



We thank you for your time spent taking this survey.
Your response has been recorded.

Regional Energy Strategic Plan (RESP) Methodology

Thank you for taking the time to respond to this consultation on the Regional Energy Strategic Plan (RESP) Methodology.

Important: Please submit only one response to this form per organisation. Each text box has a limit of 20,000 characters.

To help you draft your responses, please see the attached and copies of the consultation questions:

[Methodology Questions - PDF](#) [Methodology Questions - Word](#)

However, please note all final responses will only be accepted via this online form. This is to ensure fairness and consistency when we process your response.

To ensure that we process your responses quickly and consistently, **attachments cannot be accepted or submitted via this form.**

Attachments will only be accepted in the format of our PDF consultation question document - if you wish to submit a request, please contact: box.consultations.resp@neso.energy.

If you are not able to submit your response via Qualtrics, please contact box.consultations.resp@neso.energy by 9 January 2025

Responses are saved as you progress through the form, so you don't have to complete all questions at once, and can return later to complete, or edit previous answers before submitting. **Please save the page URL (web address) to be able to do this. However, please note that answers to questions are only saved when you go to the next page of the survey.**

You will be able to download a copy of your responses as a PDF at the end.

This consultation is a step towards producing the final RESP Methodology which will be published in Summer 2026, subject to Ofgem and DESNZ approval.

The RESP Methodology will then be used to produce the first set of full 11 RESPs – one for Scotland, one for Wales and for nine English regions.

These questions are split into 15 sections:

Terminology
Engagement
Local Actor Support
Governance
Nations & Regions Context
Pathways
Consistent Planning Assumptions
Spatial Context
Strategic Investment Need
Technical Coordination
Network Plan Assurance
Societal Considerations
Environmental Approach
Digital and Data
In-Development Register

About you / your group / your organisation (mandatory questions)

1. What is your name?

Esme Yuill

2. What is your email address?

esme.yuill@transporteast.gov.uk

3. What is your role / job title?

Head of External Affairs

4. What is your organisation name?

Transport East

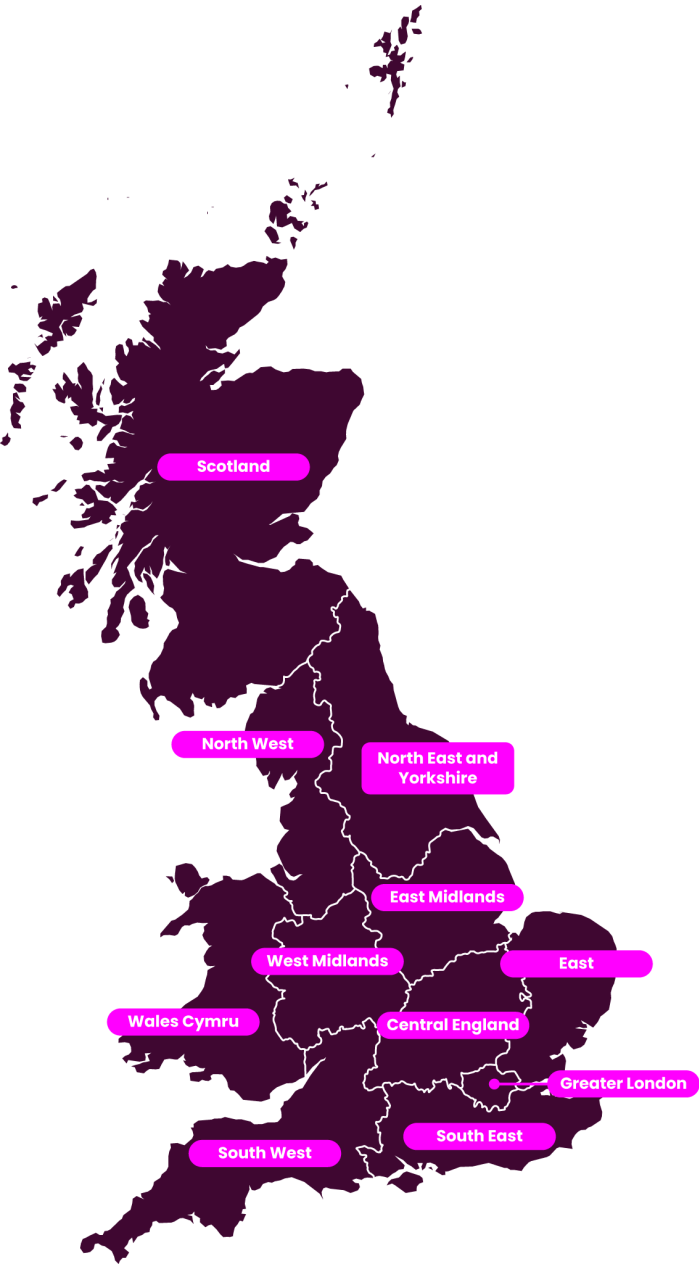
5. Please give a brief overview of your organisation:

Transport East is the Sub-national Transport Body for Norfolk, Suffolk, Essex, Southend-on-Sea and Thurrock. The partnership provides a single voice for our councils, business leaders and partners on our region's transport strategy and strategic transport investment priorities, working in close collaboration with the government and the rest of the UK. This response is the officer view from Transport East and has not gone through Board approval. Also a blank consultation response was previously submitted in error. Please accept this response as the sole response from Transport East.

6. Which category best describes your organisation? (Select all that apply)

- ☐ 1. Householder, community group or representative of a local community, inc. a local campaign group
- ☒ **2. Local authority or a representative of local authorities**
- ☐ 3. Business or a representative of businesses
- ☐ 4. Large energy user – e.g. industrial business, port, airport
- ☐ 5. Housing or commercial developer
- ☐ 6. Non-energy infrastructure provider – e.g. water, telecoms, transport
- ☐ 7. National or GB-level campaign or interest group/organisation
- ☐ 8. Network operator – distribution (electricity Distribution Network Operators (DNOs), Gas Distribution Networks (GDNs), independent Distribution Network Operators (iDNOs), Independent Gas Transporter (IGT) or trade association)
- ☐ 9. Network operator – transmission (TOs, National Gas)
- ☐ 10. Installer, operator or trade association for low carbon technologies e.g. EV chargers, heat pumps, solar, batteries, etc.
- ☐ 11. Manufacturer of energy infrastructure equipment
- ☐ 12. Flexibility provider inc. aggregators
- ☐ 13. Renewable energy or storage project developer and/or operator
- ☐ 14. Hydrogen producer
- ☐ 15. Researcher, innovator, think tank or consultancy
- ☐ Other - please specify:

7. Which Nation or Region are you / your organisation located in, or interested in? (Select all that apply - for reference, a list of Local Authorities by nation / region [is here](#))



- ☐ Scotland
- ☐ Wales
- ☐ Central England
- ☒ East
- ☐ East Midlands
- ☐ Greater London
- ☐ North East and Yorkshire
- ☐ North West
- ☐ South East
- ☐ South West

☐ West Midlands

8. Has your response been approved by your internal governance / approval process, where relevant?

☐ Yes

☒ **No**

9. Following your submission, are you happy to be contacted specifically in relation to this consultation, to further understand your views?

☒ **Yes**

☐ No

10. How would you like us to treat your response?

☐ My response can be published

☒ **My response is confidential - not to be published in an identifiable form**

Terminology

1. Do you agree that in Scotland and Wales the strategic plans outlined in this methodology should be known as the Scotland RESP and Wales RESP respectively?

☐ Strongly agree

☐ Somewhat agree

☒ **Neither agree nor disagree**

☐ Somewhat disagree

☐ Strongly disagree

If not, what alternative should be used?

Engagement

Do you agree with our approach to engagement as we develop the RESPs?

- ☐ Strongly agree
- ☒ **Somewhat agree**
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

Please provide your reasoning?

Broadly agree with the approach to engagement which captures the spectrum of the activity needed to develop appropriate RESPs in line with the Gunning Principles and established good engagement practice. Recommend that at least one full public consultation is undertaken on the final draft RESP and associated documents. Transport East undertook one for the development of the Regional Transport Strategy, so there is likely to be an expectation among regional stakeholders that a similar activity should be undertaken for a similar regional level strategic energy plan. Regional NESO teams will need the appropriate capacity, capability and resourcing to be able to undertake the engagement activity outlined in the RESP Methodology document. Also, different regions have different structures and relationships – particularly in the number and status of Mayoral Combined Authorities and the speed of which they are moving on Local Government Reorganisation. The East especially is in a period of transition. Regional teams will need a level of flexibility to ensure their engagement approaches work for each region.

Local Actor Support

Do you agree with the approach we have outlined on local actor support, and how we have phased the delivery?

- ☐ Strongly agree
- ☒ **Somewhat agree**
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

Please provide your reasoning?

We appreciate the identification of STBs including Transport East within the Local Actor categorisation. We also recognise some of the risks and challenges with engaging with the RESP development. While we see huge benefits to aligning transport and energy regional planning, as a small team our capacity is already constrained. We would welcome early engagement with NESO East on the RESP development plan, data and analytics and aligning regional stakeholders to ensure we can map requirements and understand likely capacity demands on TE, and agree any support through our own governance.

Governance

Do you agree that local authorities should be able to decide whether to send a political representative or officer to the strategic board?

- ☐ Strongly Agree
- ☐ Somewhat Agree
- ☒ **Neither agree nor disagree**
- ☐ Somewhat Disagree
- ☐ Strongly disagree

Please provide your reasoning?

If the RESP is determining the planning and delivery of infrastructure within a place, a mandatory political representative may be more appropriate, supported by officers, to provide democratic and political accountability for the decisions that are taken. For example, the Transport East structure is a political Board comprising local authority representatives, with an independent Chair, supported by a Senior Officer Group. The consistent approach of six LA representatives per regional Board may not suit all regions. For example, in the East in 2028, depending on the outcome of Local Government Reorganisation there could be 2 Mayoral Strategic Authorities and 5 Unitary Authorities – which one would miss out on a Board place in that scenario? Local Authority representatives will need to have a mechanism to represent the other local authorities in the region not on the Board, and consideration needed to what further processes will be required within Local Authorities to support this. For example in voting on key matters, such as the RESP and strategic need pipeline, the six LA reps on the Board would need to have somehow secured approval from the wider local authority family in that region - and how this is achieved adhering to democratic representation for places that are not on the Board, but for which the RESP is determining local infrastructure delivery there. More thought is needed on this. The STB or Local Government East Board model could be reviewed for how this might be achieved. As an example, the Transport East Regional Transport Strategy needed to be approved by each Local Transport Authority in the region at either Cabinet or Full Council.

Do you agree with our proposed voting structure for strategic boards?

- ☐ Strongly Agree
- ☐ Somewhat Agree
- ☒ **Neither agree nor disagree**
- ☐ Somewhat Disagree
- ☐ Strongly Disagree

If you think we should change it, please provide your reasoning?

At present, the voting structure is 50% local authority. To ensure full democratic accountability for decisions taken, and following the principles of devolution – should a greater weight be given to local authorities with statutory planning responsibility? Otherwise, decisions will be taken on strategic infrastructure in places outside of the political process which is responsible for Local Plans, Spatial Development Strategies etc. Potentially something to be discussed with relevant stakeholder representatives further – suggest the Local Government Association if you are wanting national consistency between RESP Boards. LA structures in the East are in transition with the proposed Mayoral elections for MSAs delayed and a recently closed consultation on the proposals for the make up of new Unitary authorities. Any RESP Board representation will need to flex as the region transitions to new local government structures.

Do you feel any changes should be made to the proposed terms of reference?

- ☐ Yes
- ☒ **Maybe**
- ☐ No

Please provide us the details?

The ToR notes that “Board members are expected to sit on the Strategic Board for one RESP cycle (typically three years although shorter for the first RESP) but this could extend to two cycles at the discretion of the Chair”. Need to consider RESP cycle alignment with political election cycle. New unitary authority election cycles are yet to be confirmed and MSA elections will be every 4 years. You are likely to see LA representative Board members changing within a RESP period.

Do you agree with our proposals for appointing members of the strategic boards?

- ☐ Strongly agree
- ☒ **Somewhat agree**
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

If you think we should change it, please provide your reasoning?

One of the four 'cross sector actor' spaces on the Strategic Board (in the East) should be for strategic transport, and that Transport East, as the pan-regional partnership and Sub-National Transport Body should be invited to fill this role on the East Board.

Do you agree with our proposed design for working groups?

- ☐ Strongly agree
- ☐ Somewhat agree
- ☒ **Neither agree nor disagree**
- ☐ Somewhat disagree
- ☐ Strongly disagree

If not, what changes would you propose and why?

TE supports the need to have a working group focused on transport and decarbonisation BUT that Sub-Transport Body in the East already partially fulfils this role, and that NESO East / TE should work together to align processes where practical (e.g. Data, analytics, convening, engagement), and permit funding of that joint activity through the NESO budget for supporting local / cross sector actors. Otherwise, there is a risk of duplication and confusion for partners if too many parallel processes are set up in regions on similar themes. We would be keen for an early conversation with NESO East to assess needs and identify areas of commonality or gaps to be filled.

Do you agree with the proposed representation for the GB Steering Committee?

- ☐ Strongly agree
- ☐ Somewhat agree
- ☒ **Neither agree nor disagree**
- ☐ Somewhat disagree
- ☐ Strongly disagree

If not, are there other participants you feel we should consider?

We note the only Government departments represented will be Ofgem and DESNZ. What will be the internal departmental engagement approach to ensure other relevant departments – i.e. DfT (as a high-energy sector) or MHCLG (as Local Government home department) can inform the GB Steering Committee. We also note that “There will not be individual local government representation on the GBSC, however relevant organisations who can represent their interests, but with a broader geographical remit will be invited to join” – we recommend a local government representative is identified given the impact of these plans on local planning and communities.

Do you agree that we should not be making major changes to the RESP methodology within cycle?

- ☐ Strongly agree
- ☒ **Somewhat agree**
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

If not, please can you give examples of circumstances where you think this may be necessary?

Nations & Regions Contexts

Do you agree with the approach for the Nations and Regions Contexts?

- ☐ Strongly Agree
- ☒ **Somewhat Agree**
- ☐ Neither agree nor disagree
- ☐ Somewhat Disagree
- ☐ Strongly Disagree

Please provide your reasoning?

Approach set out appears logical. There will need to be a balance between national and local level data, and recognition that different regions will have differences in the structures, sources and granularity of their data – even within a region, based on local capacity, local government structures and previous needs. Transport East can support NESO East with the regional validation of the Nation/Region context, particularly on transport data/modelling/analytics. TE's capabilities could be deployed/commissioned to support this process, to avoid duplication and reinvention of tools and products, integrate cross-sectoral planning, and provide better value to money for the taxpayer. For example, our Transport Agent-Based Model (BERTIE) and data and tools held on our Transport Regional Insights Platform (TRIP) are already being used as pan-regional consistent data sources. These could be commissioned by NESO East for validation of the future transport demand in the East region to align with baseline and future years.

How do you envisage using the Nations and Regions Contexts and what would make the output work best for your needs?

The complete Nations and Regions Contexts with aligned data and mapping for transport related energy evidence would allow for a consistent and agreed base for local, regional and national decision-making. Helping to make the case for interventions, investment and helping set a clear regional and local direction for change.

Pathways

Do you agree with the scope of 'Whole Energy' for RESP Outputs?

- ☐ Strongly agree
- ☒ **Somewhat agree**
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

How do you envisage using the RESP Pathways and how can we communicate pathways to support you to use them effectively?

Do you agree with the approach for the RESP Pathways?

- ☐ Strongly agree
- ☐ Somewhat agree
- ☒ **Neither agree nor disagree**
- ☐ Somewhat disagree
- ☐ Strongly disagree

If not, please provide your reasoning?

The RESP pathways for Transport and Decarbonisations should be developed in full alignment with the existing Sub-National Transport Strategy (and LTPs) in each region, in partnership with Sub-National Transport Bodies and Local Authorities. Transport East is willing to work with NESO in the East to achieve this. The Transport East strategy has already set out pathways for transport, following public consultation and endorsement by local authority cabinets.

Consistent Planning Assumptions (CPAs)

Do you agree with our prioritisation approach and criteria set out to evaluate the validity of the Consistent Planning Assumptions values?

- ☐ Strongly agree
- ☐ Somewhat agree
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

Please provide your reasoning?

Do you agree with our approach for the Consistent Planning Assumptions?

- ☐ Strongly agree
- ☐ Somewhat agree
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

Please provide your reasoning?

Spatial Context

Our preferred approach is to move the RESP delivery dates back to enable option 2 (page 78). Do you support this approach and are there any other wider factors we should consider?

- ☐ Yes

- ☐ Maybe

- ☐ No

Do you agree with our proposed approach for the Spatial Context?

- ☐ Strongly agree
- ☐ Somewhat agree
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

Please provide your reasoning?

How do you envisage using the Spatial Context and how can we communicate these outputs to support you to use it effectively?

Strategic Investment Need

Do you agree with our description of the three types of complexity and the examples indicated?

- ☐ Strongly agree
- ☒ **Somewhat agree**
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

What additional considerations should we take to categorise complex strategic energy needs?

Please provide your reasoning.

What further considerations should we take as we develop the approach for specifying and categorising Strategic Investment Needs to ensure consistent regulatory treatment of network investments?

Please provide your reasoning.

The strategic energy needs should be developed in alignment with other infrastructure needs, including transport. NESO should work in partnership with sub-national transport bodies and local authorities who are simultaneously developing transport investment pipelines for the same time period in the same places, which will impact on the energy needs.

Technical Coordination

What examples of whole system optimisation opportunities are you aware of and what considerations should we take to identify, prioritise and develop these collaboratively with you?

We recommend that the RESP process explicitly outlines how it will coordinate with other significant planned infrastructure investments, such as strategic road and rail, ports, airports and alternative freight fuel. This integration is essential to ensure that energy planning is aligned with the evolving needs of the transport sector, particularly as the region sees increased uptake of electric vehicles, alternative fuels, and growth in freight movements through ports and airports. There is also an opportunity to align energy network infrastructure improvements with other major infrastructure to reduce the cumulative impacts on communities and mitigate the risks of supply chain overstretch. We encourage NESO to reference and build upon the priority pipeline work already underway in the East, including the alignment of transport and energy investment plans. Transport East is actively developing a strategic pipeline of transport interventions, and there is a clear opportunity to synchronise this with regional energy planning to maximise value and avoid duplication. We also recommend that the RESP methodology recognises the importance of cross-sectoral collaboration and sets out clear mechanisms for ongoing engagement between NESO, Sub-National Transport Bodies, and local authorities. This will help ensure that technical coordination is not only strategic but also responsive to the specific needs and opportunities within each region. We would welcome early discussions with NESO East to identify areas where joint working can deliver the greatest benefit, particularly around data, analytics, and the integration of decarbonisation priorities. For example, the STBs have already jointly developed (with DfT funding) tools that assess transport carbon emissions and routes to reducing, along with various EV and EV infrastructure monitoring, forecasting and scenario testing.

Network Planning Assurance

Do you support the selection of Option 2 (page 156) as delivering best value in assuring alignment?

- ☐ Yes
- ☐ No
- ☐ Don't know

If not, please provide your reasoning.

What further considerations should we take as we develop the approach to Network Planning Assurance for gas distribution networks? Please provide your reasoning

Societal Considerations

Do you agree with our approach to societal considerations?

- ☐ Strongly agree
- ☒ **Somewhat agree**
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

What additional considerations should we make on PSED as we develop the RESPs?
Please provide your reasoning.

An emerging issue is the cumulative impacts of energy infrastructure on wider infrastructure and communities. Currently the DCO and town planning process assess the impacts of schemes individually, but this leaves few levers for local authorities to be able to understand and address the impact of multiple schemes within an authority, or the impact of schemes across LA boundaries. The East currently has the most NSIPs in the country, with the majority being energy projects – however, the cumulative impact of delivery on supporting infrastructure including road networks – can not be considered or addressed within current processes. An overarching principle should be for communities to not see overall disbenefit from being the host of nationally important energy infrastructure.

Environmental Approach

Do you agree with our proposed environmental approach?

- ☐ Strongly agree
- ☐ Somewhat agree
- ☐ Neither agree nor disagree
- ☐ Somewhat disagree
- ☐ Strongly disagree

Please provide your reasoning if you think we should be doing this differently?

Digital & Data

Do you have any observations or suggestions on our proposed approach to managing RESP data?

Transport East supports the proposed approach and encourages NESO to ensure clear data governance, transparent update processes, and accessible data-sharing arrangements with Sub-national Transport Bodies, local authorities and other partners. The acknowledgement that there is a responsibility to limit multiple requests for the same datasets across multiple stakeholders is welcome. Although for more mature data providers with data portals and APIs this is not an issue, for smaller or less mature organisations this can become burdensome. There is a related consideration, and that is consistency of the same data when used across related domains and stakeholders. Multiple requests for the same datasets made at different times, regardless of the size or maturity of the data owner, could lead to inconsistent common reference data used amongst partners. Consequently, as well as limiting the frequency of requests, there may be value in considering a federated approach to sourcing data amongst partners, perhaps along domain lines. Alignment with existing regional tools, such as TE's BERTIE and integration with TE's TRIP platform, would also reduce duplication and support consistent cross-sector planning. In terms of "protocols to gather the necessary bottom-up data...", consideration should be given to establishment of a data dictionary that can be established and refined through the discovery of the first RESP, to provide a more robust basis for data management, quality control and exploitation in future cycles. Regarding "Balancing transparency with confidentiality", aggregation – as mentioned – is a way to minimise the risk of revealing confidential data. It would be worth considering the practicalities of agreeing in advance with data owners (at data sharing agreement stage) what would satisfy them as a suitable level of aggregation for wider sharing of data as part of your transparency initiatives.

How frequently do you believe data refreshes should occur to ensure the RESP remains accurate and useful?

What criteria should trigger a data refresh? Please provide your reasoning.

The frequency of data refreshes should be guided RESP cycles and the timelines of any internal modelling, other processes and reporting requirements. Consideration should be given to interim updates where underlying assumptions change significantly. Where data are related, but updated on different cycles, consideration should be given to aligning these different cycles to minimise gaps in data currency. We recommend annual refreshes as the longest refresh period, and then only for core long-term and stable datasets. More frequent updates are appropriate for dynamic datasets (such as quarterly or 6-monthly e.g., for EV uptake, heat pump installations, transport demand indicators). We encourage NESO not to take snapshot once in a 3-year cycle. 3 years is a long time for important details to get lost between snapshots. Moreover, a long cycle length increases the importance of the delivery within that cycle, since results from the previous cycle are aging. Any disruption to data that impact a once in three-year cycle could have negative consequences for the RESP. Refreshing, particularly volatile data, at a higher frequency than 3-yearly could prove essential in the case of significant disruption that renders a snapshot, taken on a pre-determined three year cycle, unrepresentative. This is what happened to travel pattern data in the 2021 Census, where behaviour and travel patterns had been significantly impacted by COVID-19. The impacts of this were particularly extreme because of the 1-year cycle for Census. Data should be refreshed when, for example, major national or regional policy changes occur; significant infrastructure commitments are made (e.g., housing, transport, ports, energy generation); rapid shifts in technology or demands emerge; or new evidence from Sub-national Transport Bodies and/or local authorities indicates materially different future patterns. These triggers ensure RESP outputs remain relevant, accurate and aligned with real-world developments, cross-sector forecasts and scenario planning.

In-Development Register

Will commercial sensitivities discourage you or other stakeholders from contributing to the in-development register?

- ☐ Yes
- ☐ Maybe
- ☐ No

What measures could help build confidence in sharing information?

Overall

Overall, do you agree with the approaches proposed across the RESP methodology? Are there any elements of the methodology that you would like to see in more detail?

Conclusion

Thank you for participating in our consultation survey. You will be able to download a PDF copy of your responses on the next page.