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8<sup>th</sup> October 2024

To whom it may concern:

## Midlands Connect response to the RESP consultation

Thank you for the opportunity to contribute to the consultation on the development of the Regional Energy Strategic Plans.

As you may know, Midlands Connect is the Sub-national Transport Body (STB) for the Midlands. In this role we gather evidence, bring together partners from across the region and advise Government on key priorities for strategic transport investment, outlining the feasibility of schemes and the underlying rationale for improvements.

At a time where the transport sector is trying to accelerate its commitment to NetZero, it would be crucial for any future emerging transport infrastructure strategies to be integrally linked to any future energy infrastructure proposals and therefore it is vital that we identify and move forward on the opportunities to align our respective strategic planning and evidence.

A clear example of this can be found in our current **Wider Integrated Solutions for Energy Road and Rail** (WISERR) initiative. Midlands Connect has been working with the East Midlands Freeport on project WISERR - aimed at ensuring the right strategic road and rail infrastructure is in place to unlock private sector investment in and around the freeport and strengthening our connectivity from the Freeport (as the only inland UK freeport) to the rest of the Midlands and indeed to other UK international gateways.

In doing we are working closely together with key businesses like Uniper, Toyota, SEGRO and East Midlands Airport to deliver the right conditions for accelerating low carbon energy investments in the area particularly around the freight and logistics sectors. This could include the delivery of sustainable onsite energy generation and a centre for innovation, bringing together industry and academia to help identify and develop the technologies, solutions and skills needed to help meet the UK's Net Zero commitment.

Therefore, our interest in the RESP is to ensure:

- There is alignment between our pan regional approach for transport and any other strategic infrastructure options considered by the RESP.

- We work alongside Midlands Engine and other Midlands' stakeholders including the RESP and NESO to strengthen and accelerate the UK's approach to delivering energy security and Government's clean energy mission<sup>1</sup>.
- Our joined-up approach delivers much needed private sector confidence for investment in infrastructure, not just for the energy but for wider economic growth.
- We work with the RESP to share the Midlands Connect experience of working at a pan regional level to deliver a strategic vision.

Our recommendations, set out in the consultation below, are:

- Collaboration with Sub-national transport bodies such as Midlands Connect should be included within the principles guiding the development of the RESP.
- Explore the opportunity for developing a vision led approach (rather than predict and provide) which follows the model that many in transport are aiming to use.
- The need for cooperation and collaboration across sectors and regions to develop a long-term vision and pathway options which are based upon shared assumptions and evidence bases.
- Data and analytical architecture. The RESP provides the opportunity for a number of infrastructure sectors to work together and develop an analytical framework and basis for sharing evidence, and therefore an agreed starting point for strategic planning.

Importantly, our response proposes that STBs should be represented in the proposed RESP Strategic Board particularly considering our existing pan-regional strategic planning function including our mandate from Government to prioritise and drive forward the strategic transport needs of the region.

## About Midlands Connect

Midlands Connect is the Sub-national Transport Body (STB) for the Midlands. Established in 2014 our voluntary partnership stretches from Lincolnshire in the East to Shropshire in the West. Funded by the Department for Transport, we have a mandate from Government to plan for and advise on the strategic transport connectivity needs of the people living, working in, and visiting the Midlands, across our road and rail transport networks.

Our [Strategic Transport Plan](#) for the Midlands was revised in 2021 and sets out the transport corridors upon which our work is currently based and where we expect growth. It sets out the road and rail priorities on these corridors which will support growth and connectivity, as well as the importance of focusing on the transport needs of freight and rural areas, and the use of technology to identify appropriate solutions.

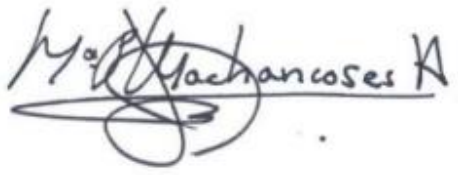
The transport priorities for the Midlands are based on the development of rigorous evidence bases to demonstrate the strategic and economic cases for investment. Priorities are agreed by working closely with our partners and government to deliver consensus at a pan regional level as to those which will deliver the greatest benefit for the region.

As we undertake this work, we seek to address the key challenges set out in our Strategic Transport Plan of Fairer, Greener, Stronger, challenges which we are sure will align with the future vision for the RESP.

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<sup>1</sup> This will approach will be set out further in the Midlands Engine Energy Security White paper, due for publication later this year.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Maria Machancoses'. The signature is stylized with a large, circular flourish at the end.

Maria Machancoses  
Chief Executive

## OUR RESPONSE TO THE CONSULTATION

### **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.**

The consultation sets out the following principles to guide the approach and methodology of the development of the RESP: place-based (so energy is integrated into wider spatial planning and responds to needs of different areas), to address the whole system (not just the energy mix but also key users of energy), vision led (working towards a clear long-term objective) and proactive (to support the development of the energy system and investment in the network infrastructure).

We agree that these are appropriate principles to guide the development of the RESP. The principle of place-based in particular is critical to understanding the energy needs of an area, and from a transport perspective it is vital to understand that the nature of how energy is used may be significantly different to other sectors. For example, we need to be able to account within the different RESP plans for the energy requirements for those journeys that go 'through' places. We also need to understand that transport solutions such as rail or charging hubs (particularly for freight and logistics) may be more significant in one region but reduce the emissions for another RESP.

However, given the significance of the demand there will be for energy in the future and the transformation that needs to take place to the country's infrastructure to meet this we think that embracing collaborative and innovative ways of working is a principle which will support delivery of the RESP and vision. Collaboration across those who are planning for infrastructure provision, particularly in the area of data and evidence frameworks is a key theme which we return to throughout our responses below. These approaches will support the speed of change which is required and efficiency (both cost and time) of delivery and should guard against using traditional and siloed approaches to planning.

### **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.**

A long-term regional vision will be an essential part of the RESP. This is not only about setting the ultimate goal, net zero by 2050, but also agreeing the wider vision for how energy will be managed and bringing together key regional stakeholders to deliver this vision.

Midlands Connect is currently in the early stages of the development of our next Integrated Transport Strategy, central to which is building the evidence base to support our vision for transport over the coming decades. This is based not only on an understanding of how the key transport modes of road and rail will develop, but also the impact of technology and projected economic growth across the region and an understanding of how we will live as a society and the outcomes we will seek in the coming years. As transport is a derived demand gaining an understanding of these factors helps us to model the transport infrastructure that will be needed. In developing this strategy, we aim to work towards a vision led approach to the development of transport, to deliver a sustainable transport system that can balance the need for economic growth alongside transitioning to net zero and providing fair and equitable access to transport infrastructure for all. This is a move away from a predict and provide model that assumes transport infrastructure will be able to

expand to meet unrestricted growth and demand. We assume there are similar strategic decisions to be made in developing the energy infrastructure and the extent to which a sustainable level of supply can be delivered, not simply continuing to expand to meet growing demand.

Given the overlaps in infrastructure between energy and transport, as well as other sectors, it would be interesting to explore in greater detail how the long-term vision is being developed and the extent to which we are approaching the development of the vision in complementary ways. In our view to fully understand the energy infrastructure and the vision for its delivery we also need to draw upon wider thinking about what our society will look like in the coming decades.

The consultation also notes the importance of cross-boundary cooperation, this will be important to ensure regions are working towards comparable visions and minimising duplication of effort on areas which are of mutual concern. This is the model which STBs follow.

We agree that a number of shorter-term directive pathways will be important to account for the significant uncertainty that currently exists, particularly in terms of the overall energy mix that will be required, the pace of technological innovation and the speed at which the network can transition to green energy. However, whilst we recognise that a certain number of pathways will be required to respond to key uncertainties for the sector, we would caution against too many pathways and the potential for causing confusion.

Our modelling for the future of the transport network takes a similar approach, delivering a business-as-usual pathway and a preferred way forward. To develop a preferred way forward we have both built an updated evidence base with the latest available data and a set of assumptions to guide us in areas of uncertainty. These cover a range of areas from transport specific assumptions such as vehicle mileage and the impact of technology on how transport is managed, to wider assumptions about the type of economy we are seeking to build and the outcomes that people want for their lives. All of which impact on how people travel and therefore on energy needs.

We would also want to see the development of the pathways taking place alongside other infrastructure sectors, so it incorporates the assumptions being made by those sectors which are reliant on energy. For example, from the transport sector there should be agreements on elements such as use of vehicles, vehicle kilometres and the speed of transition to EVs. This will be essential to delivering a joined up and vision led approach.

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

Given the pace of change which is required in the energy sector and the energy challenge which we are facing it will be vital to monitor and have access to live data.

We agree that updating the RESP every three years is a sensible and realistic approach, and in principle an annual data refresh allows for an up-to-date evidence base. However, it would also be helpful to regularly monitor the available evidence against the long-term outcomes which are being sought to understand how the trajectory is shifting and maintain the ability to respond to significant changes in trends, or breakthroughs in technology which will have an impact and need incorporating sooner than an annual or three-year update.

We would also like to explore working with the RESP to develop a common analytical framework so those with responsibility for planning for the region's future infrastructure are working from the same evidence base. Not only does this allow for more effective planning but allows us to deliver efficiencies in our budgets.

In our view to deliver the collaboration which is required all RESPs need to be drawing from a single source, a Great Britain level evidence base, with each region reporting from this. This should also ideally have the option of integrating evidence and assumptions from other key infrastructure sectors such as transport.

**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.**

The consultation sets out three areas where the RESP has a role in identification of system need. These are profiles for *low carbon technology*, *consumer behaviour profiles* and *profiles for growth in flexibility provision*.

We agree that the RESP should take the lead in developing profiles for growth in flexibility provision – an understanding of this is central to the development of a strategic plan for the region and delivering the right supply of energy.

In terms of consumer behaviour profiles and low carbon technology it would be helpful to understand if the RESP has considered whether any other stakeholders have undertaken similar work. As we have highlighted previously, cooperation across different infrastructure providers will be essential and in areas such as development of technology and consumer behaviour profiles this cannot be done simply from an energy perspective. Energy is a derived demand, and we need to look elsewhere to therefore understand what the actual demand is. We would therefore like to see this work drawing on other intelligence to ensure we are minimising the chances of duplication.

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

Yes. As an STB that works in partnership across the Midlands region, we understand the importance of delivering consensus and therefore support the RESP taking a coordinating role, especially noting the current lack of formal and transparent processes for coordination and accountability across the energy sector. However, we would suggest considering how far this role goes and potentially setting criteria for where the RESP will become involved. Is this about resolving inconsistencies at a strategic level, where it could lead to significant costs, duplication or delays to the delivery of the pathway or vision.

We also agree that this should be a whole system role identifying the gaps and inconsistencies between network company plans and opportunities for resolving these.

Without a coordinating role the opportunity for delay, duplication and inefficiencies in delivering strategic plans exists.

**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?**

The RESP sets out three building blocks: modelling supply and demand, identifying system need and technical coordination.

Beyond delivering the strategic vision for the Midlands, the three building blocks as set out in the consultation are appropriate and central to developing the energy infrastructure that the Midlands and UK requires.

*Modelling supply and demand.* It is important that the modelling balances the importance of delivering green energy with the need to allow technology to come to the fore. We should not hold back technology innovation because the infrastructure to provide a fully green energy supply is not yet in place. This role needs to recognise that there are trade-offs between the two and to identify the pathway that delivers the most effective transition.

*Identifying system need.* Understanding the energy needs is central to modelling supply and demand and as the consultation sets out has to draw upon consistent assumptions and understanding spatial context.

Whilst we agree that a central hub can support the development of key assumptions, we would expect that these will need to be adapted to meet regional needs and should draw upon relevant stakeholder expertise. For example, we know that the Midlands is an energy hungry region with a large manufacturing base and could therefore have significantly different system needs to other regions. We also know that there are strategic decisions to be made about how goods and people move sustainably and effectively – and the ability to provide energy for transport and the location of this a key part of the planning process.

*Technical coordination.* As set out above we agree that technical coordination, resolving gaps and inconsistencies within network companies' plans is an appropriate role.

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

Yes, as a framework of standard data sources, the proposals set out by the consultation seem appropriate. We would note that under other sources it would be appropriate to give specific reference to pan regional bodies (such as STBS) who have spent considerable time building up analytical frameworks that we expect will inform the RESP's development.

It may also be useful to consider whether this framework should just consider the data inputs that are required, or should it also include more qualitative information and intelligence which can equally support the development and monitoring of pathways.

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

We do not have specific proposals for this area at the moment but would expect to work closely as the framework is set up to support this process and share our experience of building an analytical framework for the Midlands. As the consultation notes there are many things which can impact credibility of inputs, and therefore it may be useful to develop a list of trusted sources – for example government sources, industry sources that have been gathered over a period of time.



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

The support for local actors as set out in the consultation seems broadly appropriate as do the principles for engagement of transparency, accountability, representation and coordination.

The framework appears similar to the governance and partnership model followed by Midlands Connect and other STBs, with a view to developing a strategic vision and an evidence base that will support local government energy and spatial planning.

However, it is important to highlight that consideration must be given to the level of capacity and capability that is in place at a local authority level. We know from experience that there is a significant variety in capacity across local authorities and therefore even when tools and training are provided to address the issue of knowledge and expertise, many partners simply lack the people to take on extra work and planning.

This challenge has been further emphasised through our work to establish and support consortiums of Local Transport Authority partners across the region to co-ordinate bid for LEVI funds to enable 14 authorities to work together, deliver scale and EV infrastructure to connect the region. One of the greatest challenges is building the knowledge at a local authority level and more widely the availability of experienced people who can work alongside them to embed these skills which we have a Midlands Centre of Excellence role to bring the region together. In addition, our experience highlights the importance of having a central coordinating role and focal point for communication between local actors to national strategy.

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

The consultation states that the purpose of a Strategic Board is to facilitate transparency, visibility of regional priorities and oversight of the RESP development, as well as being a forum for collaboration, navigating trade-offs and ensuring it reflects regional context. The Board will be supported by working groups for gathering information on place-based views, data and technical feasibility.

We agree with the purpose which is similar to the role of the Midlands Connect Strategic Board. In addition, it may be helpful for members of the Strategic Board to be expected to promote the RESP and its requirements within their own work, regionally and nationally as well to support the purpose of raising the visibility of regional priorities. We also highlighted in Q1 the potential to foster collaboration and innovation as a guiding principle of the RESP. If this is taken on board then it should also be incorporated into the purpose of the board as this is about encouraging different ways of working and facilitating engagement across sectors.

Whilst we recognise that the final decision on the content of the RESP will lie with NESO, we consider that it will be helpful for the Strategic Board to have a clear role in formally recommending their regional RESP.



**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?**

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**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 that it is important for the Strategic Board to include representation from democratic actors, network companies and wider cross-sector actors in each region. Without this the Strategic Board will not have a recognised remit to set priorities for the Midlands region.

We appreciate the challenge to try and balance the right level of representation versus those who have an interest in the development of the regional energy infrastructure. One option in deciding who the wider cross-sector actors should be is to set criteria such as:

- Incorporating specific expertise or knowledge that is missing from the other two groups, for example subject matter experts.
- Bringing in groups where they also have a democratic mandate to speak or act as a representative for their sector or region.

As pan regional bodies who are also representative of democratic actors as well as businesses (through Chambers of Commerce and the regions airports) we consider that STBs are well-placed to support the work of the RESP. Our combined knowledge of the regions, established partnerships and recognised role to plan for the strategic needs of the transport infrastructure (a key driver of energy demand) means that the success of the RESPs is integral to the success of our own work. We are happy to share the experience of Midlands Connect of working with partners to deliver a pan regional remit.

Midlands Connect has also been working with Midlands Engine to develop an Energy Security White paper, due for publication later this year, and which sets out the intention for a new regional partnership, with Government and its agencies, to strengthen and accelerate the UK's approach to delivering energy security and Government's clean energy mission through a series of short, medium and long-term actions to deliver the required impact.

**Q13. Do agree with the adaptations proposed for Option 1? Please provide your reasoning. Do we see any challenges with it?**

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

We are happy to support the proposals for an East and West Midlands region and recognise the logic of aligning these with ONS regional definitions, as long as the evidence for both regions is drawn from the same overall Great Britain evidence base (as set out in Q3). If the evidence base for the East and West Midlands is developed separately because of the development of two RESPs this becomes challenging for those who are developing infrastructure at a pan regional geography.

For further information on this response please contact Alexandra Dodds, Policy Lead, [alexandradodds@midlandsconnect.uk](mailto:alexandradodds@midlandsconnect.uk)