



EEH Business Unit
c/o Buckinghamshire Council
County Hall
Walton Street
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Friday, 16 January 2026

Dear Sir/Madam

RESP Methodology Consultation

England's Economic Heartland (EEH) is the sub-national transport body (STB) covering the region from Swindon and Oxfordshire in the west through to Cambridgeshire and Hertfordshire in the east. Our geography covers the entirety of the Oxford-Cambridge Growth Corridor. Our membership consists of the local transport and highways authorities in the region.

EEH has a role to support local authorities through the provision of data and modelling tools for application in the development of spatial plans and nationally significant infrastructure projects.

EEH is tasked by our Board (consisting of the elected leaders of local and combined authorities) and UK Government to support the delivery of economic growth through improved connectivity across the Growth Corridor.

EEH has been asked to support partners to engage with NESO/RESP by our Board and the Treasury's Oxford-Cambridge Growth Corridor team.

Our response has been shaped by discussions with local authority partners and by EEH's experience of working with political leaders, officers and central government.

It focuses on the governance of the RESP and how EEH may engage in a way that adds value for our partner organisations and NESO while remaining proportionate and avoiding duplication of effort.

Comments on RESP methodology - Governance

The RESP framework creates a new interface between national energy system planning and local growth and infrastructure delivery.

Energy sector participants (DNOs/Generators etc.) sit on the RESP Board with clear statutory duties, technical authority and a direct role in using RESP outputs.



Local authority representatives / local actors by contrast, are (likely) fewer in number, do not sit with a collective mandate from affected/impacted places, and have no formal mechanism to prevent approval where strong place-based concerns remain.

Consequently, there is an inherent structural bias towards energy sector priorities, even where the process is transparent and well intentioned. The proposed RESP Strategic Board model reflects energy system accountability but does not give sufficient weight to democratic accountability.

In areas like EEH (RESP Central Region) where devolution pathways are unclear (Cambridgeshire and Peterborough is currently the only combined authority), strategic infrastructure decisions often cut across multiple local authorities with no single democratic body.

In this scenario there is a role for sub-national bodies / partnerships such as EEH, which are democratically accountable to groups of local authorities for coordination, evidence development and alignment across functional economic areas and corridors.

As such, EEH has offered to establish a working group enabling local authority partners to discuss and develop a unified position and agree representatives to nominate to the RESP Board. Whilst this presents challenges and requires dedicated resources, our key stakeholders see this as critical. Variability in Local Area Energy Plans (LEAP) maturity and development, differences in capability, capacity, and expertise among local authority partners make this challenging.

Under the proposed RESP governance model, unresolved disagreement at the Strategic Board ultimately transfers decision-making to Ofgem, whose statutory duties relate to system efficiency, security of supply and consumer protection, rather than place-based growth or spatial equity.

While this is a legitimate regulatory approach, it could leave local authority partners exposed, particularly given the Strategic Board's role in approving and legitimising the plan.

Concerns expressed by EEH's local authority partners about the absence of a veto should not be interpreted simply as a desire for control. Rather, they reflect a deeper concern about where accountability lies if RESP outcomes materially disadvantage a place or corridor.

The Oxford-Cambridge Growth Corridor is a high-profile government priority, accommodating significant housing development, nationally significant infrastructure projects, and major economic contributors, generating significant (and sometimes conflicting) energy demand.

Given the scale of investment and growth, local leaders carry substantial responsibility and remain highly attuned to community needs. The limited influence afforded to them in this process is therefore a key concern across the region.

Potential refinements to strengthen accountability

Without proposing changes that would cut across Ofgem's statutory role, there are opportunities to strengthen accountability within the RESP Strategic Board framework.

These could include:



- Clearer expectations that local authority representatives bring democratic legitimacy, for example, through agreed and politically approved, spatial plans and adopted LEAPs from all parts of the region (noting that this may require funding support from DESNZ/NESO).
- An additional stage of governance could be introduced in which elected members are convened to provide democratic agreement to the RESP, following technical scrutiny and approval by the RESP Board. The currently suggested time commitment to the Board would largely rule out elected member participation.
- Stronger use of conditional approval mechanisms, requiring explicit documentation and response to unresolved place-based concerns before escalation.

These approaches would not create veto powers but would improve confidence that place-based accountability is meaningfully reflected in the governance process.

What EEH can do to support

Transport electrification and associated infrastructure (fleet depots, logistics hubs, rail electrification, EV uptake linked to growth) are material drivers of future electricity demand at the distribution level. However, transport evidence is currently fragmented across multiple local authorities and plans, and risks being weakly reflected in RESP pathways unless actively coordinated.

The development of transport-related demand pathways in LEAPs is inconsistent, and further planning involves a degree of subjectivity, making this a particularly challenging area.

EEH can offer support to:

- Coordinate and support the collection of transport-related evidence across the corridor
- Assessing and highlighting differences in assumptions, timing and spatial focus between authorities
- Presenting a coherent, corridor-level narrative on transport demand and growth that can be meaningfully absorbed into RESP modelling

This aligns closely with RESP's emphasis on place-based planning and the need to uplift local actor capability. Combined with our proposal to convene and coordinate a working group to engage with NESO and the Central Region RESP team in a structured manner, this approach could help deliver the region's strategic ambitions.

EEH recognises the need for a governance model that supports consistency, efficiency and regulatory clarity. At the same time, the current Strategic Board composition risks under-representing democratic accountability to place, particularly in RESP regions characterised by fragmented governance and political upheaval (including LGR) and significant growth pressures.

EEH therefore encourages further consideration of Strategic Board composition and expectations to ensure that the legitimacy of RESP is underpinned not only by sector expertise, but also by clear and credible accountability to the communities affected by its outcomes.

We would also welcome, as a sub-national body covering the entirety of the RESP geography, a non-voting seat on the Board (and distinct from membership consideration of local authority representatives).



We look forward to working with the central region RESP team to deliver the best outcomes for the Growth Corridor and the wider EEH region.

Your Faithfully

James Golding-Graham
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