

Appendix A– Responses to draft Climate Change Strategy Action Plan

Comments from public consultation	Response
<p>Q1. Do you agree with/support the broad analysis of the issues facing the Council, its residents and businesses?</p> <p>Yes = 6</p> <p>No = 2</p>	
<p>Q1 comments</p> <p>There are lots of things that are not accepted, many are opinions. Furthermore, the overall effect on the world's climate will never be identical in all parts of the world. If some of the world gets warmer, other parts may get colder, and the UK is according to much research may suffer from colder and wetter climate in future. Your assumptions are simplistic and pointless. If we are to have a meaningful strategy, it will be to determine how to live with change, not play Canute and blindly fend it off.</p>	<p>UK Climate Projections produced by Defra, suggest that London's summer mean temperature will continue to increase by a further 1.5 degrees Celsius in 2020 to 3.9 degrees by 2080. At the same time we are likely to experience a significant decrease in mean summer rainfall of 22% and an increase in mean winter rainfall of 20%. The strategy is aimed at what the council can do in Harrow to address the challenge of climate change.</p> <p>The Action Plan aims to look at what is possible within limited financial constraints. The council is not seeking to "play Canute" but the action plan has to be realistic and deliverable.</p>
<p>Q1 comments</p> <p>The strategy appears to accept that the population of Harrow and London is to increase. An increase in population has many adverse consequences, and a realistic climate change strategy should recognise these - the need for housing and services, transport, and pressure on open spaces and Green belt. Water supply for London and SE England is already under strain and cannot realistically be improved. The whole policy of concentrating economic growth and population in London and the SE needs to be challenged, not accommodated. It is not in the best interests of London and the SE, nor of the parts of the country which are losing economic activity.</p>	<p>As above, the aim of the strategy is to provide a way forward for Harrow. The Borough cannot be an island standing against national and regional policy.</p>
<p>The strategy states that the contribution from aviation and shipping to our national emissions is not considered, but that it might be in the future. This omission is absurd! It totally undermines the credibility of this strategy, and must distort our national patterns of energy use.</p>	<p>Emissions from aviation and shipping are national/international issues which are outside the scope of the council's strategy and action plans.</p>

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<p>Q1 comments</p> <p>Several of us looked at the consultation document, and we discussed it . Our general views were: - we broadly support its aims and principles, its heart is in the right place; there’s nothing specific that we disagree with</p>	<p>Noted</p>
<p>Q1 comments</p> <p>The description is too brief and oversimplified. Insufficient emphasis is put on the difficulty of reducing CO2 emissions when the population is rising.</p>	<p>It is accepted that an increasing global population contributes to rising carbon emissions particularly where this occurs in industrialised countries. However population control is outside the remit of this strategy.</p>
<p>Q1 comments</p> <p>Re 1. Planning & Development - Justification - Harrow's Contribution to 60% London reduction needs quantifying with a time line.</p> <p>Include specific reference to Smart metering.</p> <p>Re 2. - Transport</p> <p>- How do 20mph zones and local safety schemes contribute to a climate change strategy?</p> <p>- What is the evidence to show that CPZs reduce emissions / impact positively on Climate change mitigation? CPZs are more to with commuter parking than climate change. Perversely I suspect that CO2 emissions increase with an increasing number of CPZs as motorists drive around looking for a space.</p> <p>- There is no mention of improving traffic flow which reduces fuel consumption i.e. emissions i.e CO2.</p>	<p>The 60% reduction in CO2 emissions (below 1990 levels) is by 2025, working towards the UK’s emissions target of 80% by 2050. The reduction on 1990 levels equates to 45m tpa of CO2. Harrow’s contribution is therefore approximately 1m tpa.</p> <p>The introduction of smart metering is a national policy. It is therefore outside the scope of this strategy</p> <p>In areas with lower speed limits such as 20mph zones or local safety schemes, more people feel confident to walk or cycle to their destinations. When this is done in place of driving there is an environmental benefit. In addition smoothing traffic flows lowers vehicle emissions.</p> <p>In a CPZ the parking regulations are better controlled and so less people drive around looking for parking spaces and polluting the environment. Also, in Harrow, people with environmentally friendly vehicles are eligible for free parking permits so the CPZ acts as an incentive to buy such vehicles.</p> <p>Traffic flow does improve fuel consumption and this is encouraged in Harrow by reviewing signals at appropriate locations and introducing 20mph zones and Local Safety Schemes. Traffic flow in the borough is also improved through engagement with schools reviewing their travel</p>

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<p>Re 3. Water & Flooding</p> <p>- Commitment needs expanding to include water consumption e.g. specify water meters for flats.</p> <p>Re 6. Council's Footprint</p> <p>- Have a specific & aggressive action for schools which contribute 50% of the councils' carbon emissions. e.g. all schools to have phased out at least 80% of energy inefficient lighting within 5 years.; consider use of some local schools for local district energy centres.</p>	<p>plans.</p> <p>All new developments are fitted with water meters – including flats</p> <p>The council cannot set targets for schools as they are financially independent. However it will provide technical support for schools to allow them to access retrofit programmes (such as the RE:FIT Schools programme).</p> <p>These programmes are self-financing as the savings in energy costs repay the initial loans. We will continue to provide this advice and assistance.</p>
<p>Q1 comments</p> <p>There is no reference to the impact on climate change from population growth and demographics.</p>	<p>It is accepted that an increasing global population contributes to rising carbon emissions particularly where this occurs in industrialised countries. However population control is outside the remit of this strategy.</p>
<p>Q2. Do you agree that the Seven Action areas properly reflect the areas that the council can influence and take action on?</p> <p>Yes = 7</p> <p>No = 1</p>	
<p>Q2 comments</p> <p>There is no mention of how progress of the transport indicator will be measured. The majority of short and medium car journeys are unnecessary, and can be undertaken by bicycle or on foot with zero carbon dioxide emissions. The proportion of journeys and average distance walked or cycled should be monitored, with the aim of increasing these to the levels of countries such as the Netherlands and Denmark (e.g. 25% modal share of cycling within 10 years). This can be achieved, but only by prioritising cycling and pedestrian</p>	<p>See new appendix B, which sets out how progress will be measured</p>

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<p>provision in all road designs (e.g. removing unnecessary motor traffic lanes and converting them to cycle paths, removing on-road car parking which would prevent a cycle path from being built, more zebra crossings, altering pelican crossing timings to favour pedestrians).</p>	
<p>Q2 comments</p> <p>There are lots of things that are not accepted, many are opinions. Furthermore, the overall effect on the world's climate will never be identical in all parts of the world. If some of the world gets warmer, other parts may get colder, and the UK is according to much research may suffer from colder and wetter climate in future. Your assumptions are simplistic and pointless. If we are to have a meaningful strategy, it will be to determine how to live with change, not play Canute and blindly fend it off.</p>	<p>The strategy is aimed at what the council can do in Harrow to address the challenge of climate change.</p> <p>The Action Plan aims to look at what is possible within limited financial constraints. The council is not seeking to “play Canute” but the action plan has to be realistic and deliverable.</p>
<p>Q2 comments</p> <p>but the strategy appears to emphasise the role of households (eg on waste and energy efficiency) and downplays the role of business (which also generates waste and uses energy inefficiently). Needs a better balance to reflect every party's responsibilities.</p> <p>Welcome the recognition (p19) that the measures proposed need a long term commitment that should be identified, provided for, and maintained.</p>	<p>Accepted that the strategy concentrates on what the council can do and on improving home energy efficiency.</p> <p>At present these are the areas which the council can influence.</p> <p>At some point in the future it is hoped that businesses will be able to play a larger part in the process.</p> <p>Noted.</p>
<p>Q2 comments</p> <p>Yes broadly. It does not mention Harrow's growing population as being an aggravating factor; the council can influence this.</p>	<p>It is accepted that an increasing global population contributes to rising carbon emissions particularly where this occurs in industrialised countries. However population control is outside the remit of this strategy.</p>
<p>Q2 comments</p>	<p>It is accepted that the strategy focuses on insulation of homes to keep them warmer in winter. Improved insulation can also protect homes from</p>

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<p>Re Action Area 7 - Warmer Homes. P.5 Adaptation refers to the need for cooling buildings. This is not picked up. Focus of action is only warmer (which is correct for winter). Need to reflect seasonal requirements.</p>	<p>excessive heat in the summer – by preventing heat gain through the loft. At present the council has little influence on the provision of cooling for homes so no action has been proposed. This position is expected to change if and when summers become hotter.</p>
<p>Q3. Do you agree with the individual proposed actions? Do you think the emphasis is right and/or do you think we have omitted any actions which should have been included?</p> <p>Yes = 4</p> <p>No = 4</p>	
<p>Q3 comments</p> <p>The schemes mentioned in transport are hardly different to what is already in place, and have been shown to be ineffective in encouraging most of the people in Harrow to cycle. Regarding the specific measures:</p> <ul style="list-style-type: none"> - 1. 20mph should be the default speed limit on all borough roads except main roads with segregated cycle facilities, not just in limited zones. - 2. Cycle schemes should be given priority over bus schemes, to encourage people to use more active modes of transport. - 3. Most people do not cycle because they do not feel safe on the roads, and 'Sustainable transport promotion' is ineffective in changing their behaviour unless the roads are made safer, with cyclists separated from motor traffic. - 4. As well as improving walking and cycling paths, it is necessary to reduce motor traffic on local access roads by making it more difficult to make short journeys by car. Cars should only travel along 	<p>Transport policy is largely determined by the Mayor for London through TfL. The work identified in Harrow's Local Implementation Plan is predominantly funded by the Mayor and meets the transport objectives that have been agreed with the Mayor.</p> <p>There is significant evidence that cycling training and providing new cycle routes increases cycling especially among younger cyclists.</p> <p>This is a political decision. In many instances a default 20mph speed limit would not be appropriate because it could not be self enforcing and would put a greater burden on police resources.</p> <p>Decision are made relative to location and all schemes consider the impact on all road users.</p> <p>Harrow has an excellent road safety record. The strategy is to provide off carriageway cycling where space permits. In addition, significant resources are provided to encourage younger people to feel safer cycling and to build up their cycling experience.</p> <p>This is not in line with the Mayor's Transport Strategy which the borough has a legal duty to introduce. In addition, necessary changes to the highway network would require statutory consultation and the support of</p>

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<p>local roads to gain access to and from main roads; car journeys across residential areas should be restricted by means of barriers and one-way systems (whilst keeping the entire network accessible for pedestrians and cyclists). Experience in the Netherlands has shown that restriction of motor vehicle access is necessary in order to make walking or cycling more attractive than driving, and to reduce traffic to a sufficient level to make people feel safe on local roads.</p>	<p>local communities and other key stakeholders which is unlikely to be forthcoming.</p>
<p>Q3 comments Are independent/private schools and academies included in the action plan? If not, then the council should try and find a way to include them.</p>	<p>The position of schools is complicated because of the growth of academies. Since the publication of this consultation the government has decided that all schools will be excluded from the CRC scheme and that there will be a central retrofit programme for schools to encourage them to reduce their energy consumption. This position is reflected in the final draft of the strategy</p>
<p>Q3 comments your objective should be to serve the best interests of they people of Harrow whom you claim to represent</p>	<p>The council believes that the final version of the strategy does this.</p>
<p>Q3 comments The quantities of waste quoted on p 10 - totals do not tally with the individual entries - which affects the credibility of the table. Does not state how the recycling is to be conducted. If recycling is to make a contribution to climate change the recycled material needs to be used as a replacement for material that would otherwise be produced from new virgin raw materials - ie recycled materials should be used for applications of the same value as their original use. Removing materials from landfill is a worthy but limited objective - we need to do more to use it as a resource!</p>	<p>The revised action plan includes a new appendix (Appendix B) which sets out how we will measure progress</p> <p>The council will meet the definitions of recycling which are set by the EU and national legislation.</p> <p>The new strategy includes a commitment to measure the carbon impact of the waste management stream, which will enable us to ensure that resources are not wasted.</p> <p>There is a balance to be made between the costs and benefits of the various waste management options – both environmentally and economically.</p>
<p>Q3 comments</p>	<p>The council is committed to reducing the carbon impact of new buildings</p>

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<p>- p14 planning and development Action - new, add: Minimize the creation of buildings in Harrow. Each new building adds to CO2 emissions and detracts from the strategic objective Measure Amend planning applications policy and practice</p> <p>- p16 Car Parking policy What about reducing car use for school journeys etc?</p> <p>- p16 Car club. HA 21 is now Harrow Environmental Forum</p> <p>- p17 water etc Bringing down consumption in existing housing may be more difficult but should still be encouraged, e.g. Encourage substitution of dual-flush toilets.</p> <p>- p17 - Under Measure, I think the writer means water use efficiency [not waste use...]</p> <p>- p19 climate resilience Justification: line 2 - change: but it seems likely that we will experience.... Specific actions / urban greening / measure: add: Routine urban realm maintenance to include upgrading green coverage. Specific actions Manage urban space to maximize its multifunctional use, and increase its capacity to provide shade and take up CO2</p> <p>- p20 Biodiversity action plan Measures to include: publish a review of the current plan</p> <p>- p21 Fleet operations Add: look into the environmental and cost benefits of using electric vehicles</p> <p>- p22 carbon footprint of staff Add: encourage staff use of the car club [p16]</p>	<p>in line with national policy.</p> <p>Where new buildings replace old energy inefficient ones the net effect can be to reduce carbon emissions</p> <p>All schools in Harrow have a school travel plan in place. Further reductions in how pupils reach schools is encouraged through updating travel plans and by providing free cycling training in schools.</p> <p>The reference to the car club has been deleted</p> <p>The strategy concentrates on what the council can do and unfortunately, the Council has little influence over existing housing. However, the Council will continue to work with service providers (Veolia Water) to support and encourage initiative for more efficient use of water within existing dwellings and commercial buildings.</p> <p>Noted</p> <p>Agree, this is a specific objective of the Harrow Core Strategy.</p> <p>The proposed wording is the same as that currently proposed i.e. “Revised Harrow Biodiversity Action Plan prepared and published” with a date of 2013/14 for completion.</p> <p>The reference to the car club has been deleted</p>
Q3 comments	Car use is mostly influenced by the price of petrol and the state of the

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<p>There is very little in the plan which does much to reduce car use in Harrow yet we can all see that for much of the day all our main roads are full up with cars which cause pollution that leads to ill-health as well as CO2 emissions.</p>	<p>general economy. Local authorities have no influence at all over price of petrol and very little influence over the economy and hence there it is limited as to how much any local authority can do.</p>
<p>Q3 comments Schools to have phased out at least 80% of energy inefficient lighting within 5 years.</p>	<p>See above response on schools and lighting.</p>
<p>Consider use of some local schools for local district energy centres.</p>	<p>The focus for existing schools is on the introduction of on-site renewable energy generation. Only where redevelopment is proposed could decentralised energy systems be considered feasible. This would be captured under the 'Planning and Development' section</p>
<p>Q4. Are there any other comments you wish to make?</p>	
<p>Q4 comments Please refer the National Institute of Health and Clinical Excellence guideline "Physical activity and the environment (PH8)". Encouraging large numbers of people to cycle can only be achieved by prioritising walking and cycling in all road schemes, spending 10% of the transport budget on cycling and building high quality cycle infrastructure (segregated paths along main roads, restrict motor traffic on local access roads). This will have economic benefits (town centres and local shops will be more accessible, people can save on motoring or public transport costs, reduced congestion) and health benefits. Health economic analyses have shown that the NHS savings alone (due to reduction in incidence of cancer, dementia, heart disease etc.) will more than cover the cost of building cycle infrastructure. This should be a priority for the council to implement because it is a feasible way of substantially reducing the carbon footprint with many other benefits.</p>	<p>All locations are considered on an individual basis. More than 10% of available transport funding in Harrow is provided for cycling improvements in the borough.</p> <p>Physical Activity and Obesity Management is one of the seven priorities in the Joint Health and Wellbeing Board. One of the actions is to "Increase access to and use of leisure services and other opportunities for physical activity" and "promotion of active transport and green travel plans for Harrow businesses". This includes promoting awareness of a walks programme and further develops them through marked pathways throughout the borough and promotion of cycle to work schemes.</p> <p>These actions will be measured through the increase proportion of physically active and inactive adults.</p>
<p>Q4 comments</p>	<p>Yes</p>

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<p>1. Does the Council have the manpower to monitor the action plan?</p> <p>2. Regular updates of achieved/non achieved targets need to be brought to the attention of the public through every available means, e.g. the Council's 'People' magazine, the website, neighbourhood champions.</p>	<p>In general, it is intended to report progress on an annual basis. However note that some of the transport-related measures are not measured annually</p>
<p>Q4 comments</p> <p>I despair at the lack of local democracy, and these proposals merely re-enforce this. They are well meaning but misguided</p>	<p>Noted</p>
<p>Q4 comments</p> <p>Welcome the suggestion of a local energy network for major developments (such as we have seen at Woking). Recommend that the UKDCE and BRE are consulted on any proposals.</p> <p>The strategy is not clear how these are to be powered - if "energy from waste" is to be considered this needs stating honestly - not an optimum choice as its low position in the Waste Hierarchy shows (below reduce, reuse, recycle).</p> <p>The comments on car ownership and use are muddled, and measures are proposed without being thought through - eg restrictions on staff parking at the Civic Centre will only work if Harrow restricts its recruitment to local residents - is this realistic?</p> <p>Measures are proposed to curb commuter car parking round stations - difficult to reconcile this with current proposals to build on Canons Park and Rayners Lane station car parks.</p> <p>Consider thinking on car ownership and use needs to be more coherent.</p>	<p>The Council is currently working with the Mayor for London and his Decentralised Energy for London programme, which is intended to provide London boroughs and other project sponsors with technical, financial and commercial assistance to develop and bring decentralised energy projects to market. UKDCE and BRE are engaged in this programme alongside a number of others.</p> <p>There are no proposals for a local energy network to be powered by energy from waste</p> <p>Proposals for restrictions on staff car-parking at the civic centre will be the subject of consultation with staff. It is possible to envisage that this could be introduced without restricting recruitment to Harrow residents. Many members of staff already use public transport to commute to work.</p> <p>Residents parking schemes are effective in preventing commuter parking in streets.</p> <p>Noted.</p>
<p>Q4 comments</p> <p>1 A p4 what is climate change? The draft first paragraph on climate</p>	<p>This comment is noted.</p> <p>The respondent's proposed text will not be used as the aim is to set out</p>

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<p>change is so oversimplified as to be seriously misleading. Better to substitute the following even though it is longer:</p> <p>Climate change means changes in weather patterns that affect us, such as average seasonal temperatures, the frequencies and amounts of rainfall, and the frequencies and intensities of extreme weather events such as hurricanes, droughts and floods. In recent decades average temperatures have been slowly rising worldwide, so that the atmosphere takes up more water vapour from the seas, leading to more and heavier storms, while deserts expand and arctic ice shrinks. These global temperature rises are happening partly because of increases in greenhouse gases in the atmosphere. The greenhouse effect is a natural phenomenon in which naturally occurring gases trap the sun's energy and warm the planet. The main greenhouse gases include carbon dioxide [CO₂] and methane [CH₄] which are partly produced by human activities such as burning fuels and destroying forests. Also, the seas emit more CO₂ as ocean temperatures rise. Climate change is a global issue.....etc as in draft 2 p5 adaptation Add this after the adaptation bullet points: An important part of this strategy is foreseeing these effects in Harrow, and preparing for them.</p> <p>3 p10 Waste Let's have the population figures, they'll also show the number of carbon emitters in Harrow</p> <p>4 p12 Glossary It would be useful to add explanations of these abbreviations to the Glossary [some of them appear in the draft Delivering Warmer Homes]: CIL DECC DoH ECO GLA HECA LIHC NEA SoS</p> <p>5 Something which increases Harrow's CO₂ emissions and vulnerability is the growing number of people living in the borough. More residents mean more CO₂ emitters, more pressure on green infrastructure, and more people at risk from extreme events. This factor is not mentioned in either the Climate Change Strategy or the</p>	<p>in simple terms what the problem is. The proposed text may be more accurate but is less understandable. The strategy is not meant to be a scientific paper and it could be argued that the proposed text is itself a gross simplification of what is a very complicated issue.</p> <p>The new Appendix B sets out how we will measure progress – including the size of the population.</p> <p>The Glossary has been deleted but all abbreviations are explained in the text when first mentioned</p> <p>Population control/restriction is outside the remit of this strategy.</p>

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<p>Delivering Warmer Homes document, but it should be partly because it is a factor, and partly because the Council can influence it, if only slightly. In one small way Harrow already seeks to reduce growing numbers by striving to cut teenage pregnancies in the borough. In contrast, the GLA used to impose residential growth targets on London boroughs. It no longer does this, so the way is open for Harrow and other boroughs to think about stabilizing their populations. A majority of people think that the UK is already overcrowded, so the ground is ready. Obviously both Harrow's and London's climate change objectives can be met more easily and cheaply if our numbers are stable. The same is true of other areas of government and service provision e.g. housing, education, green belt protection, social care... it's hard to think of any department and its customers that would not benefit if Harrow stabilized and then gently reduced its number of residents.</p>	
<p>Q4 comments There are lots of gaps in the plans, figures omitted, targets missing.</p>	<p>See new Appendix B</p>
<p>Q4 comments I find it quite disturbing that the amount of recycling seems to be less in 2011 than in the previous year - why?</p> <p>Also I would like to know more about the plans for defining 'Open Spaces'</p>	<p>The stagnant economy and the introduction of austerity measures appear to be affecting both the total waste being delivered and the amount of recyclable waste being collected – particularly in the current year. One of the reasons for this may well be the success of the retail industry in reducing the amount of packaging it uses</p> <p>The council has successfully introduced recycling from flats but this has not countered this fall in tonnage. By contrast, the amount of waste in the Brown Bin is relatively constant.</p> <p>Falling tonnages need to be viewed, also, in the context of an increase in population.</p> <p>Open space is defined and identified in Council's recent Open Space, Sports and Recreation Study 2011, which is available on the Council's website:</p>

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<p>Q4 comments</p> <p>The various tables need completing, numerical discrepancies removed and the tables' relevance explained.</p> <p>As an observation an incomplete and at times confusing document marked DRAFT should not be issued for public consultation.</p>	<p>http://www.harrow.gov.uk/downloads/download/2861/ppg17_study_2011</p> <p>See new Appendix B</p> <p>Noted. But the paper was a draft for public consultation.</p>