

Local air quality management and smoke control guidance

Details

| Your details | |
|-------------------------------|----------------------------|
| Your name: | [Redacted personal data] |
| Organisation (if applicable): | Stove Industry Association |
| email / telephone number: | [Redacted personal data] |
| Your address: | [Redacted personal data] |

Local Air Quality Management (LAQM) Guidance

Q1. Question 1: To what extent do you agree that these proposed guidance documents capture what Local Authorities need to assist them in discharging the Local Air Quality Management obligations?

Agree

Comment:

There are some inaccuracies/inconsistencies in the Guidance such as:

"We encourage you to look for other, less polluting ways of heating your home, but if solid fuel is your only option, look for the Ecodesign standard which ensures the appliance meets strict standards for emissions and efficiency."

All solid fuel appliances now sold should be Ecodesign compliant but for smoke control areas appliances should also be "Exempt" for use in smoke control areas.
<https://smokecontrol.defra.gov.uk/exempt-appliances/>. Schemes exist which go beyond current legal performance criteria such as clearSkies Mark (<https://www.clearskiesmark.org/>) or Cleaner choice. clearSkies certified appliances Levels 3 and above are exempt for use in smoke control areas and levels 4 and above at least 15% better performing than level 3.

We would encourage the Welsh Government to maintain consumer choice and also to recognise the important part solid fuel local space-heating plays in many households and its contribution to the energy mix.. Heating with solid fuel has wellbeing benefits not least being the security having off grid heating plays in knowing that you can continue to heat your home and cook in the advent of energy storages. Solid fuel is a proven form of energy storage - energy storage and the time value of energy is likely to increase as intermittent renewable generation increases its share and potentially due to geopolitical uncertainties affecting energy supply. Finally to recognise that efficient burning of sustainably produced wood fuel is low carbon, sustainable and a potential enabler for decarbonisation. Woodfuel is a natural product arising from sustainable woodland management and an important economic driver, especially in rural economies - we would encourage the Welsh Government to promote woodland establishment and sustainable management. Finally it should be noted that for many households, , burning wood in a modern stove is an effective means of reducing their central heating, and to those in fuel poverty can be essential.

Q2. Question 2: Are there any areas not yet covered by the proposed LAQM guidance documents which would further enable Local Authorities to discharge the Local Air Quality Management obligations within the legislation?

Yes

Comment:

It should be noted that pollutants come from many sources - natural sources, industry, transport, agriculture, domestic heating, outdoor burning and importantly from international transboundary pollution. It is important that measures are proportionate. It is important not to deprive the public of choice to heat their homes using solid fuel stoves. By encouraging the public to replace open fires with modern Ecodesign and soot control exempt appliances up to 90% reductions in emissions can be achieved whilst burning a third of the fuel. Also the use of solid fuel in a modern stove, which is designed to burn efficiently and provide high levels of warmth into the home, with any combustion products vented out of a chimney system 7m and more above the street is very different from uncontrolled burning in our gardens. A study has estimates as much as 46% of particulate matter emitted from homes could arise from outdoor burning in fires and garden waste burning. With the availability of garden waste collection the use of bonfires and garden incinerators could be reduced. Making annual chimney sweeping mandatory could reduce emissions also.

Q3. Question 3: Are there any challenges within the LAQM guidance that render the timescales and obligations set unachievable or inappropriate?

No

Comment:

No comment offered

Smoke Control Guidance

Q4. Question 4: To what extent are you satisfied that the proposed guidance documents enable you to discharge your obligations under the Clean Air Act 1993, as amended by the Environment (Air Quality and Soundscapes) (Wales) Act 2024?

Satisfied

Comment:

Noting the correction in the response to question 1.

Q5. Question 5: Are there any areas not yet covered by the proposed guidance documents which would further enable you to discharge your obligations more effectively under the smoke control regime?

No

Q6. Question 6: Do you feel that the timescales and obligations for enforcement set out in the Smoke Control Area Guidance for Local Authorities webpage are achievable and appropriate? If not, please provide details as to what could be changed.

Yes

Q7. Question 7: The guidance includes example template documents to assist Local Authorities enforcement activities. Please tell us whether you feel these could be used by Local Authorities, and whether anything further is required to use them effectively? Would you like these included in the final guidance document?

No comment offered.

Welsh language

Q8. Question 8: What, in your opinion, would be the likely effects of the guidance on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No comment offered.

Q9. Question 9: In your opinion, could the guidance be formulated or changed so as to:

have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

No comment offered.

Other

Q10. Question 10: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We thank the Welsh Government for the opportunity to respond to this consultation and offer our support in future developments of legislation.

Submit your response

Q11. If you want to receive a receipt of your response, please provide an email address.

Email address

[Redacted personal data]

Q12. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response