**RESP Consultation Responses**

**Q1. 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.**

The Kent & Medway Economic Partnership (KMEP) supports the principles guiding the NESO’s approach, especially that a place-based, whole-system, multi-vector approach is required.

KMEP brings together businesses, local authorities (unitary, county and district authorities), universities, and further education colleges, to drive forward economic growth across Kent and Medway.

The supply of energy has frequently been cited by businesses as an inhibitor to growth – Businesses wish to submit planning applications, but, having spoken to UKPN, they come to realise that they will not be able to get a grid connection within their preferred timescale. Another inhibitor to growth for businesses has been their lack of confidence in the future distribution of energy – this has been an acute issue for the transport sector specifically, as businesses weigh up the benefits of electric vehicles or their hydrogen-fuel cell alternatives.

Universities around the KMEP table have also wished to engage in the regional energy discussion – with some having been commissioned to examine what future energy hubs can be set up. An inhibitor to their work has been gaining access to the data and networks of UKPN, and getting access to the network of the key stakeholders employed by the national energy organisations.

Local authorities on a county, district and unitary level, have greatly assisted local businesses and universities with their energy queries, and have supported KMEP with expert knowledge in the energy field. They are central to the energy agenda, and have significant expertise in providing regional strategic services. However, it is clear that the current level of engagement from the network companies with our local authority partners has been less than KMEP would desire.

We know from current UKPN data that there are local areas within Kent and Medway which currently must import in energy from other areas, as demand is outstripping supply. However, we are not sighted on what the situation will look like in future years. Will there be sufficient energy? We are not sure. We know that significant changes are on the horizon (such as the electrification of Roll-on Roll-Off ferries at the Port of Dover – the busiest Roll-On Roll-Off Port in the world), and we are concerned that the infrastructure needs to be invested in now, in order for these plans to be fulfilled in a few years’ time. A Regional Energy Strategic Plan is therefore essential and timely.

Adopting the place-based, whole-system, multi-vector approach – which allows much greater coordination and collaboration between local governments, central government, network companies, and place-based partnerships (such as KMEP) – would be a significantly advantageous step forward in our opinion. Ofgem’s approach that local authorities must play in regional energy planning is much welcomed.

**Q2. 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.**

KMEP agrees that a long-term regional vision is adopted, which is agreed upon collectively by key stakeholders across the region (such as the local authorities). Given the fast-paced nature of technological change, particularly in the energy sector, it feels appropriate that there are short-term pathways, and that these pathways are reviewed, at least every 5 years.

**Q3. Do you agree there should be an annual data refresh with a full RESP update every three years? Please provide your reasoning.**

KMEP agrees that there should be an annual data refresh. Reasons for this include:

* *The rapid change in energy usage.* For example, we have already seen one data centre established in Kent and Medway, and there are other proposals for more data centres to be built, which would dramatically increase the call for electricity in the region.
* *Population growth.* There are numerous garden villages and towns being built or currently going through planning – these include: 5,750 homes at Chilmington Green (Ashford); 2,500 homes at Duchy of Cornwall’s South East Faversham estate (Swale); 15,000 homes at Ebbsfleet Garden City, 5,000 homes at Heathlands (Maidstone); 2,000 homes at Lidsing (Maidstone); 1,300 homes at Invicta Barracks (Maidstone); 8,400 homes at Highsted Park (Swale); 8.500 homes at Otterpool; 4,000 homes at Mountfield Park (Canterbury); 1,600 homes at Winterbourne Fields (Swale); and 2,500 homes at Bobbing (Swale). Further housing developments are expected to meet the Government’s house building targets.
* *The need to ensure that businesses can have confidence that energy will be available*. Businesses need to be confident before they’ll invest in growth plans – whether that be their plans to expand existing facilities, relocate to an area, or innovate and change the way they work by adopting new technology. Insufficient energy supply has resulted in growth plans ceasing in the past. Having data available to view will provide businesses with more certainty, and could help them invest for the future.

We know from Kent County Council that local governments currently face significant challenges in terms of energy planning, one of which being the lack of formalised collaboration, data sharing, and joint work with network operators.

We would echo Kent County Council’s recommendation that all data collected is shared transparently amongst the organisations involved in developing the RESP.

**Q4. 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.**

KMEP agrees that it is important to:

* establish a set of standardised and consistent assumptions that can be used nationally, and that the central hub is the best entity to develop these.
* Set out the spatial view of overall system need in supporting all relevant actors in undertaking coordinated planning. A key priority for the strategic board should be to ensure that there is optimal data sharing and that the tools developed, do not share a relatively static picture of the current situation, but up-to-date data whenever possible. We’d welcome the network operators and others working closely with the local authorities to ensure a good flow of data sharing, whereby both parties can input information to ensure the correct information is displayed.
* Identifying strategic investments should be a key role for the regional energy strategic plans, informed by the strategic board.

**Q5. Do you agree technical coordination should support the resolution of inconsistencies between the RESPs and network company plans? Please provide your reasoning.**

KMEP broadly supports the role for National Energy System Operator with regard to technical co-ordination. However, KMEP echoes the comments of KCC that there is currently a lack of formalised processes for transparently considering whole system benefits and resolving trade-offs across different vectors and this constitutes a risk to effective strategic planning. Improving transparency is essential, and thus those involved in developing the RESPs, county and unitary authorities in particular, should have a formal role in shaping decisions around the integration of RESPs and network plans.

**Q6. 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?**

KMEP supports the three building blocks – modelling supply and demand, identifying system need, and technical coordination – that form the RESP.

**Q7. Do you agree with the framework of standard data inputs for the RESP? Please provide your reasoning.**

As mentioned before, data sharing between local governments and network companies is currently less than KMEP would desire, and this is impacting business growth and investment. The proposal for the National Energy System Operator to facilitate input and engagement from all local actors relevant to energy system planning in a region to ensure decisions can be made with the best available evidence is very much welcomed.

KMEP would want to emphasise once again, the importance of two-way data sharing, with bottom-up inputs being fed into the Regional Energy Strategic Plans.

**Q8. Do you have any suggestions for criteria to assess the credibility of the inputs to the RESP?**

No.

**Q9. Do you agree with the framework for local actor support? Please provide your reasoning.**

KMEP agrees with the proposed framework for local actor support.

Further detail on how the engagement between local actors and network companies would operate in practice, under this new framework, would be useful. A key issue is ensuring that there is a duty to ensure two-way flow of communication (including data-sharing) between the relevant parties.

**Q10. Do you agree with the purpose of the Strategic Board? Please provide your reasoning.**

KMEP broadly supports the purpose of the Strategic Board. We appreciate why it makes sense to have a strategic board for the different regions, that reports into the central hub to ensure some consistency at a national level – however, we would hope to see that central hub would listen closely the regional strategic boards’ recommendations, and that the regional strategic boards will have significant influence in determining the final content of the RESP.

**Q11. Do you agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?**

KMEP warmly welcomes the proposal to have county and unitary authorities on the Strategic Board, but is concerned by the lack of detail on how district authorities and other key stakeholders (particularly from business and transportation) will be able to engage with the strategic board.

District authorities often have close contact with companies wishing to enter the renewable energy market (through the establishment of new solar farms, as an example). Their role should not be underestimated. Furthermore, local partnerships (such as KMEP) and business membership organisations (such as the Chamber of Commerce and FSB) can help to provide the voice of businesses, and identify some of the inhibitors to growth on a local level, that the technical experts on the strategic board could then seek to resolve. Furthermore, there are other key partnerships (such as Transport for the South East) that can be very helpful in setting out the future transport ambitions, and the energy needs that would correspond to those ambitions.

It would be helpful if the composition of the Strategic Board was not prescribed too much from a national perspective, to allow the local areas to decide for themselves which members would best represent their needs.

**Q12. How should actors (democratic, network, cross-sector) be best represented on the board? Please provide your reasoning, referring to each in turn.**

KMEP supports the proposal to have network companies, county and unitary authorities on the regional strategic boards – bringing together the technical and democratic voice. However, we would ask that consideration is given to how district authorities, businesses and transport organisations, alongside environmental groups, could input into the strategic board. Potentially having a sub-group beneath the Strategic Board, incorporating these groups, may be advantageous.

**Q13. Do agree with the adaptations proposed for Option 1? Please provide your reasoning.**

The STB-only model and the Blended STB-ITL1 model for option 1 are identical for the South East region. KMEP has a slight preference for the Blended STB-ITL1 model as the regions are more evenly balanced in terms of population size. Having been part of the largest Local Enterprise Partnership until earlier this year, we have discovered that an imbalance in the size of regional boards can be disadvantageous.

**Q14. Do you agree with our assessment that Option 1 is a better solution than Option 2? Please provide your reasoning.**

Option 1 is a better solution that Option 2 in KMEP’s opinion.

Kent & Medway has established links with the other South East councils through the SE7 grouping, and through Transport for the South East. KMEP has not had prior involvement with our Midlands counterparts. The geography of option 2 – proposing a L-shaped region - does not feel very congruent, as London effectively acts as a physical barrier between two parts of the proposed option 2 region.

**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).**

It is not appropriate for KMEP to comment – We are based in England.