

We are pleased to submit our response to this important consultation.



Chris Deaves, Chair Zero Carbon Shropshire. 8th Oct 2024

We have a major concern regarding the approach implied in this consultation document. (Regional Energy Strategic Plan policy framework consultation, 30th July 2024)

We believe that this is best expressed under the response to consultation Q.9

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

The RESP process is clearly an attempt to improve the planning process for regional energy provision. This is evidenced by various parts of the early text, for instance:

“In this publication Ofgem is detailing the function, governance and boundaries for RESPs which will improve local energy planning and speed up the transition to net zero by enabling planners to create a clear roadmap for how local energy systems need to develop to reach net zero. The RESPs will work in tandem with organisations at a local level, such as local government, gas and electricity networks and heat network developers, to ensure there is a common objective for each region, improving Consultation – Regional Energy Strategic Plan policy framework 4 understanding of what infrastructure is needed to achieve net zero prospects and send a strong signal to investors.”

We agree with this broad objective.

However, we are very concerned that an opportunity is being missed regarding the strength of the linkage with national planning policy as expressed, for instance, in the National Planning Policy Framework (NPPF), which is, itself, undergoing consultation and revision.

We refer to:

2.17 The introduction of the RESPs will reform the governance arrangements at a regional level by providing appropriate accountability and coordination to strategic energy system planning. However, interactions with the wider planning landscape, including price control arrangements, local planning and national transmission level planning will be vital to its success.

We agree with this assertion and

Interaction with local planning

2.22 The RESP will function at the nexus of local spatial planning and energy network planning and provide a crucial source of information in a region, indicating the challenges and opportunities to better enable the transition to net zero. In developing RESPs, NESO will need to engage with local and devolved governments and gather data from local planning bodies. Our expectation is for the RESP to be utilised by those undertaking spatial and local energy planning and by wider actors (eg sub-national transport bodies or housing developers). There will be no requirements on local government to follow the direction of the RESP, but we would expect there to be a strong incentive to, as outcomes will be better aligned across energy system and spatial planning.

This policy position is far too weak in respect of the NPPF. Whilst ‘expecting a strong incentive’ may seem reasonable, our experience of the local planning process, both for specific renewable energy planning applications and in the development of the relevant Local Plan, is that the only determinant of outcome is the fine legal interpretation (and precedents) for a particular decision, with some reference to the NPPF guidelines, which are often badly out of date in this area. Indeed, on one occasion the planning Inspector hearing the appeal was unaware that, and expressed surprise, at the absence of any real linkage of Ofgem energy policy activity and the NPPF.

We believe that, given the state of flux of both planning policy and energy planning in the UK at present, the opportunity should be taken to significantly strengthen the role of the RESP documents as a mandatory input to both the planning process and preparation of Local Plans by a Planning Authority:

a) by a requirement in Chapter 2 8 c) (2. Achieving sustainable development) to require reference to an RESP,

b) the mandatory reference to a RESP should be part of the test of ‘soundness’ of all Local Plans and required in section 35 a) of the NPPF and

c) that Planning Authorities should be required to retrospectively alter their Local Plans and other similar policy documents to incorporate b) above with two years. We realise that this is unusual, but Local Plans are recognised as evolving documents and there is a clear need for urgency, otherwise the 2030 deadline for many national policies will have passed before Local Plans are revised in the ordinary way.

We fully understand that this is outside the 'immediate' scope of this consultation, but suggest that Ofgem should conduct a dialogue with the Dept. for Housing, local and community as part of a wider policy consideration of RESPs. This would result in a more coherent national policy, better energy planning decisions and clearer signals to developers as well as energy operators. It is a chance to remove a serious 'silo' barrier from this process.

END