

Table 1: List of Respondents

Reference Number	Name of Respondent
Res 1	Nugents Park Residents Association
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Table 2: Detailed Comments and the Council’s Proposed Response

1. Planning and Development		
	Comment	Response
RES 3	Agree broadly, needs strengthening, e.g.: 1 Policies must clearly address the causes of climate change as well as preparing us for the effects. Plan to reduce Harrow's CO2 emissions in absolute terms, not just per head.	Harrow has agreed an LAA to reduce CO2 emissions per capita by 11.5% by 2011. This will mean an effective reduction in absolute terms even after allowance has been made for population growth. In the longer term, government policy aims to reduce absolute emissions by 80% by 2050.
RES 3	2 ref Sustainable Design doc: we should require and oblige designers to do this, not just encourage them	Until there is a statutory development plan policy in place, to support refusal of applications not meeting this requirement, the Council cannot require compliance. This is being addressed through the LDF process.
RES 3	3 Compliance with building regs is not enough. Harrow needs to be very strict about all new buildings, commercial and residential, requiring them to be designed and built for green energy capture and use including ground source heat, with highest energy efficiency standards. CH&P always to be considered.	The boundaries set for securing improvements for new developments are defined by planning policy and Building Regulations. The Council is working alongside others (such as GLA) to improve planning policy in this area. Government review of Building Regulations is an acknowledged baseline for Building Control purposes with little scope for enhanced provision unless supported by planning policy.
RES 3	4 We should require similarly strict standards for refurbishments and upgrades of existing properties by commercial firms, developers, and landlords.	Limits to scope for applying such standards – dependent upon extent of works and reasonable requirements associated with planning process.
RES 3	5 We should encourage and help private individuals to reduce emissions from their properties. Promotion and education for this will require planning, resources, and budget.	Current review of skills in Place Shaping available to support and assist developers in securing improvements.
The Pinner Association -	Ensure that Planning Officers and Building Control Officers liaise so that any on-site inspections cover both aspects to ensure compliance with all planning consent conditions. (And see comment under Water and Flooding below.	Process in place to secure compliance monitoring from BC officers at setting out stage.
RES 5	9. Re 1.3(e) reviewing options to enforce does not commit to enforcing.	Enforcement of regulations must be considered on a case by case basis to ensure robust justification for chosen remedy. Creation of an

	Please amend text " and ENFORCE the regulations."	"enforcement policy" is underway to establish clearer rationale for planning enforcement. Review of Government proposals for the future of building control will inform BC enforcement.
RES 5	10. Re 1.3(g) Include DEVELOPERS	Noted
RES 7	I consider that solar water heating and rainwater harvesting should be compulsory in all new build properties.	Solar water heating and rainwater harvesting are dependent upon scale and detailed form of development. Compulsory requirements would not be reasonable in planning terms. Water use management and water/space heating need to be considered as part of a range of options to address climate change challenges.
RES 8	But please remember that people who have limited mobility need different designs, room temperatures etc.	Mobility needs will be addressed by the Accessible Homes SPD. Energy efficiency policies will be of significant benefit to people who have a need for a warmer than normal living environment.
The Labour Group	Add the following: h. Publish a guide to sustainability that will be given to every Planning Application and ask every applicant to sign a declaration to say that they have understood the guide.	The Council has adopted its Sustainable Building Design SPD which provides guidance and requires all applicants to prepare and submit with their application a sustainability checklist, identifying how their development has taken into account the sustainability measures identified, that are of relevance, and if not, to state the reason why such measures could not be achieved. It is unclear what consequences could be for not signing declaration e.g. refusal of planning permission would not be justified on this basis at present time.
The Labour Group	i. Develop an accreditation scheme for contractors who share the council's aim of sustainability.	We will encourage our partners to adopt accredited Environmental Management Systems
The Labour Group	j. Set up a contractor's forum to promote best practice within the industry to be led by our Partner Kier.	We will work with Mouchel and Kier to promote best practice down their supply chains.
Thames Water	Para 1.8 – Summer water shortages – as written this implies that there will be summer water shortages, whilst this is true at an environmental level the whole point of our business is to avoid water shortages for our customers.	Thames Water rightly point out that their business plan is to ensure that customers are provided with water supplies even during periods of drought. This does not conflict with the overall message in the council's strategy. Obviously there is a need for both parties to liaise closely.
Thames Water	Para 1.8 – Low stream flows – This will impact us in two ways; in the form of less water to abstract and less dilution for our effluent	Thames Water's business plan will presumably take into account the risks of this effect. This does not conflict with the overall message in the council's strategy that we are likely to face periods of drought or low

		<p>rainfall. Water saving measures, sustainable urban drainage, the use of harvested rainwater, and use of grey water will all contribute towards managing this risk.</p> <p>Obviously there is a need for both parties to liaise closely.</p>
Natural England	<p>The indicators set out in Paragraph 1.2 all focus on climate change mitigation. However, good planning and development can also help areas adapt to climate change. In particular, well designed green infrastructure helps adaptation to the effects of climate change in addition to mitigating climate change and therefore should be promoted in the Climate Change Strategy. Green infrastructure is a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Green infrastructure should include established green spaces and new sites and should thread through and surround the built environment.</p> <p>We recommend that Harrow explore the possibility of including a section in the Climate Change Strategy which focuses on green infrastructure and how it can help the borough to adapt to climate change, for example by reducing localised temperature extremes, providing shade and improving liveability, alleviating flooding, improving environmental performance of buildings and reducing local wind speeds.</p>	<p>The point about adaptation and the potential benefit of green infrastructure is accepted. The council will look to take these into account in the LDF.</p> <p>Section 6. Biodiversity and the Natural Environment is intended to deal mainly with these issues.</p>
RES 15	<p>As >50% of CO2 emissions are from buildings, this exceeds the total from transport and industry – needs to recognise that improving the performance of buildings gives the greatest opportunity to improve our performance overall.</p> <p>Not just planning has a role – this can influence the location and hence transport needs of any development. Much more scope to improve the building's performance through design, competent installation, and proper maintenance and operation during the building's life.</p>	Accepted. The sustainable Design SPD will help address this issue
RES 15	Cooling buildings implies air-conditioning, which is energy intensive.	Accepted. The sustainable Design SPD will help address this issue

	<p>Better option for achieving cool conditions by design and by sensible operation in service.</p> <p>Also a need for better control of heating systems to achieve comfortable temperatures during the heating season</p>	
RES 15	<p>The requirement for 4000 new homes shows that Harrow faces population targets imposed as a consequence of national policy.</p> <p>English regional policy also assumes a migration from the North to London and the South-East, which is particularly perverse as modern communications and modern industries make decentralisation much more practical. An increased population has serious environmental consequences, and these are greatest in areas which are already densely populated. It must now be opportune to challenge these immigration targets and internal migration patterns – they overlook the fact that England is the most densely populated country in Europe, and London and the South-East are its most densely populated regions.</p>	<p>Harrow cannot use the climate change strategy to escape its obligations under regional and national planning policy to provide new homes etc.</p> <p>Dense populations can result in very efficient use of energy and are not, in themselves, reasons not to increase population densities.</p>
Harrow U3A – Sustainability Group	<p>Population and Demographics:</p> <p>This submission made an extensive point about the effect of population growth on carbon emissions in Harrow and criticised the existing planning policies (to increase the number of households and the local population) as being intrinsically a “predict and provide” philosophy.</p> <p>It calls for a tenth theme to be added to the Strategy on the subject of Population and Demographics, which would envisage the council comparing the “predict and provide” scenario with a “steady state” (i.e. zero population growth) scenario.</p> <p>A “steady state” scenario would be the prelude to a programme to reduce Harrow’s population.</p>	<p>It is not proposed to introduce a section on the theme of Population and Demographics as the suggested policy lies outside of the scope of this strategy</p> <p>Undoubtedly world population growth does add pressure on the world’s environment but it is difficult to see how Harrow could insulate itself from these wider pressures of population growth.</p>
Harrow U3A – Sustainability Group	<p>Action 1:</p> <p>Change wording to say “how we will address the issues of climate change reduction, mitigation and adaptation” to make explicit that we want to deal with the causes. The word mitigation alone is too</p>	<p>In the commonly accepted climate change definition of mitigation, reduction of carbon emissions is included as a major part of mitigation. It is therefore not proposed to change the wording as suggested by the respondent.</p> <p>However, a new section 1.8 has been added to explain what mitigation</p>

	ambiguous.	includes. The section on Adaptation (now section 1.9) has been rewritten to exclude references to mitigation and to explain, more fully what are the anticipated effects of climate change in the UK.
Harrow U3A – Sustainability Group	<p>Harrow should oblige designers not just encourage them</p> <p>Harrow needs to be very strict about all new buildings, commercial and residential, requiring them to be designed and built for green energy capture and use including ground source heat, with highest energy efficiency standards. CHP always to be considered.</p> <p>We should require similarly strict standards for refurbishments and upgrading of existing properties by commercial firms, developers and landlords. We should encourage and help private individuals to reduce emissions from their properties.</p>	<p>See above. The extent to which obligations can be imposed is set by Regulations, statutory development plan policy and national planning policy guidance. GLA and Harrow are currently reviewing policy for the future as part of London Plan review and LDF process. This will address climate change and permit a more resilient approach to development in the future.</p> <p>Most suitable response to climate change in development is dependent upon site and development circumstances. A “one size fits all” approach is not considered appropriate or “reasonable” within current policy framework.</p> <p>Extent to which refurbishment and upgrading of property can be captured is dependent upon extent of works and consent regime (i.e. planning or building control) and whether permitted development or not.</p>

2. Domestic Energy

	Comment	Response
Nugents Park Residents Association	But a much more flexible approach would be necessary when dealing with insulation of domestic properties, particularly older or unique properties.	Agreed. Obviously retrofitting listed buildings and houses in conservation areas will need special consideration.
Respondent 3	Ref fuel poverty: to reduce climate change emissions, fuel-poor residents should have priority for help, support and funding for energy efficiency, insulation and green sourcing. It's hardest for the poor to become climate-friendly behaviors, this policy plus education and motivation may help	Agreed. The government is proposing that low-income families will receive 100% grants. For more affluent households, either reduced grants will be made available or capital investment would be provided, which would be

		repaid over a period of time using the cost-savings generated by the work to repay the investment.
The Pinner Association -	These targets seem to be totally impossible to realise in the time frame suggested, especially the insulation of solid external walls which would cause major disruption to any home. How will private home owners be made to comply these requirements? Will these targets include listed buildings and Conservation Areas? If so, how will the conflicting priorities be reconciled?	<p>The targets have been adjusted to reflect those suggested in the government's consultation on it Heat and Energy Saving Strategy.</p> <p>It is accepted that solid wall insulation is more disruptive to install and more expensive.</p> <p>The government is not envisaging compulsion but stating that all residents will be offered the opportunity to upgrade their homes.</p> <p>Obviously retrofitting listed buildings and houses in conservation areas will need special consideration.</p>
Respondent 5	<ol style="list-style-type: none"> 1. Identify funding streams to achieve insulation improvements by stated timelines. 2. Install SMART metering in all kitchens, assist re-lamping with energy efficient lamps/LEDs, integrate cooling devices and heating systems, positively discourage domestic tumble driers. 3. Identify / target high thermal / energy waste residential areas by thermal image mapping, utility consumption surveys. 4. Improve use of natural light and energy – via building design, light wells, use of modern glass. 5. Highlight and use Housing Corporation / EST Tenant Empowerment Toolkit for Social Housing 	The government is investigating how these changes can be financed so that householders can afford to repay the investment from the savings (in energy costs) that would be generated. It is expected that low income households will receive grants which will cover the full costs
The Hatch End Association	<p>Does the high proportion of domestic sector usage in Harrow's energy consumption, compared with London as a whole, reflect the comparative absence of industry in the borough rather than any remarkably excessive usage by Harrow householders? How does the figure of 47% compare with outer London boroughs?</p> <p>The abbreviation "SAP ratings" (and any others) should be spelled out fully in the text at least initially and not left just for the glossary. Is the poor SAP figure for private sector housing in Harrow a reflection of, for example, the high proportion of poorly insulated solid walls and how does the figure compare with other boroughs.</p> <p>2.3 In the table in paragraph 2.3, the targets look over-ambitious, in</p>	<p>Figures for other councils are available and will reflect the particular make-up of the area. – I.e. more or less industry, or varying proportion of solid/cavity walls. Usage in Harrow reflects the demographic and relative affluence of the area.</p> <p>In relation to older parts of London, Harrow has a higher proportion of cavity walls and therefore has considerable scope for the easier option of cavity wall insulation.</p> <p>The target date of 2012, in the draft strategy has been changed to 2015, in line with Government targets</p>

	particular when the implications are those spelled out in the text below it, in respect of minimum improvements. It is only three years away from 2012; will all lofts be insulated by then? Will all central heating systems in private homes be updated by then - improvements are expensive undertakings for householders (even without the recession); and does the Borough have any idea what proportion of central heating systems are in place in Harrow's private sector properties and what proportion will need tackling within three years ? Will all cavity walls be filled? And will all this be achieved by 'encouragement' and 'advice' even with available grants?	
Respondent 7	These targets will not be met unless substantial grants are made available to all householders.	The government is proposing that low-income families will receive 100% grants. For more affluent households, either reduced grants will be made available or capital investment will be provided, which would be repaid over a period of time using the cost-savings generated by the work to repay the investment.
Respondent 8	Go for them all, but remember that some people will be confused and find the issue hard to understand, some have anxiety needs around change or letting people into their homes, and deal with people who seem not to be complying by finding out why and helping them deal with the issues.	It is envisaged that the energy companies will provide the main input (as now) with the council providing an overall liaison role. Public education is recognised to be an essential element in delivering this programme
Labour Group	Add the following: h. Offer matching grants to residents who have carried out a Green Homes Concierge survey and execute recommendations from that survey.	The Implementation plan envisages that the council will provide council tax rebates to homes which achieve either an A or B HEC rating.
Thames Water	Para 2.1 – The design of the hot water system in a domestic property could significantly reduce energy consumption. This should be acknowledge in this section	Solar hot water systems can reduce the amount of fossil fuel used to provide hot water by over 70%. We will look to include such systems into new and existing houses as widely as possible
RES 15	Agree that cavity insulation of the 2/3rds of Harrow's properties which have cavities offers great scope for improvement. Improving solid walls by adding external insulation or dry-lining is much more difficult – sills will need to be replaced, gutters and down-pipes repositioned, all costly and inconvenient activities. Semi-bay windows – treated how? Eaves detail at roof? Single property of a semi at junction	It is accepted that solid wall insulation is more difficult to install but this may be the only option where cavity walls are not present Internal insulation reduces the floor area and involves the removal and replacement of skirting boards, cornices etc. Ideally these are best done during major redecoration or refurbishment.

	with its neighbour?	External insulation is appropriate in some circumstances but requires careful treatment of eaves and windows and drainage pipes. Schemes will need to be carefully designed – particularly in conservation areas and listed buildings. In some situations, solid wall insulation may not be appropriate
Harrow U3A – Sustainability Group	Section 2.1 – 5 th paragraph: Add “cause less CO2 to be emitted and” into the sentence dealing with retrofitting and adapting existing properties.	Agreed. Wording has been changed.
Harrow U3A – Sustainability Group	Fuel poverty: Let’s not mix up objectives. Fuel poverty may be a problem, but it is separate from the climate change problem. Just increasing the income of the fuel-poor would be likely to increase CO2 emissions and be counter-productive for reducing climate change (they may simply burn more fuel). (Anyway, increasing their income is not in the Council’s gift, is it?) Fuel-poor residents should have priority for help, support and funding for energy efficiency, insulation and green sourcing.	The respondent is correct that there is a potential conflict between tackling fuel poverty and climate change. The government’s aim in its current programmes is to tackle fuel poverty by increasing income for vulnerable people and by prioritising them for insulation and improved heating. The council can assist low-income groups to access higher value tariffs. However there is valid point that tackling fuel poverty can have social benefits in addition to climate change benefits and that this may help to deliver wider social goals – such as improved health and fitness, improved performance at school, and reduced crime and vandalism.

3. Transport

	Comment	Response
Respondent 3	Require all new and upgrades of hard standing to be permeable	Noted. This objective is currently being put into practice where possible and appropriate as part of the planning process. Policy requirements are likely to be brought forward through Harrow’s Development Management DPD, which will also seek to give effect to any Surface Water Management Plan.

The Pinner Association -	Cycle lanes do NOT need a picture of a bicycle every few metres (as on Eastcote Road, Pinner)! Workplace travel planning to start with the Civic Centre.	Cycle logos are particularly useful at junctions to warn drivers about the presence of cyclists. This is also the case where there is a lot of on-street parking such as Eastcote Road. Regarding workplace travel planning agreed.
Respondent 5	<ol style="list-style-type: none"> 1. Re 3.3 (d) – Modify to encourage IMPLEMENTATION of school & workplace travel planning. 2. Promote provision of additional weatherproof, secure etc. cycle storage facilities at all transport interchanges within Harrow LA and retail areas. 3. Introduce Cycle Loan/hire schemes. 4. Design & implement additional congestion reduction (improves air quality and reduces CO2) schemes incl. traffic light timings/synchronisation, better use of road space, lay-bys for loading/unloading and bus stops. 5. Promote / make provision for the enhancement of telecommunication infrastructure (e.g. optic fibre) to reduce commuting, business and shopping travel. 	<ol style="list-style-type: none"> 1. Implementation is dependent on funding and encouraging something without the funding to back this up is probably not sensible 2. Agree 3. This will be considered once funding is secured 4. Signals are being reviewed. Transport for London is responsible for traffic signals. 5. This needs to be led by Central Government
The Hatch End Association	The strategy is realistic, reflecting the limitations on what individual boroughs can do on their own. This is largely a matter for TfL and for transport undertakings and manufacturers, The borough's priorities and encouragement are fine, though their effect on private behaviour (walking, cycling and using public transport more) may be uncertain	Noted
Respondent 6	Agree to a certain extent, however with children in the future being unable to afford their own housing and having to live with parents for longer there will almost certainly be many households with more than one car and it is not fair to penalise them for this.	Noted
Respondent 7	I would like to see far more being done to encourage cycling. Segregated cycle tracks are required on which cyclists have right of way. Many existing tracks are interrupted by drives and side roads. A cyclist needs to be able to keep going. I suggest a visit to any Dutch city to see what could be achieved. A less officious attitude to pavement cycling by the town centre wardens would be helpful	Physical restraints and funding limit the possibilities for this happening.

Respondent 8	Generally good, but remember that there are people with mobility needs who may find some of this difficult, encourage London Transport to improve local services, tighten up parking and improve in terms of space and availability and only for disabled people.	The needs of those with mobility difficulties is considered in all schemes.
Labour Group	Amend d to read "All schools to have a travel plan by 2012 and encourage/promote workplace travel planning."	The current deadline is more ambitious than this.
Labour Group	Amend g to read "Introduce a Car club for Harrow by applying for funds from the Mayor for London."	We will be introducing car clubs in Harrow in collaboration with the Mayor for London's scheme
Labour Group	Amend h to read "Introduce electric charging points in council car parks where practicable."	We will install recharging points in council operated car parks in collaboration with the Mayor for London's scheme
Transport for London	TfL welcomes and encourages support for car clubs and charging facilities for electric vehicles, however it considers that Harrow should take a more positive approach in some areas, particularly in encouraging mode shift to walking and cycling for local journeys, the potential for resident controlled parking schemes to further incentivise CO2 efficiency, travel planning and fuel efficiency in Harrow's own vehicle fleet.	Noted
Transport for London	TfL considers that the transport section has two key omissions: freight and climate change adaptation. We suggest reference should be made to minimising the vulnerability of the transport network and services to the impacts of climate change through measures such as risk assessing the LB Harrow transport portfolio against the impact of climate change and mitigate the siting of transport infrastructure in areas susceptible to the impacts of climate change	Noted
Transport for London	On the issue of freight, reference should be made to the London Freight Plan in order to tackle the 23% of ground based transport CO2 emissions that come from freight movements. Freight operators should be encouraged to demonstrate commitment to sustainable operations and best practice by being a member of the TfL Freight Operators Recognition Scheme (FORS), or equivalent, and operating within its	Noted

	guidance.	
Transport for London	We recommend that Harrow ensures its own freight vehicle fleet attains FORS membership and make reference to FORS in procurement policies.	Noted
Transport for London	We also recommend that LB Harrow mandate the use of Delivery and Servicing Plans and Construction Logistics Plans for all new premises. TfL would suggest that the sustainable Design SPD should mandate the requirement for Delivery and Servicing Plans to minimise and mitigate the effects of the delivery activity for any new development. (See: http://www.tfl.gov.uk/businessandpartners.freight/11423.aspx .) Similarly a Constructions Logistic Plan should also be requested. (See: http://www.tfl.gov.uk/businessandpartners/freight/11422.aspx .)	Noted
Transport for London	It would also be useful to provide details on how travel information, particularly in relation to low carbon modes of walking, cycling and public transport, can be accessed. For example, TfL's travel information line 020 7222 1234 or the TfL website www.TfL.gov.uk .	Harrow provides lots of information directly via its websites
Transport for London	There could also be more information about reducing the need to travel and encouraging off-peak travel (through home-working or flexible hours, for example)	Noted
RES 15	Shipping is a relatively efficient way of moving bulk goods – aviation is definitely not. We are told that we live in a globalised world – in this case it is realistic that any strategy to control climate change should include emissions from international shipping and aviation. Further, aviation fuel does not carry the same taxes as surface fuels, which distorts competition between the different modes of travel, and favours the least fuel efficient. Are we taking climate change/energy use seriously as a world problem or not? Giving aviation a free ride destroys the credibility of all we are trying to achieve!	The points made are valid but they lie outside the scope of Harrow's Strategy. These measures would need to be considered at an international level
RES 15	Question whether electric vehicles are environmentally friendly. Agreed that they emit no emissions when they are used, but they are powered by	Electric vehicles have a place in reducing pollution particularly in built up areas where NOx and particulates have been shown to have adverse

	<p>electricity which is created in a process with a thermal efficiency of 33%, and has its own emissions, If electric vehicles become widespread the load they will pose on the National Grid when they are charged overnight will be substantial</p>	<p>effects on health.</p> <p>Government policy is moving towards decarbonising electricity generation – so electric vehicles would mean that there is an overall reduction in CO2 emissions.</p> <p>The thermal efficiency of electricity generation is also likely to be improved significantly as generation is decentralised and small scale CHP schemes are introduced.</p> <p>Charging of electric vehicles overnight may help to smooth out electricity generation over the course of the day as it will represent part of the electrical base-load.</p>
<p>Harrow U3A – Sustainability Group</p>	<p>Action 16: We should change the public's behaviour by encouraging walking and cycling and the use of public transport. . . .</p>	<p>Wording changed.</p>

4. Water and flooding

	Comment	Response
<p>Nugents Park Residents Association</p>	<p>On Water, for example, encouraging installation of meters should be a high priority and mere exhortation may well not suffice. Either it should be made uneconomic to remain on rates or compulsion should be used, possibly with free installation.</p>	<p>Installation of water meters lies outside the council's area of responsibility. The water supplier for the area is Three Valleys Water – one of our partners.</p>
<p>Respondent 3</p>	<p>Broadly agree but not enough. All new and refurbished hard standing should be permeable. Providing information is fine but the Council should regulate to require these water collection and consumption-reduction measures in ALL new builds, refurbishments and upgrades requiring planning permission</p>	<p>New hardstanding will be required to be permeable. Existing hardstanding will be more difficult to alter but we will encourage residents to change to permeable construction as and when major refurbishments take place.</p> <p>Water collection and consumption reduction measures will be a requirement in all new houses under the Code for Sustainable Homes</p>

		and the council's Sustainable Design SPD.
The Pinner Association -	Restrict the bathroom to bedroom ratio in new builds and renovations as a condition of planning consent. Not every bedroom needs a bath or shower room, as is becoming more prevalent in new builds and renovations. More bath or shower rooms means more water use, and more resources expended.	Planning policy and Building Control does not control such design matters. Internal alterations to a property are not "development" and in most cases do not require planning permission. The introduction of a planning policy of this nature would likely result in considerable opposition from the development industry and runs contrary to governments principle regarding the promotion of choice in housing. However, Code for Sustainable Homes includes water consumption requirements that ensure development results in efficient water use and may impose restrictions on bathroom numbers per dwelling to ensure compliance with the standards.
Respondent 5	1. Explain why Harrow's water consumption is relatively high? This would lead to targeted action with measurable outcomes. 2. Re 4.3 (f) - include DEVELOPERS	Harrow's water consumption levels reflect the relative affluence of the borough and the low levels of water efficiency of appliance and fittings. Water efficiency of appliances such as washing machines and dishwashers has improved significantly over the last few years and this will feed into reduced consumption as appliances are replaced. The water efficiency of showers and toilets have also improved and this will also feed into reduced consumption as people maintain and improve their homes New developments will be covered by the Code for Sustainable Homes and the council's Sustainable Design SPD.
The Hatch End Association	Investigation is needed to see why Harrow's daily water usage (170 litres per person) is distinctly more than the London average (150); how does it compare with outer London boroughs? Something more than "encouragement" is needed to achieve a switch to meters, either compulsion and/or subsidy. Why are there no targets or assumptions comparable with those for domestic energy?	See above response.
Respondent 7	I would suggest that at least two thirds of hardstanding in front gardens should be permeable. Why should the same rule not apply to all car parking spaces wherever situated?	Noted. Requirements regarding permeable surfaces are likely to be brought forward through Harrow's Development Management DPD, which will seek to give effect to any Surface Water Management Plan. However, it should be noted that permeable surfacing may not be

		suitable in all cases, especially on formerly contaminated land. Accordingly, the type of surfacing will need to be considered based upon a case-by-case basis.
Thames Water	Para 4.1 – water supply – This opening paragraph confuses the availability of water resources with supply of drinking water which then feed through to pressures on supply. The paragraph should be reworded to read “there is likely to be pressure on the availability of water resources and more incidents of flooding	Para 4.1 amended
Thames Water	Para 4.1 – Partners – An explanation of how the council will work with the different partners should be set out	It is envisaged that the Harrow Strategic Partnership will be the main vehicle for working with partners.
Thames Water	Para 4.1 – Sewage - -There needs to be a reference to the sewerage network as well as sewage treatment.	Para 4.1 amended
Natural England	We are encouraged that the council is including SUDS in new development to control surface water run-off in the Sustainable Design SPD. If the council were to include a chapter/section on green infrastructure in the Climate Change Strategy, SUDS would be an appropriate component.	Noted. Although the council’s strategy shows SUDs within the water section, and this is separate from the Biodiversity section, the aim will be to consider all schemes as holistically as possible.
Natural England	The strategy should also consider river restoration projects if appropriate where fluvial flood risk might be identified (through the SFRA). The council should refer to the London Rivers Action Plan (www.therrc.co.uk/lrap.php) which provides a toolkit for river restoration.	Noted.
RES 15	This section accepts the target of 4000 new homes. Another consequence of this development is that more water will be diverted from roofs into the drains, rather than into the ground as it would do otherwise. This is another perverse outcome from overdevelopment and the proposed target should be challenged.	Harrow cannot use the climate change strategy to escape its obligations under regional and national planning policy to provide new homes etc. The aim of the Sustainable Design SPD is to ensure that water is reused or diverted into the drainage system by the use of SUDS, rather than passing straight into the drainage system.
RES 15	Agree the need for permeable paving for hard standing in front gardens. But many properties have garages and Harrow Council planning readily accepts proposals to convert these into habitable rooms, which stimulates the need for paving front gardens or street parking.	Conversion of garages is in most cases, permitted development. Accordingly, planning permission is not required and Council’s control is therefore limited. Extent to which control is possible depends upon each case. Managing the consequences of garage conversions can only be achieved through planning applications (and more recently requirements

		of permitted development).
RES 15	New development on a flood plain will presumably have some protection from the conditions it is in. These will increase the vulnerability of buildings which are already there.	The Sustainable Design SPD requires that, where developments are permitted to be built on a flood plain, they will need to be designed so that there do not have an adverse effect on existing properties.
RES 15	Water-saving techniques should also be promoted to developers and designers.	New developments will be covered by the Code for Sustainable Homes and the council's Sustainable Design SPD. Efficient use of water and water saving technologies will be an important element in new developments.
Harrow U3A – Sustainability Group	Require all hardstanding to be permeable	Requirements regarding permeable surfaces are likely to be brought forward through Harrow's Development Management DPD, which will seek to give effect to any Surface Water Management Plan. However, it should be noted that permeable surfacing may not be suitable in all cases, especially on formerly contaminated land. Accordingly, the type of surfacing will need to be considered based upon a case-by-case basis.
Harrow U3A – Sustainability Group	Can't Harrow Council regulate to require these water consumption reduction and collection measures in all new build, refurbishment, and upgrades requiring planning permission?	New developments will be covered by the Code for Sustainable Homes and the council's Sustainable Design SPD. Efficient use of water and water saving technologies will be an important element in new developments.

5. Waste

	Comment	Response
Nugents Park Residents Association	On Waste, there seems to be no acknowledgement of the need for relative economic viability to be taken into consideration in recycling and disposal plans. The economics and cost- effectiveness are not totally irrelevant to ratepayers.	Economics and cost-effectiveness is of central importance to the council and West London Waste Authority in deciding how best to increase recycling and reduce landfill. European and national policy means that continuing to landfill waste is no longer a cost-effective option and this

		will become increasingly the case. Waste is increasingly seen as a resource which should be used beneficially. The council's aim is to recycle and compost as much as economically possible and then to recover the embedded energy from the remaining waste.
Nugents Park Residents Association	5.3.f refers to promoting education of the public. There is need for action on this now. There seems to be a dearth of information at present on how recycling works and in particular of detailed guidance to householders on how they can help. For example, should separate plastic tops be included, should dirty or greasy paper, cartons or other articles be sent for landfill, do envelope windows need to be removed before recycling etc, etc.	The council does provide extensive information on its web site. We will review to see if it can be made clearer. However there is a balance between comprehensiveness and clarity which needs to be maintained.
Respondent 3	Take on the aim to recover energy from non-recyclable waste, e.g. re-constitution of liquid oil substitutes from waste plastics	It is expected that energy will be recovered from non recyclable waste as part of the joint waste strategy with WLWA. Precise technologies will depend on an assessment of costs and benefits.
The Pinner Association -	See responses to Waste Management Strategy consultation:	Note.
Respondent 5	Include waste & packaging reduction (e.g. cross link to 7.2(k)) at point of purchase.	Waste and packaging reduction lies outside the council's area of responsibility. Packaging industry is cooperating with national government to deliver changes in this area.
Labour Group	Amend a to read "Publish a revised waste management strategy for the borough to increase further the amount of municipal waste we recycle and compost - to 55% by 2010."	The council's current target is to recycle or compost 50% of household waste by 2011. This is equivalent to approx. 40% of municipal waste (which includes the commercial waste that the council collects). A target to recycle and compost 55% of municipal waste by 2010 would not be achievable without very significant investment. Even if the investment were made available, it is doubtful whether such a level of change would be possible by 2010. The WLWA and the six boroughs, are reviewing their joint waste strategy with the aim of recycling, composting and recovering 70% of municipal waste by 2020. This would represent a significant

		achievement were it to be achieved.
HA21 – Waste Group	Clause 5.3 b) aims to maximise the use of waste as a source of energy, but does not explore whether this is by incineration or another technique. the use of waste as a source of energy is low in the hierarchy, and is not considered as recycling under the European definition.	Agreed that recovery of energy is not defined as recycling. The revised European Waste Framework Directive (WFD) defines waste recovery operations as ones that have a thermal efficiency of 65%. This will require any energy recovery facility to capture and use the waste heat from the facility. Facilities with thermal efficiencies lower than 65% are classified as disposal facilities. The WFD also sets EU wide targets to recycle 50%, and recover 25% of waste by 2020. Energy recovery is an important element in tackling climate change. The council's view is that it should not artificially exclude any recovery technology from consideration
HA21 – Waste Group	As clause 5.3 c) refers to anaerobic digestion for food waste, we must deduce that the intention is to obtain energy from plastic waste, paper or cardboard, the other combustible ingredients in waste. On climate change grounds, the use of waste from energy overlooks the fact that these have been produced and processed in processes which themselves use energy, and that the heat of combustion is probably only one-fifth of the carbon footprint of the materials. Their reuse for their original purpose is much more efficient, and a strategy that aims to reduce climate change should aspire to this.	This deduction is not correct. Cross referencing with the waste management strategy shows that the intention would be to collect food waste separately from businesses and schools for delivery to an AD plant. The council would require plastic, paper and cardboard to be collected separately.
HA21 – Waste Group	On climate change grounds it is desirable that all materials reclaimed from waste are used in their original applications or applications of similar value. If materials are of low quality and can only be used for lower value applications, then it will be necessary to use new raw materials . . . for higher value applications. but we fear that paper collected together with glass can only be used for low value purposes, and that mixed glass can only be used as an aggregate for roads – adverse for climate change On the basis of climate change and the need to maximise the reuse of waste in its original application, conclude there are grounds to reconsider	Paper collected in co-mingled collections is used for the production of newsprint provided it is processed in a facility that is properly equipped – which is the case for the facilities that Harrow currently uses. Collecting glass separately would mean that a greater proportion of material would be used in the manufacture of new glass containers – rather than as aggregate. However there would be substantial costs associated with separate collections and the public would need to be issued with an additional container and “retrained” to use the modified system. At present this is not economic. This position may change as energy/carbon becomes more expensive.

	Harrow's policy of co-mingled collections.	
HA21 – Waste Group	5.3 c) accept that food waste is best processed by anaerobic digestion, but it is essential any such plant is equipped and managed to minimise nuisance and odours. (The information from north London circulated during the West London consultation suggests that existing plants are inadequately equipped and managed.)	Anaerobic digestion is by definition an enclosed process, where gases and odours are kept separate from the atmosphere. The response may be referring to in-vessel composting operations of food and garden waste. These facilities are not air-tight and if not properly controlled, there can be problems with odours.
HA21 – Waste Group	5.3 e) The statement “ensure that development sites produce Site Waste Management Plans” rather misstates the situation – these are requirements of legislation What is necessary is that these requirements are enforced, but it is not clear which authority is responsible for enforcement.	Accepted that Site Waste Management Plans are requirements. The enforcement authority is the planning section.
HA21 – Waste Group	5.3 f) Agree that promotion and education are important parts of the strategy. Note that Harrow has an officer responsible for promotion and education involving energy, and that Tower Hamlets have an officer responsible for waste education. Harrow should consider such an appointment – need not be a full-time appointment.	Noted. At present, it is not considered that such a post is required. The situation will be kept under review.
Harrow U3A – Sustainability Group	This section should state that one aim is energy recovery from non-recyclable waste, to replace some generation of energy from fossil fuels and reduce some CO2 emissions.	The following text has been added to section 5.1 This is currently being reviewed. It is anticipated that the revised strategy will: - place greater emphasis on recycling and composting; recognise the contribution to reducing carbon emissions that energy from waste facilities can make; and reduce the amount of waste sent to landfill.

6. Biodiversity and the Natural Environment

	Comment	Response
Respondent 3	Good. Can the capacity of trees to absorb CO2 be taken into account?	Trees offer opportunities to mitigate and adapt to climate change by absorbing carbon dioxide (mitigation) and provide shade and cooling

		(adaptation).
Harrow U3A – Sustainability Group	Can the capacity of trees to absorb CO2 be taken into account? Ensure that biodiversity and carbon capture and retention are considered as part of the planning process.	See above response
The Pinner Association -	Train all Council workers and contractors to treat the environment with respect. e.g. the crews who cut and trim the grass verges must not damage street trees, etc., hedges, ivy and trees on the boundary of private gardens (an important wildlife resource), etc.. Ensure that the watering programmes for newly planted trees are maintained to enhance the chance of survival of the young trees.	Noted. This is already the case but it is accepted that training needs to be a continuous process.
Respondent 5	1. Include TPOs and promote retention of trees with no TPOs in private gardens etc. 2. Re 6.2 (k) Amend – REQUIRE residents and businesses to RETAIN / REPLACE TREES, maintain gardens and planted areas in a manner that encourages BIODIVERSITY. 3. Cross link to requirement for semi-permeable hard standings in front gardens in 3.3(f) & 4.3(b).	Such a blanket requirement to non-TPO trees would be difficult to monitor and almost impossible to enforce. Where trees of significant character and value are identified, TPO will remain as the method for retention and protection. For all other garden space, it is for the homeowner to determine the design and setting they consider appropriate.
The Hatch End Association	The strategy, virtually entirely directed to the public domain is supported; however, for householders maintenance of trees can be expensive, especially with old and large trees in their properties. Is there any chance of financial aid, as with aspects of heating, whereas an individual householder's heating choices can be a matter of personal comfort or preference with little or no direct external impact on adjacent properties?	The council does not envisage providing financial assistance for the maintenance of private trees.
Respondent 7	I would not want to see bedding displays and hanging baskets disappear completely. A splash of colour does much to lift the spirits!	Noted. The intention is not to remove all such displays. However we do need to consider the environmental cost and find ways to minimise this.
Respondent 8	Basically yes, but ensure that trees etc looked after and don't increase problems for disabled people with cracked pavements etc.	Provision of street trees does not mean that there will necessarily be problems with pavements. Provided the right type is planted in properly designed tree pits and properly maintained, trees should not adversely affect pavements.
Natural England	We welcome the inclusion of this chapter in the Climate Change	Noted.

	<p>Strategy. We are also encouraged to note that the council has adopted a BAP and will be producing a Tree Strategy and Allotment Strategy. The council may find the following website useful in developing the Tree Strategy, as it includes the guidelines for trees in urban development which were recently published (for consultation) by the Tree Design Action Group (www.forestry.gov.uk/tdag).</p> <p>As with SUDS, this chapter would be an appropriate component of the green infrastructure chapter/section.</p>	
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Question 7: Food, Fair Trade and Sustainable Shopping

	Comment	Response
Nugents Park Residents Association	<p>Section 7 (Food, Fair Trade etc) 7.2 a on promoting local sourced products is ambiguous. Does this mean Harrow, S.E England or UK? Clearly Harrow produce should, in principle, leave a lesser footprint than produce from Scotland, but produce from Scotland would carry a lesser footprint than imported produce. Relative price must also be an important factor. •</p>	<p>This is a valid comment.</p> <p>Carbon footprints are extremely difficult to identify precisely and depend on a wide range of different factors. E.g. fertiliser input; whether the food was grown in a heated greenhouse: method of providing the heat; distance travelled; mode of transport; whether or not the food requires refrigeration; etc.</p> <p>Any advice the council provides will need to be carefully worded so that people are aware of the complexity of the issue.</p> <p>Some supermarkets are beginning to calculate and display carbon footprints for food to provide customers with the relevant information.</p>
Nugents Park Residents Association	<p>Similarly, on fair trade, there is no problem in committing Harrow to use fair trade products when purchasing from developing countries (7.2.h.), but it would be inconsistent with other objectives in this sector to purchase fair trade products from distant markets in preference to local, UK or even European produce. •</p>	<p>Fairly traded food is a recognised system that supports the livelihood of small farmers in the developing world. It is normally geared towards basic commodities such as tea, coffee, cane sugar etc and fruits such as bananas which cannot be grown locally. Providing this type of support is not inconsistent with a policy to promote locally sourced produce.</p>
Nugents Park	7.2.g - promoting organic produce, is controversial and highly	Conventional farming methods are dependent on significant inputs of

Residents Association	questionable. Most organic produce is unduly expensive, with large mark-ups by retailers and not all of it necessarily yields a lower carbon footprint. It seems wrong to pressurise consumers into additional expense without much stronger evidence that this is genuinely justified. Do we have any idea whether the difference between the allegedly lower carbon footprint of organic to other produce is sufficient to justify the much higher price? •	artificial fertilisers and pesticides which are carbon intensive. Organic farming does not use these inputs and will therefore have lower carbon footprints. As noted above, carbon footprints are a complicated subject and other inputs such as heating, transport etc need to be taken into account when determining the final figure
Nugents Park Residents Association	It is also unclear how 7c and d, promoting home cultivation, fit in with the risk acknowledged elsewhere of droughts and water shortages. It is no good encouraging people to plant vegetables without a secure water supply.	Home cultivation is not inconsistent with the risk of drought etc. – provided action to collect rainwater is also promoted.
The Pinner Association -	Harrow Council must support local retailers, and other small businesses, in order for there to be local businesses from which to source products. Some local High Streets are in peril of becoming retail free zones, and Planning Officers must enforce the permitted percentage of non-retail use in primary shopping areas, and not allow all the retail outlets to become restaurants or coffee shops.	Noted. To be considered as part of review of retail policy underway together with future trends/needs for retail floorspace in the borough as part of LDF process.
Respondent 5	1. Local planning and local authority procurement policies need strengthening to support and implement these initiatives. 2. Re 7.2 (k) cross link to Waste 5.3	LDF to review role of existing retail centres as location for local services and facilities. Local procurement cannot be delivered through planning policy at present time.
The Hatch End Association	Farmer's markets should be encouraged across the borough not just in Pinner.	
Respondent 8	Please use Healthy Living Centre to help deliver	
Labour Group	Amend b. Support and promote the farmers market in Pinner and encourage their establishment in other parts of the borough.	
Labour Group	Add I. Promote and provide allotment use by schools such as the scheme at Glebe School.	

HA21 – Waste Group	<p>CI 7.2 j) and k) Welcome the aims of encouraging the use of reusable bags and re-using containers, and discouraging the use of plastic bags and excessive packaging.</p> <p>Consider that supermarket's practice of collecting all their cardboard and packing it for recycling should be challenged. Their practice was once to allow customers to use the empty containers to take their purchases away in – this is reuse, which is higher in the waste hierarchy, so should be encouraged.</p>	Noted. However this is outside the council's remit.
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Question 8: Businesses and the Public Sector		
	Comment	Response
Respondent 3	Encourage businesses to employ locals, join car clubs, provide cycle storage and encourage car sharing. Promote research into shareable carbon offsetting	
The Pinner Association -	The recycling service for businesses should be at a low cost to the users, so as to encourage businesses to recycle as much as possible.	The council's business waste recycling service is provided at a significantly lower cost than collections destined for landfill.
Respondent 5	Establish business's which implement climate change strategies e.g. Insulation installation.	Noted. Promotion of climate change and support for new businesses implantation will sit alongside support for existing premises to meet CC obligation/objectives.
Respondent 8	Yes, but also don't compromise on accessibility when planning and sz sustainability	
Labour Group	Add h. Introduce free recycling for all schools and voluntary organisations.	A free recycling service would transfer costs from the recipient of the service to the council tax payer.
HA21 - Waste Group	<p>CI 8.3 a) and b) welcome the extension of recycling services and waste audits to businesses.</p> <p>Community halls, church halls and faith groups also generate waste and</p>	The waste strategy has been amended to take on this point with regard to churches and places of worship. The full range of recycling services is available free of charge (as required under the Controlled Waste Regulations (1992)). The only reason for such services not being

	are overlooked by this initiative. Their members are well used to recycling at home and are discouraged if they are unable to do so at these premises – It is imperative that full waste services are made available to these groups.	provided would be logistical.
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Question 9: The Council's Footprint

	Comment	Response
Nugents Park Residents Association	It is agreed that the Council should pursue the necessary changes in its own operations as a matter of urgency, and make the public aware of what they are doing, and hopefully by setting a good example they will encourage individual members of the community to take action and make effective changes in their own lives.	Noted.
The Pinner Association -	It is important the Harrow Council be seen to lead by example, rather than merely impose restrictions and enforcements on residents and businesses which would be greatly resented.	Noted
Respondent 5	1. 40% of non-street lighting electricity is green; implement steps to achieve 100% and reduce consumption per se.	Noted. The council will be looking to reduce consumption by 4% a year. Government guidance on Carbon Reduction Commitment treats "green" and "brown" electricity as the same in terms of carbon footprint.
Respondent 5	2. Whilst 100% of lighting electricity is "green", reduce consumption per se with more efficient lighting.	Noted. The council will aim to reduce street lighting consumption by using emerging technologies (e.g. LED lighting).
Respondent 5	3. Re 9.3 (a) Specify a near term timeline (& cost [self funding?]) to establish the baseline carbon footprint & implement subsequent monitoring?	Agreed. This is an urgent task.
Respondent 5	4. Re 9.3(c) In addition to carbon footprint reduction (which could be achieved just by changing energy source), specify energy reduction programmes and the timeframe to which quoted energy prices refer as	Noted. The council will be looking to reduce consumption by 4% a year. It is expected that energy prices will rise over the medium to long term as a result of obligations put on energy companies to fund energy

	they have changed significantly over last 6/8 months.	reduction programmes.
Respondent 5	5. Re 9.3(d) Specify the timeframe to which quoted water prices refer.	As above, water prices are expected to continue to rise as water and sewerage companies meet higher environmental standards, replace old infrastructure and install new infrastructure to meet the challenges produced by climate change.
Respondent 5	6. Re 9.3(x) In addition, introduce a mileage reduction & vehicle fuel efficiency programme (self funding?) and extend this to Councillors.	We will be looking at transport CO2 emissions as part of our wider strategy to reduce CO2 emissions by 4% a year.
The Hatch End Association	This looks commendable but is there any information about comparability with other outer London boroughs?	All councils are required to meet the climate change strategy. Nearly all London boroughs have at least one climate change indicator as part of their LAA. In developing this Strategy, we have researched extensively Strategies that have already been developed (in London and across England)
Thames Water	Para 9.1 - -contracts – To be in line with DEFRA reporting guidance and CRC guidance the Strategy needs to consider energy supply contracts and what this is offset against.	Noted
Thames Water	Para 9.3 – Activities – In general we support the activities listed but the council needs to ensure that actions are sustainable and quantifiable.	Noted and agreed
HA21 – Waste Group	Para 9.3 l) & m) Welcome the office waste recycling system and use of recycled paper, but consider measures to reduce the volume of paper used should be considered.	Noted. Reductions in paper use will be considered
RES 15	It is unclear whether the price of £12 /tonne refers to a tonne of carbon or a tonne of carbon dioxide	This is the price per tonne of carbon dioxide.
RES 15	. . . Council officers use their own cars to make visits in their duties. This must have some implications for car parking at their offices it also means they are obliged to use their cars to travel to work. The proposed actions describe policies to encourage green travel and reduce parking. If council officers have outside duties, how will this be accommodated? Residents of Marlborough Hill already experience parking from	These are valid points, which will need to be taken into account in the development of future policy.

	employees at the civic centre – there must be a danger that restricted parking at the civic centre will displace parking to the streets nearby.	
RES15	<p>Consultants who specialise in renewable energy recognise that wind levels in London are not adequate for wind power Do not expect wind power in Harrow to achieve much.</p> <p>Ground source heat pumps are a better prospect, but will require a location where there are no services in the ground already.</p>	<p>Wind power is one of a range of options that will be considered – along with ground source heat pumps.</p> <p>It is accepted that London experiences lower wind speeds than most other parts of the UK and that this will affect the viability of wind turbines.</p>
UNISON	Draft does not incorporate an Environmental Management System to carry through and monitor performance to ant accredited standard	<p>The Council will adopt the Carbon Trust Standard as part of its response tp the carbon Reduction Commitment.</p> <p>EMS systems are used by Public Realm Infrastructure to monitor environmental performance in this area</p>
UNISON	Many of the actions that the council state they will be doing are via encouraging and advising businesses and residents to do certain things. These are seen as very much soft options and are not easily measurable or quantifiable. We feel the council needs to be far more proactive in its approach..... The strategy is good at saying what the council will do – but not in explaining how they will do it. There is also mention of promotion and education but no mechanism of the mechanism of delivery.	Agreed. The final version will contain more detail than the draft.
UNISON	UNISON feel that this type of audit (water, waste and energy) should be carried out for the council as a case of urgency.	<p>The council now has a good measure of its energy usage as a result of NI 185 and the Carbon Reduction Commitment.</p> <p>The proposed strategy includes targets to reduce CO2 emissions and potable water use, and sets a target to recycle 50% of the council's in-house waste by April 2010.</p>
UNISON	We would like to see an agreement between the council and UNISON incorporated into section 9 of the strategy so there is a mechanism in place for driving improvement through effective partnership working	The council welcomes UNISON's commitment to delivering the necessary improvements. At this stage, it does not consider that a new mechanism needs to be put in place.

