

# North East Regional Spatial Strategy

Consultation on the Secretary of State's  
further proposed changes to the draft revision  
submitted by the North East Assembly

## Comment on-line

Wherever possible consultees are being asked to make comments by submitting them online by following the link – <http://gone-consult.limehouse.co.uk>. This offers the opportunity to comment easily on the different changes, as well as allowing you to view the representations submitted by others. Alternatively consultees can use this response form.

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 Regional Spatial Strategy (RSS) document or other document you are commenting on.

More copies of the form can be printed from the CD, downloaded from the Government Office web site at <http://www.go-ne.gov.uk/> or requested from the Regional Spatial Strategy Team at the address below.

When the form is completed, please return it to:

Regional Spatial Strategy Team  
Government Office for the North East  
Citygate,  
Gallowgate,  
Newcastle upon Tyne, NE1 4WH

Telephone: 0191 202 3528

Email: [strategy@gone.gsi.gov.uk](mailto:strategy@gone.gsi.gov.uk)

For GO-NE use:  
Consultee reference  
  
Comment reference

## **By 5pm on Wednesday 2 April 2008**

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.

<b>Please complete the boxes marked with a star* Other details are requested but not required:</b>	
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Organisation (if applicable)	Energy North East

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<b>I am commenting as (please tick):</b>			
A private individual	<input type="checkbox"/>	Local Authority or Parish Council	<input type="checkbox"/>
Business representative group	<input type="checkbox"/>	Campaign Group	<input type="checkbox"/>
Utility and emergency services	<input type="checkbox"/>	Statutory Body or Government agency	<input type="checkbox"/>
Landowner, Developer or Agent	<input type="checkbox"/>	Voluntary / community group	<input type="checkbox"/>
Representative of a client	<input type="checkbox"/>	Other (please specify)	Partnership <input type="checkbox"/>
If you are commenting on behalf of a client, please add their name here			

<b>Please tick which of the documents the comments in this section relate to:</b>				
Further Proposed Changes	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input type="checkbox"/>	Other <input type="checkbox"/>
Please indicate further proposed change (FPC) number				
Please indicate Page number				
Please indicate Paragraph number				
Please indicate Policy number		Policy 39		
Please indicate Map name				
Please use this section below to give your comments, or attach a separate sheet if you need more space				
<p>Energy North East welcomes the opportunity to respond on behalf of the region's energy community to the Consultation on the Secretary of State's Proposed Further Changes to the draft revision of the Regional Spatial Strategy.</p> <p>It is disappointing that at this late stage in the consultation process there is such a significant and fundamental change to policy 39(e). This change completely removes any mandatory requirement for major new developments, be they retail, commercial or residential developments, to have embedded within them a minimum of 10% of their energy supply generated from embedded renewable sources. Instead the text proposes "<i>an ambitious but viable percentage of their energy supply from renewable sources</i>", something that is not only weak, cannot be enforced and does not assist North East England in making a contribution towards the European Union targets that the United Kingdom must meet 15% of its energy needs from renewable sources by 2020 with a 16% reduction in CO<sub>2</sub> emissions in the same timeframe. Since there will be no strategic target within the region for the deployment of renewable energy technologies the only vehicle to implement any targets will be the local development framework of each local authority. Not only are some of these frameworks some years away, two of the sub regions within the North East are subject to a fundamental structural change; so a complete set of these frameworks will be at a distant time in the future. Using the Regional Spatial Strategy as a mechanism to meet the targets specified in</p>				

the EU Green package will:

- stimulate earlier and more effective action;
- articulate the commitment of the region to addressing, for its citizens, the energy and climate change crises;
- demonstrate that our region not only understands its own contribution to enabling the UK to meet the EU targets but also understands the role of public policy to deliver these obligations; and
- provide a common region wide renewable energy target.

Stern in his seminal report to HM Treasury was very clear about the adverse economic effect of inactivity in mitigating the effects of climate change, a factor that must be borne in mind by all policy makers when defining, evaluating and reviewing public policy levers. Indeed there is a danger that the absence of any target for embedded renewable energy generation within the Regional Spatial Strategy will be interpreted that North East England is unwilling to make an active contribution to the challenges that face the whole of the United Kingdom. At a time when our neighbours are setting the bar higher (e.g. Scotland, who have set a target of 50% for electricity generation), it is the view of the Energy North East Partnership that the Regional Spatial Strategy MUST have a realistic but demanding target for embedded renewable energy generation within major developments.

If the UK energy target is 15% then new developments must go much further than this, so a much higher level of 50% may be more realistic. It is widely accepted that the UK as a whole will need to have approximately 40% of electricity from renewable sources to meet the 15% energy target by 2020. Indeed, the North East region, like Scotland, has the resources and physical space to develop renewable energy projects and consequently will need to contribute more than just its pro-rata share. Whilst the other renewable energy generation policies in the RSS, namely policies 40 to 42, will also contribute to overall mix of policy levers required to achieve the EU energy and CO<sub>2</sub> reduction targets there is a strong argument that the threshold for embedded renewable energy generation in new developments should be considerably higher than 10%.

Energy North East is pleased that the proposed further changes recognise the value of the regions Micro-renewable toolkit and is actively working with colleagues at One NorthEast to improve the functionality of the toolkit. However, policy 39 would be considerably strengthened by:

- supporting the use of the toolkit with an onus in the policy on developers to use the toolkit to demonstrate where viability would prevent the inclusion of embedded energy generation;
- a robust and enforced target for embedded renewable energy in major developments; and
- the restoration of policy 39(b) to require the inclusion of BREEAM ratings and the Code for Sustainable Homes in new developments instead of the proposed wording to encourage and promote opportunities.

Such a restoration of policy 39(b) reinforces the emphasis and direction of policies 2A (d) & (e) and 24(n).

Partners in Energy North East recognise the requirement for a clear monitoring framework to ensure that any defined targets are meaningful and achievable. In summer 2007, Energy North East commissioned work to establish the regions energy evidence base, the report is freely available and published on the Energy North East website. The outputs from this work provided information on the regions energy usage, energy generation and infrastructure assets. However, the key conclusions were the need to develop a framework to keep this data current; as well as supplementing this with data on Micro-renewable installations, combined heat and power plants and the embedded energy generation within proposed major developments.

A partnership involving Energy North East, the North East Assembly, One NorthEast and the North East Regional Information Partnership needs to be established to develop the processes and protocols to fulfil these requirements. The outcomes of this further work are

fundamental to monitor the energy aspects of the Regional Spatial Strategy (once endorsed) and there may be an opportunity to extend this approach to monitor other aspects of the document.

In summary, Energy North East considers that, at a minimum, the original wording of policy 39(e) should be re-instated into the Regional Spatial Strategy, i.e. that major new developments, be they retail, commercial or residential developments, must have embedded within them a minimum of 10% of their energy supply generated from renewable sources. In addition, the proposed target of 10% should be reconsidered with a view to setting a more challenging threshold; this could be in the wider context of a carbon reduction target.

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.**