

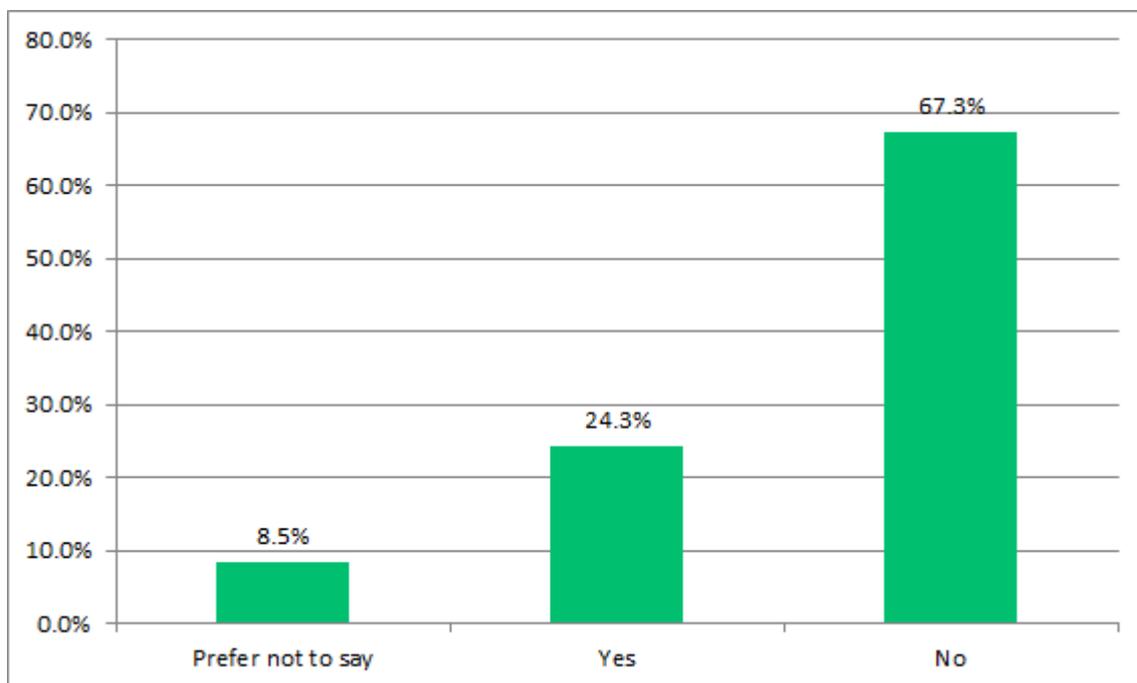
Smoke Control Area Consultation - Summary of Responses

1. Do you confirm that you have read and understood the privacy notice?

297 respondents (99.7%) answered 'Yes' and 1 person (0.3%) answered 'No'. Respondents were required to answer 'Yes' to continue with the survey.

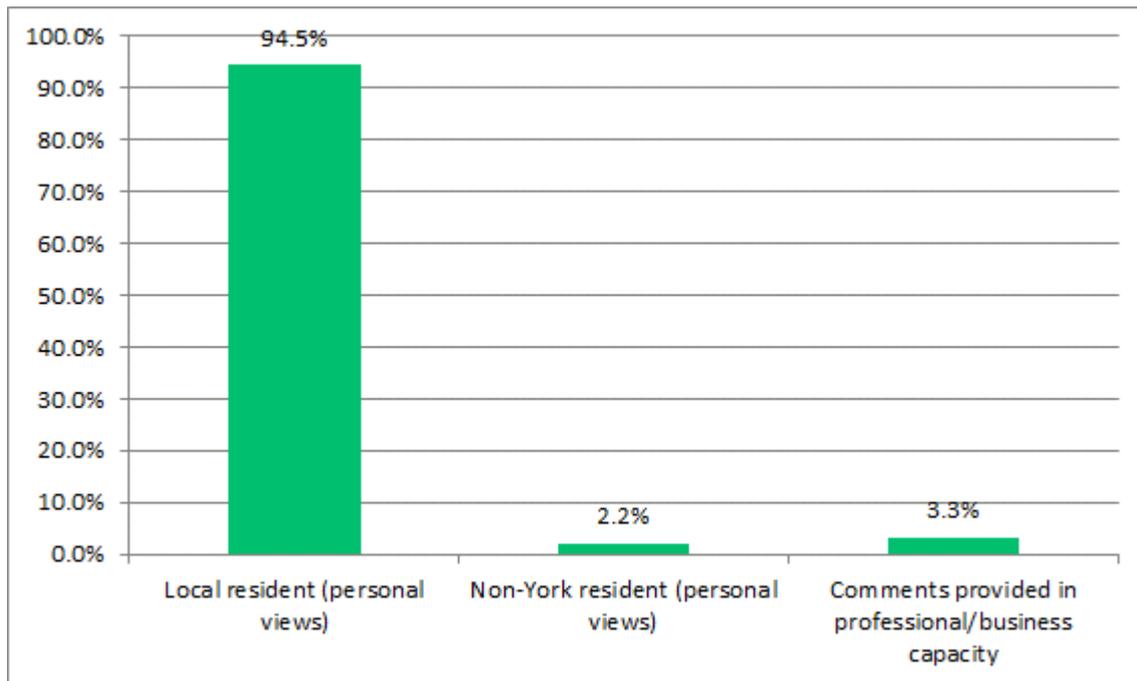
2. Whilst air pollution can affect everyone's health, do you, or anyone in your household, have any health conditions that may be made worse by poor air quality (e.g. respiratory conditions such as asthma or heart disease)?

272 respondents answered this question and 26 people skipped this question



3. Respondent type

A total of 274 responses to the survey were received from 259 York Residents (94.5%), 6 non-York residents (2.2%), and 9 people (3.3%) responding in a professional / business capacity (including Dunnington Parish Council, Earswick Parish Council and Stockton-on-the-Forest Parish Council). No specific business names were provided from those responding in a professional / business capacity.



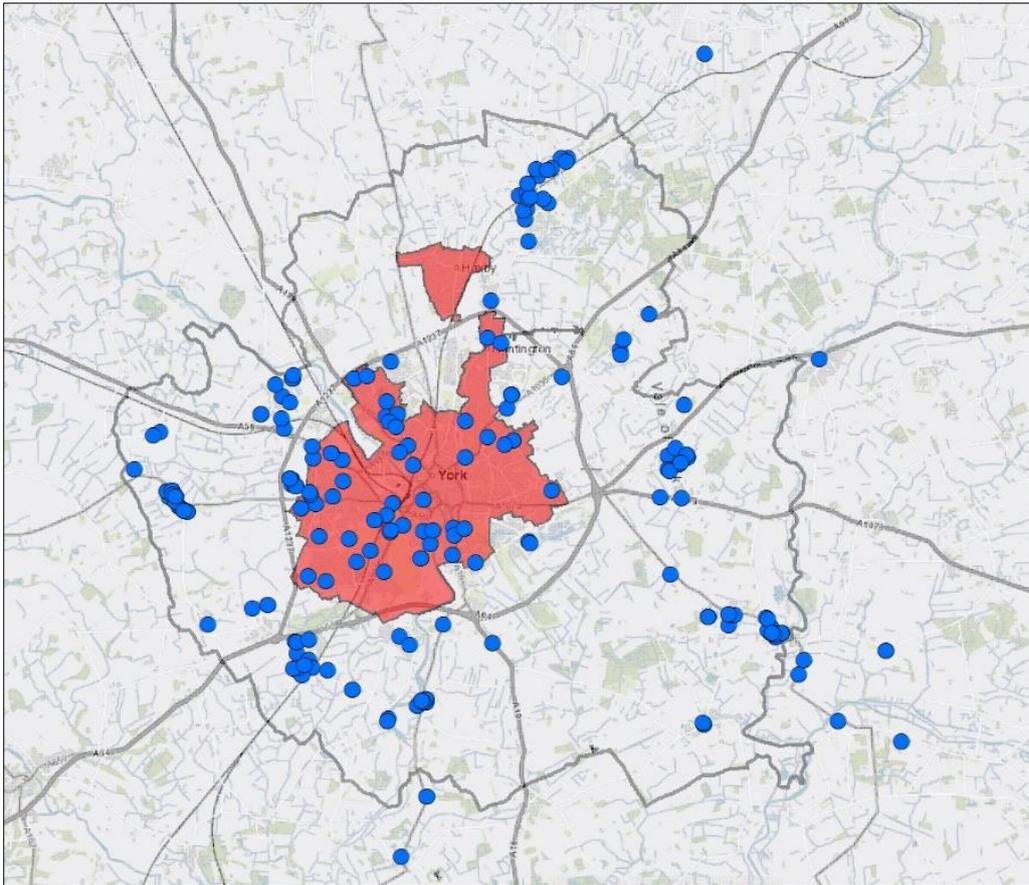
An additional 23 written responses to the consultation were received via email / letter from 19 residents, 3 Parish Councils and 1 CYC Councillor.

4. Postcodes

The figures below show the approximate distribution of responses (blue dots) covering the immediate vicinity of York¹. The existing SCA is shaded red.

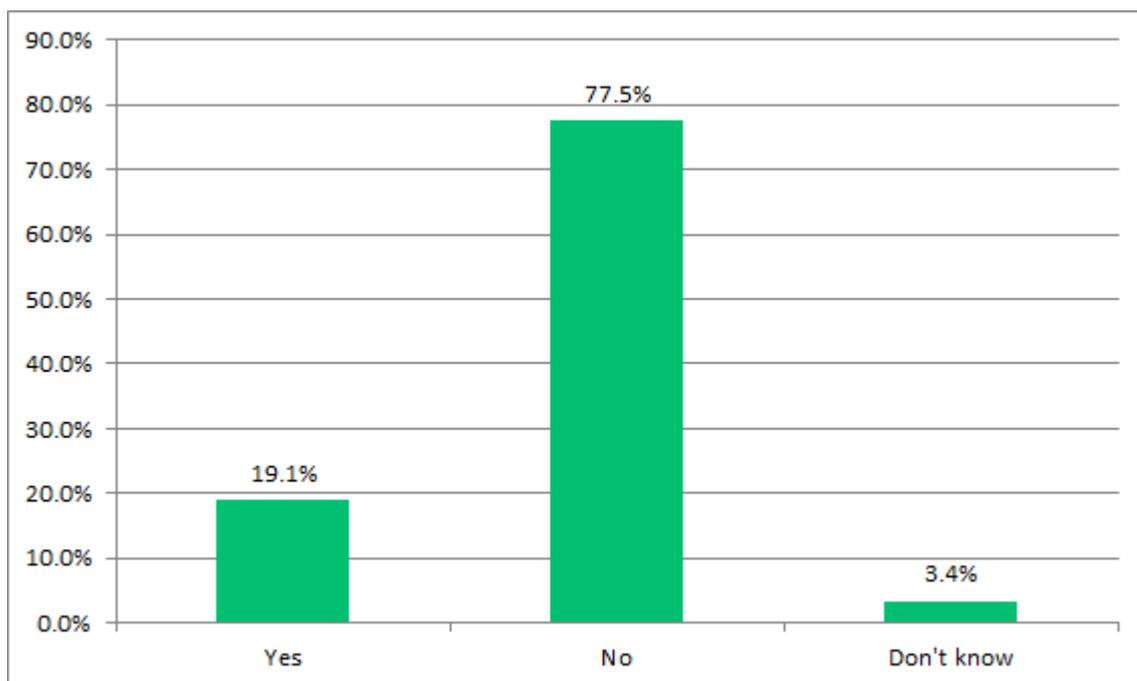
Outside the immediate vicinity of York, 2 responses were also received from the locations of Itchen Abbas (Winchester) and Beverley.

¹ Some postcodes (20 out of 264 responses) had to be 'cleaned' to allow plotting (as they were either incomplete or wrong / mistyped). For these records, the exact location has been inferred, for example, YO30 becomes YO30 4XZ.



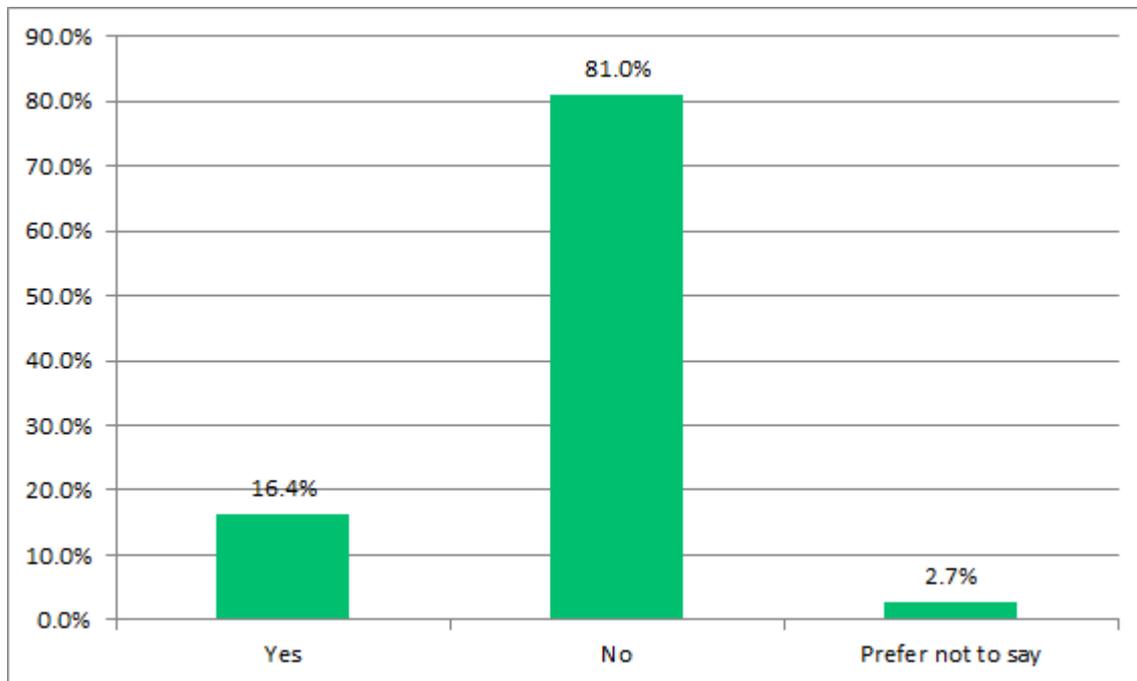
5. Do you live in the existing Smoke Control Area?

Of the 262 responses to this question, 50 (19.1%) lived within the existing Smoke Control Area, 203 (77.5%) lived outside the existing Smoke Control Area and 9 (3.4%) did not know if they lived within the existing Smoke Control Area.



6. Have you ever suffered from a nuisance problem related to smoke from a chimney in your local area?

Of the 263 responses, 43 (16.4%) had suffered from a nuisance problem related to smoke from a chimney, 213 (81.0%) had not suffered from a nuisance problem related to smoke from a chimney and 7 (2.7%) preferred not to say.



The issues mentioned in this question related mainly to neighbouring and nearby properties burning wood/logs (sometimes wet) in open fireplaces and wood burning stoves, causing smoke and odour nuisance. In some cases, this had prevented occupants opening windows (or using window trickle vents), using mechanical ventilation systems (designed to extract stale air and provide fresh air to their property) or undertaking duties in the garden / on the driveway of their own properties. Some respondents stated that the nuisance has made their gardens unusable.

Some respondents specifically outlined that the smoke from neighbouring properties had aggravated respiratory issues for themselves and children in their households.

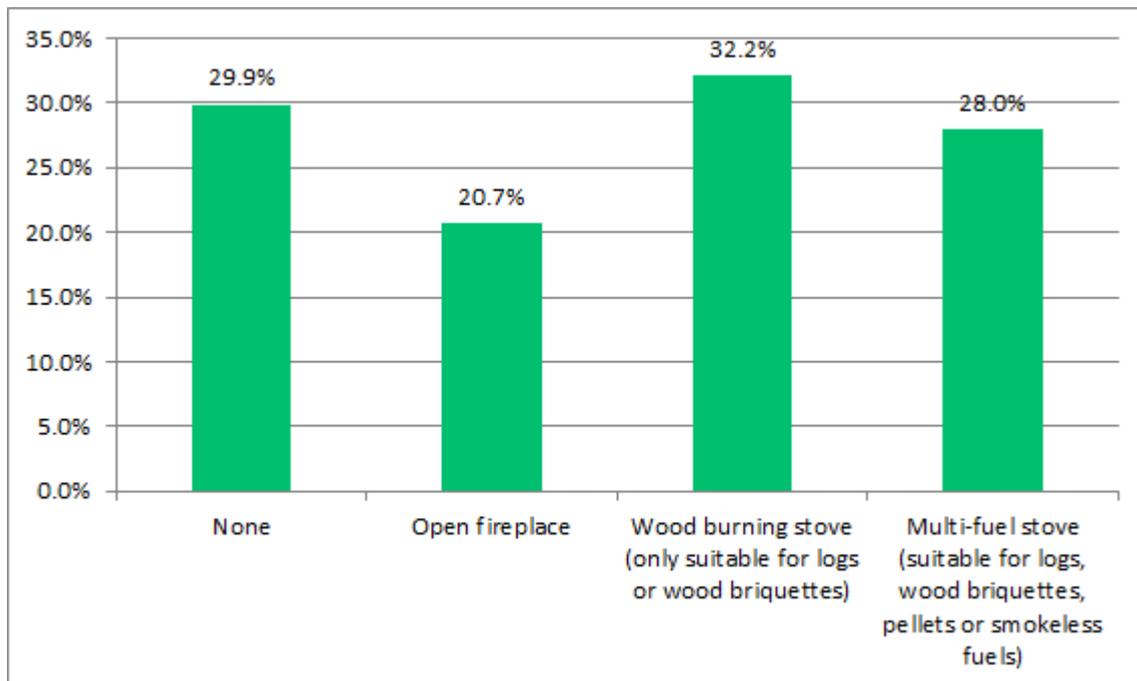
Respondents also mentioned the use of a chimineas and garden bonfires at neighbouring properties resulted in smoke and foul odour (note: neither of these issues are covered by smoke control legislation, but can be dealt with through statutory nuisance powers).

7. Do you have any of the following at your home?

There were 261 respondents to this question, some of which indicated they had multiple solid fuel burning appliances at home.

Of the 261 respondents, 54 (20.7%) indicated open fireplaces, 84 (32.2%) had wood burning stoves, 73 (28.0%) had multi-fuel stoves (suitable for wood and other

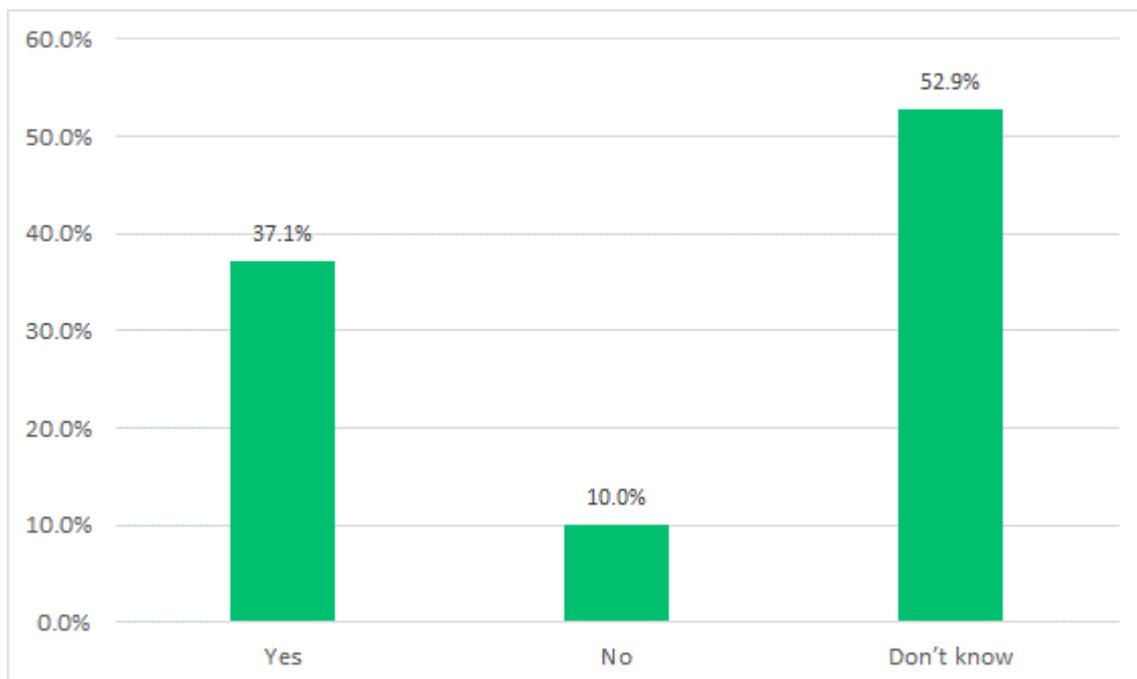
manufactured smokeless solid fuels). The remainder (29.9%) had no solid fuel burning appliances at home.



Note on above – sum of percentages is greater than 100% as some respondents indicated multiple solid fuel burning appliances at home.

8. If you own a stove, it is approved by DEFRA (Department for Environment, Food and Rural Affairs) (i.e. is it on DEFRA’s list of exempt appliances)?

Of the 140 people who owned stove, 52 (37.1%) said their stove was ‘exempt’ (i.e. DEFRA approved), 14 (10%) said their stove was not ‘exempt’ and 74 (52.9%) did not know.



9. Which of the following statements most accurately reflects how you use your solid fuel burning appliance:

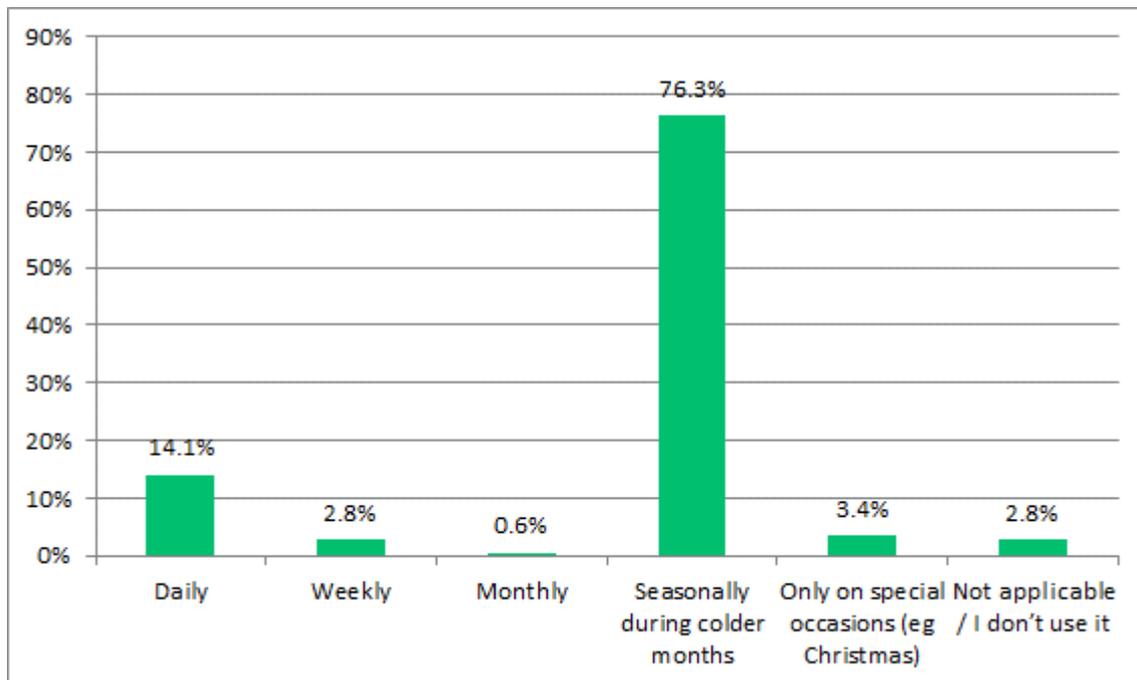
Of the 169 respondents who burned solid fuels, the majority (81.1%) did so to supplement other forms of heating they available (e.g. gas central heating). They did this mainly to save money and / or to create a cosy atmosphere at home.

30 respondents (17.8%) of people burned solid fuels for heating and stated they had no mains gas supply / no other means of heating. A number of people stated that whilst their houses had no mains gas, they did have oil fired boilers and the use of wood was to save on the cost of heating oil. Others referenced the cost of gas or LPG caused a move towards burning solid fuels. Other comments received related to views that burning wood was zero carbon or the fact their property was too cold if they relied on gas central heating alone.

2 respondents (1.2%) specifically said they burned solid fuels for other reasons. Reasons given were to heat water (via a back boiler) and another mentioned burning to use up logs created when trees were felled / pruned on their land.

10. How often do you use your open fire or solid fuel stove?

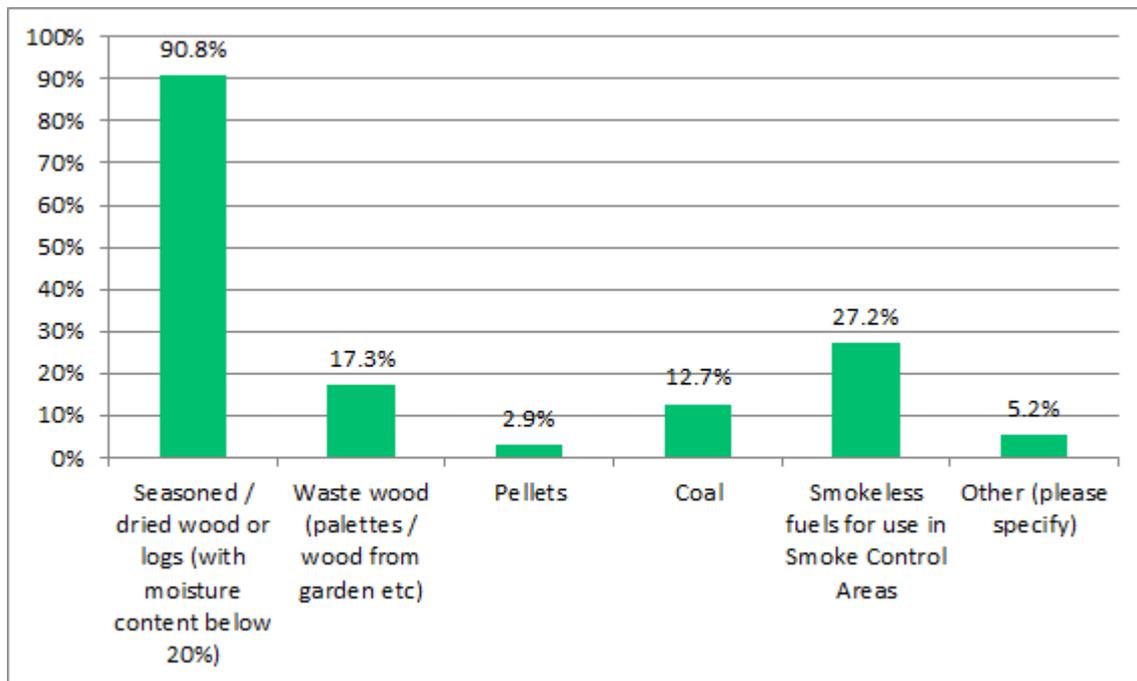
The vast majority (76.3%) of the 177 respondents who answered this question used their open fire / solid fuel stove seasonally during colder months, the full breakdown is shown in the figure below.



11. Which solid fuels do you burn? Select all that apply

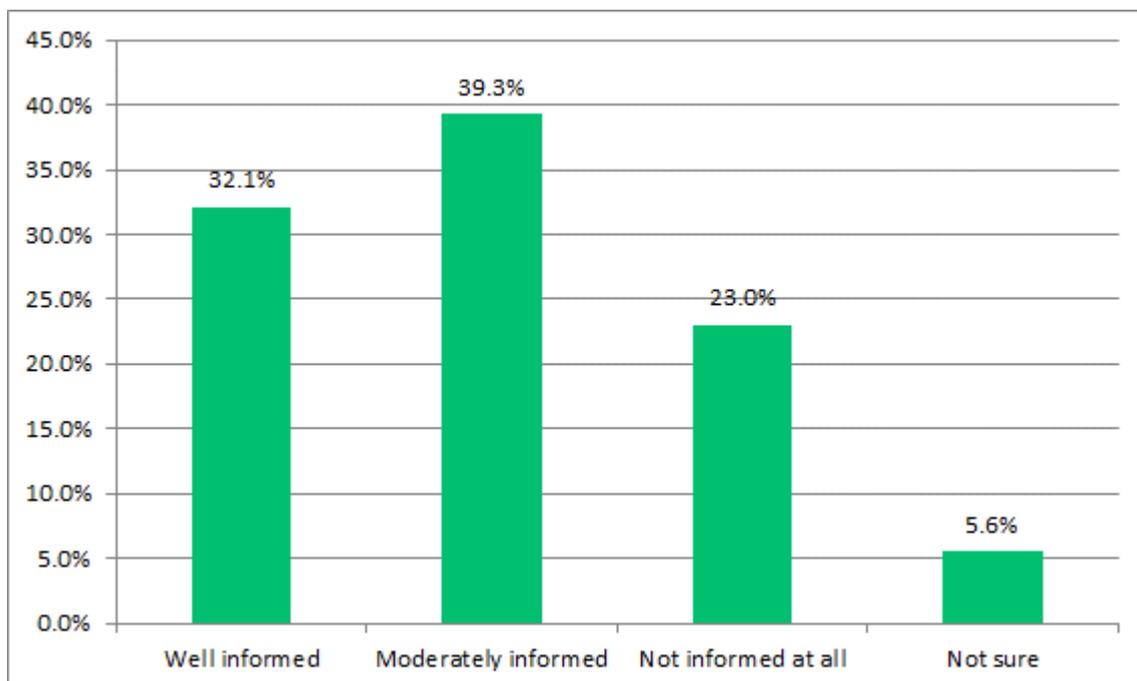
There were 173 respondents to this question, some of which indicated they burned more than one type of solid fuel. Most respondents (90.8%) used seasoned / dried wood or logs with 27.2% of people using smokeless fuels. Waste wood was used by 17.3% of respondents with 12.7% still using coal, despite this now being banned in England for retail sale.

Other fuels mentioned were 'briquettes', 'hotties <8% moisture' and 'seasoned' wood.



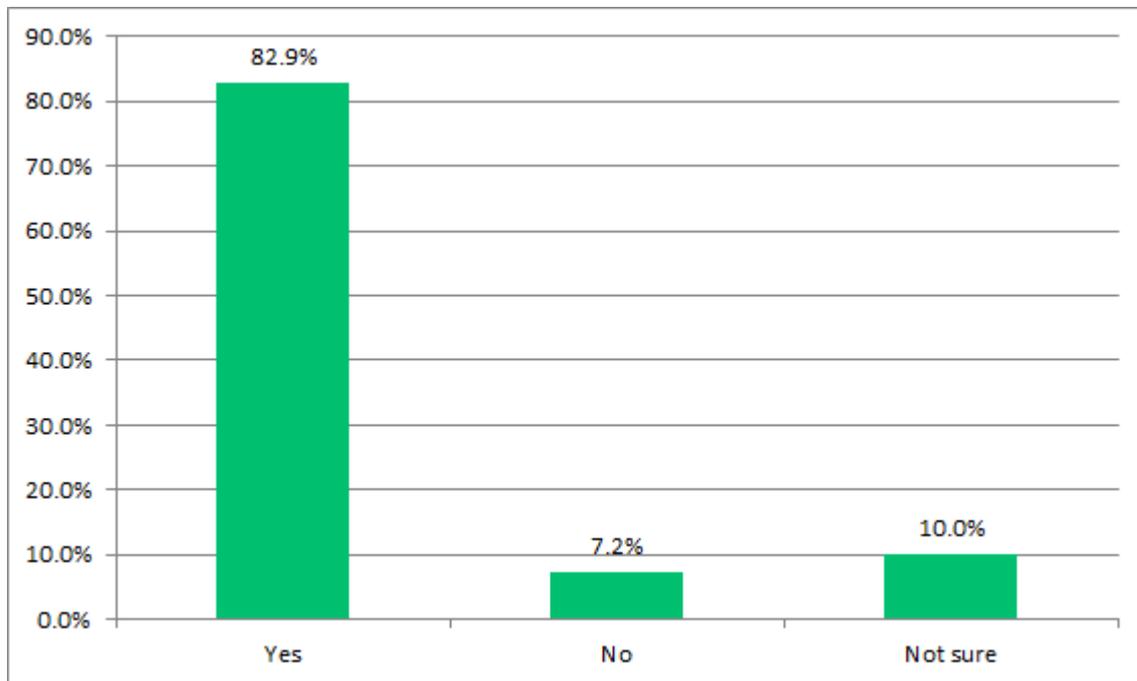
12. How well informed are you with regards to what you are or are not allowed to burn within a Smoke Control Area?

252 respondents answered this question. Most people (39.3%) were 'moderately informed' with 32.1% being 'well informed'. 23% of respondents were 'not informed at all' and 5.6% were 'not sure'.



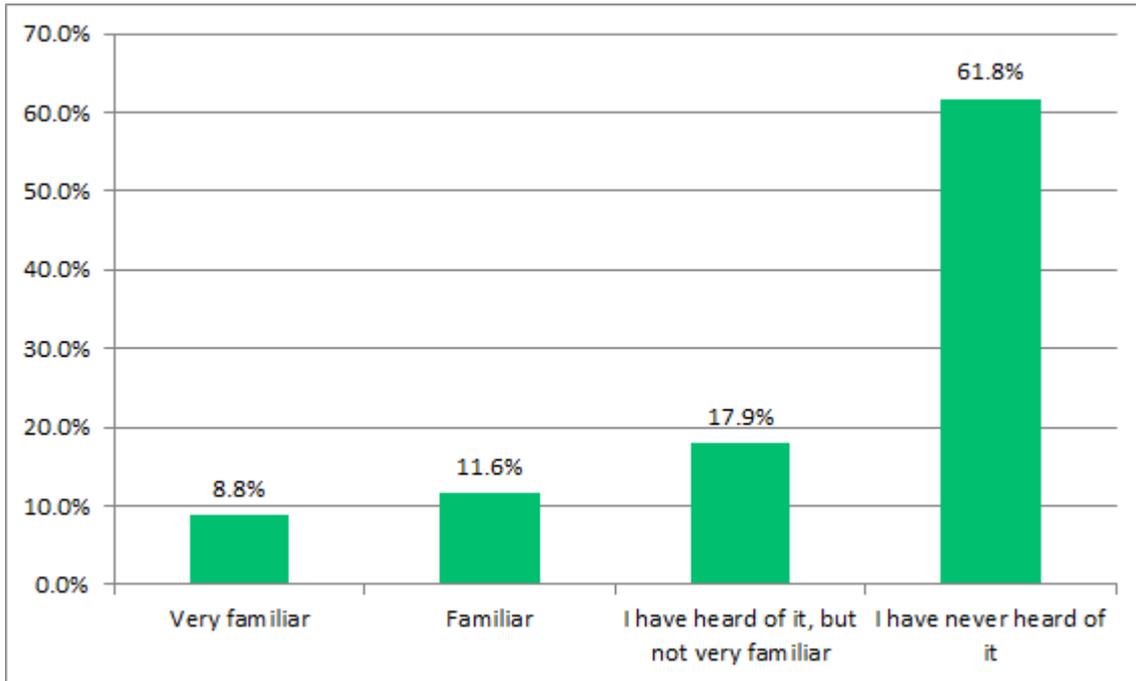
13. Did you know that breathing in smoke from wood burning stoves and open fireplaces can affect human health?

Of the 251 respondents to this question, most people (82.9%) were aware that breathing in smoke from wood burning stoves and open fireplaces can affect human health, with 7.2% being unaware and 10% being unsure.



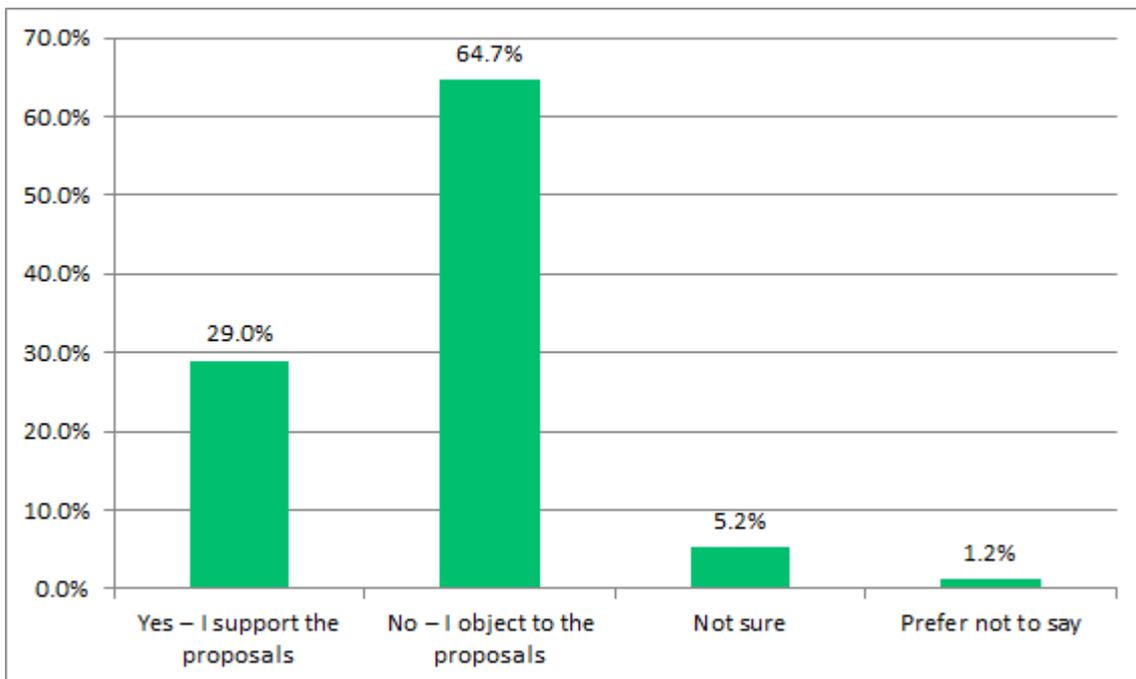
14. How familiar are you with City of York Council’s awareness campaign “Fuel for Thought”, launched to educate and inform people who use wood burning stoves and open fireplaces on the harms they cause, and ways to reduce their impact?

Of the 251 respondents to this question 38.2% of people had heard of the campaign and 61.8% had not heard of the campaign. Of those that had heard of the campaign, 20.3% of people stated they were ‘familiar’ or ‘very familiar’ with the campaign content.



15. Most areas within the York outer ring road as well as all of Haxby and Wigginton are already covered by Smoke Control Areas. Most areas outside the outer ring road are not contained within the Smoke Control Area boundary. Do you support expansion of the Smoke Control Area to cover the whole of York to improve local air quality and health?

Of the 252 respondents to this question, 29.0% of people supported the proposals, 64.7% did not support the proposals, 5.2% were not sure if they supported the proposals and 1.2% preferred not to say.



16. If you have any further comments on the proposals please write them below

A total of 138 respondents provided further comments on the proposals. Comments were made both in support and in objection to the proposals. The general themes and issues raised by those who objected to the proposals (and CYC's response to each) are summarised below, under the following themes:

- Practical considerations
- Awareness and enforcement
- Economic considerations
- Evidence base

Annex D presents the full responses to this question and other general comments received during the consultation period (via email and via comments obtained via the consultation webpages on CYC's website).

The responses to this question revealed some apparent misunderstanding of the proposals. A number of respondents assumed CYC were proposing to ban solid fuel burning outright, despite consultation materials stating that this was not the case.

Practical considerations

Solid fuel systems are more practical for rural heating and offer reliability during power outages

There are no proposals to ban solid fuel heating systems, which City of York Council recognise provide essential heat for some homes and offer resilience during power outages.

Concerns that people with log burners will no longer be able to use them should the smoke control area be expanded.

Wood burners can continue to be used in smoke control areas, provided they are approved by DEFRA and appear on the list of exempt appliances. Multi-fuel stoves can be used to burn fuels other than wood, so smokeless fuels are an alternative to wood in these stoves.

Concerns that people who burn coal will be affected by the proposals.

Traditional house coal, also known as bituminous coal, is already banned from being sold for domestic use in England. Working farms and businesses (e.g. pubs with open fires) are exempt and can therefore still purchase coal for use on open fires outside a smoke control area. Such businesses could still use open fires if the smoke control area is expanded, but they would have to burn smokeless coal / manufactured smokeless fuels instead.

It is impossible to keep my home a habitable temperature without the use of my open fireplace. The house is around 100 years old and insulating to a modern standard would be financially impossible.

CYC is not proposing a ban on the use of open fireplaces. In open fires residents can burn authorised fuel (i.e. usually sold as 'smokeless' fuel). The list of authorised fuels is here: <https://smokecontrol.defra.gov.uk/fuels-php/england/>

Smokeless coal does not throw out heat the way coal does and there is a requirement to use seasoned logs for extra heat

Smokeless coal, while designed to reduce smoke emissions, can sometimes produce insufficient heat if not used properly. Several factors can contribute to this, including insufficient airflow, insufficient quantity of fuel used, presence of moisture on fuel, or an improperly sized or maintained stove. Solid fuel suppliers can offer advice on the correct storage and use of smokeless fuels to maximise heat output and efficiency.

Using seasoned logs as kindling is useful to get a smokeless fuel fire started and to supplement it as there are few flames from smokeless fuel and logs add to the reach of the heat from the fire

It should be noted that burning solid fuels, even in exempt appliances, is unlikely to be completely 'smoke free' from the outset and most appliances will have a period of 'start-up' where there may be unavoidable emissions of smoke for up to 15 minutes as an appliance reaches operational temperature. CYC's Smoke Control Enforcement Policy allows officer discretion for start-up smoke for up to 15 minutes.

We only burn logs from trees on our own land, from fallen trees or ones pruned by a tree surgeon. It is irrational not to use this free resource

Correctly seasoned logs can still be burned in a suitable appliance within a Smoke Control Area. The moisture content of wood can be checked with a moisture meter.

Awareness and Enforcement

Domestic chimney smoke is not an issue in our area

CYC has a legal duty to investigate complaints of smoke emissions. Whilst the severity of smoke and its potential to cause nuisance can be subjective, the cumulative impact of smoke emissions across CYC's area can be significant. Vulnerable people, including older people, children, pregnant women and those with respiratory and other illnesses, are more likely to be adversely affected by poor air quality caused by burning solid fuels. However, enforcement of smoke control area regulations will improve general air quality across York and will therefore benefit everyone. CYC will only take enforcement action when it is proportionate and in the public interest to do so, in accordance with the Council's enforcement policy. There may be valid reasons why a financial penalty would not be imposed for smoke control contraventions; such reasons will be assessed on a case-by-case basis.

CYC should focus on making sustainable low-emission solid fuels more affordable and accessible; to ban the sale or resale of non-compliant burners and fuels, except by exemption

It is not within CYC's power to ban the sale of specific stoves and fuel. Local authorities regulate the sale of domestic solid fuels in accordance with The Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020. Smokeless fuels (and 'Ready to Burn' wood/logs) are readily available across CYC's area.

CYC should raise awareness around what residents can and cannot do in a Smoke Control Area as there is confusion around the use of chimineas, BBQs, bonfires etc

CYC has previously undertaken seasonal promotion of the rules for Smoke Control Areas and maintains information on the CYC website about this topic. Further publicity will be undertaken on any approved expansion of the smoke control area.

The rules for smoke control areas do not apply to:

- outdoor barbecues or chimineas
- outdoor fireplaces, firepits or pizza ovens
- garden bonfires

Complaints relating to these are dealt with under the Environmental Protection Act 1990. Further information is available at <https://www.york.gov.uk/BonfiresAndSmoke>

If you are going to extend the Smoke Control Areas you need to effectively enforce the existing areas, extend the existing boundaries where there is new housing. Stop anyone who has fitted central heating from using coal, wood or smokeless fuel.

It is outside CYC's legislative remit to stop residents burning solid fuels as a secondary heating source, but CYC *can* enforce smoke emissions within the Smoke Control Areas.

In line with CYC's Smoke Control Enforcement Policy, CYC undertake a staged approach to enforcing smoke emissions, with warning letters being sent to alleged perpetrators in the first instance, offering advice on best practice and mitigation.

CYC Environmental Protection are consultees on planning applications where there is the potential for significant emissions to air and will work with Planning colleagues and applicants to ensure that smoke emissions and potential for canyoning are minimised as far as practically possible.

There should be more awareness around what kinds of fuel are available and more help for purchasing the right kind of wood and alternatives where possible. I think warnings should go on wood packets like with cigarettes.

The Ready to Burn mark on retail packaging helps consumers to easily identify solid fuels that are legal to burn at home in compliance with the new Air Quality Regulations. The scheme makes it easy for people to find the cleanest fuels for burning at home. Using fuels that are approved and labelled as Ready to Burn also ensures compliance with Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020 that outlaw the sale of wet wood and house coal, which are the most polluting fuels. CYC undertake seasonal promotion around the use of

appropriate 'Ready to Burn' solid fuels and investigate sales of non-authorized solid fuels / complaints of non-compliance.

Extending the area will serve little purpose unless punitive action is taken against offenders.

CYC will investigate all complaints of smoke and enforce any breaches of the smoke control requirements in accordance with CYC's approved Enforcement Policy. In line with this policy, CYC will take enforcement action when it is proportionate and in the public interest to do so.

Inconsistency in exemptions for outdoor burning (the fact that the rules for SCAs do not apply to outdoor barbecues/chimineas/firepits/pizza ovens etc) even though these can also contribute to particulate pollution.

The Clean Air Act 1993 Part III sets out the rules and regulations for SCAs, which only apply to the release of smoke from chimneys attached to buildings. Outdoor barbecues/chimineas/firepits/pizza ovens etc are not covered by this legislation, but nuisance smoke from such appliances can be dealt with under the Environmental Protection Act 1990.

I would prefer an outright ban on wood burners due to respiratory health

The government is not considering a ban on domestic burning in England and as such a ban on the use of wood burners in York is not being considered as part of the current proposals.

This control will only be any use if it is enforced which I doubt it will be. Who is going to check that people are conforming and enforce this late in the evenings?

CYC can investigate all complaints of smoke but is largely reliant upon complaints from nearby residents and officers of the council witnessing smoke emissions. CYC will enforce smoke control rules in accordance with the council's approved Enforcement Policy, at all times of day.

More education and enforcement is needed.

CYC's 'Fuel for Thought Campaign', launched in November 2023, focuses on the negative impacts of burning solid fuels on air quality and health. The campaign aims to raise awareness of the dangers associated with open fires and wood-burners, emphasizing the need for cleaner and more efficient heating practices. The campaign resulted in improved understanding and awareness of a range of pollutant sources and impacts on both indoor / outdoor air quality and links to health. Campaign resources will be used for seasonal promotion of the rules around smoke control areas with ongoing enforcement in response to complaints.

The expansion of the smoke control area will be redundant if people in the new areas are not sufficiently informed as they won't know that anything has changed.

Further publicity of any new Smoke Control Areas will be undertaken should the area be expanded. This will include members of the public and local suppliers of solid fuels. The geographic boundary of any new Smoke Control Order will be reflected on CYC's Geographic Information System (GIS) and therefore reflected in any 'Local Land Charges' search.

Concerns around inadequate consultation, publicity and information on how to object to the revised Smoke Control Area Order.

CYC undertook a 6-week public consultation from 22 April to 3 June 2025. This consultation was in line with DEFRA guidance and activities undertaken went significantly above and beyond statutory minimum requirements. The consultation included:

- Production of a series of accessible consultation webpages to provide further information on the proposals and background information. A 'consultation summary' document was also produced, with hard copies available on request to those not digitally enabled.
- Printed copies of consultation materials draft Smoke Control Orders (and maps) were made available for public inspection at West Offices throughout the consultation period.
- An online survey was made available via the CYC Consultations webpage. Hard copies of the survey were made available via West Offices reception and upon request.
- A press release on 22 April 2025 with further articles on this topic also appearing in York Press online on 13th, 19th and 24th March 2025.
- In line with statutory DEFRA guidance, a public notice was placed in the London Gazette and York Press on 8 April and 15 April 2025, stating that CYC proposes to make an order to expand the SCA (and outlining its general effect) with details of how to comment.
- Physical copies of the notice were placed at 32 locations outside the existing SCA throughout the consultation period to ensure people who may be affected are aware of the proposal. Locations were placed across outlying villages. The notice was drafted by CYC Legal in line with statutory requirements.
- Promotion via residents' newsletters issued by CYC's Marketing and Communications team throughout the consultation period, including the Families Newsletter (issued 24 April 2025 and 22 May 2025), Resident update (issued 1 May and 15 May 2025) and the Health and Wellbeing Newsletter (issued 7 May 2025).
- Promotion via CYC's social media channels throughout the consultation period, including Facebook.
- Copies of consultation posters displayed across all CYC libraries.

- Additional notification of the consultation was sent directly to other relevant stakeholders including Department for Environment Food and Rural Affairs (DEFRA), York Travellers Trust (YTT), neighbouring local authorities and York based suppliers of solid fuels.
- CYC's Supported Housing Manager / Traveller and Gypsy Site contacts were made aware of the consultation and asked to signpost residents with solid fuel burning appliances to the consultation.
- Notification of the consultation was sent directly to all CYC Councillors and Parish Councillors on 22 April 2025.

In addition to the above, CYC's Environmental Protection team were available to answer questions on the consultation over the phone, in person by appointment, or by email during the consultation period.

The regular burning of cable at the Osbaldwick & Gypsy Caravan Site and the previous burning of scrap fridges/freezers that saw no enforcement action by CYC will have and has had a much greater impact on local air quality than more restrictions on wood burning

Cable burning and periodic burning of scrap materials outdoors is not within scope of Smoke Control Rules under the Clean Air Act. Any complaints relating to such activities are fully investigated by CYC Environmental Protection with enforcement action progressed where sufficient evidence is available.

Economic considerations

With the cessation of winter fuel allowance for pensioners, any further restrictions would be very punitive.

Following an announcement in early June 2025, Winter Fuel Payments will be reinstated to all pensioners in England and Wales this winter (2025).

Concerns for areas with no gas supply where people may still rely on LPG, oil or solid fuel for heating

CYC recognises that some rural communities use solid fuels for practical and economic reasons, particularly where homes do not have mains gas supply.

CYC is not proposing a ban on burning solid fuel / wood / logs / oil / LPG. Households in smoke control areas can still burn wood and other solid fuels. It should be noted that traditional house coal, also known as bituminous coal, is already banned from being sold for domestic use in England.

In smoke control areas, there are two options:

- If residents wish to burn wood / logs etc they need to use an exempt appliance. These appliances are approved by DEFRA. The searchable list of over 3000 exempt appliances for the UK is available here: <https://smokecontrol.defra.gov.uk/appliances-php/appliances-phpcountryengland/>

- In open fires etc (or non-exempt stoves) residents can burn authorised fuel (i.e. usually sold as 'smokeless' fuel). The list of authorised fuels is here: <https://smokecontrol.defra.gov.uk/fuels-php/england/>

Where existing stoves are not DEFRA approved, they can remain in place, but people would have to burn smokeless fuels (if the appliance is multi-fuel) or upgrade their appliances where this is not possible. Dedicated wood burning appliances are designed for wood only, but many models can be converted to multi-fuel with an optional manufacturer supplied kit which allows the burning of smokeless fuels. CYC would assist any affected residents by signposting to relevant sources for advice.

Most appliances will have a period of 'start-up' where there may be unavoidable emissions of smoke for up to 15 minutes as an appliance reaches operational temperature. CYC's Smoke Control Enforcement Policy takes account of start-up emissions and CYC would not take action in these circumstances.

Proposal should not be considered due to current fuel prices / cost of utilities for heating / cooking

CYC recognise there must be a balance between the environmental and health benefits of the proposal and any potential harm caused by the economic impacts for residents. As explained above, CYC is not proposing a ban on burning solid fuel / wood / logs / oil / LPG.

It is not anticipated that expansion of the Smoke Control Area will require many residents who use solid fuels as a secondary heat source to invest in new appliances, but it is acknowledged that some users may be required to switch to burning smokeless fuels (if they wish to continue to use open fires or non-exempt multi-fuel stoves and previously burned wood); there may be cost implication, especially where users previously used scavenged wood from their own estates or wood gifted for free.

Residents struggling with the cost of heating will be signposted to advice on accessing financial and practical help on heating their homes. We recognise that some low-income households may burn non-compliant solid fuels due to rising energy costs. CYC will take a proportionate approach, on a case-by-case basis, to those who are burning non-compliant solid fuel for financial reasons and who are unable to afford an alternative means of heating. CYC will only take enforcement action when it is in the public interest to do so, in accordance with the [Council's Enforcement Policy](#)

The proposal to expand the SCA to the whole of York will:

- provide clarity for the public in terms of the rules for burning, which are currently different in different areas of York.
- ensure the council has a consistent approach to dealing with smoke emissions across the whole of York. This includes areas allocated for development in the Local Plan.
- act as a deterrent to burning non-authorised fuels or using appliances / stoves that are not approved by DEFRA, which can make air quality worse.

- demonstrate CYC's commitment to working towards national targets for fine particulate matter (PM_{2.5}) to provide cleaner air for all residents.
- complement the council's other air quality improvement activities and emission reduction policies to help us reduce levels of particulate pollution that can affect public health.
- support the council's carbon reduction programme.

There should be a grace period to allow existing fires/stoves to be upgraded or replaced, or for trying different fuels

In line with the statutory Clean Air Act requirements, any new Smoke Control Order cannot come into effect less than six months after it is made. This would effectively allow a grace period of 6 months for any affected residents to explore / trial the use of alternative smokeless fuels.

The provisional date for the proposed order to come into effect is 25th May 2026 (this aligns with the date of the revocation order for the existing smoke control areas declared prior to November 1980).

Our central heating system is fully dependent on our multi fuel stove - it also heats the water for the house - we can't afford to change it over to other heat sources

There are no proposals to ban the use of multi-fuel stoves. Multi-fuel stoves are versatile and can usually burn a variety of solid fuels including wood and smokeless fuels.

The wood suppliers around us rely on selling wood from well managed farm estates

Suppliers can only supply or sell wood fuel in volumes of less than 2 cubic metres if it is certified as 'Ready to Burn'. This confirms it has a moisture content of 20% or less. The rules for selling wood for domestic use in England are outlined at <https://www.gov.uk/guidance/selling-wood-for-domestic-use-in-england>.

If stoves / fires are not allowed, then either a grant should be given so people can replace older stoves / fires, or the rules should apply to newly fitted stoves / fires.

Whilst no grants are currently available from CYC to assist with upgrades, CYC has previously offered grant funding through the Home Upgrade Grant Scheme Phase 2 (HUG2) to help homes which have off-gas heating systems. Off-gas grid homes are those which are primarily heated by oil, LPG, coal, other solid fuels, or electricity for heating purposes. Whilst the HUG2 is now closed to applications CYC is currently rolling out the Warm Homes Local Grant. The grant covers energy-saving upgrades, including insulation, low-carbon heating systems, and smart energy technologies. Further information is available at <https://www.york.gov.uk/WarmHomesLocalGrant>

It is not possible to impose smoke control requirements on new stove installations only, as the legislation relates to emission of smoke from a chimney. CYC would be

unable to distinguish between new and old installations and this would further complicate the rules around solid fuel burning in York which is undesirable.

Evidence Base

There is no supporting data or evidence base etc for the proposal / data used to underpin the proposals is outdated and solid fuels are now a more financially viable and necessary option for many households.

The evidence base and background information was summarised in a report to the Executive member for the Environment and Climate Emergency in March 2025. This report highlighted that burning solid fuels is one of the most polluting methods of domestic heating and is a major contributor to a type of pollution called fine particulate matter (PM_{2.5}) both indoors and outdoors. It is estimated that long-term exposure to PM_{2.5} was a contributory factor to the cause of death in 4.4% of deaths or 1 in every 23 deaths in York in 2023 (see Fingertips – Public Health Profiles).

Research undertaken as part of the evidence base for these proposals analysed household Energy Performance Certificates (EPCs) for 53,720 households across York. Solid fuel was identified as a source of heating for 8% of these households (4302 locations). Outside the current SCA boundary, 3% of households (1,611 locations) used solid fuels, although only 0.2% (98 locations) used a solid fuel as the main source of heating. Other locations outside the SCA boundary utilised solid fuels to supplement other main heating methods.

Analysis of EPCs provided a snapshot heating methods for York homes at the time of the study. EPCs are generally only updated when properties are bought/sold; any homes that have bought wood burning stoves since 2022 would therefore not be reflected in a more up to date analysis, unless those properties had been sold in the last 3 years. The EPC data used is considered robust.

A comprehensive 'source apportionment' study was undertaken for the development of CYCs latest Air Quality Action Plan (AQAP4), published in July 2024. Domestic combustion of wood was shown to be one of the largest single primary emission sources of PM_{2.5}, comprising nearly a third (31%) of PM_{2.5} emissions across York and over twice that produced by road traffic.

The Chief Medical Officer's (CMO) 'Annual Report (2022): Air Pollution' highlights the substantial difference between the least and most polluting methods of domestic heating. The report states that 'solid fuels are by far the most polluting method of domestic heating and for air pollution emissions, there is substantial difference between the different open fire and stove designs, the age of the appliance and how well maintained it is, and the moisture content of the wood, for those who want to burn wood. In urban areas, burning wood has the potential to worsen local air quality significantly'.

CYC recognises that burning solid fuels can be a financially viable option for some households. Smoke Control Areas do not prevent residents from burning solid fuels, simply that they do not cause excessive emissions / smoke when doing so.

There is lack of local pollution evidence to justify the proposed policy, particularly as York is already below national pollution limits for fine particulate matter (PM_{2.5})

In 2024 CYC consulted on an updated Action Plan (AQAP4) that outlines the action CYC will take to further improve air quality in York over the next 5 years to go beyond health-based Air Quality Objectives in all areas and work towards meeting World Health Organisation (WHO) Air Quality Guidelines.

AQAP4 commits to reduce concentrations of air pollutants and exposure to air pollution as far as practically possible, thereby improving the health and quality of life of residents and visitors to York. AQAP4 recognises that there are no 'safe' limits for particulate emissions, particularly PM_{2.5}.

The Committee on the Medical Effects of Air Pollutants (COMEAP) provided advice on the health effects of exposure PM_{2.5} to DEFRA, to inform the development of targets under the Environment Act 2021. COMEAP highlighted evidence that indicates that PM_{2.5} pollution can have harmful effects on people's health at lower concentrations than had been studied previously and that continuing to reduce concentrations to, or below, the World Health Organisation's new Air Quality Guideline (5µg/m³) would benefit public health. Levels of PM_{2.5} in York are currently above this value.

Other air pollutants add far more pollution to the atmosphere so they should be targeted first

Burning of wood contributes to a type of pollution called fine particulate matter (PM_{2.5}) both inside and outside the home. Around a third of PM_{2.5} emissions in York are caused by burning wood for heating (over twice that produced by road traffic). Emissions of PM_{2.5} present in smoke are particularly harmful to health as their size means they can get deep into the lungs and enter the bloodstream to be transported around the body.

CYC's Air Quality Action Plan (AQAP4) outlines that there are no 'safe' limits for fine particulate emissions and as such CYC is committed to reducing such emissions as far as practically possible. AQAP4 outlines wider action CYC will take to further improve air quality and reduce other pollutants (including nitrogen dioxide) to go beyond national health-based objectives and work towards meeting stricter World Health Organisation (WHO Guidelines).

Impact on air quality across less densely populated rural areas outside the outer ring road will be less significant. Housing stock in these areas tend to be older and many have fireplaces used to supplement the heating of their homes.

Whilst concentrations of PM_{2.5} can be higher in areas where solid fuel burning is most prevalent, it is also the case that PM_{2.5} can travel long distances, often hundreds or even thousands of kilometres. This is due to the small size of the particles, which allows them to be carried by winds and air currents. A significant portion of PM_{2.5} pollution in the UK comes from natural sources like pollen and sea

spray, as well as from other European countries. However, a substantial amount also originates from human activities within the UK, such as domestic wood burning.

The cumulative impact of fine particulate emissions in smoke from all areas within CYCs administrative area must be considered as this affects concentrations of pollution both across the City of York and in adjacent areas.

Housing stock can indeed be older in rural villages outside the outer ring road and some of these houses may indeed use solid fuels to supplement the heating of their homes. However, there are no proposals to ban the use of solid fuels for this purpose, only for residents and businesses to take responsibility for the type of fuel they burn to minimise air pollution and protect health. Residents are still free to burn manufactured smokeless solid fuels in open fires, or appropriately dried/seasoned wood/logs in DEFRA approved 'exempt' appliances.

Considered that vehicle pollution is a greater issue, including HGVs in rural villages and car emissions due to congestion

CYC is committed to reducing emissions from all sources. Our [Air Quality Action Plan](#) (AQAP4) outlines the actions we will take to further improve air quality in York, to go beyond health-based National Air Quality Objectives and work towards meeting stricter World Health Organisation (WHO) guidelines.

AQAP4 particularly focuses on transport emissions (as the major source of NO_x emissions and the reason for the current Air Quality management Area designation), but also includes measures to address fine particulate matter (PM_{2.5}) from sources such as burning solid fuels. AQAP4 is aligned with the CYC's broader strategies for climate, health, transport and the economy.

Labour Government is allowing new homes to be built with Wood Burning stoves, so why the need to change in York

Wood-burning stoves are permitted in new build homes under the proposed Future Homes Standard. This means they can be installed as a secondary heating source in new homes. However, the Climate Change Committee has recommended the phasing out of wood-burning stoves in homes because of the carbon they emit. They also produce dangerous PM_{2.5} particles that, according to a growing body of research, are responsible for a range of health problems including heart and lung disease, as well as diabetes, cancer, brain function and premature births.

A study by Prof Chris Whitty, the Chief Medical Officer for England, found that even "eco-design" wood-burning stoves produced 450 times more toxic air pollution than gas central heating.

CYC is committed to reducing levels of PM_{2.5} across York for the protection of public health.

Burning wood and solid fuel is a tradition in the villages and wood burning is sustainable and almost carbon neutral, important in tackling climate change.

The sustainability of wood burning stoves is a complex issue with the wider environmental impacts dependent on the source of the wood and how

'environmental harm' is defined. Whilst sustainable forestry practices can ensure that for every tree felled for timber, another one is planted, illegal logging behaviour can make it difficult to be certain about the responsibility, sustainability and legality of firewood. In terms of carbon footprint, wood burning stoves may be considered by some as 'environmentally friendly' in that the carbon they release comes from wood, and such carbon has previously been removed from the atmosphere by the tree during its growth. By growing an equivalent number of new trees, it should in theory be possible to make wood burning stoves carbon neutral during use, although the implications of transporting firewood (often vast distances) is often not fully considered. In addition, the implications for local air quality in urban areas can be considerable, as can the negative impacts on indoor environments, increasing the risk of respiratory illness and long-term health among inhabitants.

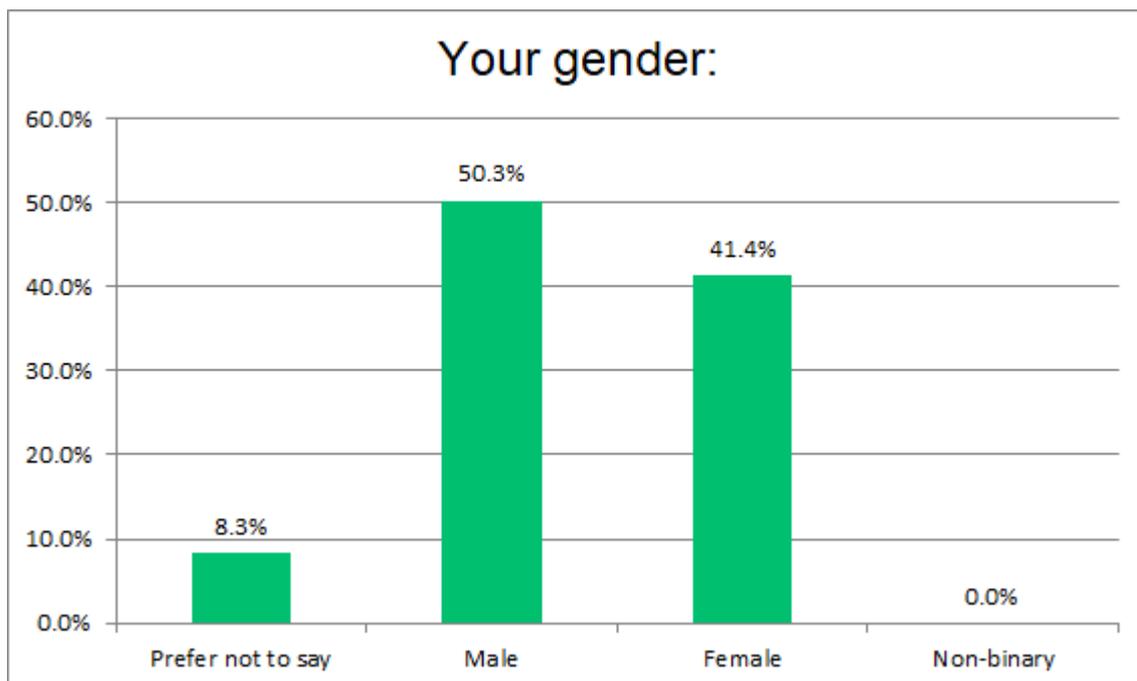
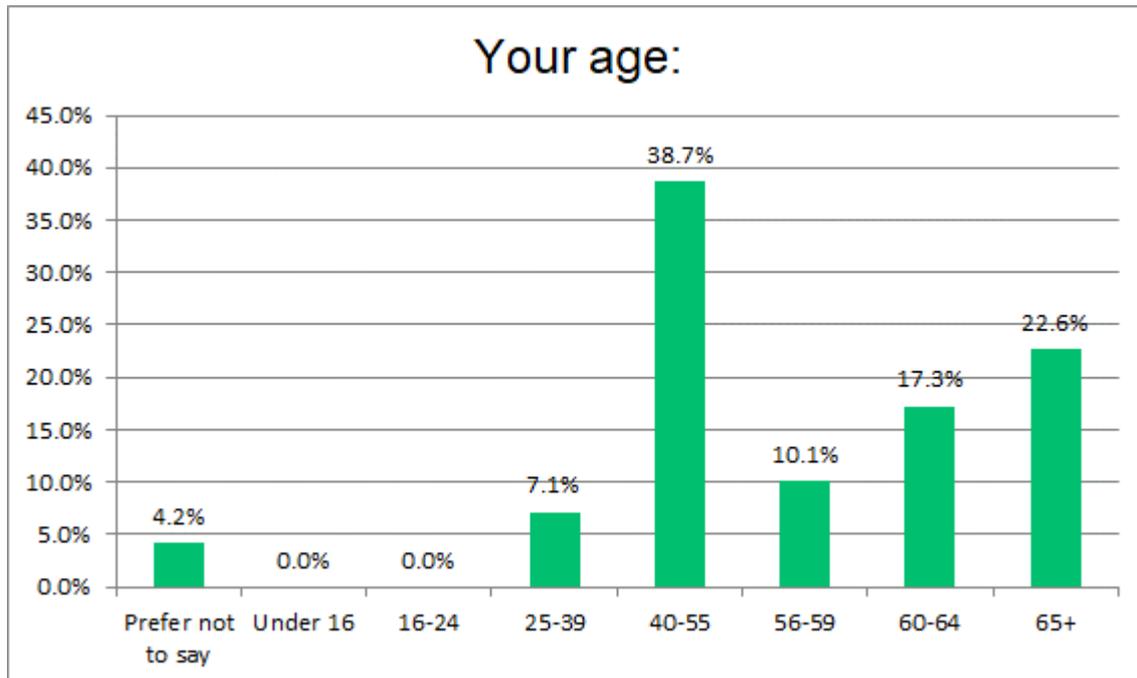
CYC should work with farmers to reduce the air quality impact of manure management, and fertilizer application as this is also a source of PM_{2.5}

Nationally, farming is estimated to be responsible for around 88% of ammonia emissions, which can lead to particulate formation in the atmosphere; this can cause odour impacts and can affect local and national air quality. Some farming practices (e.g. lime spreading) can also directly give rise to particulate emissions that are known to affect health. CYC has previously contacted over 350 farmers to highlight resources and grant opportunities available to assist in adopting best practice with respect to reducing ammonia and particulate emissions (see CYC's 2024 Air Quality Annual Status Report).

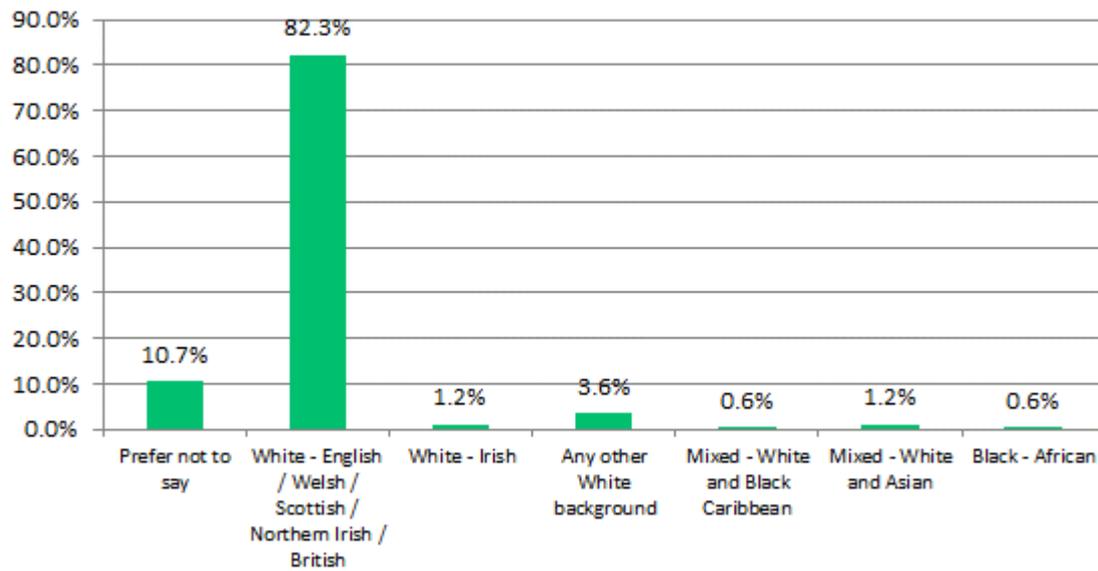
Considered that greater impact could be achieved but addressing methane slip in gas boilers rather than addressing solid fuel burning

Methane slip in domestic gas boilers refers to the release of unburned methane into the atmosphere when natural gas supplied to a boiler fails to fully combust. Gas boilers are generally designed for high combustion efficiency, but factors like age and maintenance can affect performance. CYC has limited control over maintenance regimes for domestic solid fuel boilers but AQAP4 commits to strengthening local planning guidance to facilitate a transition away from fossil fuel heating sources in the longer term, which can contribute to local air quality issues.

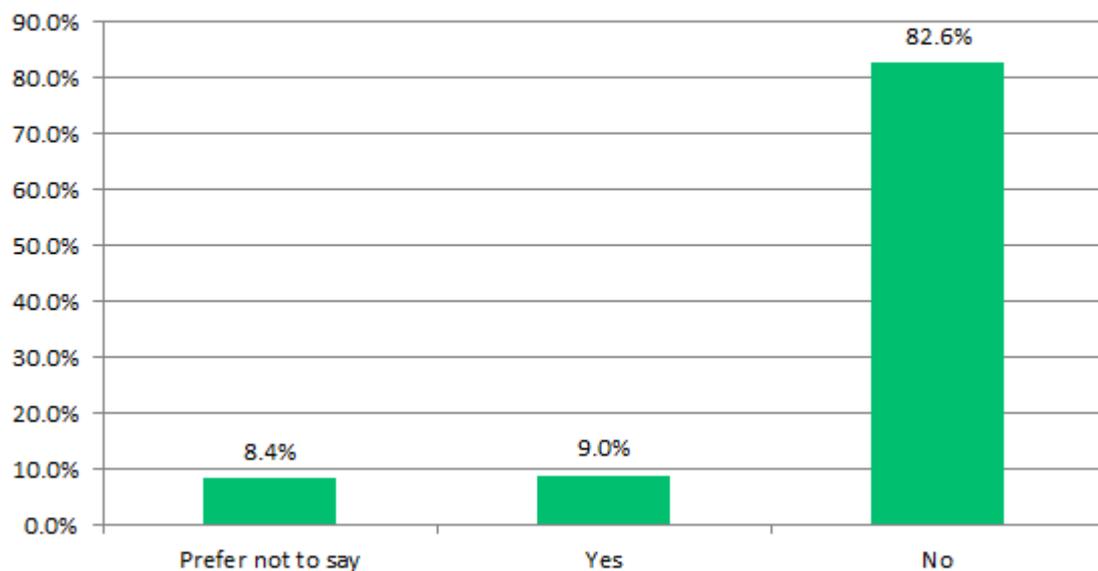
Questions 18 – 25: Respondent Profiles



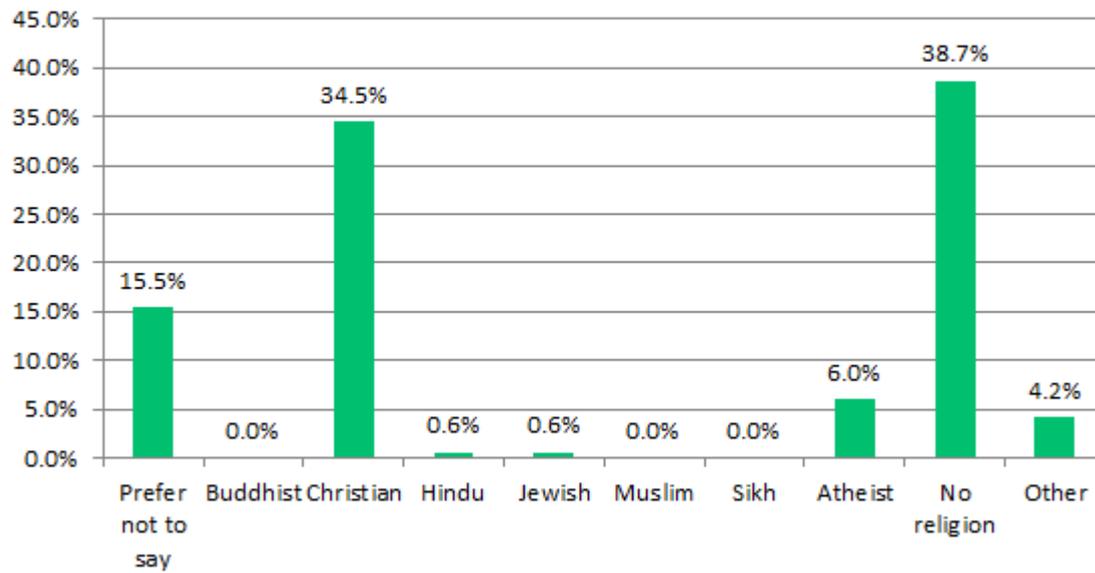
What is your ethnic group?



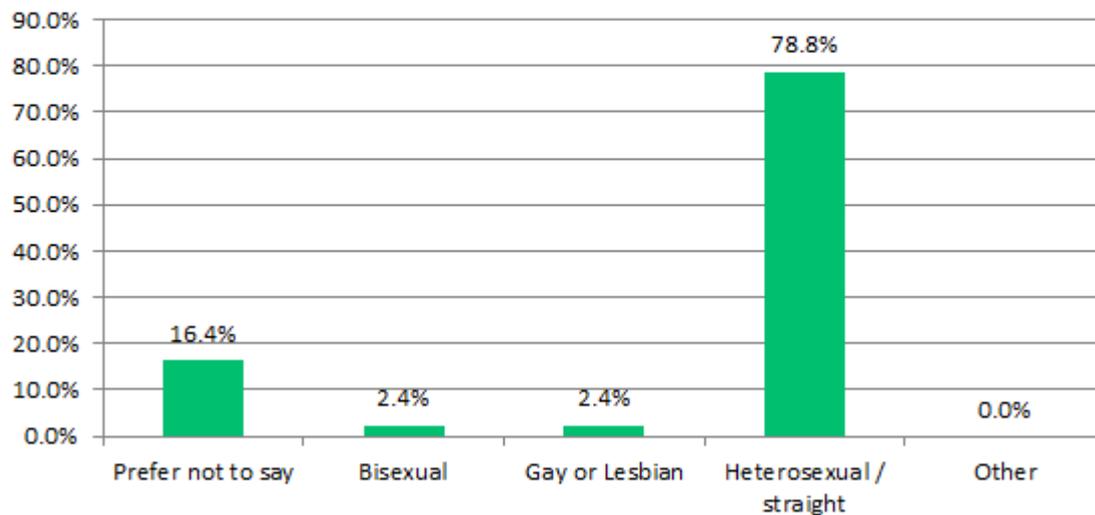
Do you consider yourself disabled?



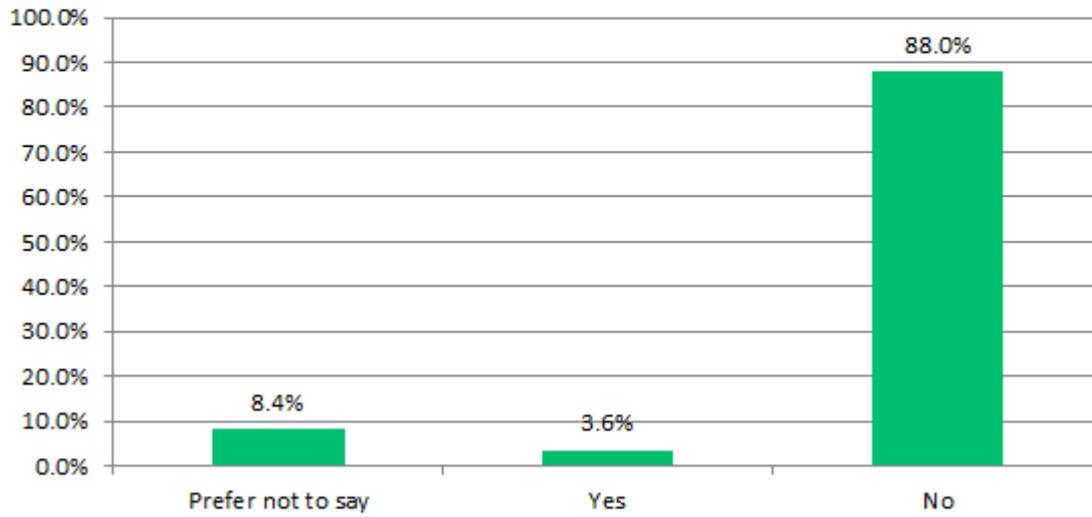
What is your religion or belief?



Which of the following best describes your sexual orientation?



Do you have any experience of being in care?



Do you look after, or give any help or support to, anyone because they have long-term physical or mental health conditions or illnesses, or problems related to old age?

