

**Regional Energy Strategic Planning  
Methodology Consultation  
National Energy Strategic Operator  
UK100 Submission**

**Contact:**

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**5. Please give a brief overview of your organisation**

This submission is from UK100 which is a network of 122 local authorities and the only network of ambitious councils led by all political parties working together to tackle climate change. We help local leaders overcome challenges and turn innovation into solutions that work everywhere. We build the case for the powers needed to make change happen. From cities to villages, we help communities across the UK create thriving places powered by clean energy – with fresh air to breathe, warm homes to live in, and a healthy natural environment.

We also recently co-hosted an online event with the NESO team for local authorities (UK100 members and beyond) in England to support the RESP Methodology Consultation process.

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

2. Local authority or a representative of local authorities

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

Yes

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

Yes

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

My response can be published

**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? If not, what alternative should be used?**

Yes

## ENGAGEMENT

### Q2. Do you agree with our approach to engagement as we develop the RESPs? Please provide your reasoning?

Somewhat Agree

We broadly agree with the proposed approach to engagement and welcome the emphasis on early, ongoing and structured engagement with a wide range of stakeholders as the RESPs are developed, including UK100, our members, and wider local government..

However, the effectiveness of this approach will depend on how it is implemented in practice, particularly in relation to the role, capacity and resourcing of strategic and local authorities and other local actors.

**Meaningful and resourced engagement:** Local authorities are expected to play a central role in informing RESPs, yet they currently have no statutory duties on energy and widely varying levels of capacity, expertise and resource. Without dedicated support (which the RESP team have identified in their 'Local Actor Support'), there is a risk that engagement will favour areas with stronger institutional capacity, existing devolution arrangements or more advanced energy planning, reinforcing regional inequalities.

**Clarity of roles and expectations:** Greater clarity is needed on what engagement is expected to deliver at different stages of the RESP process, how stakeholder input will be used, and where decision-making authority ultimately sits. In particular, local authorities need clear guidance on what information they are expected to provide.

**Inclusivity across local government and local actors:** While engagement at a regional scale is welcome, the approach must ensure that lower-tier authorities, where key spatial planning and delivery powers often sit, are not marginalised or lost as important actors as they also go through Local Government Reorganisation (LGR). Clear mechanisms are needed to ensure their views are captured, especially where Strategic Board representation is limited, the Working Groups are a start, but could be further developed..

**Stakeholder fatigue and duplication:** Many local authorities and stakeholders are already engaging with multiple, overlapping energy, planning and decarbonisation processes, creating a risk of stakeholder fatigue. The RESP engagement approach should therefore be streamlined, coordinated with existing processes and structures, and proportionate to avoid repeated asks for similar data and input. We heard for instance that the NESO sits on the new North East Energy Board, this could be a model replicated elsewhere.

**Engaging businesses and wider local stakeholders:** More clarity is needed on how different stakeholder groups will be identified and engaged, including businesses, community energy organisations and other local actors. Local authorities are keen to help, but need transparency from the RESP teams on who has been engaged and when, so they can help support this outreach in their areas. Members were also keen to understand the relationship between the different Working Groups to avoid siloisation.

**From consultation to collaboration:** Engagement to date has focused on informing and consulting stakeholders, particularly in the early stages. As RESPs mature and the NESO fully develop their regional teams, the approach should shift towards deeper involvement, collaboration and shared problem-solving, enabling stakeholders to actively shape priorities and solutions rather than responding to fixed proposals.

**Alignment with existing structures and plans:** There are often existing governance, planning and partnership structures at local, regional and devolved levels, though these might not perfectly map onto the nations and regions for RESPs. Local authorities need clarity on how RESP engagement fits alongside existing plans, strategies and forums, what is expected of them within these structures to avoid confusion and inefficiency and more broadly, how to make use of the existing structures for the RESP process.

**Continuous learning and improvement:** NESO should commit to regularly gathering feedback from local authorities and other stakeholders and using it to improve RESP processes over time. Clear mechanisms for feedback, review, impact and visible changes will be important to build trust and long-term engagement.

## LOCAL ACTOR SUPPORT

**Q3. Do you agree with the approach we have outlined on local actor support, and how we have phased the delivery? Please provide your reasoning?**

Somewhat Agree

We broadly agree with the proposed approach to local actor support and welcome the recognition that different regions and local actors are at varying stages of readiness. We also agree with phasing support over time as well as building on existing support mechanisms, however, its effectiveness will depend on clarity, resourcing and how well it responds to existing capacity gaps at the local level. We would be keen to work with the NESO on making it work and maximising its effectiveness, a robust model of local actor support could and should be co-produced with local government and organisations like UK100 and our members..

**Capacity and resourcing:** Many local authorities lack the technical expertise and staff capacity to engage meaningfully, particularly in the early phases when data

inputs and strategic choices are being shaped. While funding cannot be made available, care should be taken to ensure the process does not increase inequalities between well-resourced and less-resourced areas.

**Absence of statutory levers and core capacity:**

Local authorities currently have no statutory duties or dedicated resources for strategic energy planning at the scale envisaged by RESP, and this is not a core function of local government. Without addressing this foundational issue, the proposed support risks being limited in impact and taken up primarily by those authorities already best placed to engage, rather than delivering consistent and equitable participation across regions.

**Early-phase support is critical:** The most intensive support should be front-loaded and investment in early capacity building will reduce reliance on assumptions and improve the quality of plans and formal engagement across all regions and nations.

**Consistency and a level playing field:** A phased approach must not result in inconsistent levels of engagement or influence across nations and regions. Minimum standards of support should be defined to ensure all strategic and local authorities can participate (especially given the impact of devolution and LGR) with similar confidence and capability, regardless of starting point.

**Clear leadership and coordination:** There needs to be clear leadership for local actor support, with defined responsibility for coordinating engagement and ensuring all relevant local actors, including lower-tier authorities are involved appropriately. Without this, there is a risk of fragmented engagement and unclear ownership across phases.

**Support for effective participation in governance:** Local actors will also need support beyond technical energy knowledge, including training and best practice on working effectively within Strategic Boards and governance structures. This would help ensure discussions are balanced, inclusive and productive, particularly where local democratic voices engage alongside highly technical network stakeholders.

**Access to expertise as well as guidance:** In addition to written guidance and training, local actors will need access to hands-on expertise they can draw on when needed. This could include advisory support or peer learning to help local authorities engage effectively with the RESP process.

**Supporting and understanding innovation:** Our members have told us they want the RESPs to understand local context and priorities, from different views on the shape of the future energy system to supporting community energy and more ambitious net zero targets. Local authorities from Bristol to Hackney are

looking at new approaches and don't want to be held back, There was also an interest in understanding how divergence or conflict might be managed, and considerations on the RESP boundaries between different regions and nations.

## GOVERNANCE

**Q4. Do you agree that local authorities should be able to decide whether to send a political representative or officer to the strategic board? Please provide your reasoning?**

Somewhat Agree

We agree that strategic and local authorities should have the flexibility to decide whether to appoint a political representative or an officer to the Strategic Boards.

**Balancing political leadership and technical expertise:** Many structures across local government blend officer and elected member representation, and we have seen it as a huge strength in our own UK100 network and associated structures. It requires work and understanding of the unique and distinct roles on all sides. In some areas, political representation may be essential to reflect democratic priorities and secure local buy-in, while in others officer representation may enable more technically informed discussion. Allowing local choice supports both democratic legitimacy and effective technical engagement.

**Value of combined representation:** In some cases, having both a political representative and an officer involved in Strategic Board discussions could add significant value. This would help balance democratic leadership with technical expertise and improve the link between strategic decisions and local delivery.

**Continuity and capacity considerations:** Officers may be better placed to provide continuity across RESP cycles, while political representatives may face changes linked to election cycles. Local authorities are best placed to judge how to balance continuity, capacity and democratic accountability.

**Clear expectations regardless of role:** Regardless of who is appointed, clarity is needed on roles, responsibilities and decision-making authority of Board members. This will help ensure consistent and effective participation across regions. Through the Local Actor Support work the NESO will need to support these individual representatives to fulfil this new role.

**Recognise range of views:** Across UK100 and the wider local government sector, we want to recognise that there are a range of views on this question. With some authorities suggesting it should be 100% officer or 100% elected member representation, this is understandable and reflects the experience of the actors involved. We believe the best way to address this challenge and range of views is

to leave it up to local authorities to decide, not mandate the shape of representation from the NESO.

**Q5. Do you agree with our proposed voting structure for strategic boards? If you think we should change it, please provide your reasoning?**

Somewhat Agree

**Local Government Role:** Overall we welcome the formal role for local government in these new structures, and that they will have a formal decision making role and vote for the first time in shaping and agreeing the RESPs.

**Transparency and clarity:** Clear guidance is needed on when votes will be used, what decisions require formal voting, and how dissenting views will be recorded and addressed. Transparent processes will help build confidence in Board outcomes from all stakeholder groups represented.

**Embedding consensus from the outset:** The format and governance of Strategic Boards should be designed to promote consensus-building from the start, with structured discussion and early resolution of disagreements. This would help ensure that voting is used as a final step rather than a primary decision-making tool.

**Maintaining ambition:** Governance arrangements should guard against outcomes being diluted simply to achieve agreement. Clear alignment with national net zero objectives are needed to ensure decisions remain ambitious while still commanding broad support.

**Q6. Do you feel any changes should be made to the proposed terms of reference? Please provide us the details?**

**Alignment with local planning frameworks:** The terms of reference should clearly set out how RESP outputs will align with existing local and regional planning frameworks, including local energy planning (LAEPs) and spatial strategies. We have heard more informally that this is going to be the approach, but it would help if the terms of reference were more specific. This will help ensure the RESP process is truly bottom up and supports, rather than cuts across, established local priorities and delivery processes.

**Quorum and representative balance:** Quorum arrangements should reflect the fact that local authority representatives are speaking on behalf of a wide range of authorities across a nation or region. The terms of reference should ensure that different types and tiers of local authorities, and a mix of relevant roles, are present so decisions reflect diverse local perspectives and energy priorities.

**Clarify roles and decision-making authority:** The terms of reference should more clearly set out the respective roles, responsibilities and influence of Strategic

Boards, Working Groups, the GB Steering Committee and the NESO. This clarity is important to avoid confusion over where decisions are made and how input is reflected.

**Strengthen accountability and feedback loops:** Clear expectations are needed on how recommendations, dissenting views and feedback will be recorded, responded to and, where appropriate, escalated. This would improve transparency and confidence in the overall governance process.

**Q7. Do you agree with our proposals for appointing members of the strategic boards? If you think we should change it, please provide your reasoning?**

Somewhat Agree

**Inclusivity across local government tiers:** The approach should explicitly consider how lower-tier authorities are represented, particularly where key planning and delivery powers sit below the strategic or combined authority level. Clear mechanisms are needed to ensure their perspectives are consistently fed into Board and Working Group discussions.

**Capacity and capability:** Appointments should take into account not only organisational representation but also the time, expertise and capacity required to participate effectively. Where needed, appointed members should be supported with training briefings and/or structures to engage confidently in technical and strategic discussions.

**Continuity and accountability:** Consideration should be given to term lengths and succession planning to balance continuity with accountability. This would help maintain institutional memory while allowing Boards to adapt as the RESP process matures. There needs to be a recognition that if local authorities are abolished; elected members lose their seats or roles; or officers move on that it may prove impossible for individuals to continue to represent local government to the RESP bodies. If there are concerns about continuity then perhaps non-voting co-option should be explored in exceptional and defined circumstances.

**Alignment with planning geographies:** There are also concerns around misalignment between RESP boundaries and existing strategic planning geographies, such as Spatial Development Strategy areas, political regions and Strategic Authority footprints on the local government side and DNO and Gas Network areas on the energy side. Without clear mechanisms to manage this, there is a risk of fragmented governance, duplication of effort and reduced legitimacy.

**Transparent and consistent appointment process:** Greater clarity is needed on how local authority representatives will be selected, including the criteria for nominations and how decisions will be made where demand exceeds available

seats. A transparent framework would help ensure consistency in seniority and expertise while maintaining diverse representation across Boards.

**Q8. Do you agree with our proposed design for working groups? If not, what changes would you propose and why?**

Somewhat Agree

**Balanced and inclusive membership:** Working groups should include a mix of technical experts, local authority officers and other relevant local actors to ensure outputs reflect both system requirements and place-based realities. Over-reliance on network or technical perspectives risks overlooking delivery and planning constraints at the local level.

**Clear purpose, remit and data access:** Each working group should have a clearly defined purpose, scope and expected outputs, with a direct link to Strategic Board priorities. Working groups should also have timely access to relevant data and assumptions so members can meaningfully interrogate evidence and contribute effectively. Working groups should also be aware of the work and make up of other groups and have the opportunity to collaborate if needed. Our members were also keen to ensure that silos don't develop around working groups, and that the links between for example business, industry and local government were understood across the regions and nations.

**Clear leadership and coordination:** Each working group should have a clearly identified lead and coordination function to manage inputs, timelines and outputs. This will be particularly important where multiple working groups are operating in parallel.

**Managing stakeholder burden:** Participation in working groups can be resource-intensive, particularly for local authorities with limited capacity. Engagement should be targeted, time-bound and coordinated with other processes to avoid stakeholder fatigue.

**Effective links to decision-making:** There should be clear mechanisms for how working group outputs are escalated, challenged and adopted by the Strategic Board. Without this, there is a risk that technical work does not meaningfully influence strategic decisions.

**Integration with existing local and regional structures:** Working groups should be better integrated with existing local and regional networks, partnerships and sources of evidence to avoid duplication and tap into and strengthen local relevance.

**Q9. Do you agree with the proposed representation for the GB Steering Committee? If not, are there other participants you feel we should consider?**

Somewhat Agree

We broadly agree with the proposed representation for the GB Steering Committee, but would encourage consideration of broader local government representation beyond a single organisation. We believe, as suggested in the consultation document, that UK100 could add value as a network that uniquely bridges the energy sector and local government, bringing together political leadership and delivery insight from across different geographies, and helping ensure local perspectives from all tiers of local government are fairly reflected alongside sectoral expertise rather than consolidated into a small number of representatives.

**Q10. Do you agree that we should not be making major changes to the RESP methodology within cycle? If not, please can you give examples of circumstances where you think this may be necessary?**

Somewhat Agree

We agree that major changes to the RESP methodology should generally not be made within a cycle, as stability and predictability are essential for effective engagement, transparency, planning and delivery. But given this is a new approach, structure and decision making methodology for the new NESO, local government and the energy sector, having a review mechanism and the ability to fix any problems in the methodology could be useful and the role might be held by the GB Steering Committee.

**Need for stability and certainty:** A stable methodology allows local authorities, network companies and other stakeholders to plan resources, provide consistent data and engage with confidence. This is particularly important given the capacity constraints many local authorities face.

**Reducing stakeholder burden:** Avoiding in-cycle changes helps prevent repeated data requests, rework and consultation fatigue. This supports more efficient engagement and higher-quality inputs over the course of the cycle. It also allows the governance structures and those serving in them to develop relationships and experience, building trust and supporting delivery.

**Clear and limited exceptions:** There may be limited circumstances where changes are necessary, such as significant changes in national policy, major regulatory reform, or the emergence of critical evidence that materially affects system planning. Any such changes should be clearly justified, proportionate and communicated transparently.

**Safeguards for local actors:** Where exceptional changes are unavoidable, there should be clear safeguards, including sufficient notice periods and support for

affected stakeholders. This will help mitigate impacts on local capacity and ongoing delivery.

## NATIONS & REGIONS CONTEXT

### Q11. Do you agree with the approach for the Nations and Regions Contexts? Please provide your reasoning?

Somewhat Agree

We broadly agree with the approach to developing Nations and Regions Contexts and welcome the intent to ensure RESPs reflect place-based realities alongside national objectives. These Contexts will be most effective if they are built on consistent evidence, genuinely co-produced with local actors, and kept practical for delivery.

**Need for energy plans:** There would be a significant variation in terms of the data available and level of detail with local authorities. Some might only have a local plan with energy not adequately covered while others might have a full LAEP. While technical guidance for energy plans is one type of Local Actor Support that could be provided to local authorities, the mechanism as well as how the process will be standardised across different tiers and levels is unclear. It is critical that all local authorities can input data with a similar level of granularity and detail so that the outputs reflect the actual need on the ground. It came across strongly in our discussions with local authorities and our members that they want LAEPs, where they exist to be recognised and formally valued. In the Welsh and Scottish contexts, these plans have also been recognised and supported by the devolved governments, so must be given that additional weight.

**Inconsistency in data availability and predictability:** The data available and the capacity to collect data could vary across authorities. The expertise could vary with the tier of the local authority, the existing data collection plans and the resources at their disposal. Not all local authorities have a dedicated energy plan or a local area energy plan which might make it challenging to predict or model future demand and supply needs. The local plan might not be able to accurately predict this as well. Overtime, and as the RESP process matures, we would hope to see full data sharing and the ability of local authorities to access any tools or aggregated data that might be helpful to them to develop or refresh more localised plans.

**Grounded in local evidence:** The Contexts should draw on the best available local data and existing strategies to reflect real constraints and opportunities. Where local evidence is limited, assumptions should be transparent and open to challenge by local authorities.

**Clarity on purpose and use:** Local actors should understand how their inputs translate into decisions and what influence the Contexts have within the overall

methodology. It should also be clear that the NESO RESP process is not replacing or crowding out local energy plans or the important work done at local authority, regional, strategic or network operator level. We have heard some concerns from members and the sector that there is some confusion about this.

**Inclusive engagement across local government:** The approach should ensure input from a broad range of local authorities, including lower-tier authorities where key planning and delivery powers often sit or indeed upper tier authorities or county partnerships who in some areas have invested in and coordinated local energy work for example, but not limited to Oxfordshire, Hertfordshire, Essex, Leicestershire and Somerset. Without this, there is a risk of gaps between regional narratives, strategic authorities (not areas will have them) and local priorities and delivery realities.

**Clarity on data sources and evidence hierarchy:** Greater clarity is needed on how data sources will be identified, assessed and prioritised, including how conflicting or overlapping datasets will be handled. A transparent hierarchy of evidence is essential to ensure robust local data is not overridden by national assumptions.

## Q12. How do you envisage using the Nations and Regions Contexts and what would make the output work best for your needs?

Nations and Regions Contexts would provide a useful shared evidence base to support engagement with our member local authorities and wider partners. Clear, accessible outputs would help facilitate discussions on regional priorities, support collaboration across places, and inform local strategies by setting local ambition within a broader regional and national context.

## PATHWAYS

### Q13. Do you agree with the scope of 'Whole Energy' for RESP Outputs?

Somewhat Agree

We agree with the ambition of a 'Whole Energy' scope for RESP outputs, but its value will depend on how accessible, usable and actionable it is for local authorities and other delivery partners. Without careful design, there is a risk that a whole-system approach becomes overly complex and difficult to apply in practice.

### Q14. How do you envisage using the RESP Pathways and how can we communicate pathways to support you to use them effectively?

**Clarity and simplicity:** Pathways should be communicated using clear, non-technical language alongside technical detail, so they are accessible to both officers and political leaders. Overly complex presentation risks limiting understanding and uptake.

**From ambition to usability:** A whole-energy scope must translate into outputs that local authorities can realistically use to inform planning, investment and delivery. Highly technical or abstract outputs risk limiting practical impact at the local level.

**Access and practical use by local authorities:** Local authorities need clear and practical access to RESP outputs, including tools or interfaces that allow them to explore data and assumptions. Without this, RESPs risk being perceived as static documents rather than decision-support tools.

**Clear links to local decision-making:** It should be explicit how whole-energy outputs are intended to be influenced by and in turn influence local plans, LAEPs and investment decisions. This clarity will help ensure the approach supports delivery rather than remaining a high-level analytical exercise.

**Scenario-based options:** Rather than presenting a single preferred pathway, Pathways should be communicated as a set of credible options that reflect different assumptions, trade-offs and delivery choices. This would enable local authorities to understand the implications of different routes and select those that best align with local priorities.

**Visual and spatial communication:** Visualisation tools, maps and graphics should be used to show how Pathways play out spatially and over time. This would support better understanding of impacts on land use, infrastructure and communities.

**Digital and interactive access:** Where possible, Pathways should be supported by transparent and open digital tools that allow local authorities and other to collaborate and explore scenarios, test sensitivities and interrogate assumptions. Interactive access would help Pathways function as decision-support tools rather than static reports.

**Use as a shared local evidence base:** Local authorities could use RESP Pathways as a core evidence base to inform local planning, infrastructure investment and cross-authority coordination. They could add real value and support the testing local ambition against regional trajectories, understanding system interactions, and identifying strategic investment needed to unlock housing, transport decarbonisation, heat networks and wider place-based priorities.

**Clear links to local action:** Pathways should clearly set out what they mean for local plans, delivery timelines and investment decisions. This clarity will help local authorities understand how to translate Pathways into practical action.

**Opportunities for feedback and challenge:** Strategic and local authorities should have the opportunity to review, question and refine Pathways before they

are finalised. This will improve accuracy, build confidence and strengthen local ownership of the outcomes.

**Q15. Do you agree with the approach for the RESP Pathways? If not, please provide your reasoning?**

Somewhat Agree

**Granularity and evolution over time:** Using LSOA-level analysis is a helpful starting point, but the approach should allow for increased granularity over time where data and capacity improve. This would enable Pathways to better reflect local delivery realities and planning decisions.

**From analysis to practical tools:** There is an opportunity for the Pathways platform, or a related platform, to evolve into tools that local authorities can use themselves to test policy options and delivery choices. This would reduce duplication of effort, with outputs from one process feeding into another rather than each authority investing in separate modelling.

**Interaction between 10-year pathways and updates:** More clarity is needed on how 10-year Pathways will interact with the proposed three-year update cycle. In particular, it should be clear how updates are incorporated without undermining stability or creating confusion about which pathway is current.

**Flexibility in timeframes:** While a 10-year horizon is understandable, the approach should allow flexibility to adapt Pathways where there are significant shifts in policy, technology or local ambition.

**Consistency to reduce burden:** Strategic and local authorities are subject to multiple, overlapping plans and data requests from different actors for different purposes. As far as possible, RESP Pathways should align and streamline data requirements and timeframes to avoid repeated requests for the same information and reduce overall reporting burden.

**Handling data gaps and assumptions:** Where data does not exist or is low confidence, the process for developing assumptions should be transparent and clearly communicated. Strategic and local authorities should have the opportunity to review and challenge assumptions to ensure they reflect local context and avoid misalignment with delivery realities.

**CONSISTENT PLANNING ASSUMPTIONS (CPAs)**

**Q16. Do you agree with our prioritisation approach and criteria set out to evaluate the validity of the Consistent Planning Assumptions values? Please provide your reasoning?**

Somewhat Agree

**Broadening stakeholder involvement:** While collaboration with electricity and gas distribution network operators is essential, other stakeholders should be involved in shaping non-technical aspects of the assumptions. Strategic and local authorities and other local actors can help define priorities, highlight local constraints and opportunities, and ensure important factors are not overlooked.

**Avoiding blind spots:** A network-only approach risks missing socio-economic, planning and place-based considerations that materially affect demand and delivery. Broader input would help surface these issues early and improve the overall validity of assumptions.

**Transparency and feedback:** Stakeholders should be able to see how their input has informed the final assumptions and have opportunities to flag concerns. This transparency will build confidence and improve the quality of future iterations.

**Q17. Do you agree with our approach for the Consistent Planning Assumptions? Please provide your reasoning?**

Somewhat Agree

Our response focuses on the governance, engagement and place-based aspects of the approach rather than the detailed technical modelling, where others are better placed to comment.

**Role of local authorities and place-based insight:** While collaboration with electricity and gas distribution network operators is essential, local authorities and other place-based actors should be involved in shaping non-technical assumptions. They are well placed to highlight local priorities, development trajectories and constraints that may not be visible through network-led processes.

**Iteration and learning over time:** Consistent Planning Assumptions should evolve as local planning maturity improves and new evidence becomes available. Building pathways for local data and plans, including LAEPs, to progressively replace assumptions will improve accuracy over successive cycles.

**Enabling local authority flexibility and contribution:** Electricity flexibility is not currently a priority for many local authorities, despite being a growing government and system priority. Local authorities could play a stronger enabling role over time, but this will require clearer policy direction, capacity building and support.

**Ease of understanding:** From a local authority perspective, the Consistent Planning Assumptions are highly technical, and it is not clear how Strategic Board members, particularly those from local government will be supported to meaningfully review them. Without accessible explanations, there is a risk that

discussions are dominated by those most familiar with the modelling rather than reflecting place-based considerations, negating the value and input local government can bring.

**Supporting informed local input:** Providing clear, non-technical summaries that explain what key assumptions mean in practice for local planning would help level the playing field.

## SPATIAL CONTEXT

**Q19. Do you agree with our proposed approach for the Spatial Context? Please provide your reasoning?**

Somewhat Agree

**Q20. How do you envisage using the Spatial Context and how can we communicate these outputs to support you to use it effectively?**

**Value of a spatial, place-based view:** A shared spatial context can help align network planning, local development and strategic investment by making constraints and opportunities visible. This is particularly important where decisions have long-term spatial and community impacts.

**Clarity on purpose and influence:** Greater clarity is needed on how the Spatial Context will be used within decision-making, including how it informs Pathways, Strategic Investment Need and trade-offs. Local actors need to understand whether it is descriptive, directive, or somewhere in between.

**Transparency of data and assumptions:** Users need to be able to clearly see underlying data sources, assumptions and confidence levels within the spatial outputs. This transparency is essential for trust and meaningful engagement.

**Interactive and layered outputs:** The Spatial Context would be most effective if communicated through interactive, layered mapping that allows users to explore different constraints, opportunities and scenarios. Static maps or reports would significantly limit its usefulness.

**Digital and interactive access:** Where possible, this should be supported by transparent and open digital tools that allow local authorities and others to collaborate and explore scenarios, test sensitivities and interrogate assumptions. Interactive access would help Pathways function as decision-support tools rather than static reports.

## STRATEGIC INVESTMENT NEED

**Q21. Do you agree with our description of the three types of complexity and the examples indicated?**

Somewhat Agree

**Q22. What additional considerations should we take to categorise complex strategic energy needs? Please provide your reasoning.**

**Include delivery and governance complexity:** Complexity should reflect not only technical system interactions but also delivery readiness, consenting, supply chains, and institutional capacity. Some “strategic needs” are complex primarily because delivery responsibilities and powers are fragmented.

**Planning and land-use constraints:** Spatial planning constraints, land availability, protected areas and competing land uses can materially increase complexity and change the feasible set of solutions. These factors should be explicitly considered in categorising strategic needs.

**Equity and just transition impacts:** Some needs are complex because they have uneven distributional impacts or require careful sequencing to avoid disadvantaging vulnerable group or geographies. Including equity and just transition considerations would strengthen the framework and improve legitimacy.

**Interdependencies with non-energy infrastructure:** Complexity often arises from dependencies on transport, housing retrofit, water, telecoms and other infrastructure. Categorisation should account for cross-sector interdependencies that affect timing, cost and feasibility.

**Stakeholder and public acceptance:** Some interventions are complex due to public acceptability, local politics and the need for sustained engagement (e.g., heat network zones or major transmission upgrades). This should be treated as a real complexity driver rather than an external issue.

**Other barriers to delivery:** At a local authority level there could be other barriers faced, that are beyond the scope of the RESP or NESO but can be significant challenges to local delivery. For instance, there are planning and regulatory barriers for renewable energy projects that need to be addressed to ensure local delivery can go ahead at the pace needed. Issues with the grid, including delays in connection, are another example of challenges that may hinder progress.

## **SOCIETAL CONSIDERATIONS**

**Q27. Do you agree with our approach to societal considerations?**

Somewhat Agree

**Q28. What additional considerations should we make on PSED as we develop the RESPs? Please provide your reasoning.**

**Make “societal impacts” more defined and comparable:** The examples given (jobs, fuel poverty, air quality) are useful, but the methodology should set out a clearer framework of priority outcomes and indicators so comparisons across pathways are consistent.

**Embedding societal considerations in decisions:** Societal considerations should be built into decision-making and trade-offs, and not evaluated after decisions are made. Strategic Investment Need should explicitly recognise social value such as fuel poverty reduction, health benefits and equitable access, so least-cost options are not prioritised at the expense of just transition outcomes.

UK100's 2025 report, [\*Beyond Targets: The wider benefits of climate action\*](#), makes a strong case for expanding measurement frameworks to capture the wider social, economic, and health. This would provide a more complete picture of project value, strengthen investment cases by demonstrating returns beyond energy generation, and help secure wider public support and funding from different sources.

**PSED needs to be operationalised, not just referenced:** The document notes NESO will have due regard to PSED, but it would help to specify how equality considerations will be built into decision points, trade-offs and documentation.

**Disaggregated evidence and place-based equality risks:** Equality impacts can vary significantly within regions, so assessment should use the most granular data feasible and consider compounded disadvantage (e.g., fuel poverty, poor housing, health). This will help avoid pathway choices that unintentionally reinforce inequalities.

**Meaningful engagement with affected groups:** PSED should include a clear plan for engaging groups with protected characteristics and those representing them, using accessible formats and targeted outreach. This should complement Strategic Boards and working groups so lived experience informs decisions, not only technical evidence.

**Role of local authorities and delivery partners:** Strategic and local authorities can help identify vulnerable groups and practical mitigations, but many will need clarity on what inputs are required and support to participate consistently. This is important so PSED is not limited by uneven local capacity and structural inequality.

## ENVIRONMENTAL APPROACH

### Q29. Do you agree with our proposed environmental approach?

Somewhat Agree

### Q30. Please provide your reasoning if you think we should be doing this differently?

**From assessment to influence:** While identifying environmental considerations is important, greater clarity is needed on how these will actively shape Pathways, spatial priorities and Strategic Investment Need. Environmental assessment

should inform choices and trade-offs, not sit alongside them.

**Alignment with existing environmental frameworks:** The approach should clearly align with existing environmental legislation, strategies and assessments, including biodiversity net gain, nature recovery strategies and climate adaptation plans. This would reduce duplication and help local authorities integrate RESP outputs into existing processes.

**Transparency and trade-offs:** Where environmental impacts are balanced against system efficiency or cost considerations, the basis for those trade-offs should be clearly documented. Transparency will be important for public confidence and stakeholder buy-in.

**Influence and safeguards:** While RESPs may not be formally prescriptive, their outputs are likely to influence investment decisions and local and regional interpretation of spatial priorities. Additional safeguards and clarity would help ensure environmental considerations are applied robustly given this practical influence.

**Consistency of environmental evidence:** Reliance on bottom-up plans is welcome, but environmental evidence and assessment approaches vary significantly across places. Clear expectations and minimum standards would help avoid uneven environmental consideration across regions and strengthen overall confidence in the approach.

**Role of local authorities and partners:** Local authorities and local environmental partners hold valuable place-based knowledge but may need clearer guidance on how to contribute effectively. Supporting their involvement will improve environmental outcomes and strengthen delivery.

## DIGITAL & DATA

### Q31. Do you have any observations or suggestions on our proposed approach to managing RESP data?

**Avoiding duplication and data fatigue:** Local authorities are subject to multiple overlapping data requests from different organisations and processes. The RESP data approach should align with existing datasets and reporting requirements wherever possible to avoid repeated requests for the same information.

**Transparency of data quality and assumptions:** The assumption or founding principle should be that data is transparently held and shared. It would be a positive step to embed this open data approach and ensure that any tools or platforms developed by NESO, see strategic and local authorities as key end users and built with usability and them in mind from day one. Data confidence levels, gaps and assumptions should be clearly flagged and documented, with the Local

Actor Support offer able to pick up any areas of deficit. This will help users understand limitations and avoid assumptions being treated as definitive.

**Opportunities for feedback and correction:** Local authorities and other stakeholders should have the opportunity to review data used for their area and flag inaccuracies. A clear mechanism for feedback and correction would improve accuracy and build confidence.

**Longer-term capability building:** Over time, the data approach should support a transition from assumed or proxy data to more robust local evidence, including through Local Area Energy Plans. This will improve the quality of future RESPs while strengthening local capacity.

**Consistency and minimum standards:** There is a wide variation in the quality and format of local data which could make integration a challenge. Clear minimum standards, templates or guidance would help ensure authorities with less analytical capacity are not disadvantaged.

**Handling conflicting datasets:** Greater clarity is needed on how NESO will resolve conflicting datasets where multiple sources exist for the same issue. Decisions should be based on credibility and local accuracy, not simply on which data is most publicly available.

**Approach to gap filling:** The methodology for filling data gaps should be tested with stakeholders before being applied in practice. Alignment with existing network data standards would also help avoid duplication and additional burden.

## IN-DEVELOPMENT REGISTER

### Q34. What measures could help build confidence in sharing information?

Building confidence in sharing information will require clarity, consistency and trust in how data is handled, used and protected. Clear rules and transparent processes will be essential to encourage open participation from all stakeholders.

- **Clear data agreements:** A clear data-sharing agreement or memorandum of understanding would help set expectations on transparency, use and access. This should clearly define when commercial sensitivity applies and avoid overly cautious restrictions that limit effective collaboration.
- **Transparency on data use:** Stakeholders need clarity on how shared data will be used, who will have access to it, and how it will inform decisions. This transparency will reduce reluctance to share information and improve trust in the process.

- **Clear governance and safeguards:** Strong governance arrangements, including clear accountability and audit trails, would reassure stakeholders that data is being managed responsibly. This is particularly important where data informs strategic investment and long-term planning decisions.

## OVERALL

### Q35. 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?

**Governance in practice:** While the proposed governance structures are welcome, more detail is needed on how Strategic Boards and working groups will operate day-to-day, how decisions will be taken, and how disagreements will be resolved. Clear accountability, feedback loops and escalation routes will be essential to ensure governance is effective rather than procedural.

**Balancing network and place-based perspectives:** While coordination with network planning is essential, RESP should not be overly driven by network investment cycles. It needs to remain a strategic, vision-led process that is shaped by local priorities and statutory spatial planning, rather than functioning primarily as an input to DNO or GDN plans.

**Learning and iteration:** Greater clarity is needed on how learning from the tRESP and early RESP cycles will be captured and used to refine the methodology over time. A structured approach to iteration, review and adaptation would help ensure the process improves without creating instability or additional burden.

**Data, visualisation and usability:** More detail is needed on how RESP data and outputs will be presented and accessed, including the use of visual, spatial and digital tools. Over time, RESPs should move beyond static reports towards decision-support tools that local authorities can use for planning, scenario testing and investment decisions.

**Streamlining across processes:** There is scope to set out more clearly how RESP will align with existing plans, data requests and governance structures to reduce duplication and stakeholder fatigue. Streamlining across processes will be key to sustaining long-term engagement.

We would be grateful if, in addition to considering UK100's response to the consultation, you would also explore opportunities for continued further engagement with UK100 and our members. The engagement and collaborative approach has been excellent so far and we would like to see it maintained in the next stages of this work. Please get in touch if you would like to know more or explore our response in more detail. We would also be happy to convene a

discussion with our member local authorities, to discuss the themes within our response further.