**Welsh Local Government Association - The Voice of Welsh Councils**

We are The Welsh Local Government Association (WLGA); a politically led cross party organisation that seeks to give local government a strong voice at a national level. We represent the interests of local government and promote local democracy in Wales.

The 22 councils in Wales are our members and the 3 fire and rescue authorities and 3 national park authorities are associate members.

This response is not confidential.

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**Key Points**

1. Welsh Local Government Association welcomes the proposed approach to a long-term evidence-based strategic plan which aligns with the need for long-term planning to respond to climate crisis. However, we feel the proposals need to include consideration of the implications of having to adapt to present and future climate risks.
2. We broadly support the proposals in the consultation and are pleased to see recognition of the need for place based and regionalised input to energy system planning which we hope can feature as part of multi-sectoral integrated initiatives.
3. We are also pleased with the proposed governance around RESPs and creation of several expert groups which will ensure local and regional priorities are considered and the voice of councils heard.

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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.**

Overall, we agree with the principles and have a couple of specific comments on some of the principles.

***Place-based*:** it is paramount that the RESPs consider local and regional factors especially in light of the work taking place in Wales with the regional and Local Areas Energy Plans as this evidence could inform the RESP. Although it is not the role of RESP or NESO to plan with a view of supporting councils and regions work in this area, the RESP can indirectly help through conscious consideration of local and regional, present and future needs.

***Proactive***: (and also dynamic). The ability to adapt to changing circumstances whether it is demand, net zero policies or climate crisis will be important.

***Evidence based***: It will be essential that the RESP is designed based on the best available evidence

1. **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 RESP should include a long-term regional vision. However, it is important to note that whilst NESO sees Wales as a single region for RESP, we have 4 distinct regions either set up through legislation- Corporate Joint Committees (CJCs) or driven by economic stimulus and funding arrangements (City & Growth deals). The RESP long-term regional vision must therefore consider the governance in Wales and plans created by the CJCs (transport, planning).

There are also a range of national (i.e at Wales level) strategies and plans which will need to be considered when developing the regional vision (which is actually national for Wales) to ensure that RESP support strategic direction set by Welsh Government.

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

Agreed with no specific comments other than ensuring decisions are evidenced based. It is also important to consider how data and reports will interface without creating duplication in data submission requirements.

**For Q4-7 with have no specific comments**

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

This would need to be evidenced using existing sources of data from national, local and regional sources

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

We support the proposal which would be helpful in supporting local plan development to consider energy infrastructure as an important element. However, the support (wrongly) assumes local authority staff and elected members have the capacity to take advantage of this support and develop skills and knowledge to become active participants in developing network plans.

Local government is under enormous pressure at the moment due to ongoing loss of expertise, lack of capacity and budget pressure. WG has had to provide additional resources to support the work of REPs and LAEPs and unless a similar approach is taken, it will be extremely challenging for local government to actively input.

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

We are broadly supportive of the concept of having a national, high-level Strategic Board and its proposed purpose. we are also supportive of representatives of those impacted by network provision into the network plan development process.

1. **Do you agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?**

Yes, we agree that representation should be across democratic actors, network companies and cross-sector actors.

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

Once the requirements of board members are known, WLGA officers can assist by working with our council Leaders to agree appropriate Member and/officer representation.

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

No specific comment. However, it is important to note that the term *adaptation* is commonly used to describe how organisations, services or other are changing their approaches and ways of working in the face of current and future climate impacts. We note the different meaning in this consultation document and how it may lead to confusion with stakeholders.

No specific comments for Q15-16