Consultation response from: Energy Strategy working group of the [Staffordshire and Stoke-on-Trent Climate Commission](https://staffordshireclimate.com/#:~:text=The%20vision%20of%20the%20Climate%20Commission%20is%20to)

To: [Regional Energy Strategic Plan policy framework consultation](https://www.ofgem.gov.uk/consultation/regional-energy-strategic-plan-policy-framework-consultation#:~:text=This%20consultation%20sets%20out%20our%20proposed%20policy%20framework)

Date: 8 October 2024

Authors:

Laura Rhodes, Head of Net Zero Delivery & Sustainability, Keele University. Email: l.j.rhodes@keele.ac.uk

Mark Johnson, Journalist and District Councillor for Leek North Ward, Staffordshire Moorlands District Council. E-mail: mrkjohnson289@gmail.com

Mike Kinghan, Director, Board Member, Staffordshire Community Energy

E-mail: mike.kinghan1@gmail.com

Judith Smith, Director, Sustainabilitysmith Ltd. E-mail: action@sustainabilitysmith.co.uk

Consultation Response

Qu 1. We agree with these principles but feel there needs to be more details about how a place-based approach would be taken - for example how granular this would be, full set of regional characteristics which would be assessed etc. On paragraph 2.22, would be useful to know how other agendas, such as local nature recovery strategies, would be considered within proactive development of the energy system.

Qu 2 & 3. Agreed on both counts.

Qu 4. We agree that consistent, transparent, reliable data, which is open-source/ industry standard, is vital to remove hurdles and to enable valuable whole-system modelling and planning at regional and national levels. We agree that RESP should inform identification of system need, and that providing consistent assumptions, spatial context and technical co-ordination will be crucial for both this and in driving strategic investments. We point to the importance of being able to capture the need for strategic network investment to anticipate the emergence of significant clusters of renewable projects in historically low-activity areas, as has happened in parts of Staffordshire.

Qu 5. As above, however this needs to be thoroughly considered how it would work in practice to enact the culture/ operational/ governance change required.

Qu 6. We agree with these building blocks as the foundational elements to enable coherent strategy and onward action, but the solidity will depend on the detail within!

Qu 7. We agree with the framework of standard data inputs and agree that that efforts should be made to identify all place-specific data inputs which may develop over time, as stated in paragraph 3.45. Where credibility of bottom-inputs is lower, this should not automatically mean they are giving lesser weight or immediately discounted, but instead assessed as to whether more guidance and support can be given in raising the credibility of inputs to the required confidence level.

Qu 8. Other than checking source, date and methodology used to create data, it would be worth establishing processes for verifying aggregated bottom-up data is within tolerance of expectation from relevant top-down data to identify potential anomalies or gaps. We have concerns that there may be significant gaps in the quantum, quality and timeliness of data inputs from areas with traditionally low areas of energy planning and/or a less devolved administrative geography, and wonder how this would be addressed. We advise consideration should be given to how much resource will be needed to create required data inputs and who is responsible; if not a regulatory requirement for LA’s, then this may well not be prioritised

Qu 9. We agree in principle but, as aforementioned, we have concerns that the lack of funding will seriously affect the resource assigned to and therefore quality of output required for effective RESPs. We also point out the importance of establishing the best point of contact within a local authority:  particularly at the lower tier of authority, engagement with the network may have been minimal and from a variety of named posts; as far as is possible, RESP managers must be alive to any internal changes in LA responsibilities, and generically to the increased role Planning Departments will play if the proposed changes to the NPPF and renewable energy are effected.

Qu 10. We agree with the purpose of the Strategic Board.

Qu 11. We agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region and that the embedded model for the Strategic Board is preferable to ensure effective communication and collaboration. The RESP will need to ensure that appropriate region-wide arrangements are in place to ensure that representatives of the different sectors are accountable to the sector as a whole and so can act with proper authority.

Qu 12. We agree that it is challenging to represent all layers of interest in energy planning whilst keeping the direct membership of the Strategic Board as lean as possible, however recommend that Community Energy Group representatives sit on the boards, and that lower tier authority representation is properly considered. We also envisage that working groups have potential to create a strong supporting structure, but this would need to be resourced appropriately.

Qu 13 & 14. As representatives of the Staffordshire and Stoke-on-Trent Climate Commission, we fully agree that the original proposal for one Midlands Connect STB was too large for a single RESP area and support the proposal for a blended STB-ITL1 model.

Q15. No comment.