

Regional Energy Strategic Plan (RESP) Consultation

York and North Yorkshire Combined Authority Response

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

We broadly agree with the principles outlined for guiding NESO's approach to developing the RESP methodology, particularly the emphasis on a place-based approach. However, we believe that this approach should ensure cross-border collaboration within regions to prevent missed opportunities. This consideration should extend beyond energy provision to take into account economic and social factors, especially for rural areas that often look outside of North Yorkshire to nearby urban centres.

We are also supportive of the principle of adopting a whole-system perspective and a proactive approach, as this will avoid duplicating efforts and resources to solve similar challenges, while supporting our businesses, communities and wider stakeholders to get to net zero. We suggest that there needs to be a strong integration of existing local evidence and policies, such as Local Area Energy Plans and net zero strategies as a starting point for proposing new research or strategies.

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

We agree that incorporating a long-term regional vision, alongside a series of short-term and long-term directive net zero pathways, is a sensible and effective approach. This strategy could allow businesses, communities, and stakeholders to plan confidently for the future while ensuring that the region stays on course towards its net zero targets. The inclusion of short-term pathways is particularly valuable, provided they are regularly reviewed to accommodate evolving policies, new technologies, and changing market conditions. This iterative review process will help maintain relevance and agility in the face of rapid advancements in the energy sector.

Regarding the long-term regional vision, it is important to ensure that it does not duplicate existing local work, such as Local Area Energy Plans (LAEPs) or regional net zero strategies. Many regions, including ours, have already undertaken substantial efforts to coordinate and engage local actors, and this existing groundwork should be leveraged rather than replicated. Clear coordination between the RESP and local strategies will enhance efficiency and avoid unnecessary overlap.

In terms of the net zero pathways, we would welcome further clarity on how these differ from the work already undertaken in developing LAEPs or initiatives like the Routemap to Carbon

Negative for York and North Yorkshire. Understanding how these pathways will build on, rather than repeat, previous efforts will be crucial for ensuring their added value. Additionally, it would be helpful to define what is meant by 'short-term' and 'long-term' in practical terms, as these timelines can vary significantly depending on the scope and ambition of the targets. Clearly defining these timeframes will be essential for stakeholders in aligning their efforts with both regional and national net zero goals.

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

We agree that an annual data refresh, with a full RESP update every three years, provides a sensible balance between ensuring agility and offering clear investment signals. Keeping the strategy regularly updated is critical to maintaining its relevance, as any misalignment between projected and actual progress could reduce its effectiveness.

A useful addition to this approach could be the creation of a live data dashboard, which would offer stakeholders timely access to key metrics such as low carbon technology installations and network-level data. This would allow for a more dynamic view of progress, beyond the annual refresh, as many stakeholders are already reporting data on an ongoing basis. By integrating this information into a real-time platform, any emerging issues could be identified and addressed sooner, potentially leading to more cost-effective solutions.

Providing this kind of visibility would also help reassure stakeholders that progress towards targets is being tracked continuously, reducing concerns about potential major changes during the full three-year updates. This level of transparency could strengthen confidence in the RESP and support more consistent alignment with the region's long-term net zero goals.

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.

We agree that the development of common and consistent assumptions by a central hub is required to adequately translate the technology growth into projections of how these technologies will contribute to changes of the demand on the network; especially as from a national perspective, the technologies will be available in similar timescales throughout the country. Nonetheless, it is mentioned that the assumptions will have an acceptable range of variation, and we encourage the understanding of local considerations that affect the scale of deployment of technologies in certain regions over others. Therefore, including the place-based approach, even when developing the ranges of variation is suggested, as the technology growth may look different depending on the location. Socioeconomical aspects, funding availability and local priorities will have an impact on those variations and should be integrated into the considerations while developing them. Even within the York and North Yorkshire remit, the technology uptake can look different depending on the communities.

We are supportive of the development and use of geospatial tools to understand the needs of the network for reinforcement or where it has capacity for expansion. We agree that this will help improving planning and investment; and if developed with the considerations of the Local Area Energy Plans (LAEPs) and other local sources of information already in place, then it could be relevant for the wider strategy setting of local authority partners.

We consider that the use of RESP for an identification of strategic investments is valuable as long as there is clear communication to integrate the information generated through the LAEPs to ensure that the work developed in this area is not ignored, and that there is coherence and alignment with our proposed strategies and plans.

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

We agree that a technical coordination role is required to facilitate coherence and coordination among various regional stakeholders, including network companies and local decision makers. We welcome this support, as it will encourage further dialogue between stakeholders, leading to greater integration and efficiency within the regions. This approach will also support the aim of stronger ownership and accountability while shaping the regional direction through the development of more integrated systems.

The collaboration between parties can help take advantage of local opportunities, such as making better investment decisions that may not have been evaluated or considered without a whole-system approach. We believe that the establishment of NESO as the technical coordinator will be key for solving any inconsistencies that arise between the different aims, visions and strategies of stakeholders. Through regional dialogue more transparency will be obtained, and the development of local strategies will be more impactful as it will be aligned with the national picture through the integration of a wider range of stakeholders. Nonetheless, it will be important to clarify the levels of accountability that will be expected from each stakeholder; a framework that allows for flexibility in terms of targets and strategies for all stakeholders is preferred. As the energy system continues to evolve, it is essential that local authorities and network operators are able to modify their plans accordingly. Without such flexibility, stakeholders may choose to have less involvement, or additional barriers could emerge as partners try to meet outdated plans that no longer align with regional needs.

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?

We agree that the three building blocks align with the overall vision. These elements offer a comprehensive framework that can balance local nuances with national energy system planning, creating a cohesive approach to the regional transition to net zero.

It would be useful to understand how granular these building blocks will go in practice. For instance, will the resulting pathways be high-level or tailored to specific local areas? The extent to which the RESP can address local challenges will influence its overall effectiveness.

We also suggest the inclusion of an additional building block focused on spatial and regional variations. This could help capture the unique challenges and opportunities within different regions more effectively. Top-down approaches sometimes overlook critical local factors, such as community interests, local political contexts, or specific land use designations. For example, in a recent project, important MoD training areas were not identified, which impacted planning. A spatial building block could ensure these local differences are considered, leading to more efficient and realistic outcomes.

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

We support the framework of standard data inputs for the RESP, as it provides a balanced approach that combines national direction with local insights. The integration of top-down inputs, such as net zero targets and Future Energy Scenarios, with bottom-up local data ensures consistency across regions while still allowing for flexibility to reflect local data.

We believe that combining national policy targets with local government data will help create a clearer and more robust strategy for meeting regional energy needs. It is particularly important that CSNP and SSEP stipulated assumptions are used as part of the top-down strategy -except where they can be demonstrably proven incompatible with a specific local concern-, since this can reduce the risk of poorly chosen assumptions leading to inconsistencies or creating counterfactual narratives.

At the same time, where national inputs may conflict with local concerns, there needs to be a clear process for addressing these issues. Ensuring transparency in how both national and local data are integrated into the RESP will improve confidence among stakeholders and support the development of greater collaboration between regional and national bodies.

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

We consider that for assessing the credibility of inputs to the RESP, new, highly precise and measured data should be preferred as the gold standard. One primary consideration should be the age of the data, including both the dataset itself and the assumptions underlying it, particularly when modelled rather than direct data is used. We suggest that recent data should generally be preferred, as older datasets may no longer reflect current realities, especially in such a rapidly evolving sector. Where modelled data is used, the assumptions behind the models must be aligned with current standards, such as those in the CSNP.

In relation to inputs, such as Local Area Energy Plans or strategic net zero / climate change plans, it should be considered whether sufficient stakeholder engagement have been undertaken to guide the development of the plans, alongside ensuring they are based on a robust evidence base.

Data gaps are another important consideration. For us, inputs with significant missing information may have lower credibility, especially if they rely heavily on assumptions to fill those gaps. We support the idea of where assumptions are necessary, they should be transparent and based on robust methodologies to ensure confidence in the overall pathway. Datasets that reflect real-world interactions, where possible, should also be preferred, as they give a more accurate picture of system behaviour and can help avoid over-reliance on theoretical models. We consider that while recent, raw data is often more reliable, older or modelled data can still hold credibility if supported by other, more current datasets at a broader level of aggregation. For example, if older data aligns with newer national inputs or regional trends, its credibility could increase. This approach could ensure that all inputs are rigorously assessed, providing confidence in the pathways without the risk of overbuilding or unnecessary costs.

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

The framework for local actor support seems appropriate to facilitate a coordinated and strategic approach to energy planning. However, it needs to be acknowledged that local areas need funding to create and update effective local energy plans, whether this is through the framework, or another means. In York and North Yorkshire, we have suite of 4 integrated Local Area Energy Plans (LAEPs). Without additional funding or CA being mandated by central government to have a local energy planning function, there is a risk that these LAEPs will soon be out of date, and not appropriate to feed into the development of the RESP. Without funding and clear roles and responsibilities set out across key actors, there is a critical risk that some places will be left behind and there will be different quality standards for the various RESPs. Current capacity within CA and LAs also need to be considered to ensure that there is meaningful engagement, utilising existing working groups where appropriate. Combined

Authorities have a key role to play in coordinating input from Local Authorities within their geographic boundaries.

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

Overall, we agree with the purpose set out for the Strategic Board. It is evident that the role of the Strategic Board is critically important, and as such, it should be ensured that board members have both the capacity and capabilities to carry out the roles to the level required. As such, there needs to be policy flow through to the funding and statutory responsibilities of Combined Authorities i.e., to provide representation on the RESP Strategic Board and establish associated working groups/ forum to provide sufficient place-based evidence and data.

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?

We support the proposal for Combined Authorities to be represented and for them to represent the views of unitary authorities within their geographic area. It should be considered how the Strategic Boards can link to the Net Zero Hub Boards governance structures – for example, priorities through the RESP could be used by the Net Zero Hubs to prioritise development of specific energy projects.

There should be clear guidance on associated groups / forums that should be established to feed into the Strategic Boards to ensure consistency.

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

As above, we agree with the proposal for Combined Authorities to be represented on the Strategic Boards. Representatives will need to have significant energy expertise, strategic thinking skills and understanding of the local economy, as well as provide an appropriate level of seniority.

It is suggested that key utilities, such as water companies, have representation on the board. Whilst wider stakeholders feed in their input through working groups / forums.

We agree with the proposed embedded model that integrates technical actors and democratic actors into a single board. However, it should be recognised that the Board has a strategic remit, and that technical work will need to be undertake outside of the Board.

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

Yes, we agree with the proposed adaptations for Option 1. Being part of the combined North East and Yorkshire & Humber region will allow the York and North Yorkshire Combined Authority to collaborate more effectively with areas that face similar energy challenges, infrastructure needs, and economic priorities. This alignment allows us to build on existing partnerships and pursue shared energy initiatives more efficiently.

The strategic coordination with the North East could support the advancement of regional energy projects that are relevant across the region, offering opportunities for joint planning and infrastructure development. The East-West divide along the Pennines also ensures that York and North Yorkshire's unique needs are better represented. With the North West being more densely populated and industrialised (such as Greater Manchester), this separation allows our region to focus on the distinct characteristics and requirements of our energy landscape.

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

Yes, we agree that option 1 is a better solution than option 2. While option 2 could provide more focused representation, and greater regional specificity; we believe that option 1 supports the potential of stronger cross-regional collaboration with the North East. By sharing a region under this model, we see clear benefits for energy projects, as it could allow for wider discussions and the potential of strategic planning of larger-scale projects. This, in turn, could further support economic development and accelerate progress towards achieving net zero targets more effectively. Therefore, as long as strong governance is in place to ensure that our representation is robust and that the regional vision is aligned with our needs, we believe Option 1 provides greater advantages compared to a more regionally isolated approach.

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).

We have no comments regarding this question.