

Q1.Planning and Development - Comments	RESPONSES to comments
<p>1. Key issue is the ability of enforcement services to ensure regulations are enforced. This is not addressed clearly. This is either a capacity or prioritisation issue.</p>	<p>New planning enforcement policy with priorities being produced for consultation shortly. Active management of enforcement resources is producing improvements in this area.</p>
<p>2. Broadly support actions proposed. Would prefer doc to be in English rather than marketing-speak - cl 4 should read "Potential introduction" and "promote sustainable technology. . . " (ie delete "mainstreaming")</p>	<p>We will review wording in the final document to ensure it is clear.</p>
<p>Comments applicable to Appendix A as a whole:-</p> <p>3.1. 2010/11 has only some 5 weeks to run. Hence there is now no opportunity to influence a different outcome for this financial year.</p> <p>3.2. The significant amount of white (unpopulated) space in the 2011/12 &amp; 2012/13+ columns suggests that there are very few action plans for these years - not even implementation plans or monitoring activities despite the plethora of strategies (written, approved, being written and yet to be written) referred to in this Appendix A. This is amazing considering that the purpose of the document is the implementation of the Climate Change Strategy (CCS).</p> <p>3.3. The few actual implementation activities have either now been watered down, rescheduled or removed.</p> <p>3.4. New websites are being built or proposed. Is there evidence that there is an unmet need? Is there the resource to maintain and market them? Is there evidence that they will make a difference?</p> <p>3.5. There is no indication of resources being expended, required and approved for the implementation of the CCS. That there was, has clearly been cut back. Accept that CCS is no more immune to cut backs than other issues. Where is the priority</p>	<p>1. The timetable for publishing the draft strategy and the consultation has slipped. As a result some of the actions etc. have been overtaken by events. We will review the timetable etc for future reviews to ensure that this does not happen again.</p> <p>2. The uncertainty over the future level of spending has affected the production of future plans. However, responding to the carbon agenda requires a radical shift and takes time to plan and implement</p> <p>3. Accepted. To some extent the original Strategy was too wide-ranging and lacked focus. We have rationalised the Strategy to reflect this and the changed financial circumstances.</p> <p>4. The development of our website is seen as a way of disseminating information and good practice. We intend to maintain the site using existing resources (i.e. other websites) as much as possible..</p> <p>5. General comments are noted.</p> <p>We have taken the opportunity of the consultation to look again at the targets for 2011/12 and to include relevant changes into the</p>

<p>of CCS? Overall a disappointing picture is painted. This does not give confidence that climate change abatement measures will be significant in Harrow over the foreseeable future, notwithstanding all the strategies and websites. With regret I therefore see little value in commenting on each of the sections specifically for the reasons above. This is also not the forum to comment on the various strategies currently being / to be formulated. A more constructive response would be likely if a populated Implementation Plan to 2014 was re-presented by June 2011.</p>	<p>Action Plan.</p> <p>The next version, of the Action Plan will cover the three-year period from April 2012 to March 2015. It is intended to publish this in October/November 2011 for comment..</p>
<p><b>4.1</b> The plan is supposed to cover the period up to 2012-13, but there is virtually nothing in the 2011-12 or 2012-13 columns of the plan.</p> <p><b>4.2</b> There is no estimate of the predicted effect of policies and policy cutbacks on the achievement of the CO2 reduction targets.</p> <p><b>4.3</b> There is no progress report on the targets. What is the progress to date on the targets for NI186, NI197, NI198, for example?</p>	<p>Part of the reason why some actions have been dropped is that the impact is considered to be relatively small. We will review the format of the strategy for the next review to ensure that it is more precise and measurable</p> <p>The strategy is there to set the general direction of the council's policy. It is quite difficult to predict the effect of policy changes on individual targets. The exception to this is the policies covering the council's own footprint.</p> <p>The report to cabinet on the Carbon Reduction Commitment, in December 2010, set out the need to develop a corporate Carbon Management/Reduction Plan, which will identify how the council will achieve its 4% reduction target</p> <p>The change in government and the resulting review of performance indicators has made it difficult to report progress on NIs.</p> <p>For example, NI 185/194 were not collected for 2009/10. the decision has now been made that this information will be reported this year along with indicators for 2010/11.</p> <p>NI 186 – per capita CO2 emissions in the local authority area - has been subject to revisions to the baseline that make it difficult to compare but continues to show a downward trend.</p> <p>NI 187 – We believe the current measurement is flawed. We have consulted via the Affordable Warmth/Fuel Poverty strategy for an</p>

<p><b>4.4</b> It is not clear whether whole house standards are set as part of consent for building modifications. They should be. Uttlesford District Council in Essex has established the principle that a planning application can require energy efficiency improvements in another part of the building or another building altogether. Their rule is that if you want to build an extension you can do it only if you don't increase the carbon emissions of the building. This can be met by making the extension zero carbon, or by making equivalent energy efficiency improvements to the main building.</p>	<p>alternative local indicator</p> <p>NI 197 – Improved local biodiversity (active management of local sites) – is measured but it is not clear how useful the indicator is in determining the quality and quantity of biodiversity</p> <p>NI 198 – children travelling to school (mode of transport usually used) – see 8.3 below.</p> <p>The government has determined that the primary vehicle for setting standards for construction in future should be the Building Regulations. These have been subject to progressive review. Recent government statements have also suggested that planning controls will be reduced and a new national planning policy statement is expected to replace all current guidance (including the supplement to PPS1 on Climate Change) shortly. Harrows Development Management Polices DPD (part of the LDF) will need to have regard to such statements prior to adoption and a review of the current approach set out in the SPD will be required.</p>
<p><b>Q2.Domestic Energy - Comments</b></p>	<p><b>RESPONSES to comments</b></p>
<p><b>5.1</b> Over-reliance on developing websites to inform people (too passive a form communication). Are all these references to a single website? If so, this must be made clear and it be given a concept name. Surely there should be effort put into developing partnerships with business and community sector organisations (such as Mark Group (UK's largest insulation installer) and Brent Energy Solutions, local grant application support) to increase the face-to-face marketing of insulation. Only proactive promotion will result in a significant uptake of promotion. Also all other media should be used, such as Harrow People, not just websites.</p> <p><b>5.2</b> Opportunity to develop face-to-face communication with residents should be an action plan item or if not, then development of a detailed communications plan to secure change (not just inform). Also there are enough websites out there already. What is the rationale behind creating another</p>	<p>The intention is to develop the council's website so that people can find relevant information. We expect to direct people to existing websites rather than re-invent the wheel</p> <p>We accept that there is a need to develop a more comprehensive approach to promotion and education and that this will include more face to face contacts.</p> <p>As indicated above, we will direct people to existing websites.</p>

<p>one. Surely the existing information on the EST site should be leveraged by the Council. Generally the action plan is not SMART enough, with non-specific targets.</p> <p><b>5.3</b> Developing partnership links with NHS bodies should be an action point in this section. Better insulated homes result in fewer heart attacks, strokes, respiratory problems and mental health conditions. The interests of the PCT, future GP Consortium, Mental Health Trust and Hospital Trust are all served by this programme so these should be involved in promotion and delivery.</p> <p><b>5.4</b> An affordable warmth event for partnership bodies is needed.</p> <p><b>5.5</b> cl 2.3 would be useful to define the extent of solid walled properties in Harrow - these are common (much 1930s housing when this was the norm) and less easy to insulate.</p> <p><b>5.6</b> cl 2.3 bullets - loft and cavity wall insulation are established technologies - the central heating and control technology, external insulation and double glazing all require proper attention to detail in their design, installation and maintenance, and controls need to be easy to operate if the required performance is to be achieved. Question whether the workforce has the necessary skills to achieve this, and if info on heating systems and their control is user-friendly.</p> <p><b>5.7</b> cl 12 wind-turbines are not effective in the sheltered conditions of a London suburb, and many companies which supply them recognise this.</p> <p><b>5.8</b> HA21 are making detailed comments on the Affordable Warmth strategy which covers the same ground as this section.</p>	<p>We have been developing an Affordable Warmth/Fuel Poverty strategy with the NHS and other partners. This was consulted on at the same time as the climate change strategy.</p> <p>During the development of the Affordable Warmth/Fuel Poverty strategy, such a workshop/event was held.</p> <p>Agree that this information would be useful.</p> <p>Agree with comments on technology.</p> <p>Also agree that the correct installation of these technologies will require industry to train the relevant workforces.</p> <p>Agree that controls for these new systems will need to customer friendly.</p> <p>Agree</p> <p>Noted</p>
<p><b>Q3.Transport - Comments</b></p>	<p><b>RESPONSES to comments</b></p>
<p><b>6</b> This is fine</p>	

<p><b>7.1</b> As a Harrow strategy it is fair to exclude aviation from this study. But aviation's contribution to CO2 emissions is substantial, as the 11% from taxiing on the ground alone shows. Needs to be considered in wider London and national studies.</p> <p><b>7.2</b> cl 18 - to minimise travel there is a need to avoid schoolchildren crossing the borough to avoid their local school - standards should be uniform across the borough so parents can feel confident in their local school. Harrow should not seek to recruit schoolchildren from other boroughs (believe many pupils at Whitchurch are from Brent).</p> <p><b>7.3</b> All schools should be audited to establish whether the travel plans they have on the shelf are in fact being followed.</p> <p><b>7.4</b> cl 19 appears to be an attack on car ownership. What is necessary is a reduction on car use - if residents travel to work by train they have a greater need to park their car at home.</p> <p><b>7.5</b> cl 22 if new developments are to have charging points for electric vehicles it is important that the design of the building avoids the need for electric leads to cross footpaths - represents a trip hazard, particularly in the dark (when charging is likely to take place).</p> <p>The thermal efficiency of the power stations which supply the electricity is 30% - when this is considered there is little case for electric vehicles on climate change grounds - their benefit is in emission-free operation.</p>	<p>Agreed</p> <p>Education policy is not included in this review</p> <p>This does take place and travel plans are reviewed annually</p> <p>This policy is designed to control parking. It is not an attack on car ownership. The policy is designed to encourage the use of environmentally friendly vehicles.</p> <p>Health and safety at electric charging points will be an important consideration.</p> <p>It is accepted that fossil fuel powered power stations have the thermal efficiencies quoted. The switch to electric vehicles needs to be viewed in the context of the proposed reduction in carbon intensity of the nation's electricity generating capacity (by increased renewable and nuclear generation) and the greater use of combined heat and power generation (to improve overall thermal efficiency). As these policies are implemented, net carbon emissions will fall</p>
<p><b>8.1</b> Lower speed limits make roads safer and encourage walking and cycling. What plans are there for 20mph zones? Several cities have a blanket 20mph on residential roads, eg. Portsmouth, Oxford, Norwich, Aberdeen.</p> <p><b>8.2</b> What consideration has been given to "shared spaces" in</p>	<p>Harrow prioritises implementing 20mph zones around schools in the borough and aims to do 2 additional schools each year.</p> <p>This has been considered in the borough but no locations have</p>

<p>appropriate locations, which give pedestrians and cyclists equal priority to motor vehicles and improve safety?</p>	<p>been identified to be suitable.</p>
<p><b>8.3</b> What is the progress on NI198: proportion of children travelling to school by car?</p>	<p>In 2009/10 there were 32%. The target for the borough is to reduce this to 29% by 2012/13.</p>
<p><b>Q4.Water and Flooding - Comments</b></p>	<p><b>RESPONSES to comments</b></p>
<p><b>9</b> This is fine</p>	
<p><b>10.1</b> Broadly support these proposals, particularly on the use of permeable paving - many suitable techniques exist. Support attention being given to floodplains - baffling that building took place on these in the past -it's not a new concept.</p>	<p>No response</p>
<p><b>10.2</b> cl 31 the water saving technology described here requires a higher level of expertise in design, installation and maintenance than standard techniques - doubt if the current workforce has the necessary skills.</p>	<p>Agree that some of these technologies will need to become more widespread. This will involve some training of the workforce.</p>
<p><b>10.3</b> Harrow has hard water, which will make low flow showers and reuse of grey water unreliable because of possible blocking. Sutton have a similar source of water but soften it - consider Harrow should do the same - there are other benefits.</p>	<p>This could be raised with Veolia?</p>
<p><b>11.1</b> Major developments should be required to provide drinking water fountains in public spaces.</p>	<p>The mechanism for such provision is unclear. Any off site contributions will, in future, can only be delivered through a Community infrastructure Levy. S106 agreements will be limited to on site provision only. The CIL Regulations mean that a robust case and evidence (sufficient to withstand independent examination) will be required. The provisions of fountains would need to sit within an infrastructure delivery schedule in which all infrastructure is costed and has a strategy for its delivery. This aspiration may require more detailed examination and justification.</p>
<p><b>11.2</b> Are there any further opportunities for culverted rivers to be opened up?</p>	<p>The Emerging Harrow Green Grid project will be exploring, with the Environment Agency and others, the scope to achieve this objective in Harrow.</p>

Q5. Waste - Comments	RESPONSES to comments
12 This is fine	
<p>13.1 5.1 need to recognise that Harrow's landfill at Calvert uses the methane generated to fuel a power station - the statement in the first para on emissions is not relevant for Harrow's practice.</p> <p>13.2 Harrow's recycling rate is good, but the Campaign for Real Recycling and Aylesford Paper works are horrified at glass and paper being collected together - the paper is unsuitable for reuse as newsprint, and the glass in mixed colours can only be used as road aggregate - both of these inferior uses mean that it is still necessary to produce paper and glass for higher value applications from virgin raw materials. Shards of glass also endanger staff working at MRFs.</p> <p>13.3 Would prefer Waste Prevention to be explored with much more enthusiasm before anaerobic digestion or energy from waste incineration are considered.</p>	<p>Although methane is captured at some landfill sites, it remains European policy to phase out the land-filling of biodegradable waste – to reduce methane emissions. Generally accepted that not all methane is captured and the remainder is released to atmosphere. Methane is a powerful greenhouse gas.</p> <p>The council has to balance costs of collection against environmental benefit. In current circumstances it is not financially viable to collect glass separately.</p> <p>Although paper mills prefer to use paper that has not been in contact with glass, they do accept it and it is used to produce newsprint.</p> <p>Staff working at MRFs should be equipped with the relevant PPE to prevent injury from glass.</p> <p>We have been developing a Waste prevention strategy with WLWA</p>
14 Have previously submitted response to Qs 1-5	
15 The council should be promoting home composting and its composter subsidies, and find a way of reflecting the use of home composting in its figures.	<p>We do promote home composting.</p> <p>We are not allowed to use such figures in our recycling figures</p>
Q6. Biodiversity and the Natural Environment - Comments	RESPONSES to comments
16 This is fine	
17 have no time to continue now but prefer to submit doc up to this point - comments to be continued	
18.1 6.1 and 47 Agree that trees are a beneficial part of the wider environment and streetscape, and that many in Harrow are mature and may need replacing. A proper regime of ad hoc observation, regular planned formal inspection and planned	<p>Agree.</p> <p>Cyclical maintenance remains an objective. However this will continue to be subject to funding considerations</p>

<p>maintenance and replacement is essential, and should be properly funded and the funds not raided for other purposes (good practice for buildings and highways is equally appropriate for natural assets).</p>	
<p><b>18.2</b> Wood in nature has a high moisture content which detracts from its value as a fuel - if it needs artificial drying before it is used as a fuel this will be counterproductive - maybe use in horticulture would be more appropriate.</p>	<p>Noted</p>
<p><b>18.3</b> 40 Many tree species introduced into Britain from abroad have thrived in our conditions, so am reasonably confident they will respond robustly to any change in climate. Not confident we can predict which species we should introduce in a climate change strategy as we cannot be sure what conditions we can expect. Damage to trees is usually caused by diseases/pests introduced from abroad, not the climate - we risk this sort of damage if we deliberately introduce other species and the pests they may carry.</p>	<p>Agree</p> <p>Choice of alternative trees will be carefully considered</p>
<p><b>18.4</b> 43 &amp;44 Agree that use of plants requiring less water is appropriate - hanging baskets are particularly wasteful.</p>	<p>Agree</p>
<p><b>18.5</b> 45 Tree pits should be fitted with some arrangement to create a level surface for pedestrians passing by - and to avoid a stumble hazard. (They do exist.)</p>	<p>Agree</p>
<p><b>18.6</b> 48 One problem with businesses sponsoring this planting is the advertisement that comes with it - always large, obtrusive and ugly, and detracts from the display being created. We should aim to resist these commercial values and embrace the spirit of the Big Society, and encourage citizens to care for beds, without identifying themselves. Beds on roundabouts (and the associated adverts) often impede the drivers' view of traffic on the roundabout, and slow down traffic flow - increasing emissions and fuel use.</p>	<p>Noted.</p> <p>But business sponsorship is an increasingly important method of improving the local environment.</p> <p>The size and location of sponsorship boards is carefully considered and regulated by planning</p>
<p><b>18.7</b> 49 Is Belmont trail a nature reserve or a cycle route? Needs considerate behaviour from cyclists if it is to be both. Why do</p>	<p>Belmont Trail is both a nature reserve and a potential cycle route. These are not mutually exclusive.</p>



<p>cyclists no longer use a bell? Very necessary in these circumstances (and I thought it was a legal requirement in any case). Belmont trail and Belmont subway could give access to the RC primary school alongside (and avoid the need for a crossing patrol and delay to traffic). Any plans to extend trail north of Belmont Synagogue towards Stanmore?</p>	<p>Investigations are underway regarding extending this trail north towards Stanmore however there are issues regarding land ownership that need to be resolved.</p>
<p><b>19</b> Occupancy rate is given for allotments, but this does not necessarily reflect activity level. We'd like to see some measure of activity level, and efforts to ensure that occupants are using their plots.</p>	<p>Occupancy is currently 95%. We are taking management steps to improve the utilisation of the allotments.</p>
<p><b>Q7.Food, Fair Trade and Sustainable Shopping - Comments</b></p>	<p><b>RESPONSES to comments</b></p>
<p><b>20</b> This is fine</p>	
<p><b>21.1</b> Welcome Harrow's moves to become a Fair Trade borough. Other actions depend on use of website - how will info be given to those who have no web access? <b>21.2</b> 52 Aldenham Country Park Farmers' Market is just outside the borough, yet serves many Harrow residents</p>	<p>The council will be developing a communication strategy for this agenda. This will provide information via publicity and face to face events Noted.</p>
<p><b>22</b> Duck Pond Market no longer exists at Tithe Barn, but is mentioned in the report - are there plans for supporting its return, in this or another location?</p>	<p>Noted.</p>
<p><b>Q8. Businesses and the Public Sector - Comments</b></p>	<p><b>RESPONSES to comments</b></p>
<p><b>23.1</b> No clarity in the plan on what body or forum will be set up to allow partnership working. Green Harrow awards should not be removed from the plan, because funding opportunities might become available. Action point should be to encourage community sector bodies and/or business to work towards setting up Green Harrow awards. This doesn't require a new forum to be set up, but as focusing of existing priorities. <b>23.2</b> Carbon Trust schemes promoted by a website? Forget it.</p>	<p>The council has tried to engage with business in Harrow on this issue but, to date, has been unsuccessful. The Smartworks scheme was established to provide help and advice to 40 SMEs in the borough. Take up has been disappointing. The proposed Green Harrow Awards have been deleted in the review as they were unfunded. If the community sector and/or business wish to take the lead, the council would welcome such an initiative As indicated above, we intend to provide links on the council's</p>

<p>The Carbon Trust does better marketing than the Council ever could and everyone has heard of them. What is needed is a one-off business event, which promotes "Winning new business, and cutting costs" which then promotes organisations like the Carbon Trust. We need to talk to businesses in an active face-to-face way to inspire them to contact the Carbon Trust. The aim should be to develop a partnership of local groups, like Pinner Association, Hatch End Association, Stanmore Society, Harrow in Business through a body like Harrow Agenda 21 that understands the aims of sustainability. The action point should be to investigate this potential. The awards are a secondary aspect that will come out of such a focus.</p>	<p>website to other sites that provide information etc.</p> <p>The impetus for engaging with the business community needs to come from the community sector and/or business. The council would welcome such an initiative</p>
<p><b>24</b> No comments</p>	
<p><b>Q9. The Council's Footprint - Comments</b></p>	<p><b>RESPONSES to comments</b></p>
<p><b>25</b> Streetlight dimming is a far better carbon saving project than LEDs to generate faster payback. Proposal to avoid installation of new streetlighting should be made.</p>	<p>Noted.</p> <p>We will be consulting on street lighting policy later this year. Options will include trimming and dimming and new technologies.</p> <p>It is unlikely that the policy will suggest that new developments are not lit.</p>
<p><b>26.1</b> 71 Is there a role for infra red photography to establish buildings which use heat wastefully?</p> <p><b>26.2</b> 73 See earlier comments on trees under 6.1 and 47 - if we have a "Maintenance backlog" it confirms that building maintenance has been neglected - this should stop! Scheduled inspections and prompt maintenance extend the life of the existing fabric and prevent the need for replacement - ie is more sustainable.</p> <p><b>26.3</b> 81 Emails from Harrow Council contain a legal disclaimer which could easily be given in a link - serves no purpose - but often means the person who receives it needs to print 2 pages rather than one. Doesn't affect Harrow's use of energy</p>	<p>We are investigating this with the intention of carrying out a survey next winter.</p> <p>The maintenance backlog is a fact that cannot be easily undone. Extending the life of existing plant and fabric is not necessarily a good thing (in terms of this strategy) if it does not lead to improvements in energy efficiency and use</p> <p>The recommendation should be not to print emails unless absolutely necessary - rather than to remove legal disclaimers.</p>

<p>or paper, but any environmental study should consider the overall picture - it is still waste!</p> <p><b>26.4</b> 84 &amp; 85 Where do Harrow's staff live? Some home-work journeys are easy by public transport - many are not (particularly if orbital journeys are involved) - if Harrow is to introduce a stiff green travel plan it ought to restrict how it recruits staff - this is unrealistic. Any move to restrict parking at the Civic Centre will fill the neighbourhood with parked staff cars. How many staff need to be mobile to conduct their work?</p> <p><b>26.5</b> 88 also necessary to consider adequacy of controls on heating.</p> <p><b>26.6</b> 90 wind turbines are not economic in the sheltered conditions of a London suburb and some suppliers do not consider supplying them to these areas.</p>	<p>The council does need to develop a green travel plan for its sites. The area around the Civic Centre is already a controlled parking zone. If parking were to be restricted around the site, it is unlikely that staff parking would affect this area</p> <p>Agreed</p> <p>Agreed</p>
<p><b>27</b> What is the progress on NI185 and NI194 targets?</p>	<p>NI 185/194 were not collected for 2009/10. The government has now decided that this information will be reported this year along with indicators for 2010/11.</p>
<p><b>Q10. Environmental Impact - Comments</b></p>	<p><b>RESPONSES to comments</b></p>
<p><b>28</b> The public health aspects of climate change adaptation are not addressed. This requires leadership by the Council to coordinate health and voluntary sector partners. An action point on this should be added.</p>	<p>These comments refer to the new guidance for report writers. The website listed in the guidance lists both adaptation and mitigation effects. So this point is already addressed.</p>
<p><b>29</b> The assessment asks whether a recommendation will affect the corporate CO2 target (i.e. NI185) but should also ask how it would affect the area wide CO2 target, NI186.</p>	<p>The emphasis of the guidance is how decisions will affect the corporate target of reducing carbon emissions by 4% a year. For some reports the area-wide indicator – NI 186 – will be more relevant and report writers will be expected to refer to this.</p>