

Regional Energy Strategic Plan policy framework Draft Impact Assessment

Closing date: 10th March

5th March 2025

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Introduction

The Centre for Sustainable Energy (CSE) is a national charity that supports people and organisations across the UK to tackle the climate emergency and end the suffering caused by cold homes. For over 45 years we have been working with householders, communities and local authorities and delivering practical solutions to address fuel poverty and cut carbon emissions. Our latest [Impact Report](#) provides more detail of our work.

In our response to the Regional Energy Strategic Plan policy framework consultation, we welcomed the proposals supported the move to a regional system of strategic spatial planning for the energy system. This view has not changed, but we would make the following comments.

Do you agree that we have, to a reasonable extent, identified and understood the potential impacts of the introduction of the RESP?

Yes.

Having reviewed the impact assessment we feel that RESP is highly likely to result in the cost and efficiency savings that exceed the total investment requirement.

Do you agree that we have, to a reasonable extent, captured and understood the potential impacts of the introduction of the RESP on different stakeholders, including persons engaged in the generation, transmission, distribution or supply of electricity, as well as consumers?

No, we do not consider that the impact assessment considers the full impact of RESP on local authorities. Local authorities have a fundamental role to play in the delivery of the RESP pathways. The involvement of local authorities of all sizes will be critical to the RESP's success.

Local authorities already struggle to engage with the numerous stakeholder engagement processes that their existing gas and electricity providers operate. For some local authorities they can be dealing with two to four different networks across both fuels. It is the larger tier one local authorities that may typically have the resources to engage with the networks on a routine basis.

Without putting additional measures in place, the RESP risks deepening the resource divide between those local authorities with resource and those without. To build capacity and enable participation across all local authorities we would like the RESP to

- To provide regional support and resources to engage all local authorities, not just the larger ones. It will need to provide additional resources, tools and measures to help reduce the gap between well-resourced and under-resourced local authorities.
- To build capacity and enable participation across all local authorities we would like the RESP to provide a regional function and resource that provides dedicated capacity to engage with individual local authorities.

This should be facilitated by a regional RESP team who can explain and translate for each local authority what the RESP means for their area and facilitate local input. Where there is not a LAEP or local heat and energy efficiency strategies (LHEES), the RESP needs to provide additional support and attention to enable local authorities to develop their own plans.

It is also imperative that the process and outputs also provide value to local authorities and community stakeholders. Unless local stakeholders can understand and clearly see the benefits for their own decarbonisation plans, programmes and projects, the ambition to provide place-based and proactively developed regional plans, will be far more difficult to achieve.

For local authorities and other community stakeholders to see demonstrable benefit and value, RESP needs to reduce the potential duplication of effort on their part i.e. engaging with the gas networks, electricity networks, regional net zero hubs and the RESP. Ideally the RESP should build on existing relationships and increase engagement between network companies and local authorities.

Has anything in this draft IA changed your views/response to our July 2024 RESP policy framework consultation? If so, please explain what part of your response/view has changed and the reasons why. Please provide as much detail as possible

No.

We maintain that the RESP is also likely to unlock significant benefits for consumers by facilitating a low-cost transition to a smart, flexible energy system, ensuring the network can support the growth in demand due to the uptake of electric vehicles (EVs) and heat pumps.

However, since our response the devolution white paper has proposed the creation of strategic authorities across England which may have a role in RESP i.e. as a Tier 1 authorities. It is not yet clear how devolution will affect local authorities' roles and responsibilities. We would be concerned if with the creation of strategic authorities, local authorities were no longer involved in RESP at all.

Do you agree that we have, to a reasonable extent, identified and understood all the potential costs of implementing the RESP?

The consultation appears to identify the costs of running RESP but does not appear to account for the costs of local authorities in engaging with the process. Whilst we agree that some of these costs already exist and there may be additional cost savings due to synergies (for example simplifying or in some cases removing the need for local authorities to pay for Local Area Energy Plans) nevertheless the RESP process will likely involve further work on the part of local authorities. Your consultation anticipates “a high level of stakeholder engagement” with key stakeholders including local authorities and other local actors.

Unless local authorities understand the benefits they may derive from RESP and are sufficiently resourced to respond, they may not engage with the process.

Have we, as accurately as possible, identified and understood all the potential benefits of implementing the RESP?

In our view the consultation takes a conservative view of the potential benefits likely to be delivered by RESP. We agree that the risk of under investment and hindering net zero ambitions is greater than the risk of over investment and RESP is a key enabler in enabling growth and decarbonisation ambitions across Great Britain.

Are there any unintended consequences of implementing RESP that we have not identified?

In our earlier consultation response, we commented on the need for clarity on decarbonising heat and the future role of gas networks and hydrogen:

The RESP needs to be proactive not reactive in enabling net zero. There needs to be complete transparency on the need to phase out fossil fuels (including gas heating) and far more clarity on the likely scale and cost of decommissioning the regional gas networks at different points in time. This is key to the RESP's enabling effective whole system energy planning in the short term – not just the longer term.

This uncertainty is also referenced in your current consultation. Without clarity and certainty on the role of gas networks and hydrogen in home heating, it will be very difficult to produce RESPs which will have usable results. RESPs which come to assumptions about the future role of gas networks or hydrogen in heating which are then proven to be incorrect, will be likely to predict infrastructure investment needs incorrectly.