

Our ref: N.A
Your reference: Regional Energy Strategic Plan policy framework consultation
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Dear Fiona Campbell,

RE: Ofgem – Regional Energy Strategic Plan policy framework consultation

Thank you for the opportunity to comment on the Ofgem – Regional Energy Strategic Plan policy framework consultation. Ipswich Borough Council's (IBC) Planning Policy Team have provided comments from the perspective of a Local Planning Authority, using the questions provided within the consultation document.

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.

Principles as follows: Be place-based; Be whole system; Be vision-led; Be proactive

The principles outlined in section 2.8 seem both robust and flexible enough to accommodate spatial differences. There is room to emphasize collaboration, as this will need to align with priorities at the regional and district levels, in addition to national objectives. This is particularly relevant when considering local housing targets and areas designated for significant growth.

It is also important to acknowledge changes stemming from updates to national documents, such as the National Planning Policy Framework (NPPF). With the government proposing changes that could result in increased housing targets, we must also consider the implications of the proposed 'data hubs,' which require substantial energy to operate.

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.

Defined as:

A long-term regional vision which sets thematic priorities for the region, developed through the close coordination and engagement of local actors. A series of directive net zero pathways providing a whole system strategic assessment of energy needs across the region. To account for

uncertainty, the pathways should include a single short-term pathway and multiple longer-term pathways.

The capacity to consider both short-term and long-term perspectives would offer the plan greater flexibility in achieving net-zero targets. IBC wishes to emphasize the importance of having all plans shaped by local stakeholders, such as planning professionals, to effectively plan for growth in each designated region. Additionally, it is crucial that the data refresh is conducted to capture any local changes, ensuring the RESP remains current and responsive to local need.

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

Yes, IBC believes that this is vital. The ability to adapt to local changes is necessary to achieve net-zero targets in a timely manner. From a planning standpoint, IBC produces an Infrastructure Delivery Plan, which serves as a living document. Updates to this plan can inform and enhance the overall planning process.

Q4 – 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.

1. providing consistent assumptions

This will be fundamental to ensure that everyone is aligned and utilising the same data.

2. setting out the spatial context for capacity needs; and

Agree. It will be important to understand when and where development is proposed to occur.

3. informing strategic network investment.

The results of the first two building blocks will enable the formation of an investment strategy. From a planning perspective, this can be integrated with Community Infrastructure Levy (CIL) and Section 106 (S106) contributions, where applicable, which will also provide certainty regarding delivery.

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

Proposal: We propose, in delivering the RESPs, NESO has a technical coordination role to support resolution of any resulting gaps and inconsistencies of constituent network company plans in a region and identify whole system opportunities.

Yes, this will be crucial for establishing certainty moving forward. If network companies pursue varying outcomes and strategies, it will hinder the development of effective solutions. A unified approach is essential to ensure that RESPs can collectively address challenges and implement cohesive strategies. Alignment will facilitate smoother collaboration and drive progress towards our goals.

Q6 – 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?

Proposal: We propose NESO produce a RESP for each region that is comprised of three building blocks - modelling supply and demand, identifying system need, and technical coordination.

While these three building blocks are robust, IBC believes incorporating stakeholder engagement and feedback mechanisms could significantly enhance the building blocks. Additionally, integrating a framework for monitoring and evaluation would ensure that the RESP remains adaptable and responsive to changing needs over time.

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

<p>Network data</p>	<ul style="list-style-type: none"> • GDN and DNO data – including units distributed, network capacity, connections and flexibility assumptions. • Independent DNO and Independent Gas Transporter data. • Transmission Operator asset availability data.
<p>Local government data</p>	<ul style="list-style-type: none"> • Heat network zoning data. • Housing stock data. • Investment plans. • Local and community energy projects. • Local Area Energy Plans (LAEPs). • Local Plans. • Local Heat and Energy Efficiency Strategies (LHEES). • Local Transport Plans. • Net zero targets. • Regional energy and industrial strategies.
<p>Other sources</p>	<ul style="list-style-type: none"> • Electrical vehicle ownership data. • Heat Pump ownership data. • Transport, water and telecommunications strategies and plans.

It is essential to maintain this consistency to enable the plans to track success using metrics that can be easily traced back.

Q8 – Do you have any suggestions for criteria to assess the credibility of the inputs to the RESP?

Specifically concerning Local Plans, the RESPs will need to assess targets based on past performance. This involves reviewing Authority Monitoring Reports and comparing them with the targets outlined in a Local Plan to evaluate the accuracy of areas such as housing delivery.

Q9 – Do you agree with the framework for the local actor support? Please provide your reasoning.
To ensure actors can engage effectively in the RESP development process, we have developed a framework of support, including:

- *Providing proportionate technical advice on local energy plans.*
- *Supporting coordination and coherence between local, regional and national plans.*
- *Setting up a 'bank' of energy planning good practice to foster transparency and knowledge sharing between local actors.*
- *Providing training on the energy sector to enable meaningful participation and engagement (at Strategic Board and working group levels).*
- *Coordinating and facilitating working groups between local authorities, network operators and other key actors.*
- *Providing access to common digital tools and improving data consistency.*

The framework seems strong within the context of Local Authorities. It is essential to incorporate training early in the process to enhance the quality of contributions from members of the proposed working groups. Additionally, it is important to ensure that digital tools and data formatting are consistent across all Local Authorities. Consistent outputs across all authorities would promote information sharing and facilitate collaborative learning, making the process more supported and straightforward.

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

<u>Strategic Boards</u>
<ul style="list-style-type: none">• Provide oversight of RESP development.• Facilitate transparency and increase visibility of regional priorities.• Produce a recommendation / steer on key decisions being made.

IBC supports the purpose of the Strategic Board, emphasising that it is essential for the board to function as a 'supporting' entity rather than a decision-maker. This approach helps to prevent political influence and establishes the board as a platform for collaboration and guidance.

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?

IBC believes this approach would offer valuable input from a wide range of relevant stakeholders. The embedded model is preferred, as it brings key stakeholders together in the same space, fostering interactions that integrate technical expertise across all discussions. This avoids compartmentalizing expertise into technical silos.

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

IBC would support the organisation of working groups that include democratic actors. While higher-tier authorities on the board will have insights into broader activities within local areas, it is

essential to incorporate the detailed information held by those with extensive local knowledge. This feedback will ensure that the plans are informed by the highest level of detail.

Q13 – Do you agree with the adaptations proposed for Option 1? Please provide your reasoning.

The proposed adaptations lead to a more balanced distribution of the population across each of the strategic board areas. Since the plans are intended to guide future energy needs, reducing the extremes within the model should help ensure that each strategic board manages a region of comparable size.

Q14 – Do you agree with our assessment that Option 1 is a better solution than Option 2? Please provide your reasoning.

No comment.

Q15 – 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 comment.

Thank you again for the opportunity to comment on the Ofgem – Regional Energy Strategic Plan Policy Framework Consultation. We look forward to engaging with the process in the future. Please note IBC will be undertaking a review of the adopted Local Plan in the near future, and we would be interested in exploring ways to engage further with the RESP's process. If you require further detail, please don't hesitate to get in touch using the contact details provided in the header of this letter.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'J. Mann', written in a cursive style.

James Mann MRTPI
Head of Planning and Development
Ipswich Borough Council