

Brighton & Hove City Council

Place Overview & Scrutiny Committee

Agenda Item 35

Subject: Solid Fuel Burning

Date of meeting: 22nd September 2025

Report of: Chair of Place Overview & Scrutiny

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Ward(s) affected: (All Wards);

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 At the October 2024 meeting of Place Overview & Scrutiny Committee, members were presented with a paper on the issue of solid fuel burning. They recommended the following actions:
- Targeted messages and communications to raise awareness of the air quality health and fire safety impacts of burning solid fuels by developing a communications and messaging strategy that draws on local evidence, good practice and material from other agencies, local authorities, with a focus on pointing out the invisible pollution, health and fire safety risks
 - An enforcement pilot within the existing Smoke Control Areas including with the above mentioned communications towards the end of 2024 and continuing into next year. Previously Brighton & Hove communications had discouraged solid fuel burning indoors and outdoors.
 - Assessing the outputs from new pollution sensors, including new monitoring networks, with a specific focus on seasonal particulates, to help inform future actions.
- 1.2 It was agreed that the results of these actions would be brought back to Place Overview & Scrutiny Committee in summer 2025.
- 1.3 The slides in Appendix 1 show the latest results from air quality monitoring, which will help inform and decide whether the current five smoke control areas in Brighton and Hove need to be updated.

2. Recommendations

- 2.1 That Place Overview & Scrutiny Committee notes the update on solid fuel burning and to comment on the suggested options for further work in this area.

3. Context and background information

- 3.1 Solid fuel (mostly coal) used to be the most popular form of heating for homes in the UK, but from the 1960s central heating grew in popularity and is now used by 93 to 98% of commercial and domestic users. However, since the 1990s solid fuels, especially wood logs and pellets, have increased in popularity as supplementary heating and as a feature in the living room. This resurgence in burning solid fuels has implications in terms of nuisance to communities, as well as environmental and health impacts due to the release of particulate matter.
- 3.2 The air quality monitors measure levels of PM_{2.5} (particulate matter that's 2.5 micrometres or smaller) which is harmful air pollution (that is not a gas). The microscopic particles can get into people's lungs and blood causing issues such as making asthma worse, affecting the heart and increasing the risk of serious illness and reducing life expectancy. These particles come from the inefficient burning of fuels, including intermittent solid fuel burning.
- 3.3 PM_{2.5} is used when describing non-gas pollutant levels both outdoor and indoor, where health impact from exposure considers the amount of PM_{2.5} over a 24-hour period. Health impact can be acute and long term. For vulnerable people there is no safe level for PM_{2.5}.
- 3.4 A concentration response function is +1 µg/m³, PM_{2.5} is associated with a roughly 1.08% increase in mortality risk, reference [Quantifying mortality associated with long-term exposure to PM_{2.5}](#)
- 3.5 The health damage cost of domestic PM_{2.5} emissions in central contributions is £84,629 per ton generated, with a high sensitivity range rising to £222,114 per ton, reference [Air quality appraisal: damage cost guidance - GOV.UK](#) (updated 2023).
- 3.6 Central areas and lower slopes flanking Lewes Road and the City Centre have the highest total prevalence of COPD, asthma and heart disease. Contributing causality is more concentration pollution, roadside NO₂ and wintertime PM_{2.5}. Dense housing stock and late Victorian terrace houses mean smoke emission happen in the same residential places as highest population density.
- 3.7 Monitoring in and around local Smoke Control Areas are above the World Health Organisation's guidelines. Suburbs and residential areas also show similar levels of particulates. Progress has been made towards the council's 2027 commitments, set out in the Air Quality Action Plan, but further work is needed.
- 3.8 Options for further work are:

- Maintain the current five smoke control areas and continue to monitor another winter's data to see if there is any fluctuation, establishment or longer term trends
- Begin the process for extending or amending the smoke control areas. This process can take several more months and will include public consultation.
- Continue the public awareness campaign that began in 2024
- Continue the Smoke Control Area enforcement initiatives or establish further initiatives.

4. Analysis and consideration of alternative options

- 4.1 See section 3.8 above for suggested options for further work to enable the council to reach its targets.

5. Community engagement and consultation

- 5.1 Not applicable for this report

6. Financial implications

- 6.1 Costs associated with Smoke Control areas will be met from the existing Regulatory services budgets. Any under or overspend against these budgets will be monitored and reported through the council's TBM process.

Name of finance officer consulted: David Wilder
(16/09/2025):

Date consulted

7. Legal implications

- 7.1 Statutory Nuisance regulation under the Environmental Protection Act 1990 is the first legislative approach that comes into effect when Environmental Health respond to domestic or commercial smoke complaints, and it applies throughout England.
- 7.2 The Air Quality (Domestic Solid Fuels Standards) Regulations 2020 are the same throughout England. BHCC, Trading standards have carried out checks on wood and manufactured fuels being sold by local retailers.
- 7.3 Smoke Control Areas (SCAs) were declared following the Clean Air Act 1968, in Brighton from 1974. This legislation has since been amended by the 1993 Clean Air Act and the Environment Act 2021. Only Defra exempt appliances can be used in a local authority SCA. In SCAs new stoves have a smoke emission limit of 3g/ per hour. It is an offence to emit any smoke from a building chimney in an SCA. A case could be considered to be more serious, if frequent and persistent dark smoke from the same chimney in a residential area.
- 7.4 Building Regulation 2010, certification relating to the installation of solid fuel burning appliances

- 7.5 Highways Act 1980, 161A danger or annoyance of fire and smoke on land not forming part of the Highway, including smoke impairing vision of road users
- 7.6 Tenancy agreements and landlord responsibility regarding home safety and need to have working smoke and carbon monoxide alarms

Name of lawyer consulted: Rebecca Sidell Date consulted: 08/09/25

8. Equalities implications

- 8.1 None specifically for this report. There are concerns that people experiencing economic inequalities may turn to solid fuel and refuse burning as a potentially cheaper alternative to gas heating.

9. Sustainability implications

- 9.1 A risk to Brighton & Hove's precious elm trees when the beetle that spreads the disease lives in local logs stores. The import of logs and anthracite to the region creates truck trips with emissions into air. Forest replanting may not keep up with the demand for wood. Reforestation of Sussex and UK and the restoration of habitat could be delayed due to the commercial demand for logs. Solid fuel burners will have significant impact on sustainability as their intermittent use will emit Carbon Monoxide CO, Carbon Dioxide CO₂ and Particulate Matter PM₁₀ and PM_{2.5} smaller than ten and two and a half micrometers.

10. Health and Wellbeing Implications:

- 10.1 None specifically for this report. The burning of solid fuel creates particulate pollution that is adverse for health as mentioned earlier in this report.

11. Conclusion

- 11.1 Place Overview & Scrutiny Committee notes the update on solid fuel burning and to comment on the suggested options for further work in this area.

Supporting Documentation

1. Appendices

1. Presentation on solid fuel burning
2. Smoke Control Areas Extensions Timescales

Background documents:

- [How we manage air quality in the city](#) including [Health risks of solid fuel burning](#)
- [Wood burners and air pollution | Clean Air Hub](#) including [Clean Air Night](#)

- [Asthma – RCPCH – State of Child Health](#)
- [Air Pollution Companion: Knowledge hub - Start with the basics | RCPCH](#)
- [Fingertips | Department of Health and Social Care](#) part of the Public Health Outcomes Framework
- [rcp-full-report-a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution.pdf](#)
- [Air pollution linked to 30,000 UK deaths in 2025 and costs the economy billions | Imperial News | Imperial College London](#)
- [New pollution rules come into effect for cleaner air by 2030 - European Commission](#)
- [Chief Medical Officer's annual report 2022: air pollution - GOV.UK](#)
- [Indoor smoke from solid fuels: assessing the environmental burden of disease at national and local levels](#)

