk and Suffolk's geographic context differs from Hertfordshire), we note the (current) reduced stakeholder connections from a net zero/sustainability context. HCCSP works with bodies with a range of regional configurations. Our interactions with EEH are through our Transport Subgroup, and so have limited regular direct involvement with EEH. Instead, our interactions are usually based on configurations resulting from East of England (through the East of England LGA) and the Greater South East Net Zero Hub, and most recently its North Eastern Regional Advisory Board.

*15. Do you agree a single region for Scotland is optimal? If you think a two region solution is better, do you agree the split should occur at the SSEN and SPEN DNO boundary? If not, please provide your reasoning and alternative option(s).*

No specific comments.

Thank you for the opportunity to provide our thoughts on this consultation.

Yours sincerely

*Cllr Simon Speller*

Chair, Hertfordshire Climate Change & Sustainability Partnership  
Cabinet Member - Environment and Performance  
Stevenage Borough Council