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Dear Bridget,

## A Clear Vision for the South East TV Energy response

TV Energy (TVE) is a 'not for profit' organisation established to raise the awareness of local people to energy issues whilst promoting and catalysing the installation of sustainable energy/ renewable energy projects in the SE of England. My comments on the 'Clear Vision' will be restricted to issues and policies that relate to TVE's mission to enable change in the region from non-sustainable to sustainable energy systems.

TVE broadly welcomes the vision set out for the region, a vision which has been developing over the past 5 years with input from TVE. The policies and plans relating to sustainable energy have already been debated in public (Reading, December 2003) and TVE has also made known its views at that time. RPG9 update issued in November 2004 also relates. The following points are made to reinforce these earlier statements and to raise new issues where appropriate:

1. Sustainable energy issues permeate all aspects of regional planning including the economy, social, environmental, cultural and health dimensions of local living. As such, to deal effectively with sustainable energy requires considerable cross-matrix working and classic 'joined-up' government at the regional and local level. Otherwise, policies seen as beneficial in one area may undo the good work being done elsewhere. ***Hence, the strategic vision and joined-up nature of the 'vision' is fully endorsed. The region is encouraged to further develop this linkage and to be pro-active across all sectors (e.g. transport, housing, waste etc.).***
2. Sub-regional working for energy matters is seen as essential in the region which is too diverse to have a 'one size fits all' approach. For renewables, four sub-regions are set out. ***This is supported.***
3. TVE believes that the region must continue to grow its economy if it is to continue to flourish. However, this growth must be sustainable and large energy consumers new and old must be encouraged to generate at least a proportion of their energy from green energy sources. ***TVE endorses the linkage made in the 'Vision' with***



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*sustainable development and the appraisal systems described.*

4. A growing economy needs people and people need housing. The demand in the SE is almost overwhelming to many and resistance to further development is on the increase. Such development must again be sustainable as far as this is possible and for large developments must insist on a significant proportion of energy to be derived from green energy sources. Surrey CC has followed Merton's lead here and has set out that developers must utilise a minimum of 10% green energy. The 'Vision' should push this approach and where possible seek 50% of energy from renewable sources (in line with targets set for 2050 – a conservative estimate of the lifetime of new developments). In addition, higher energy efficiency standards can and must be encouraged, some developers are meeting standards that are 40% better than current building regulations. New developments and regeneration opportunities are the most likely way that the SE can meet its modest 5.5% green energy target for 2010. ***The 'Vision' should take a strong stand and encourage even higher standards than those proposed in all developments of a significant size.***
5. As a result of development pressures in the SE, there are some in the population particularly sensitised and willing to prevent any developments in rural areas. Renewable energy is a diverse and dispersed resource. Much of it occurs in rural areas and must be allowed to be developed sensitively. ***The plan must be to support sensible green energy initiatives across the region and provide regional planning and technical advice and assistance to local authorities enabling them to move forward on this issue with urgency. Such advice might be provided at least in part through local and regional agencies.***
6. ***Co-firing of green fuels (particularly wood) with fossil fuels (particularly coal) should be decoupled from targets set for renewable energy more generally.*** This is a distraction and will at best be a short term measure geared to encouraging fuel infrastructure developments.
7. The region should invest in sustainable energy infrastructure for the delivery of green transport fuels, linking to the ideas on 'Transport Hubs'.
8. The strong position adopted on climate change is welcomed.
9. The region is encouraged to be more pro-active with seeking funding and joining in EU wide initiatives of general benefit. Such an approach would enable easier and more cost effective implementation of new Directives (particularly those relating to sustainability).
10. **OBJECTIVES AND INDICATORS:** Table B1, indicators 16 – 19 are endorsed but the indicator for 19 should be more diverse. Renewable energy is more than just electricity (indicator is by installed capacity). ***Indicators for heat and for green transport fuels should also be included.***
11. **CROSS CUTTING POLICIES:** CC1 and CC2 endorsed. CC3 should go further and include a statement on renewable energy insisting on a minimum of 10% generation and use as discussed above in para. 4. RE1 and RE2 could be very supportive of green energy developments and the industry to support it. There is no reference given.
12. **SECTION D5 – Sustainable Natural Resource Management:** ***The importance of sustainable construction cannot be over-emphasised*** and TVE supports the 'Vision' statements under this section. Policies supporting wood fuel production alongside sustainable woodland/ forestry management is endorsed also (NRM5). Such approaches can have a major beneficial impact on biodiversity too (NRM4) and on water quality and management. References here are rather vague. Waste policies that encourage waste reduction, recycle and segregation are supported.

- Keeping material as uncontaminated as possible and minimising mixing is supported, enabling a more sustainable system of management to be implemented.
13. EN POLICIES: EN1, should be improved as set out previously to insist on a minimum of 10% renewables (reference also PPS22), higher targets are preferred depending on the likely life of the development (the contribution target should be aligned with the lifetime). EN2 fully supported. EN3 should be strengthened and a target for heat and green fuels included. Co-firing should be given separate targets and not impinge on those set out already. EN4, fully supported but Local Authorities should be encouraged to adopt their own local targets and implementation plans. EN5 accepted but the region must give strong and consistent guidance and back-up to developers and communities wishing to become more sustainable. The wording is open to misinterpretation by NIMBYists. EN6 supported and local involvement encouraged.

Yours sincerely,

**Dr Keith Richards**  
Managing Director