

North East Regional Spatial Strategy

Consultation on the Secretary of State's Proposed Changes to the draft revision submitted by the North East Assembly

It is very helpful to us if you use the online form on the [Government Office Website](#); or **this form** to make your comments.

Please complete a separate copy of the form for each matter that you wish to comment on, showing each time which page, policy or paragraph of the RSS document or other document you are commenting on.

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When the form is completed, please return it to:

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Please note that all comments will be made available for the public to read – they cannot be treated as confidential. However, please be assured, Government Office for the North East will only use the contact details provided for the sole purpose of distributing appropriate information about this consultation.

Please complete the boxes marked with a star* Other details are requested but not required:	
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I am commenting as (please tick):			
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Please tick which of the documents the comments in this section relate to:					
Proposed Changes	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input type="checkbox"/>	Other	<input checked="" type="checkbox"/>
Please indicate Page number					
Please indicate Paragraph number					
Please indicate Policy number			Policies 39 to 48, Proposed changes 8,9,11, 12, 32, 60,81,91,159		
Please indicate Map name					
Please use this section below to give your comments, or attach a separate sheet if you need more space					
<p>The Energy North East Steering Group welcomes the opportunity to respond on behalf of the regions energy community to the Consultation on the Secretary of State's Proposed Changes to the draft revision of the Regional Spatial Strategy submitted by the North East Assembly.</p> <p>Whilst Energy North East recognises that much effort has taken place in terms of drafting and consulting to ensure the robustness of policies 39 through to 48 within theme 3c – “conserving, enhancing and capitalising upon the region’s diverse natural and built environment, heritage and culture”; it is disappointing that within policy 40 a minimum 10% threshold is set for energy supplied from renewable sources within a new development. Given the urgency to act to mitigate climate change and the often lengthy timescales involved between specification and approval of new developments through to the final completion of schemes; Energy North East would like to see a stronger and enforceable target in line with the European minimum of 20% of energy supplied from renewable sources. Indeed, individual planning authorities are disincentivised from implementing a higher percentage than the minimum within the RSS since this may displace economic activity through the transference of new developments to authorities with a smaller target.</p>					

However, within the proposed modifications there are many other policies where the climate change/ environmental/ energy impact which is unacknowledged.

Proposed changes 8 and 9 update the context of sustainable development, identifying the Governments' Code for Sustainable Development published in 2006 with changes 11 and 12 placing a greater emphasis on climate change. This latter change identifies the regional, national and international dimensions of a complex policy framework. This change could be considerably strengthened by acknowledging that efficient and effective energy generation, distribution and usage make a significant contribution to the mitigation aspects of the climate change agenda. The timing for releasing the 2007 energy white paper (on 23rd May 2007 just prior to the release of the proposed modifications on 29th May 2007) was unfortunate. However, it would be opportune for the next iteration of the RSS document to be cognisant of this updated policy. Increased efficiency of technologies is a key theme for this white paper and the RSS as a planning framework should be unequivocal in its support for the deployment of the most energy efficient technologies throughout the region. There is some discussion about the role of Carbon Capture and Storage in relation to land management, however the next version of the RSS should be aware of the Clean Coal Carbon Capture and Storage technologies that are being piloted in the Tees Valley for energy generation projects, a tangible demonstration of improvements in energy generating efficiency.

The document touches on transport policy in changes 32 and 60, and since the transport sector accounts for one third of the regions energy consumption increased energy efficiency has a significant role to play. The North East as a region is recognised as leading on bio-fuels, both in terms of bio-diesel and bio-ethanol. The next version of the RSS should support these initiatives recognising the contribution of a greater availability and uptake in bio-fuels combined with increases in fuel efficiency to improving long term sustainability.

Finally, changes 81, 91 and 159 all consider land use in the region, discussing the release of employment land to meet the anticipated housing demand as well as the need for more agricultural land for bio-fuel feedstocks. Practitioners in the energy sector consider that there will be demands for land to be made available to support new energy infrastructure projects as well as land to support the business development of energy technologies, their wide scale deployment and associated supply chain. Land that is currently reserved for heavy industrial use should be preserved for the development of big energy installations.

The Energy North East steering group recognises that it has raised a wide range of issues in this consultation response and would be keen to expand on these if any clarification is require or appropriate.

The opinions expressed in this response are a collective view of the partnership and do not represent the views of the individual members of the partnership.

Thank you for your comments. If you have any further comments you wish to make on any aspect of the proposed changes please use the space below.