

Appendix B

Climate Change Strategy Responses Schedule

The consultation ran from **21st October to 20th December**. The following methods were used:

- Emails to statutory bodies and other interested parties
- Posters with QR Codes on notice boards around the district
- Notifications and posters sent to all libraries
- Council Offices copy and poster
- Go Vocal questionnaire
- Konveio document with opportunity to embed comments within it – published on Go Vocal
- Discover Harlow Hub hard copies of questionnaire, poster and two Q&A sessions
- Website wording with copies to view and questionnaire to download and complete
- Social media along with notifications to media outlets (Your Harlow, The Guardian and BBC Essex)
- Winter Harlow Times spread
- Harlow Business Forum presentation, blog on Harlow Business website
- ECC Climate Change newsletter
- Circulation to specific youth groups
- Summary document available

18 people/organisations submitted responses, which have been split into 108 points/comments.

The comments are provided in the table below, along with responses from the Council.

A further 15 questionnaires were completed (13 online and two emailed) and results from this can be found after the table.

Response Comments	Council response
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Author	ID	Point	Text (summarised where appropriate)	
Hertfordshire County Council	001	1 – Referencing of dates	HCC are supportive of the approach taken in the strategy and aligns well to the aspirations of the Garden Town. One consideration HCC would raise is ensuring that the strategy can remain relevant after it has been published. It is noted that a number of references to dates are included and reference to other elements that could become outdated in the future. Therefore, HCC would recommend removing firm commitments towards the delivery of infrastructure by a certain date. Specific examples of this are found in paragraph 7.4 and 7.10. 7.4 refers to Active Travel Fund 4 which was a single year of funding issued by DfT a couple of years ago. 7.10 refers to the delivery of infrastructure in 2025 which does not make any allowances should delivery be delayed.	Although the Council appreciates that outlining dates in the document does not allow for possible delays, they are for information purposes only and the Council will be preparing a more detailed tracker to update where certain projects are. This will be updated more frequently and therefore any slippage will be noted in there.
		2. - Freight	While HCC acknowledge the pressure around freight movement it is felt that there need to be further consideration as to how many of these proposals are realistic and deliverable. It is also noted that Essex County Council should provide input into this as the Highway authority. In practice, at least from a UK perspective, voluntary schemes such as route optimisation, driver training and consolidation centres have not resulted in the meaningful improvements envisaged, largely because they do not achieve high uptake. Equally, many larger scale businesses such as Amazon already deploy these interventions as part of their business operation.	Comments are noted; however, this is considered a long-term consideration and the Council feels it is important to recognise it as a potential future action in the Strategy.

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Author	ID	Point	Text (summarised where appropriate)	
		3. – 15-minute neighbourhoods	HCC would recommend that the term 15-minute neighbourhoods are amended. 15-minute neighbourhoods still have negative connotations in relation to Low Traffic Neighbourhoods delivered during the COVID pandemic.	The 15-minute concept or 20-minute neighbourhoods is an extension of urban planning models that already existed. This is particularly true for Harlow as a former planned New Town which was designed around separate neighbourhoods, a town centre and employment centres. The same principles should apply to new sites in HGGT and it is considered that this principle of accessible centres and facilities is more widely understood in a place such as Harlow than just Low Traffic Neighbourhoods.

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Author	ID	Point	Text (summarised where appropriate)	
		4 – Air Quality	<p>HCC recognises that while there are some references to air quality included within the strategy it is felt that a stronger reference could be presented. Most sources of greenhouse emissions also produce air pollutants and therefore should not be treated separately. It is recommended that consideration be given to the documents linked below which promote the link between air pollutants and greenhouse emissions and provide evidence on which measures may have the greatest impacts. - Effects of Net Zero Policies and Climate Change on Air Quality The Royal Society. Figure 10 within the linked document provides a clear overview and promotes electrification of all energy supply for buildings. However, the suggested actions are unlikely to promote air quality. - theies.org/sites/default/files/reports/epic_air_quality_climate_change_guidance_0.pdf Environmental Policy Implementation Community. Box 1 provides an overview of win-wins. This specifically shows that although climate change measure energy efficiency is more important it is not the most beneficial for air quality improvements.</p>	Council will consider appropriate additions and references within the document on measures to improve air quality.
		5 – Ventilation	<p>Additionally, it is noted through Objective 2 that creating energy efficient homes is promoted through the strategy and acknowledged as an important aspect of climate measures. However, is it also noted that reference is made to air tightness. Although this is in relation to commercial units (paragraph 8.7) there is also reference to housing stock and consideration of air tightness here. Creating buildings that are airtight without good ventilation can create consequences such as internal air quality issues and a build-up of humidity and mould within properties. It is recommended that thought is given to specify the need for ventilation beyond building standards to ensure future challenges are avoided.</p>	References to good ventilation made to paragraphs which refer to energy efficiency and air tightness.

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Author	ID	Point	Text (summarised where appropriate)	
		6 – Stewardship /BNG	<p>HCC are pleased to see reference towards the stewardship of green spaces and feel as a whole it makes a positive contribution by providing hooks to existing work and exploring further options. Reference is made to the HGGT Stewardship Charter for the Garden Town for the long-term stewardship of green spaces on development sites, with stewardship structures being considered at the earliest opportunity of a planning application especially for larger sites. While this is all positive the relationship between the management of existing green spaces and the stewardship approach in the growth areas being developed need to ensure a consistent approach. One which ensures longevity of all green spaces across the town, especially if there are different delivery partners. In regards to Biodiversity Net Gain (BNG) an opportunity to sell credits is referenced on paragraph 6.7 in preparing a woodland management plan. This is potentially another important factor to consider going forward. If this were to be managed by Harlow Council via HTS (Property and Environment), then additional resource will be required. Understanding what stewardship and maintenance practices should be put in place and the partners that need to be involved to enable this to happen will be essential. Additionally, establishing management companies and long term funding will be fundamental and it is clear that this has been considered in paragraphs 6.21 and 6.22. Whilst there may not be answers as yet, it is positive to see that the Council is open to exploring options and good practise that comes out of the HGGT Stewardship Charter can be utilised elsewhere. It is positive to see that thought has been given to the demand on green spaces by different users and the need to work out appropriate maintenance and cutting regimes. Whilst cost saving is an element that the strategy focuses on this needs to be balanced with the benefit for the environment and community.</p>	Comments are welcomed and noted.
Environment Agency	002	1 – General	General information and useful links and documents provided. No specific comments made on changing the document however useful policy considerations for Local Plan and policy work provided. Detailed response can be made available upon request.	Information and relevant documentation will be useful for Local Plan Review work in the future.

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Forestry Commission	003	1 – GI and Home Grown Timber	<p>The Forestry Commission encourages authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach. For instance through:</p> <ul style="list-style-type: none"> The inclusion of green infrastructure (including trees and woodland) as a requirement in and around new development, eg by making all new streets tree lined. As stated in the Environmental Improvement Plan 2023 it is a strategic government objective to increase the net area of tree canopy and woodland cover to 16.5% of total land area in England by 2050. Therefore, the Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. Promoting the use of home grown timber used in construction as a sustainable building material, therefore reducing the embodied carbon emissions of new builds. In line with the Government's 25 Environment Plan (Page 47), the "Timber in construction" roadmap and the Net Zero Strategy. 	<p>Strategy will be updated to refer to the 2023 Environment Improvement Plan and its targets on tree canopy/woodland cover and the use of home grown timber in construction as a potential alternative.</p>
Canals and Rivers Trust	004	1 – Heating and cooling	<p>The water flowing through our waterways contains enough thermal energy to produce approximately 640MW of energy. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity. The waterways can facilitate sustainable heating and cooling of waterside developments. However, the potential use of water for heating or cooling buildings is not referenced within the Strategy though it should be identified as a renewable energy technology to ensure all options are identified and considered at the earliest opportunity. Applicants/Developers should also be encouraged to discuss the options in relation to this and any commercial agreements that would be required with the Canal & River Trust at the earliest opportunity.</p>	<p>Noted, a reference to water for heating or cooling to be noted under objective 2 in particular</p>

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		2 - BNG	<p>The Statutory Biodiversity Metric User Guide requires that if a site boundary of a proposed development includes land within 10m of a river / canal the adjacent lengths of watercourse should be included within the watercourse baseline assessment in the Metric. Unless an exemption applies, the developer will need to deliver a minimum 10% net gain in watercourse biodiversity units. Development may also affect other habitat types on land owned by the Trust, including, but not limited to, grassland, woodland, scrubland, and hedgerows. However, the Trust may also be able to assist developers in meeting BNG requirements by providing off-site biodiversity units. This would be subject to operational, management and commercial considerations. Developers wishing to discuss opportunities to secure biodiversity units on Trust land should contact bngenquiries@canalrivertrust.org.uk. No works to habitat on Trust land should take place without the Trust's prior consent. Ecologists working on behalf of developers should obtain, and comply with, consents from the Trust to undertake any necessary habitat condition assessments and ecological surveys on our land, consistent with our Code of Practice.</p>	Noted for future reference with applicants who seeking BNG on sites. No change to the Strategy required.
		3 - Drainage	<p>The Trust recognise the value of using our canals and river navigations for drainage facilities and the potential for surface water drainage to the River Stort Navigation could be referenced within the Strategy. Any surface water discharge to the canal would require prior consent from the Canal & River Trust. The Trust would require full details of any proposed discharge and any appropriate mitigation measures to ensure there would be no adverse impact to water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement.</p>	The comments are noted but the comments are too detailed for the Climate Change Strategy but will be a consideration in future drainage schemes and development projects/planning applications.

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Author	ID	Point	Text (summarised where appropriate)	
		4 – Electric charging points/ moorings	Electric charging points/moorings - The Trust have been trialling the additional provision of electric charging points/moorings in some areas so that boats can be less reliant on diesel and move to a more sustainable energy source which may also improve air quality and reduce noise pollution. Support for this could be set out within Objective 5 and as part of this we would also suggest that support should be provided for boaters wanting to convert to electric propulsion, due to costs being prohibitive for many.	The Strategy will be amended to include reference to electric charging mooring points and support for boaters wanting to convert to electric propulsion boats.
		5 - Towpath	The towpath is an already a popular choice for walking and cycling and it could be referenced within the Strategy to ensure its potential as part of the active travel network is considered at the earliest opportunity However, it should be acknowledged that towpath, access points, wayfinding and bridge improvements would be required to improve accessibility. The Trust have previously provided comments on the East Herts LWCIP in August this year. We have also provided comments on the HGGT applications and identified improvement that would be required to support increased use of the towpath.	Comments are noted and amendments will be made to refer to the network of towpaths and the identification of potential improvements to ensure these facilities can still be used and can support sustainable walking/cycling modes.
		6 - Freight	We also promote the use of our canals for the moving of freight, with materials such as building materials and waste, being suitable cargoes. The potential for freight by water should be included within the list for developers to consider in Paragraph 7.19.	Noted, changes will be made to refer to canals for potential freight movement.

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Natural England	005	1 - General	<p>Natural England is fully supportive of the preparation of a Climate Change Strategy for Harlow. We particularly welcome the Strategy objectives to achieve Net Zero emissions from the Council's operations and from all homes and the built environment, to reduce consumption of resources and waste, to adopt good stewardship of the natural environment and a shift towards more sustainable means of transport and reduced emissions.</p> <p>We support the Strategy's promotion of the value of green and blue infrastructure, biodiversity net gain (BNG) and Local Nature Recovery Strategies in contributing towards climate change mitigation and adaptation in Harlow.</p> <p>High quality green infrastructure ensures places are more resilient to climate change and can contribute towards your zero carbon and air quality targets. Green and blue infrastructure should be designed to adapt to climate change and ensure its long-term resilience – for example through the selection of appropriate tree species. Delivering sufficient, good quality green and blue infrastructure across Harlow can also support wider policy aims and ambitions – e.g. by supporting sustainable transport initiatives and improving the health and wellbeing of local communities.</p> <p>We are supportive of your ambitions around BNG and using the emerging Essex LNRS to improve biodiversity and nature across Harlow. The role of nature-based solutions should also form part of your strategic planning for nature and climate change – for example how can sites help to manage flood storage or improve air quality, alongside their importance for wildlife and people.</p> <p>Natural England's Green Infrastructure Framework contains a range of tools and resources that may be useful to you in developing climate change policy / strategy for Harlow. The Framework includes a design guide on how to plan, design and deliver quality greenspaces, as well as a Process Journey for LPAs looking to integrate green space into their Local Plans. The GI Framework can be accessed here: Green Infrastructure Home. We would be happy to help and advise further on any elements of the GI Framework.</p> <p>We welcome proposals to monitor the Strategy objectives through the indicators presented in Table 7, to inform any updates to the Climate Change</p>	Noted. Reference to Natural England GI Framework to be included in the Strategy.

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Historic England	006	1 – Re-use of buildings	The greenest of buildings already exist. The repair, maintenance, continued use and reuse of buildings is one of the easiest ways to avoid the unnecessary release of additional carbon and the generation of waste associated with demolition and new build. The UK has the oldest building stock in Europe with around 21% of buildings constructed before 2019, and 80% of the buildings that will exist in 2050 have already been built. Historic buildings will play a critical role in helping the UK transition to a Net Zero society. In addition to heritage protection, there is also not further imperative to make the case for the reuse of buildings in order to meet carbon reduction targets and to support a low waste circular economy. We recommend that this section includes greater emphasis on the dual benefits of reusing historic buildings and benefits for heritage protection and the historic environment as well as carbon reduction.	Objective 2 chapter to reference the reuse of buildings and avoidance of demolition that releases carbon. Further consideration will need to be made in a review of Local Plan policies.
		2 – Retrofitting projects	We recommend including a paragraph specifically relating to heritage assets and energy efficiency. Historic buildings can and must adapt to ensure they remain in a low carbon climate resilient society. HE recommends taking a whole building approach to saving carbon emissions. Work can be undertaken in phases to suit budget constraints, tie in with replacing services or fit around other planned building works. Properly considering and coordinating the phases can prevent unnecessary works being undertaken at any stage. Savings from early energy efficiency interventions can fund later projects.	Objective 2 to reference improvements to historic buildings to make them energy efficient and support available for homeowners.
		3 - SuDS	Recommend that text on SuDs (6.19-6.20) state they need to be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDs.	Reference made to archaeological considerations to be made to SuDS paragraphs where appropriate.

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		4 – modal shift	For streetscape improvements we would refer you to the Streets for All publications. These documents provide updated practical advice for anyone involved in planning and implementing highways and other public realm works in sensitive historic locations. We also refer you to our regionally specific advice in Streets for All East of England. We recommend stating that active and sustainable travel proposals should give careful consideration to potential impacts and the historic environment be designed to avoid harm to or minimise any impacts. We also recommend incorporating links to the Streets for All documents in the Strategy.	Useful links section to include a reference to Streets for All document.
		5 – Electric Vehicle Charging	We recommend the following text is added – Careful consideration will be needed when considering where to locate Charging Provision in the vicinity of heritage assets. In the majority of cases, charging points can be accommodated without harm to special interest provided they are located in discreet places. Consideration should be given to archaeological remains when considering ground works and service runs. Listed building consent is required for fixings to listed buildings, alongside planning permission.	Additional wording will be included referencing careful consideration on the location of electric vehicle charging points including listed buildings, heritage assets and other environmentally protected areas. However, the provision of charge points will be considered on a case-by-case basis and therefore the Strategy will not go into further detail on what will be considered harmful.

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Essex County Council - Climate and Planning Unit	007	1 – Para 4.1	<p>Emissions from homes are not just due to the energy used for heating and the impact of poor insulation, it is also due to other energy uses which includes both regulated energy (heating, hot water, ventilation, lighting, cooling) and unregulated energy (plug loads, lifts, IT, cooking and appliances).</p> <p>It would be valuable to make this clear in paragraph 4.1, as Building Regulations currently do not address unregulated energy, preventing them from creating homes which are truly net zero. Highlighting this provides justification as to why councils must make stipulations which go further than existing Building Regulations to meet net zero targets.</p>	<p>Noted. This will be referenced in para 4.1 to make it clear what is considered emissions from new homes.</p>
		2 – Para 4.2	<p>It is recommended to note here that current Building Regulations are insufficient for achieving energy efficient and truly net zero carbon in operation buildings needed to align with UK climate targets. It can be stated, as it is elsewhere in the Strategy, that the council will strive to introduce net zero standards in homes which will go further than current Building Regulations. This would be a valuable opportunity commit to targets in the Essex Planning Policy Position for Net Zero Carbon Homes and Buildings.</p>	
		3 – Para 4.3	1-3 years is by 2028; 2035 would be ten years	Noted, changes will be made.
		4 – Para 4.10	<p>Support the commitment for new homes built by Harlow Council to be net zero wherever feasible or at least have the energy efficiency standards equivalent to Passivhaus. The Essex Net Zero Evidence base and 'model' policy position / specifications guidance that would be useful to help support Harlow Council deliver its commitment.</p>	<p>Noted, further consideration of this will be required in a Local Plan Review. No further detailed amendments to be made to the Strategy.</p>

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Author	ID	Point	Text (summarised where appropriate)	
		5 – Para 4.13	<p>Recognition that it is easier to build new net zero buildings than retrofit existing ones is welcomed by ECC. The acknowledgement that local councils can surpass existing net zero policy is an ambition that ECC also supports.</p> <p>The Climate Change Act 2008 (CC Act 2008) sets the UK statutory target for reducing greenhouse gas emissions to at least 100% lower than 1990 levels by 2050. The Climate Change Committee warns that the UK is currently off target and rapid and deep cuts to emissions must be made in all sectors.</p> <p>The current and future proposed Building Regulations do not deliver the energy efficient, climate resilient, healthy, affordable to run new homes that we need. This has been highlighted to the Government by a swathe of local authorities (including several Essex authorities) and industry / sector organisations, as demonstrated by the joint letters submitted to the Government led by the Good Homes Alliance.</p> <p>It is therefore imperative that the built environment sector plays its full role in tackling climate change, and the new build sector must not delay action and add to the problem by increasing emissions unnecessarily.</p> <p>Local Authorities have statutory powers to set planning policies which require energy efficiency standards that are better than Building Regulations as long as these are evidenced and justified, and policies can be expressed using energy metrics if they are supported by an evidence base that justifies their viability. The legal justification is set out in the Essex open legal advice which should be read alongside the TCPA resource page.</p> <p>The Essex 'Net Zero' evidence base (prepared in collaboration with the Greater Essex local planning authorities and led by the Climate and Planning Unit at Essex County Council) provides comprehensive and robust technical feasibility and costings evidence to justify the Essex-wide model policy approach.</p> <p>The proposed Planning Policy will help ensure that new homes and buildings are designed and built so that energy demand is minimised; where energy is needed it is used as efficiently as possible; and opportunities for on-site renewable energy generation are maximised. It uses the best practice, measurable, clearly defined, absolute, energy metrics approach of setting</p>	<p>Changes made to the document to refer to Local Plan Review considering the documents and evidence prepared by the ECC CaPU and that current Building Regulations do not deliver energy efficient or climate resilient buildings.</p>

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Author	ID	Point	Text (summarised where appropriate)	
		6 – Para 4.14	<p>As outlined in the comment above to para 4.13, the evidence base and Essex-wide model policy position on net zero developed collaboratively with Essex authorities, including Harlow, goes much further than the current Harlow Local Development Plan requirements from which para 4.14 is taken. The Essex model policy position aligns with statutory climate targets whereas the current Harlow policy does not. It is suggested that it be recognised in the Climate Change Strategy that the Harlow local plan policy needs to be reviewed and updated, and that Harlow are committed to doing this and will make use of the resources provided on the Essex Design Guide. In the meantime, it is suggested that they update their Design Guide to incorporate the Essex model policy position specific requirements / targets.</p> <p>The performance and quality benchmarks listed encourage building standards which far exceed the recommendation of 19% above Building Regulations. The Planning Policy Position for Net Zero Carbon produced by CaPU also advocates for the construction of all new residential buildings to a standard similar to Passivhaus Classic. ECC suggests the removal of this 19% figure as it does not align with any of the suggested performance and quality benchmarks.</p> <p>It should also be noted that BREEAM UK New Construction 2018 has since been replaced by BREEAM New Construction Version 6.1. ECC recommends listing the most up-to-date version.</p>	<p>Comments are noted and the Strategy under para 4.22 already states that the Council will review the Harlow Local Development Plan and a major part of that will be looking at how Climate Change and Net Zero policies can be made more robust. The Local Plan Review is the best way to test the viability of those policies and consult more widely on the material and potential policies referred to in this representation and that it would not be suitable to include a firm commitment to include them until appropriate evidence and consultation has been undertaken. The Strategy will be amended to refer to the CaPU evidence and material which will be used to support the Local Plan Review and a potential early review of the Design Guide Addendum if appropriate. BREEAM reference in the Strategy will also be updated.</p>

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		7 – Para 4.15	<p>The inclusion of net zero design policies in design guides is welcomed as it has been identified as a further means of ensuring new homes and buildings are built to the standards advocated in the Essex model policy position on net zero. Section 12 of the NPPF states:</p> <p><i>‘134. Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. [...] [A]ll guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.’</i></p> <p>This illustrates that any stipulations around sustainability included in a design guide have material weight as long as that design guide is adopted as part of an SPD. This would equally apply to design codes should Harlow choose to create one which incorporates net zero policy into its design standards.</p> <p>The addendum to the Harlow design guide does not, however, include specific targets for net zero buildings, particularly with regards to energy use intensity or space heat demand. The addendum does link to the <i>Harlow and Gilston Garden Town Sustainability Checklist</i> to find these targets, but creating a chain of links to this information could prevent readers from seeing it. It is recommended that core targets found in the Planning Policy Position for Net Zero Carbon, particularly regarding EUI and space heat demand, be stated in the strategy itself.</p> <p>The definition of operational carbon in paragraph 4.15 is incorrect. As outlined in the Planning Policy Position for Net Zero Carbon, operational carbon is the carbon emissions that arise from the use or occupation of a development. The carbon emissions associated with the processes and materials used in construction and eventual disposal of buildings is embodied carbon. Policy NZ1 of the Planning Policy Position for Net Zero Carbon sets out requirements for the reduction of operational carbon and Policy NZ2 provides recommendations for the reduction of embodied carbon which are further elaborated on in the Essex Embodied Carbon Policy Study. Combined</p>	<p>Comments are noted. An additional paragraph referring to the documents prepared by CaPU and how they could be considered early on in planning applications will be made as will reference to earlier review of the Council’s Design Guide addendum if considered appropriate. Operational carbon amended to embodied carbon. Specific core targets will be considered in this review and/or Local Plan Review.</p>

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		8 – Para 4.16	Essex is one of the most water stressed counties in the UK. The commitment to water efficiency of no more than 110 litres per person per day is appreciated as a positive decision in this regard. ECC would encourage a further commitment to reduce this to 80 litres per person per day in the medium and long term. This will place Harlow targets in line with the Water Ready report by the Future Homes Hub, which recommends the adoption of 80 litres per person per day in water stressed areas by 2035.	As stated above the Strategy refers to a Local Plan Review which will consider changes to Net Zero and Climate Change. However the Strategy will be updated to include reference to water efficiency standards being reconsidered in the Local Plan Review as well as the potential 80 litres target in line with the Water Ready report.
		9 – Para 4.18	<p>ECC welcomes the creation of such a thorough and easy to navigate checklist which will likely be an aid to developers aiming to comply with net zero targets. It is suggested that it would be a useful exercise to review the checklist against the more recent findings of the evidence base developed to support the Essex model policy position on net zero.</p> <p>It should be made clear that this checklist for Harlow and Gilston <i>Garden Town</i> is intended to be used for all residential developments, rather than just this particular garden town development. Alternatively, Harlow Council can develop its own checklist which corresponds more closely with its goals for residential development for the entire authority. This can provide an opportunity to align targets for metrics like space heat demand and energy use intensity more closely to those outlined in Essex model net zero policy.</p>	Strategy updated to reflect potential for the checklist to be updated and to clarify that it applies to all major developments across the Garden Town.

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		10 – Para 4.21	<p>The acknowledgement that councils can surpass the targets in the Future Home Standard aligns with the stance of Essex authorities and the approach taken in the Essex Planning Policy Position for Net Zero Carbon.</p> <p>The Building Regulations set minimum standards that must be achieved for energy performance in new homes and buildings. These are a ‘floor’ and not a ‘ceiling’.</p> <p>Planning policy is necessary to address the shortcomings within the Building Regulations 2021 and the proposed Future Homes Standard 2025. These do not adequately address operational or embodied carbon emissions from new development as they only cover a proportion of energy use of a building, namely regulated energy use and they rely on grid decarbonisation to achieve ‘net zero’.</p> <p>Regulated energy use only makes up about half of the energy used in a building. The other half is known as ‘unregulated’ energy and this is not covered by Building Regulations at all. Net Zero Standards EUI metrics cover both types and so ensures that carbon emissions from a building’s total energy use are addressed and hence delivers truly net zero carbon buildings in operation.</p> <p>A target for all planning permissions for new buildings to be net zero carbon by 2025 and carbon positive by 2030 was recommended by the Essex Climate Action Commission (ECAC) in July 2021 and endorsed by Essex County Council (ECC) in November 2021.</p> <p>It is welcomed that Harlow makes a clear commitment to adhering to these timeframes.</p>	Comments noted.

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		11 – Para 4.22	<p>The strategy notes that it is investigating toolkits and guides to disseminate information about sustainable construction practices. The Essex Net Zero Specifications Guide (Residential) is recommended as one such document which presents net zero design recommendations that align closely with the Essex Planning Policy Position for Net Zero Carbon.</p> <p>The Essex Solar Design Guide is an additional resource which can be provided to developers for information on optimal solar design in new developments. This is valuable for pursuing net zero goals as it provides recommendations for site orientation to maximise solar PV generation and increase passive solar gains while preventing overheating.</p>	Include in para 4.22 of the Strategy the two referenced documents/helpful toolkits.
		12 – Para 4.23	<p>ECC welcomes the commitment to monitoring the performance of buildings, which aligns with Requirement 5 in the Essex Planning Policy Position for Net Zero Carbon.</p> <p>This states that:</p> <p><i>a. All developments must submit as-built performance information at completion and prior to occupation;</i></p> <p><i>and b. In-use energy monitoring is required on a minimum of 10% of dwellings for development proposals of 100 dwellings or more, for the first 5 years of operation.</i></p> <p>The CaPU is leading the work to establish guidance and tools which will be available as a resource on the Essex Design Guide to support the implementation of the Essex model net zero policy that is being embedded into Local Plans.</p>	Comments noted

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		13 – Para 4.24	The continued commitment to supporting updates to the Essex Design Guide regarding climate change and Net Zero in new developments is welcomed.	Noted
		14 – Para 4.25	<p>Highlighting the services that the Climate and Planning Unit (CaPU) can provide to developers and officers is valuable to increase access to expert advice and raises the awareness of the net zero evidence base among relevant stakeholders.</p> <p>It is recommended that the paragraph describing the function of the unit be changed from the future tense to the present tense, as CaPU has been fully operational and providing advice for some time.</p>	Noted. Changes to relevant text and additions inserted on the function of the unit.
		15 – Para 4.26	Please note that ECC is now working with the Essex Developers Group on updating the charter and its actions to reflect progress in energy targets and the growing commitment in the development industry to work towards net zero.	Noted. Paragraph to be updated to reflect comments.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		16 – Table 2	<p>No clear dates or timelines as to when most of the aims listed should be delivered. These would provide a clearer direction to stakeholders to develop pathways to adopt net zero policy.</p> <p>It is suggested that more clarity would also be provided if actions and their intended outcomes were outlined in greater detail.</p> <hr/> <p>As noted in the comment on paragraph 4.14, the performance and quality benchmarks listed encourage building standards which far exceed the recommendation of 19% above Building Regulations. The Planning Policy Position for Net Zero Carbon produced by CaPU also advocates for the construction of all new residential buildings to a standard similar to Passivhaus. ECC suggests the removal of this 19% figure as it does not align with any of the performance and quality benchmarks listed.</p> <p>It should also be noted that BREEAM UK New Construction 2018 has since been replaced by BREEAM New Construction Version 6.1. ECC recommends listing the most up-to-date version.</p> <hr/> <p>Water efficiency statements and sustainability statements are welcomed by ECC as a means of assessing compliance with policy.</p> <p>It is recommended that, in the medium term, the recommendations of the Essex Embodied Carbon Policy Study on reporting whole life carbon are progressed. An assessment of whole life carbon will be a valuable tool in pursuing net zero development, as it can be a means to hold developers to account and provides data which can form the basis of future net zero policy. This statement will encourage reductions in operational carbon, pursuing the targets of NZ1 of the Planning Policy Position for Net Zero Carbon and will also ensure compliance with limits for upfront embodied carbon recommended in the Essex Embodied Carbon Policy Study as follows:</p> <p>new major developments, major renovations and rebuild developments should achieve the following set limits for upfront embodied carbon (A1-A5):</p> <ul style="list-style-type: none"> Low rise residential (up to 11m): ≤500 kgCO₂e/m² (GIA) 	<p>The tables are to give an indication of the short-, medium- and long-term actions and does not commit to specific dates. In most cases more detailed work is required to understand delivery timescales and costs. However, the Council will be preparing a more detailed internal tracker and annual action plan to update where certain projects are. This will be updated more frequently and therefore more specific timescales will be noted in there.</p> <p>The 19% figure is the current Local Plan requirement, therefore this is included in the short term. However a reference for applicants to consider higher standards in the table in the short term until a Local Plan Review has taken place will be added. Will also refer to new BREEAM standards (the old version is referenced because it is current policy).</p> <p>Will refer to the studies prepared by ECC CaPU in the medium-term action when referring to the Local Plan review.</p>

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		17 – Useful Links	The Essex Design Guide , Essex Net Zero Specifications Guide (Residential) , Essex Solar Design Guide , Essex Embodied Carbon Policy Study and Planning Policy Position for Net Zero Carbon are not listed in the Useful Links section of the document.	Update useful links section with these documents.
ECC Energy, GI & Community Engagement	008	1 – Para 2.3	Encouraging to see acknowledgement that the Council can play a “community leadership” role and that influencing the wider community and local economy to enhance delivery is vital. Involving local people on this journey will be vital – and that this is reflected in the 7 th objective, “lead and encourage local communities, partners and stakeholders...”	Comments noted
		2 - Chap 3	Support principles here. They address using renewable energy for heat, but they don't seem to address the nature of their electricity supply contract Consider making a commitment to 100% renewable electricity supply contract for their corporate supply (unless already in place.) Also explore using their estate (roofs, land, car parks etc) for renewable generation, including to supply into the grid and/or into local customers.	Council already has a renewable electricity supply contract and has in the past considered estate renewable generation subject to ongoing maintenance and financial viability. But reference to it being reconsidered for certain estates/car parks etc can be considered as an action and will be included.
		3 - Para 3.3	It is positive to see the inclusion of solar panels on the roofs are being explored. The ECC GI team recommends that the use of Bio Solar is explored, where feasible. There is the potential to combine the two to extend the green roof areas (depending on roof load) and increase the BNG benefits.] This can have dual benefits for energy and biodiversity. This includes biodiversity habitat creation, water storage capacity, flood alleviation and energy saving potential.	Will add reference to consideration of bio-roofs as well in para 3.3

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		4 – Para 3.6	<p>AS part of the energy efficiency to explore other nature-based solutions where feasible. Is there possibility surrounding the premises to green i.e. pocket parks, tree planting etc.</p> <p>ECCs GI team recommends sustainable design is explored in terms of building in climate resilience as part of the planting mix. Such as planting to:</p> <ul style="list-style-type: none"> • Provide shading and reduce solar glare, • Improve building energy efficiency, • Provide carbon storage and sequestration, • Improve flood and water management, • Drought tolerant planting i.e. <ul style="list-style-type: none"> • Xeriscaping: Landscaping with minimal use of water and climate resilient planting. 	<p>This information on nature-based solutions, planting to support carbon storage/sequestration etc as well as shading is covered under Objective 4 and is inappropriate to include in the energy efficiency of operational buildings paragraph. Bio-roofs has also been inserted.</p>

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		5 – Paras 3.3 – 3.7	<p>As a way to boost engagement from local community, there should be a commitment to explore delivery of low carbon infrastructure on some council buildings using a community energy model and approach.</p> <p>A community energy approach will not be suitable or desired on all buildings, but a commitment to consider a sub-section of sites that might be suitable for community energy would offer a great opportunity to boost the sector and support community engagement efforts across the District.</p> <p>Mission Zero report, Chris Skidmore MP, one of the 6 key pillars is Pillar 4: Net Zero and the Community, that states “Place-based action on net zero will not only lead to more local support but can deliver better economic outcomes as well.” We will need to support and enable the community energy sector to boost their ability to deliver the essential place-based action</p> <p>Add in a commitment along the lines of “We will work collaboratively with the community energy sector in Harlow and Essex to identify potential sites that may be suitable for community energy projects. This will boost local engagement and participation in addressing climate change, and provide resources for community energy to deliver additional benefits across the District.”</p>	<p>Will add reference in an appropriate place in Objective 1 on working collaboratively to deliver community energy models and approaches – suggested wording by ECC is considered appropriate.</p>
		6 – Para 3.17	<p>To explore and consider the Essex Local Nature Recovery Strategy on how opportunities to enhance, connect and protect the nature environment can help to adapt and mitigate from climate change.</p>	<p>LNRS wording updated to reflect latest position on this.</p>

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		7 – Para 3.18	<p>The tree strategy to also consider the location of trees – The principle of "right tree, right place" is a guide for selecting and planting trees in a way that supports the environment and the needs of the trees and to build in resilience for the tree survival.</p> <p>As part of the tree strategy that all new trees will have their establishment considered at the time of planting. This should include weeding, mulching and watering. All newly planted trees with a trunk diameter of 6cm or more will be watered for three years via a buried watering tube, irrigation bag or irrigation well; applying 60 litres per visit, at least 14 times between May and September. Mulch, stakes, ties and weed establishment will also be inspected and actioned as required. Stakes and ties should be removed 3 years after planting.</p>	Noted. This level of information is too detailed for the Strategy but will be considered by the Council as part of the Tree Strategy project and future tree planting.
		8 – Para 3.19	<p>Support an approach to landscaping that seeks to maximise opportunity for biodiversity enhancement, carbon sequestration, drought resistance, and ease of maintenance and management. To ensure the integration of nature and other multifunctional benefits, we recommend alternatives to low quality, monoculture grasses are explored and consideration of the following, depending on variables like sunlight and soil type.: -</p> <ul style="list-style-type: none"> • Grassland: Consideration of species rich grassland within developments can encourage biodiversity by providing habitat, it is low maintenance as it requires less mowing and also provides a carbon sink. For more information see Grassland The Wildlife Trusts. • Wildflower Meadow's: Meadows can look spectacular and attract a variety of pollinators to enhance biodiversity of an area. A mixture of wildflower species is recommended and there are many Native British species to consider. For example, the Primrose (<i>Primula vulgaris</i>). Meadows can also be both small and large scale. 	Comments are welcomed and noted. The level of information is too detailed for the Strategy itself but will be considered in any future landscape strategy as referred to in the Climate Change Strategy.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
			<ul style="list-style-type: none"> • Orchards, Food Forests and food trails can have wide-reaching benefits for the community, for social and mental well-being, provide education, and produce seasonal and local produce. There are also benefits for biodiversity and the climate. • Lawns: Encouraging residents through behaviour campaign to keep their lawns longer, especially in the spring can increase the biodiversity within the development. Schemes such as 'no-mow-May' provide an example into the impact 'wild' lawns can have on the biodiversity in a local area. • Wetland and water features: Areas of marsh, fen, peatland, or water—whether they are created naturally or artificially, permanent or temporary, with still or flowing water that is fresh, brackish, or salt—are referred to as wetlands. Constructed wetlands are specially created landscape elements that are installed in order to treat contaminated water, lower the risk of flooding, increase biodiversity, and provide amenity spaces. They do this by utilising naturally occurring physical, ecological, and chemical processes. • Xeriscaping: Landscaping with minimal use of water and climate resilient planting. 	
		9 – Para 3.20	<p>Welcome the sponsorship of roundabouts. Consideration of climate-resilient, low-visibility planting could be a suitable choice for planting of roundabouts. These plants are typically hardy and require minimal maintenance, making them ideal for areas with high traffic and limited access. Additionally, they can enhance the aesthetic appeal of roundabouts while contributing to local biodiversity and resilience against climate change. Implementing such planting strategies can also improve safety by maintaining clear sightlines for drivers.</p> <p>Colchester City Council has partnered with Beth Chatto that could provide a useful example to monitor - Planting on the Albert roundabout</p>	Comments welcomed and noted.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		10 - Maintenance of Green Space and Green Infrastructure	Other consideration is the green Infrastructure features within the towns and urban areas. To explore opportunities to improve urban greening of our towns, and villages through the provision of street trees, road verges, green walls, green roofs, Sustainable Drainage Systems and Natural Flood Management etc.	Strategy already makes reference to opportunities for the maintenance of hedging and other planting, especially in residential areas which can have a significant benefit for biodiversity and a separate section identifies these measures (within Objective 4).
		11 - Maintenance of Green Space and Green Infrastructure	Support the actions identified in this section. Is there a consideration how this links to the Biodiversity Duty?	To include reference to the biodiversity duty and the Environment Act in Objectives 1 and 4.
		12 – Paras 3.27 -3.28	Community energy, would be a good opportunity to establish a commitment to consider procuring community energy services as part of wider climate strategy, as this not only supports delivery and installation of low carbon technologies but also boosts local and community engagement, providing additional benefits in the wider strategy to address climate change – i.e. it boosts objective 7 of strengthening and encouraging local action Add something similar to “we commit to exploring procurement of services from community energy groups where feasible and suitable”	Similar to point 5 above, the Strategy will include a separate paragraph on the potential implementation of community energy groups.
		13 - Table 1	Add another row to “short term actions” column to summarise the above points Additional short term action “We will engage with and explore partnership with the community energy sector in Harlow and Essex”	Table 1 to refer to community energy groups as a potential future action as well as potential for estate renewable generation.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		14 - Objective 1	<p>We support Harlow implementing measures to reduce water usage. Would suggest more content could be included within the plan about the challenges of future water supply and water quality issues.</p> <p>Positive that this climate change strategy supports many recommendations of the Essex Water Strategy.</p>	Add additional commentary on water challenges in the region under Objective 2 which refers to the 110 litres per person per day Local Plan policy. See comments made above on reference to lower targets, Local Plan Review and Water Ready report.
		15 - Overall comment	Appears to be no position on encouraging and enabling the transition to a Clean Power system and the role Harlow can play in that – through the Planning system for example, but also engaging with the private sector to ensure the benefits from investment in renewable energy come to the local community (through community benefit funds, ownership or access to cheap renewable electricity). Potentially there is an Objective missing which is something along lines of “To enable the transition to renewable energy and contribute positively towards the Government target of a clean power system by 2030 in a way that benefits local communities and local businesses”	Further information and discussion may be required with ECC and other district authorities to provide detail as to how this can be actioned by the Council before it can be included or considered in other documents such as the Local Plan Review.
		16 – Para 4.7	Here, it would be good to have a breakdown of measures installed to greater understand the costings and £65k average per property, as this seems high.	Information can be made available in further discussion with ECC and not within the Strategy itself. There are various costings available nationally and locally on what ‘retrofit’ would mean to an average property, however in Harlow there are many properties which are not typical of construction which affects the average cost of improving Council owned stock hence the high average figure provided.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		17 – Para 4.12	“...work with key partners to enhance the retrofit and clean energy skills of residents to support delivery...” – this will be essential to deliver retrofit at the scale required, but will also boost local jobs and training opportunities. Would be great to name check partners	Objective 6 refers to partners that will help support green skills including ECC and Harlow College.
		18 – Para 4.29	No reference to Community engagement or collaboration on energy advice events. How can the Community Hub (referenced in 4.27) assist in driving referrals to energy grants? It is also important that existing channels are regularly updated	Comments noted. A communications strategy referred to in Objective 1 will help set out in more detail how these messages will be communicated to the public.
		19 – Para 4.32	Generally agree, but the Council can play a greater, more proactive role in collaborating with ECC and external community stakeholders to further promote awareness of energy efficiency funding, through community awareness days and also identifying properties for funding (WH:LG)	Noted. See comments above.
		21 - Table 2	Last short term action in the table – working with key partners. Can we add a reference to “key partners, including local and community energy groups, to enhance supply of retrofit and clean energy skills”	Noted, will make change to table.
		22 – Para 6.1	To recognise the benefit to the economy. Green spaces offer significant economic benefits, including increased property values, attracting investment, and boosting tourism. They promote health cost savings by encouraging physical activity and mental well-being and provide environmental benefits like stormwater management and pollution reduction. Additionally, green spaces create jobs in maintenance and park management, support local businesses, and foster community cohesion, all contributing to overall economic growth and stability.	Noted, amend para 6.1 to also make reference to the economic benefit and further environmental benefit of green spaces.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		23 – Para 6.1	Managing and maintaining green spaces play a crucial role in adapting to climate change. These spaces help mitigate the urban heat island effect by cooling the air and providing shade, which reduces energy consumption for cooling buildings. They also improve air quality by filtering pollutants and sequestering carbon dioxide. Additionally, green spaces enhance stormwater management by absorbing rainwater, reducing the risk of flooding. By preserving biodiversity and supporting ecosystems, they contribute to overall environmental resilience. Effective management ensures these benefits are sustained, helping communities adapt to the changing climate.	Noted.
		24 – Para 6.4	<p>Is there an opportunity to encourage behaviour change in residents in promoting permeable paving if they have to convert gardens into driveways.</p> <p><i>le.Pervious/Permeable driveways and surfaces: It allows rainwater to infiltrate through into underlying layer where it is temporarily stored and fills gaps of exposed turf between plants.</i></p>	Amend para 6.14 to refer to the Local Plan Review considering how policies can support permeable materials in all new applications where permission is required as well as any covenant consent that may be required.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		25 – Paras 6.5 - 6.6	<p>Opportunities to link to the Landscape strategy or green and blue infrastructure Strategy mentioned under objective 1.</p> <p>The emerging LNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement (including identifying strategic opportunity areas) and will provide further useful information. The LNRS plays a crucial role in Biodiversity Net Gain (BNG) by offering a strategic approach to off-site BNG delivery. The LNRS includes strategic opportunity maps highlighting areas with the highest potential for environmental benefits for new habitat creations across Essex. Sites of strategic significance offer a 15% uplift in biodiversity units compared to other sites, providing a 15% bonus on units purchased in these locations.</p> <p>Consideration of the BNG duty and how this links into the climate change plan.</p> <p>It is not only the opportunity for carbon sequestration from new and existing green spaces, but it's also recognising the multifunctional benefits from these green spaces and wider green and blue infrastructure. Such as air quality improvement, reduce urban heat island affect, flood and water management. Through the right design, right green infrastructure, and right location of green infrastructure it can deliver more than one function and contribute to more than one priority, providing cost efficiency in the long term to deliver better outcomes.</p> <p>The interconnectivity of natural environment, flood protection and water management, outdoor sport and open space, and public realm is an important part of the GBI network and shouldn't be seen or treated in silo. Consideration of improving connectivity to reduce habitat fragmentation and strengthen and build resilience of the GBI network.</p> <ul style="list-style-type: none"> • Every effort needs to be made to ensure that connections between green spaces, local amenities and developments are achieved to ensure that routes make sustainable connections and are attractive through the delivery of GI for the benefit of the new community and existing communities. • Recommends including 'improvements or greening the public realm (i.e., street trees, dual purpose street furniture with planters, rain 	<p>Amendments to be made will include:</p> <ul style="list-style-type: none"> - LNRS sites now included for Harlow that will benefit from BNG uplift - Biodiversity duty placed on local authorities - Additional wording on GI as stated in response under para 6.12

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		26 - Managing and Maintaining Council Owned Land	See comments relation to the management and maintenance of the natural environment under objective 1 for the tree planting and maintenance strategy and landscape strategy.	Noted. No further changes to the strategy required.
		27 – Para 6.7	To give more consideration of tree lined streets. Tree-lined streets help communities adapt to and mitigate climate change by sequestering carbon dioxide, regulating temperatures, and improving air quality. They also manage stormwater, reducing flood risks, and support biodiversity. Additionally, tree-lined streets enhance aesthetics, making areas more desirable for living and investment. These benefits contribute to creating more sustainable and resilient urban environments	Noted, however the Strategy already refers substantially to landscaping, trees etc providing opportunities for reducing flood risk/improving biodiversity etc.
		28 – Para 6.11	Supports the consideration of natural play. For this, we would expect play strategies to be formed by the character and function of the green spaces. It should be imaginatively designed using landforms, level changes and water, as well as natural materials such as logs or boulders, which create an attractive setting for play. Considerations on how this links in with the Local Plan and any opportunity to strengthen within the local plan. Policies should be strongly worded 'requiring' positive action for the implementation of multifunctional GBI. The need for and importance of GI should be incorporated within a range of policies within the plan, as well as the provision of an overarching GI policy	Noted. To be considered as part of the Local Plan Review as set out in Objective 4.
		29 – Para 6.13	Welcome the reference to the Essex Green Infrastructure Strategy and Standards. Applying Essex's nine GI principles will help to ensure quality and consistency in the provision, management, and stewardship of GI an essential part of place-making and place-keeping for the benefit of people and wildlife.	Noted

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		30 - Mitigating Surface Water Flooding	Supports the delivery of 'a variety of green and blue infrastructure that provides an environmental support system for the community and wildlife'. Recommends consideration is given to the utilisation of GI and Sustainable Drainage Systems (SuDs). GI and SuDs should be developed together to maximise benefits through multifunctionality- they do this by helping to reduce flood risk whilst providing biodiversity and amenity benefits.	Reference to be added on maximising opportunities for SuDS and GI together.
		31 – Para 6.22	The creation and stewardship of new green spaces or enhancing existing ones doesn't always need to come at net expenditure. Has the council explored how some of these sites can generate revenue or council savings through ecosystem services – e.g. using some green spaces as habitat banks to generate and sell BNG units, exploring possible funding (e.g. EA) for flood mitigation benefits, engaging with utilities on possible payments for water quality interventions.	Noted. Stewardship will require further consideration for both publicly and privately managed green spaces.
		32 – Para 6.22	The creation of new green spaces can serve many functions, acting as surface water storage area, an area for biodiversity and also an amenity area for residents and their families to enjoy, learn and play.	Noted.
		33 – Para 6.19	This para refers to the increase in hard surfaces, it is important where new areas of hardstanding are added that they be permeable to alleviate the risks of surface water flooding.	See comment above on additional inclusion on permeable surfaces.
		34 – Para 6.4	Reference to the positive impacts of GI on water quality could be added here and referenced throughout this section as one of its multiple benefits. More info about the water situation can be found in the Water Strategy for Essex	Comments noted and reference made to water quality. Water Strategy for Essex added to document links.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		35 – Paras 6.19/6.20	Support for a more integrated catchment management approach could be made in this section. For example, prioritising upstream natural flood management and GI solutions which slow the flow for those at risk downstream, and help to recharge the water system in a more natural way - along with providing other amenity, water quality and biodiversity benefits.	Reference made to the end of para 6.20 on the inclusion of catchment management approaches that mitigate flooding upstream to mitigate downstream risks including use of GI.
		36 - Chapter 9:objective 7	<p>Leading and encouraging local communities, partners and stakeholders will be essential and is great to see that it has been included as one of the objectives. However, there is little detail and could be strengthened significantly.</p> <p>This is by far the smallest amount of content and detail regarding any of the Objectives. And maybe the most important if net zero is to be achieved across the district and not just for council operations. As mentioned above, the Mission Zero report, and many others, outline the vital nature of working with local people, involving them in the decision making process and ensuring they receive the benefits too. Net Zero will not be delivered at the scale required without effective community participation and buy-in.</p> <p>This objective could be strengthened significantly with a commitment to working with the community energy sector and at least adding a table summarising the actions the council will take (as they have for the other objectives)</p>	Noted that this section requires further consideration on engaging, leading and encouraging and actions in previous sections link to this objective, hence the absence of its own table. Communications strategies and further actions need to be developed before they can be included in this overarching Strategy and welcome further discussion with ECC on how the Council could look to do this successfully.
		37 - Para 8.10 And table 6	The Climate Advice Packs were produced by ECC not the Commission. The image used is of an old version.	Noted. Will amend and replace with new image.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		38 – Para 9.1	ECC has over 400 staff who have achieved carbon literacy accreditation and has Bronze status as a Carbon Literate Organisation. ECC is happy to share its experience with Harlow., as well as its training materials which have been adapted to make them more relevant to Essex	Noted and welcomed.
		39 – Para 9.2	ECC is currently developing a new microsite – sustainableessex.org – a one stop shop for all information in the county on climate action. We will support local councils, grassroots action groups etc to use this website to promote their own action on sustainability. Harlow may wish to consider using this.	Noted and will refer to this in the Strategy as a useful link.
HDC Landscape Team	009	1 – Para 6.7	Include reference to rainwater management on our existing greenspaces.	Para 6.10 already refers to Green Wedges/Fingers green spaces being used to improve drainage such as rain gardens.
		2 – Para 6.11	Porous surfaces is a good idea but wooden play equipment can be less sustainable, requiring much more frequent inspections and needs to be replaced every 10 years.	Noted. Will refer to these issues in the Issues section of the objective.
		3 - Allotments	There is nothing mentioned about allotments. Promoting local food growing will support climate change adaption (not moving loads of food around)	Include reference to allotments and promoting local food as a means of supporting sustainability.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
Uttlesford District Council	010	1 - General	<p>The range and ambition of the objectives are welcome and cover key areas though should the topic of 'water' have more prominence?</p> <p>It is unclear who the target audience is, and this will influence the style of writing and language/tone. To bring it to the attention of local communities might be preferable to use a shorter highly illustrated version, perhaps with interactive maps where appropriate.</p> <p>It might be useful to share the draft with private owners, other organisations, developers and householders to agree the objectives and to use, where possible advice by the CaPU unit to seek higher energy and fabric standards in relation to new building.</p> <p>It might be helpful to set out a timescale for adoption of the strategy, including the Communications Plan under Objective 7 and how it might be implemented- high level at its stage- and what sources of funding might be available; a simplified version that combines the action areas.</p> <p>It would be good to share this, if not already, with the North Essex Climate Board for their views.</p> <p>It might be helpful to share it with the Essex Developers' Group – Alistair Pollock could advise on this as Lead for the group (apollock@castlepoint.gov.uk) or, if Harlow has its own developers' group, with them. This links to Objective 6 and is reflected in para 4.26 which helpfully endorses the Essex Developers' Charter which we understand will be revised during 2025.</p> <p>Water usage is covered in para 4.16 but it would be worthwhile to have further engagement with the water company strategies who, we believe, would support a tighter standard.</p> <p>You will of course need to check against the new NPPF.</p>	<p>Comments have been received and changes being made which refer to water standards and water scarcity in the area. The target audience is far reaching, covering residents, businesses and stakeholders. A shorter version was provided as part of the consultation and will also be updated where needed. The Strategy was shared with a range of stakeholders but individual actions will have more targeted consultations and engagement including developers for any changes to the Local Plan as a result of new policies on Net Zero and higher energy standards. The strategy itself will be adopted at Cabinet but regularly reviewed with an internal tracker and annual action plan being developed to track individual projects subject to resources. When this is developed, specific actions such as the Comms Strategy will be able to be timetabled appropriately. The Council will continue to engage with specific projects with various groups for assistance and support including Developer's Group and Climate Board (chair was notified). Water companies were consulted as part of the strategy and any changes will be made. A review of the NPPF and any government changes since the consultation will also be undertaken as part of amending the final version.</p>

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		2 – Para 4.1	The Uttlesford policy on net zero reflects the fact that emissions from homes are not only due to the energy used for heating, worsened by poor insulation, but arising from other energy uses both regulated (heating, hot water, ventilation, lighting, cooling) and unregulated energy (plug loads, lifts, IT, cooking and appliances). Paragraph 4.1 should make this clear because this is not reflected in Building Regulations and hence are not the appropriate tool for making homes net zero. Hence the need for the ECC-style policy which goes further. Para 4.10 could add that energy efficiency standards should be equivalent to Passivhaus.	Paragraph 4.1 to be amended to reflect regulated and unregulated emissions. Paragraph 4.10 already refers to Passivhaus.
		3 – Para 4.15	Paragraph 4.15 (and 4.14) is welcomed. The inclusion of net zero design policies in design guides has been identified as a further means of ensuring new homes and buildings are built to the standards advocated in the Essex model policy position on net zero, and the County has recently received a final piece of advice confirming the legality of this from Kings Counsel, to be published in the new year. This illustrates that any stipulations around sustainability included in a design guide will have material weight as long as that design guide is adopted as part of an SPD. This would apply to design codes also should Harlow choose to devise a Code for the district and as well as for new communities in HGGT. To this end it is noted that the addendum to the Harlow design guide does not include specific targets for net zero buildings, particularly with regards to energy use intensity or space heat demand, and you may wish to consider this.	Noted. The Design Guide SPD and Net Zero policies will be considered as part of the Local Plan Review process. Amendments will be made to the Strategy to reflect this as per previous comments.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		4 – Para 4.18	Para 4.18 - Uttlesford welcomes the creation of Harlow's Sustainability Checklist that will need to be provided to support planning applications. We have looked at this too and provided for the use of a Checklist in the Uttlesford Local Plan, awaiting the emerging checklist prepared by the County Council which is more comprehensive but acknowledging the balance between a comprehensive approach and one that facilitates usability. It will be a useful aid for DM officers and for developers aiming to comply with net zero targets.	Noted.
		5 – Objective 3	Para 5.6 – we would support the need for the planning process to help design how waste is provided and located in new development proposals as a key consideration in planning applications, presumably for larger developments, and that applicants will be required to submit a Waste Management Plan to support residents in recycling. Similarly in para 5.7 we would support mixed recycling bins in public areas. Para 5.19- We support the need for the right infrastructure to be delivered to support proposals such as electric vehicles in public areas as well as for residents for home use but also to consider the EV needs for larger vehicles. Some provision could be captured through planning policy particularly for commercial developments.	Noted
		6 – Para's 6.17/6.18/6.23	Para 6.17-18- Biodiversity Net Gain- we would encourage the Council to explore the viability assessment for 20%+. Uttlesford used evidence for a similar percentage for the local plan policy. ECC viability evidence for 20% is expected early in the new year. Para 6.23- we would encourage the inclusion of multi-functional green areas and to consider how BNG can be useful such as in 'offset' sites.	Refer to the Council considering higher percentage if viable. Refer to the use of multifunctional green areas in paragraph and how BNG can support these spaces.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		7 – Objective 5	<p>We support the concept of Sustainable Transport Corridors which can more easily be achieved in denser urban areas. We support the intention on para7.11 regarding planning applications which will need to be accompanied by the submission of transport assessments, transport statements, Green Travel Plans and School Travel Plans to set out how developments are supporting walking and cycling and helping to achieve modal shift. We feel 50% is an appropriately ambitious target, and will need to be supported by a community engagement on behaviour change as played out in Objective 7. We note the intention in para 7.22 to prepare an Electric Vehicle Charging Strategy, working with Essex County Council on their Essex wide strategy and the council's installation of EV charge points; this could be covered in planning policy and conditioned too for public and non-residential areas. It is similarly an ambition in Uttlesford to develop an EV strategy.</p> <p>Has the Council considered 'mobility hubs'?</p>	<p>Noted and welcome comments. Mobility hubs form part of the HGGT Transport Strategy and are already being delivered including an improved mobility hub at the Harlow Bus Station and improvements to train station areas. They are also an important component of strategic sites.</p>
		8 – Objective 7	<p>We would consider it essential to progress the community engagement plan which sets out engagement activities with the community including businesses, schools and residents on waste, recycling etc (para 5.16) and by extension to other climate change mitigating behaviour changes through event days and activities. We agree with the importance of the Council taking the lead in encouraging communities, partners and stakeholders to reduce their emissions (para.1 and all the stated ambitions in this paragraph) though acknowledge the resources involved to deliver.</p>	<p>Noted</p>
		9 - Monitoring	<p>The indicators in Table 8 are useful but could include one referencing net zero homes/buildings – to be checked on completion that they have been designed and constructed to the agreed and permitted standard.</p>	<p>Table 8 are LGA identified indicators rather than Council considered indicators. Table 7 will be amended to include reference to net zero homes/buildings being reviewed (subject to new policies being adopted on this).</p>

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
Shaun Andrews	011	1 - General	Your first two key objectives. " (1)To achieve Net Zero emissions from the council's operational buildings, land, vehicles, and services, including those provided by service delivery partners (2)To achieve Net Zero emissions from all homes and the built environment within Harlow. " How can you stop vehicles from outside Harlow, driving through Harlow and contributing to Harlow's vehicle emissions? You can't. How can you stop houses and homes being built by Epping, and Hertfordshire councils tight on Harlow's border that will have an impact on Harlow's own emissions? Again you can't. So why do you keep peddling net zero when you know forces beyond your control means you have no control. The people of Harlow know this too	Comments noted and the Council appreciates that there will be some emissions that the Council will not be able to control or manage and the Strategy acknowledges the issues and pressures under each objective on reaching Net Zero. However the Strategy aims to include actions that the Council can deliver, support and encourage to help reduce emissions such as its own buildings and vehicles under Objective 1 and work with partner authorities for delivering net zero housing across the wider area as well as in Harlow.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
Charlie Browne	012	1 – General	40% of global warming is caused by the manufacture of cement, aluminium, steel. In the light of this statistic, and the fact that the UK population has been falling for many years, it seems to me that the worst thing the council could do to halt global warming would be to continue with the building of 23,000 new dwellings on greenfield land around the periphery of Harlow, including the construction of the Harlow - Gilston “Villages”. THIS consultation is merely a fig-leaf concealing the true nature of undemocratic decision-making in the town. To be more than a whitewashing of absolutism, the council would have to put the various decisions before the electorate, in binding referenda. This could easily be carried out on our smartphones etc; after all, it’s considered secure enough to pay our council taxes that way. In Switzerland, Mexico, many American states and towns, they have such a system. M Macron wants to introduce it throughout France. It’s called ‘semi-direct democracy’ - look it up! (‘Swissinfo’ and Wikipedia may be helpful). Without such a referendum, this consultation is just eyewash.	The Council is required to deliver new homes to support its residents, both private and affordable. The Strategy provides the opportunity to ensure that they are more sustainable and energy efficient so that their impact is significantly reduced on the environment than what was built before. Comments on engagement noted and will be considered in future communications and consultations relating to specific climate change actions.
		2 – Objective 2	I would suggest that it is NOT the business of the council to tell householders how to regulate emissions from their properties and from their vehicles.	The Strategy does not force residents to make certain changes to their homes but can support those that do wish to make their homes more efficient or sustainable as well as support them with any available grants.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		3 – Objective 4	As the manufacture of cement, aluminium, steel causes 40% of global warming, I suggest that all of the actions proposed by the Council will be rendered irrelevant by continuing the construction of 23,000 new dwellings around the town's greenfield periphery. As a first measure, abandoning the Harlow-Gilston "Villages" greenfield developments would be a good move. I would point out that the UK birthrate has been declining for many years; so to increase the UK housing stock by the projected 1.5 million, then import a similar number of job-seekers from abroad to take up the slack, just in order to promote growth/profits, is an insult to the intelligence of the people of Britain, and of Harlow. This consultation is anti-democratic in as much as our comments carry no weight whatsoever - this exercise is merely the democracy-washing of the diktats from the elected dictatorship called Harlow Council. What we need is 'Semi-direct Democracy' as they have in Switzerland, Mexico, many US states and towns. Macron wants it for France. 'Semi-direct Democracy' would provide the electorate with the opportunities to BINDINGLY record their wishes, issue-by-issue, in referenda. Could be done on our smartphones etc. - after all, the payment of our council taxes can be made this way. Look up 'Swissinfo' and other sites giving descriptions of Semi-direct Democracy in action.	See comments above under point 1.
Roy Adams	013	1 - General	The climate has and always will change due to natural phenomena. Anyone who thinks man is or can have an impact on it is living in cloud-cuckoo-land. Increase in C02 have not scientifically been linked to the climate but as we all know it is vital for plants and increased levels of C02 will help green the planet and feed the every increasing human population.	Noted.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
Adam Taylor	014	1 - General	Net Zero will make us colder / poorer / and damage our nation significantly. Climate change is not important, the UK results in less than 1% of global emissions.	The Council has declared a Climate Emergency and a Net Zero target, and the Strategy supports to deliver that and support reduction in local and global emissions. Some actions identified in the Strategy have a wider benefit to the community than just minimising CO2 including providing green spaces, walking and cycling routes for active lifestyles and improved air quality.
Penny Hunter	015	1 – Chapter 2 & objectives	To provide more insulation and solar panels to the existing council homes in the area and where possible heat pumps. This would not only reduce emissions from residents but help the quality of life of the tenants who are struggling to heat and eat. This also means long term while homes are empty the council can still make money on the homes by selling solar energy back to the grid. To improve energy efficiency levels in homes that Harlow council own.	Noted. Reference made to energy efficiency measures already included under 4.8 bullet point
		2 – Para 3.4	I'd like to see all council buildings including council homes included in these	Council owned homes is set out in Objective 2.
		3 – Para 3.5	This should include homes owned by Harlow council in these surveys	As above – detailed under para 4.8.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
Daniel Popescu	016	1 – Table 3	There's an urgent need to educate and encourage everyone to report and to pick up all the litter such as drink cans , bottles , plastics wrappings papers and all sorts of things that is spread everywhere in town , the green spaces everywhere in Harlow are littered with these items thrown by careless people or blown by the wind from bins , the hedges everywhere are full of junk and waste. There should be an action plan to help clear the litter that is everywhere you turn in Harlow as it makes a very depressing image of careless town .There should be more information and requests that all the residents are responsible for clearing the area's around their homes and fines should be imposed.	Comments noted. Strategy references the provision of new bins to try to prevent this from happening.
		2 – Table 5	The current highly polluting buses should be all replaced as a matter of urgency with electric busses that could be charged from solar panels that could have been installed on all council/ public buildings and the big warehouses around Harlow where big Business such as Amazon Poundland etc etc could help install these panels and generate electricity for these busses to be able to run on very low prices to make it cheaper for everyone and to encourage the local population to use the public transport more. These big businesses pay next to nothing in taxes they should all be approached to start helping us all to achieve net zero quicker and give residents free electricity and free rides around town. Also the council could do a few of these solar panels charging stations around town so people can get free or very cheap electricity in order for people to start adopting electric cars. Harlow could set an example for the rest of the country in this respect as it owns a lot of buildings that can produce a lot of free electricity that can also help with the maintenance of those buildings when the electricity is sold into the grid. And that's how you will lower the residents bills for council taxes.	Comments noted and welcomed. References made in the Strategy to the future provision of cleaner buses on the sustainable transport corridors. Will consider the potential for utilising solar panels on business properties to pay into the grid but the Council can only encourage businesses to help deliver this.
Moss Ali	017	1 – Para 7.6	More street lighting would encourage people to walk more. Especially through the quiet and dark alley ways that connect different neighbourhoods	Noted. These measures are considered in the LCWIP as noted in para 7.7.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		2 – Para 7.13	I would use public transport if it was quicker. There needs to be quicker bus journey times to Epping Station from near the old town area. 15 to 20 mins would be great (depending on traffic). That or extend the central line to Harlow. The overground to London is too expensive and slow	Noted.
		3 – Para 7.33	On social media, a lot of residents complain of neighbourhood centres being run down and not feeling safe . Redevelopment would encourage people to use them more, than have to drive their cars to the retail areas (water gardens, edinburg way, etc) instead. New developments increase pressure on local services. Services need to be upgraded accordingly	Noted and comments welcomed. The Council has prepared several development briefs to support the improvement of neighbourhood centres as well as implementing improvements to the town centre and will continue to do so. The LCWIP and 15-minute neighbourhoods aim to support local walking and cycling to these services to avoid the use of the car.
		4 – Table 5	Need more pedestrian crossings on B roads like First Avenue, Edinburgh Way, etc	Noted. Will include action under Table 5 to include consideration of additional crossings across Harlow.
HGGT	018	1 – Site monitoring	Development site monitoring should also include consideration of regulated and unregulated energy consumption and emissions.	Agree. Include in monitoring section (Table 7)
		2 – Stewardship Charter Para 6.16	Para 6.16 references the HGGT Stewardship Charter in a way that implies it is 'draft'. The Charter is published, adopted and is a material Planning consideration. It is suggested the wording is updated in this regard.	Relevant paragraphs will be updated to reflect Stewardship Charter endorsement.

Response Comments				Council response
Author	ID	Point	Text (summarised where appropriate)	
		3 - LCWIPs	This section mentions LCWIPs nearing delivery or being delivered at present. It is suggested that these incorporate LCWIP 1, 4, 6 and 8. It is suggested that it would be helpful to discuss prioritisation preferences with Essex CC as the Local Highway Authority before finalisation.	Council will continue to work with ECC on prioritisation of routes. The Strategy will be updated to reflect work undertaken on Routes 9 and 4 already and ongoing work with ECC to deliver improvements to the other routes as per the LCWIP.
		4 - Freight	Options for freight could consider whether this strategy should reference the HGGT Re-Imagining How to Travel Differently (MTDF) long term plan to explore freight hubs in Harlow and the wider HGGT area. In addition, this guidance document 'HGGT Re-Imagining How to Travel Differently' - Modal Transition Delivery Framework should be included in the Strategy's discussion of modal shift.	Reference the How To Travel Differently document prepared by the HGGT and exploration of Freight Hubs.
		5 – Para 7.33	Para 7.33 is badged as the '15 minute neighbourhood' creating neighbourhoods to live and work in alongside access to green spaces that are well connected. It is suggested that the HGGT Vision and the TCPA Garden City Principles are highlighted in this section.	Will include reference to HGGT vision and TCPA Garden City Principles in this section.
		6 – Objective 6	HDC's Economic Development Strategy is mentioned, it is recommended that the Strategy also references HGGT's Strategic Economic Framework 2023 which ensures that HDC's Economic Development Strategy is embedded in the wider economic region.	Reference will be made to the Strategic Economic Framework 2023 in the Strategy

Climate Change Strategy Questionnaire Responses

- 15x participants (13x online, 2x email)

Q1- Which objective do you think should be prioritised in Harlow?

Objective 1- 9 votes (Council operations)

Objective 3- 9 votes (waste/recycling)

Objective 2- 8 votes (housing)

Objective 4- 5 votes (natural environment)

Objective 5- 4 votes (sustainable transport)

Objective 6- 4 votes (green economy)

Objective 7- 2 votes (lead/encourage communities)

*Several participants voted for more than one objective.

Q2- The Strategy contains several short term actions the Council can help tackle as local authority. Which of these actions should the Council focus on?

1. Retrofitting as many Council homes as possible to make them more energy efficient - 10 votes
2. Working with residents to reduce their waste and increase recycling - 9 votes
3. Improving cycle paths, footpaths and existing bus network - 8 votes
4. Switching as many Council/HTS owned vehicles to electric - 7 votes
5. Additional tree planting, and reviewing the way the Council maintains spaces e.g. wild meadows - 7 votes
6. Communications and engagement with the community on sustainability, climate change etc - 7 votes
7. Making Council buildings more sustainable (where possible) - 6 votes
8. Working with education partners to improve 'Green Skills' for the future (see page 56 of the Strategy) - 6 votes
9. Identifying schemes that reduce surface water flooding (existing identified problems) - 5 votes
10. Making Council staff travel more sustainably - 0 votes

*Several participants voted for more than 1-2 actions.

Q3- Is there anything you think we have missed (or should be included) in the strategy?

- Drains
- Central government funding
- Community activities and events
- Energy efficient of homes (not just council homes)
- Upcycling, reducing waste, recycling
- Local food
- Education

Q4- What information would you find useful from the Council on sustainability, net zero and climate change?

1. Ideas for increasing recycling, reusing items and reducing food waste - 10 votes
2. Any grants or subsidies available e.g. to help retrofit your home/business, bus subsidies. - 9 votes
3. Events or initiatives held by local communities and residents such as repair days, clothes sharing events - 9 votes

4. Any guidance for housebuilders wishing to build more sustainable buildings/home extensions etc - 7 votes
5. Updates on any climate change actions/schemes the Council have undertaken/agreed - 7 votes
6. Information on local electric vehicle charging points across Harlow - 5 votes
7. Opportunities to volunteer at the town park or other green spaces e.g. for planting/maintenance - 5 votes
8. Opportunities for businesses to sponsor/green existing spaces e.g. roundabouts/verges - 4 votes
9. Information or announcements for 'green skilled' job opportunities or 'green' education courses - 3 votes
10. Local procurement opportunities the Council may have or are upcoming - 1 votes

*Participants were encouraged to vote for as many as they wanted for this question.
