

Directorate for Planning Growth & Sustainability

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Fiona Campbell

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Local Governance and Flexibility Strategy

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Dear Ms Campbell,

Re: “Regional Energy Strategic Plan policy framework consultation”

Please find below the response from Buckinghamshire Council. A separate response has also been submitted by England’s Economic Heartland (EEH).

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 support the four guiding principles outlined for NESO’s approach in developing the RESP methodology. A place-based strategy that integrates local priorities and characteristics will enhance local engagement and ensure a balanced development between local and national interests. Adopting a whole system approach will identify the most efficient and economically beneficial routes while preventing redundant investments that might occur with a single energy vector model. This could help mitigate overdevelopment and reduce costs associated with network infrastructure in sensitive areas. A vision-led strategy, rooted in regional contexts, will firmly align the place-based approach with local priorities. Mitigating environmental impacts of proposed infrastructure developments is critical. Given the long lag between initiating and delivering new energy infrastructure, a proactive approach is necessary to achieve low carbon energy systems and meet net zero ambitions. This aligns with the new RII0-ED2 strategy allowing investment ahead of need.

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 concur that the RESP should encompass a long-term regional vision, consistent with the vision-led approach stated in Para. 2.8. Incorporating both short-term and long-term net zero directive pathways ensures alignment of immediate actions and investments with the overarching long-term goals. A co-created regional vision will necessitate consensus, whilst the pathways will delineate the required activities. The short-term pathways are particularly relevant for local governments to plan their decarbonisation projects and facilitate resident input through local authority participation in the RESP.

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

In principle, we agree that an annual data refresh and triennial full update are appropriate. However, the consultation document lacks an assessment of costs or resources required for annual updates. Thus, evaluating the costs and time involved during the initial three years from 2026 is essential. Thereafter, assessing efficacy and value for bill payers will be crucial. Adequate resourcing must be provided to public bodies contributing data to ensure consistent quality and region-wide engagement; without this, some areas may be underrepresented, leading to inequitable outcomes.

4. Do you agree the RESP should inform the identification of system needs in the three areas proposed? Please provide your reasoning, referring to each area in turn.

Yes, RESP should indeed inform the identification of system needs in the three proposed areas. Local authorities already contribute to low carbon technology profiles through the Distribution Future Energy Scenarios (DFES) exercises, and extending this to profile translation into network demand is logical. Consistent assumptions across regions enhance comparability, aggregation, and reliability, informed by emerging data such as UKPN's Neighbourhood Green project findings. This consistency is vital for areas like Buckinghamshire, where three DSOs operate. Understanding regional consumer behaviour changes is crucial, and accounting for flexibility provision growth profiles predicated on DNO-provided consumer uptake data is supported. Additionally, providing a spatial view of demand projections relative to existing network conditions is invaluable for understanding local constraints and preferences. This spatial context allows meaningful local authority involvement in strategic planning and energy infrastructure investment alignment.

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

We agree that it would be prudent to have a mechanism supporting the resolution of inconsistencies between the RESP and network company plans, though further methodological development is needed.

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?

The proposed building blocks represent a solid foundation for the RESP. However, discrepancies exist between regions that have completed detailed net zero pathway analyses and those that have not, potentially leading to uneven stakeholder engagement and extensive reliance on network companies for data. Until a mandated and uniformly applied local energy planning mechanism (such as LAEPs) is established, significant variation in RESP output effectiveness by locality will persist. Reflecting on actual vs. projected supply/demand trends could pinpoint lagging areas and inform targeted interventions.

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

We broadly agree with the framework but are concerned about disparities in input quality between regions with comprehensive LAEP/LHEES analyses and those without, potentially creating a two-tier scenario whereby less-prepared areas fall behind.

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

The suggestions from England's Economic Heartland cover the assessment criteria comprehensively. Rolling out LAEP consistently and establishing guidelines would aid comparability and integration into the RESP framework.

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

While the framework for local actor support is appropriate, it doesn't address disparate levels of capability and resources amongst local authorities in England. Providing best practices and tools is insufficient for under-resourced authorities. Alignment between Ofgem's regulatory approach and the central government's stance that neither mandates nor funds LAEPs is imperative for success.

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

We generally agree with the Strategic Board's purpose, although sign-off responsibility outside Ofgem's jurisdiction may not be ideal. Without funded mechanisms for LAEPs, there's potential discord if RESP plans diverge from local authority goals. Coordination between regulated and democratic entities is essential.

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?

Agreed. We endorse the embedded model over the multi-stage model. Including network companies is crucial for both informing and influencing RESP outputs. Strategic Board discussions must remain accessible and informative through clear terminology. Education and support roles are vital for robust collaboration among all participants.

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

Participation from local government should be voluntary, with direct engagement for training on the energy sector. Each participant should have an institutional slot fulfilled as appropriate. Only directly affected bodies or actors should be represented to avoid undue influence from unaffected parties.

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

Yes – we have no additional comments beyond those from England’s Economic Heartland response.

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

Yes – no further comments aside from England’s Economic Heartland response.

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)

No response.

Kind regards,



Darran Eggleton

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