

Smoke Control Area Public Consultation Results and Analysis

PUBLIC OPINION AND COUNCIL RESPONSE TO THE
PROPOSAL OF DESIGNATING ALL OF SANDWELL AS A
SMOKE CONTROL AREA

Consultation Period: 9 MAY – 20 JUNE 2022

Borough-wide Smoke Control Area Public Consultation

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Borough-wide Smoke Control Area Public Consultation

Background

An on-line public consultation was held for a 6-week period between 8 May 2022 to 20 June 2022. The consultation asked residents and business owner to have their say on Sandwell's intention to declare a borough-wide Smoke Control Area.

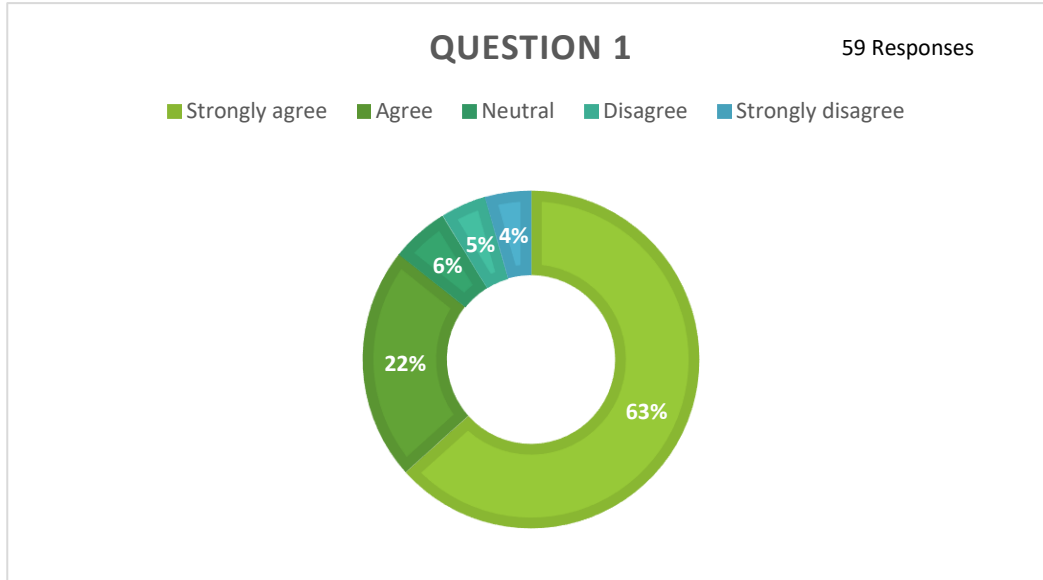
The public consultation was brought to the public's attention using social media advertising and a poster campaign. A copy of the poster is provided in **Appendix 1**, and the following information channels were used to advertise the proposal:

- 2 formal public notices in the Express and Star over two weeks.
- Live radio interview with Radio WM (11 May 2022).
- Live radio interview with Black Country Radio (11 May 2022).
- An article in the GovDelivery bulletin issued to residents.
- Council press release and article published in the Express and Star.
- Social media posts on Sandwell Council's Facebook page and Environmental Health Facebook page.
- An article in Sandwell Council's business website 'Think Sandwell'
- An article in the 'Schools Newsletter' circulated to all schools in Sandwell via email.
- Posters displayed in all public libraries.
- Posters and email article circulated to community centres and faith centres.
- Emails, posters and information sent to the Canal and Rivers Trust for advertising at the 3 residential moorings in Sandwell.
- Emails sent to all Councillors via Democratic Services.
- Emails sent to all West Midlands local authority pollution control teams (Dudley, Wolverhampton, Birmingham, Walsall, Solihull, and Coventry).
- Emails sent to staff at the West Midlands Combined Authority

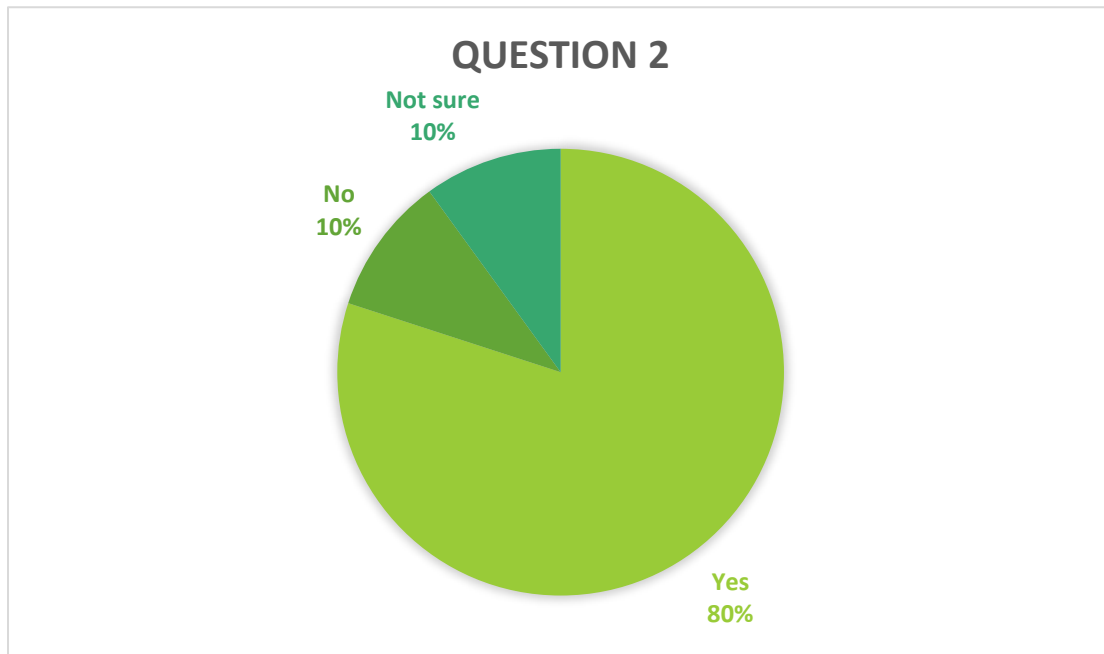
Borough-wide Smoke Control Area Public Consultation

Consultation Results

1. How much do you agree or disagree that improving air quality should be a key priority for Sandwell?

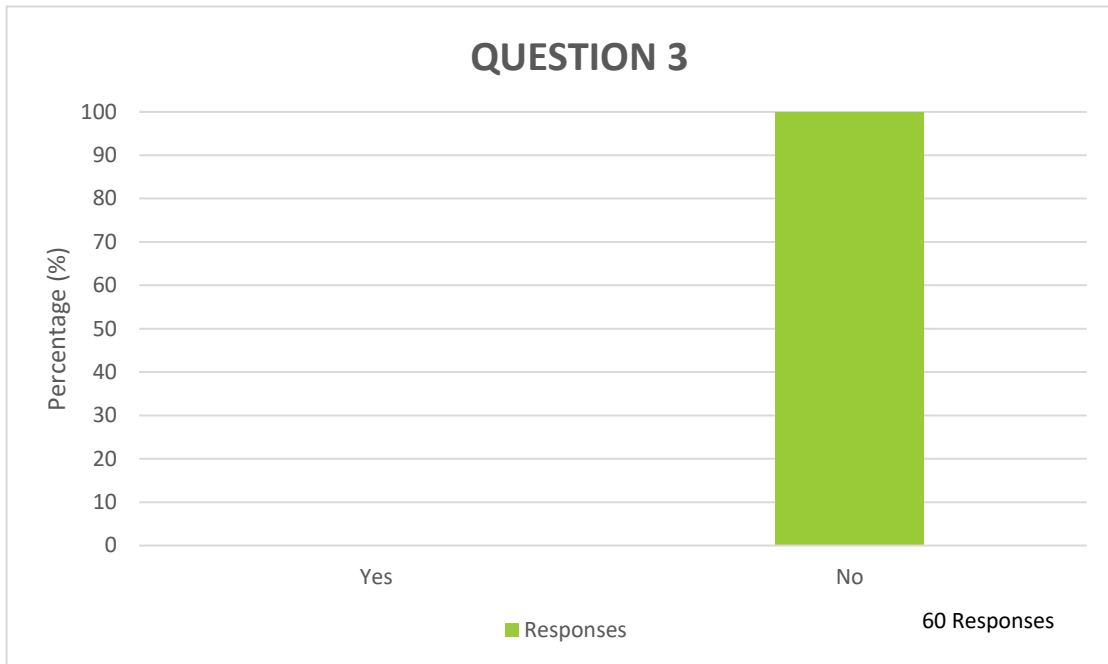


2. Did you know that breathing in smoke from wood and coal burning can result in cancer, stroke, heart disease, asthma, COPD, decrease children’s lung development and can cause pregnancy complications?

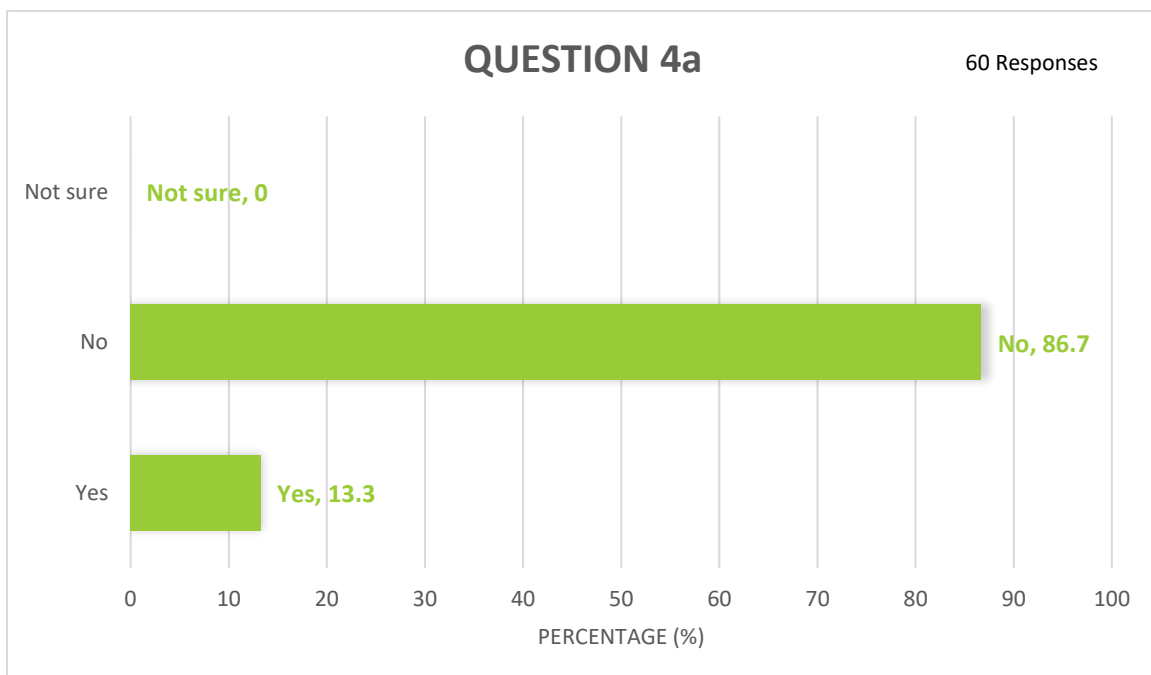


60 Responses

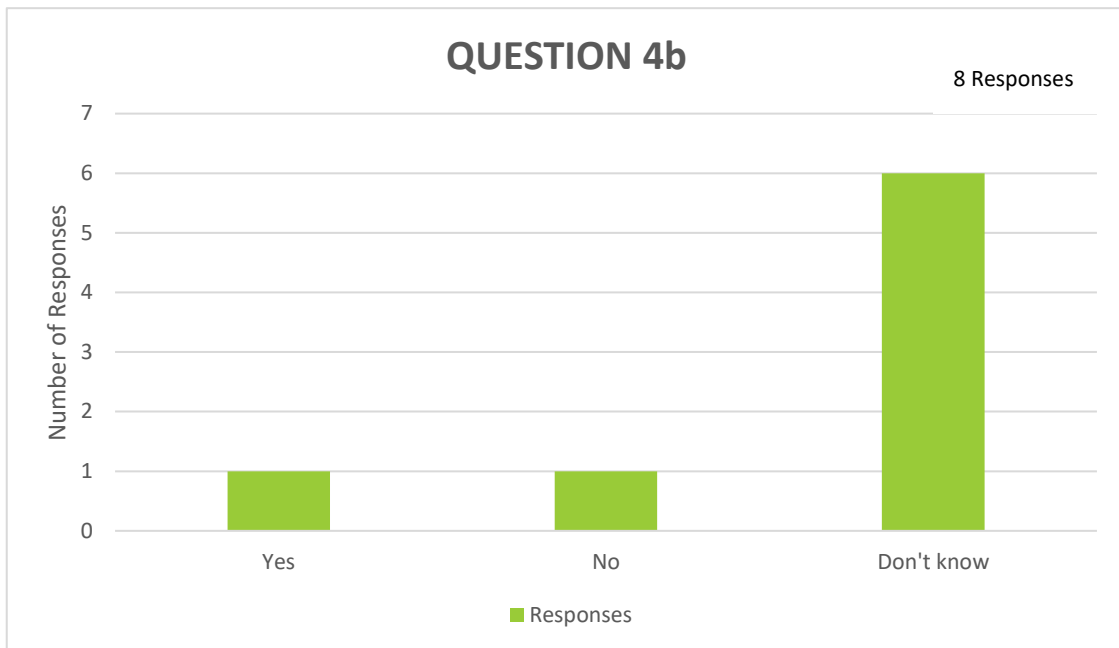
3. Do you live on a canal boat or other inland water vessel which is moored in Sandwell?



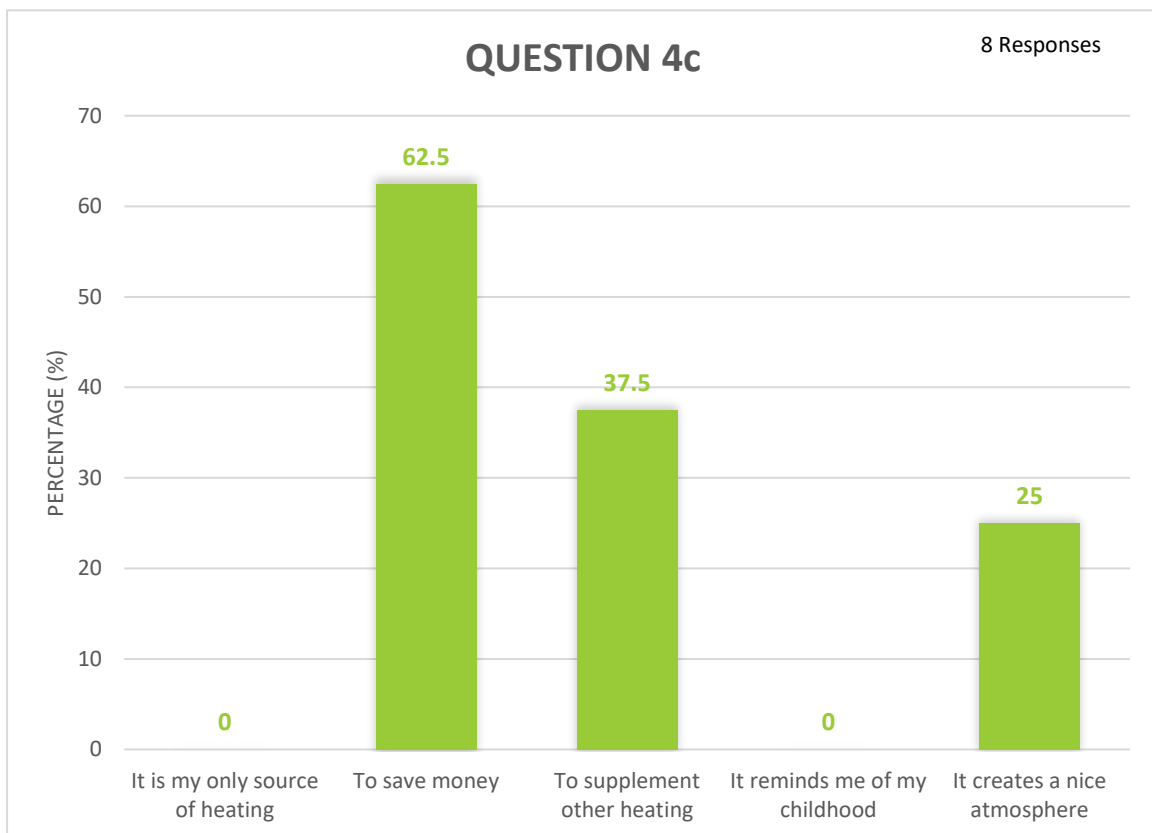
4a. Do you use a wood/coal burning stove, an open fireplace or use any other combustion appliance with a chimney inside your home, (this includes boats moored in Sandwell)?



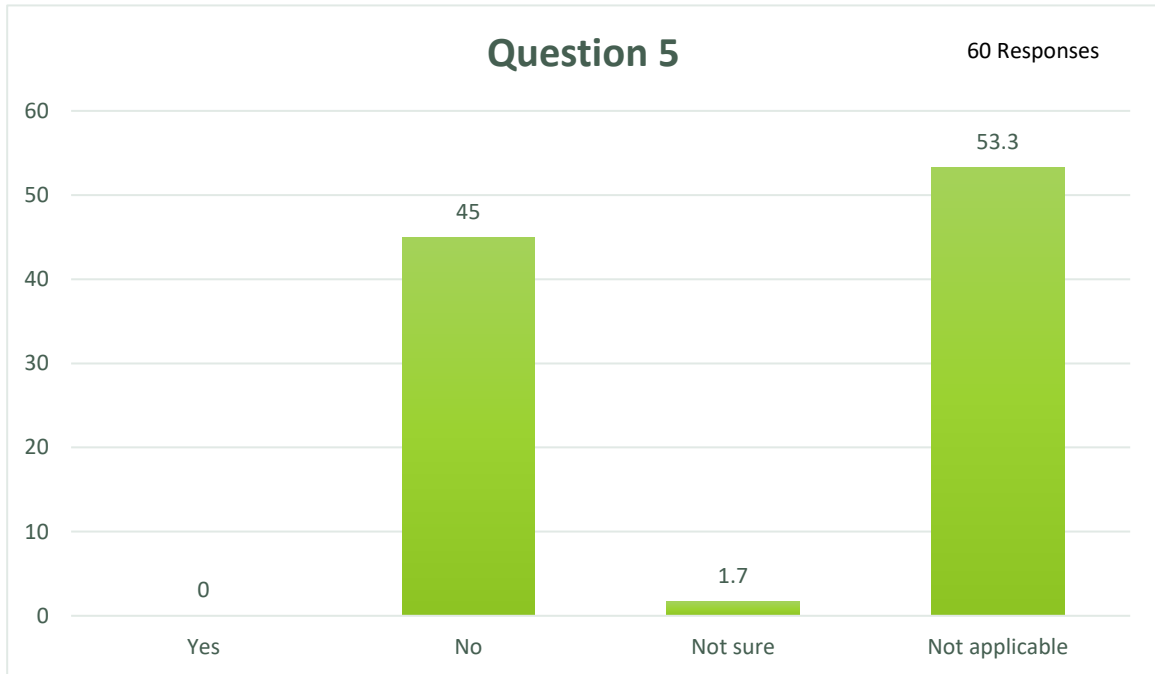
4b. If yes, is your stove from Defra's list of exempt appliances?



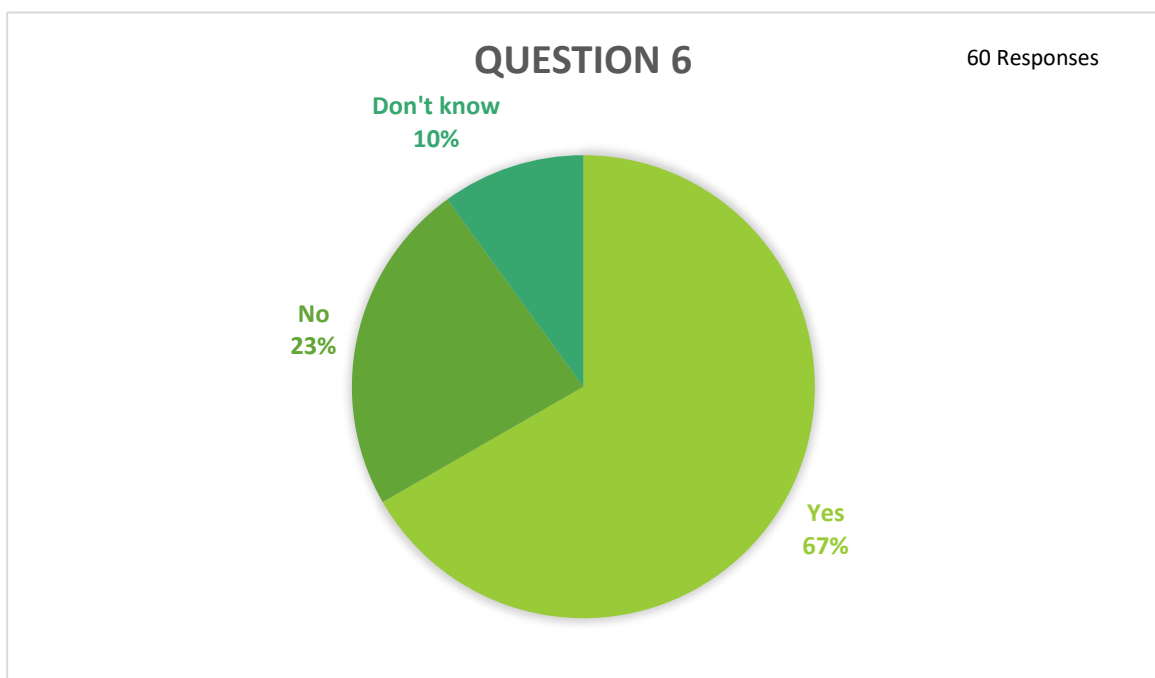
4c. If you have one, why do you use a solid fuel appliance or open fire place?



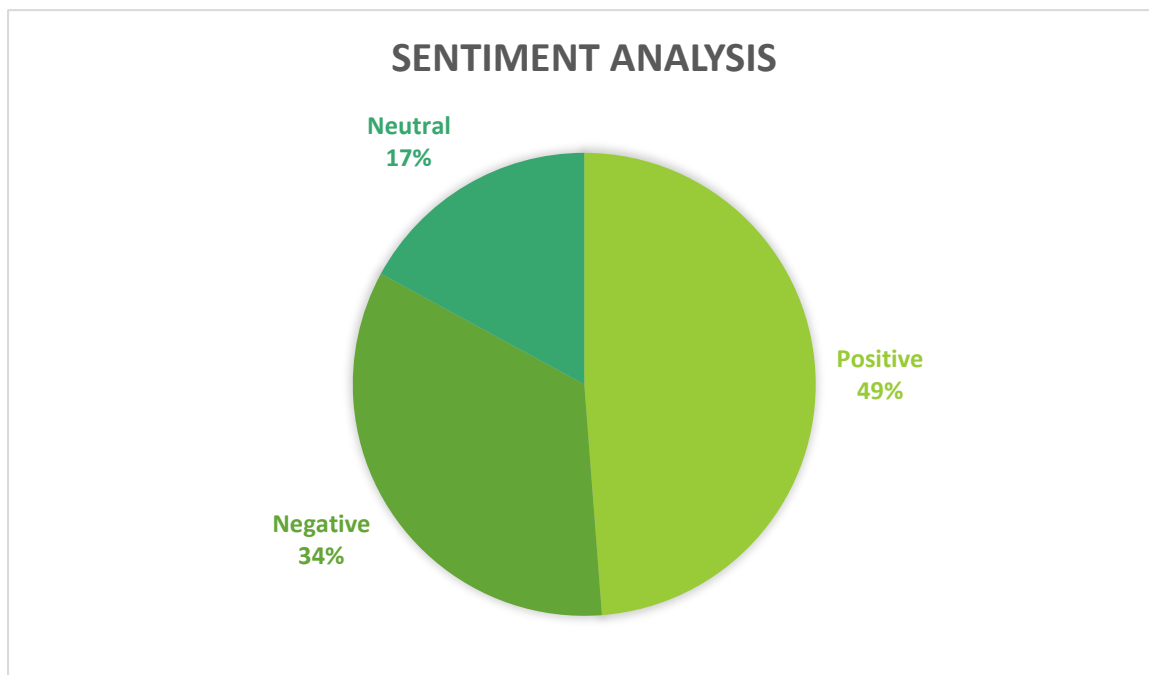
5. If you own/manage a business in Sandwell do you use a biomass boiler/wood/coal burning stove, an open fire place or any other appliance with a chimney?



6. Currently only parts of Sandwell are protected by a Smoke Control Area order - do you think all of Sandwell should be?



7. Do you have any further comments?

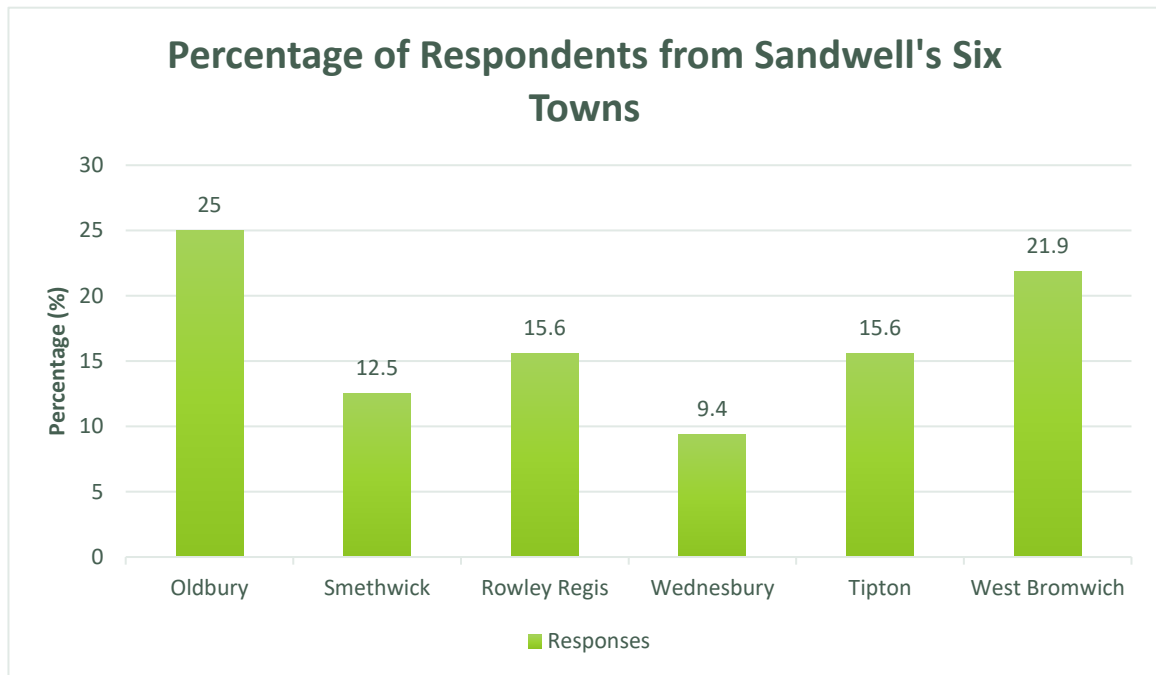


Key Issues/Concerns Raised

In summary;

- 41 comments were received.
- The most common concern was the financial impact of requiring everyone to use an authorised appliance or authorised fuel against the rising costs of living.
- Concerns were voiced that the proposal would cost a lot to implement but conversely comments were also made that the council was undertaking the proposal for financial gain.
- Many comments related to respondents concerns about air quality that were outside the scope of this consultation. These included requests for more action in tackling air pollution from motorway traffic and garden bonfires, chimeneas and BBQs and more investment in active and sustainable travel.
- The word cloud in **Appendix 2** represents the key concerns/comments raised.
- Details of all comments received to the consultation on-line and via Facebook and Twitter and the Council response to them is provided in **Appendix 3 and Appendix 4.**

Demographic Breakdown of Respondents



Consultation Publicity Poster

IMPROVING LOCAL AIR QUALITY
HAVE YOUR SAY
SMOKE CONTROL AREA CONSULTATION



What do you think about Sandwell Council's proposal to create a boroughwide Smoke Control Area?

A Smoke Control Area could help improve local air quality by reducing the amount of harmful air pollution that can be emitted from wood and coal burning stoves and fireplaces in homes and businesses.

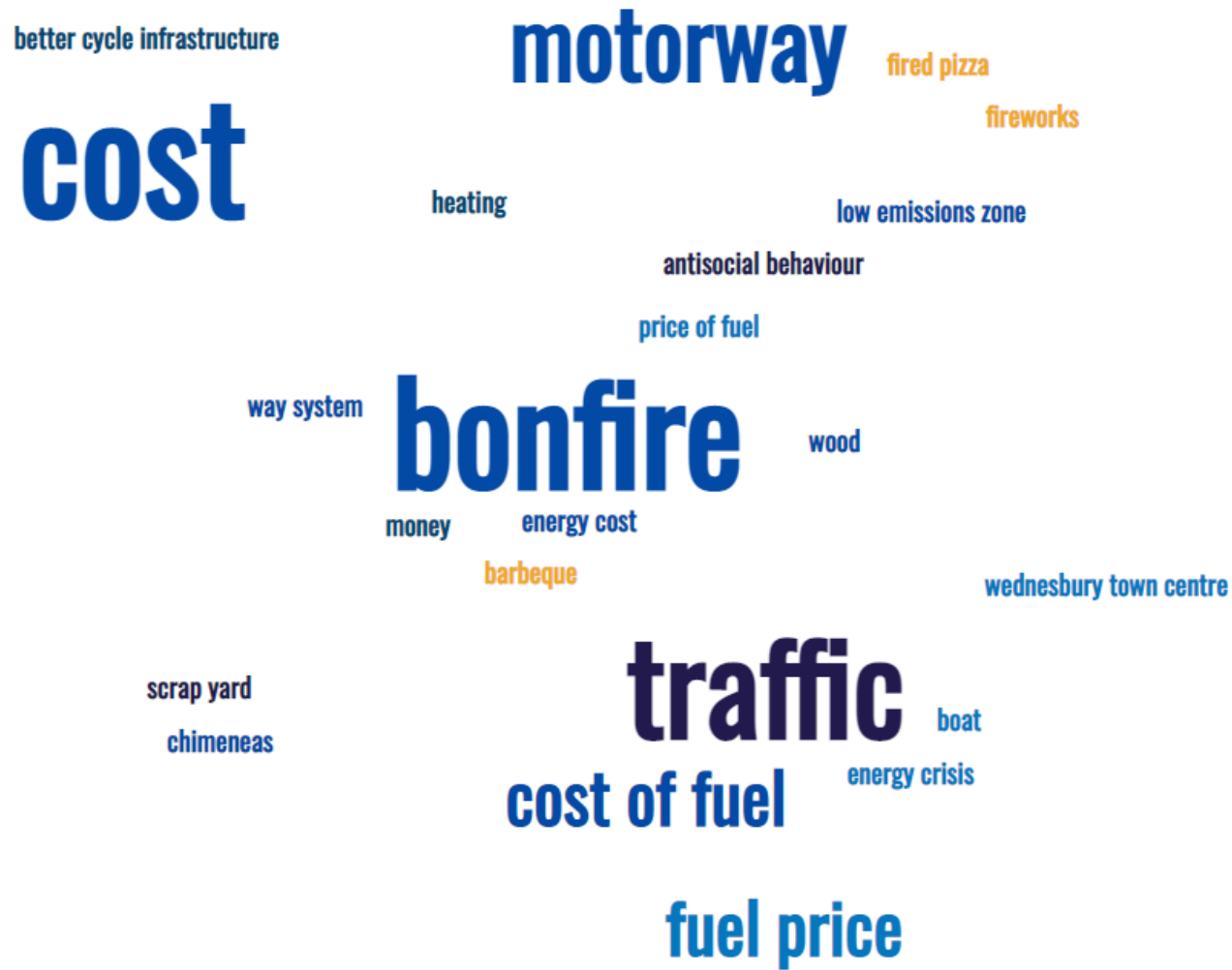
Find out more and have your say at:
www.sandwell.gov.uk/SmokeControlArea

Consultation starts 9 May, ends 20 June 2022



A copy of the proposed Smoke Control Order and the accompanying plan may be inspected free of charge 9am to 5pm Monday to Friday from 9 May 2022 until 20 June 2022 at:
Sandwell Council House, Freeth Street, Oldbury, B69 3DB
OR online at: www.sandwell.gov.uk/SmokeControlArea

Word Cloud of Comments Received



Summary of Comments and Sandwell MBC's Responses

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	Responses in agreement with the proposal	
1.	<ul style="list-style-type: none"> Wood burning stoves are a real problem around here, people are burning the wrong fuels, or they aren't working properly, often wet wood, and pallets. 	In support of the proposal, no response required.
2.	<ul style="list-style-type: none"> Air pollution is a health emergency in this borough. 	In support of the proposal, no response required.
3.	<ul style="list-style-type: none"> There are several wood burners and open fireplaces in my street and we know that they burn anything even fences that have been pre-treated. There needs to be control of these obnoxious materials being burnt 	In support of the proposal, no response required.
4.	<ul style="list-style-type: none"> Wednesbury regularly smells of chemicals and fumes. I'm asthmatic and a believe the air pollution does contribute to my discomfort 	In support of the proposal, no response required.
5.	<ul style="list-style-type: none"> Strongly agree that all of Sandwell should be designated a smoke free area. 	In support of the proposal, no response required.
6.	<ul style="list-style-type: none"> I am pleased that canal boats are included because the smell of burning wood in the moorings down the street can reach my home on cold nights. 	In support of the proposal, no response required.
7.	<ul style="list-style-type: none"> With the cost of fuel increasing, wood burning stoves will only become more common - only yesterday, a neighbour had a very large flue for a stove installed and this is worrying for me as I am asthmatic. The increased burning of wood and other 	In support of the proposal, no response required.

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<p>noxious materials will become a problem for Sandwell if not controlled. We do not want to return to those days of smoke polluted air and smog which have been largely eradicated in the last few decades.</p>	
8.	<ul style="list-style-type: none"> BRILLIANT idea, as many people appear to burn any old rubbish in wood burners these days and the smell often requires the closing of windows 	In support of the proposal no response required.
9.	<ul style="list-style-type: none"> I suffer from Asthma and find it particularly difficult to get my breath when the air quality is poor. My quality of life is therefore reduced and I whole hearted approve of the idea of a smoke free Sandwell. 	In support of the proposal, no response required.
10.	<ul style="list-style-type: none"> Response from the WM-Air project, University of Birmingham. Exposure to poor air quality results in short- and long-term health impacts and is estimated to be responsible for up to 36,000 premature deaths each year across the UK (RCP, 2016). In the West Midlands Nitrogen dioxide (NO2) and particulate matter (PM) are the pollutants with the greatest impact on health. The WHO (2021) guideline level for PM2.5 (an annual average concentration of 5 µg m-3) is exceeded across Sandwell and in most UK urban areas. The proposed PM2.5 target of an annual average concentration of 10 µg m-3 (DEFRA, 2021) is also exceed across much of Sandwell (see Zhong et al. 2021 Figs. A1 and A2). The UK Clean Air Strategy (2019) states that, based on National Atmospheric Emission Inventory (NAEI) data, 38% of primary particulate emissions come 	In support of the proposal, no response required.

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<p>from burning wood and coal in domestic open fires and solid fuel stoves. In the West Midlands, the “domcom” sector within the NAEI contributes a small amount to total NO2 emissions but is responsible for a large proportion of direct (41%) PM2.5 emissions, primarily through domestic solid fuel combustion. Modelling from the WM-Air project (Mazzeo et al., 2022) assessed the impact of a range of scenarios with reduced emissions from changes in road transport, agricultural activities and domestic combustion to test the impact of possible mitigation policies at a national or local level (WMCA area) on ambient concentrations of PM2.5. Results showed that, of the cases considered, combined mitigation policies to reduce both road transport and agricultural emissions would have the strongest effect on the average PM2.5 levels both in winter and in summertime if applied at a national level (UK cases). Conversely, mitigation policies to reduce domestic solid fuel combustion inside the WM area would result in the most effective policy if applied on a regional level only (WM case), of the scenarios considered. Reducing PM2.5 concentrations is necessary to improve public health and to allow the region to meet the proposed national PM2.5 target levels. Given the relatively long atmospheric lifetime of PM2.5 action to address PM2.5 emission is best taken across the Borough and actions, such as the Sandwell smoke control area, designed to reduce PM2.5 emissions</p>	

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<p>from domestic solid fuel combustion across the region are important to reduce total PM2.5 emissions. References provided.</p>	
	<p>Wood burning is fine, we need it to keep warm</p>	
<p>11.</p>	<ul style="list-style-type: none"> • We need to let houses burn whatever fuel they need to keep their homes warm. • Man has burned wood since the dawn of time to keep warm. • It is not a major issue in Sandwell. Stop controlling people and forcing them to purchase more expensive products. You would be punishing a handful of people just so you can be seen to follow the herd of Greta. Folk have used wood as a natural recourse for thousands of years and should continue to do so. 	<p>Scientific research clearly demonstrates that burning even untreated, bare wood produces smoke that contains a harmful mix of gases and fine particulate matter. The dangerous gases produced during domestic burning include benzene, formaldehyde, acrolein and polycyclic aromatic hydrocarbons (PAHs). If we allow people to burn ‘whatever they want’ this could include treated wood and plastics which release extremely harmful chemicals.</p> <p>Treated timber contains CCA (chromated copper arsenate) and should never be burnt as firewood. CCA is a wood preservative that has been used for timber treatment since the mid 1930's. It is a mixture of chromium, copper and arsenic. When burnt toxic arsenic is released into the atmosphere and the ash released from CCA treated timber can contain up to 10 per cent (by weight) arsenic, chromium and copper. Swallowing only a few grams of this ash can be extremely harmful. Symptoms can include nausea and/or vomiting, diarrhoea, and a ‘pins and needles’ feeling in the skin. Timber is commonly treated with CAA and can be found in fencing, decking and outdoor structures, so it is tempting to burn off cuts from fencing projects. Although there are alternative timber treatments that do not contain arsenic, unless there is certainty that it hasn’t been treated with CCA timber should never be burnt that has had any sort of chemical treatment.</p> <p>Arsenic in the body accumulates in cells, which over time may lead to skin, bladder, kidney, liver, lung, and prostate cancers. Other forms of arsenic toxicity in humans have been observed in blood, bone marrow, cardiac, central nervous system, gastrointestinal, gonadal, kidney, liver, pancreatic, and skin tissues.</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	Considered consultation information inadequate and/or questioned the statistics provided.	
12.	<ul style="list-style-type: none"> • Not clear which parts of Sandwell are currently protected by a smoke control area. • I would like to know which areas of Sandwell are smoke controlled because you don't get this message out very well. 	<p>The areas currently protected by Smoke Control Areas are highlighted on Sandwell's Smoke Control Area web page www.sandwell.gov.uk/downloads/file/33089/maps_of_existing_and_proposed_scas_2022 . Sandwell's Air Quality web page has also now been updated to include a list of all streets in Sandwell that are in existing smoke control areas. https://www.sandwell.gov.uk/downloads/file/33090/existing_smoke_control_areas_by_street</p>
13.	<ul style="list-style-type: none"> • Not entirely sure what this is supposed to be about, all the surrounding documentation is as clear as mud. 	<p>Information about the Smoke Control Area was and is provided on Sandwell's air quality web pages, including FAQs about exempt appliances and approved fuels, as well as a copy of the legal Smoke Control Area Order.</p>
14.	<ul style="list-style-type: none"> • This questionnaire is designed to channel people to the answers you want to hear. I am aware that combustion is a source of substances that can harm health. I am surprised at the quoted high percentage of pollutants attributed to stoves. In this locality my sense of smell tells me that few people burn wood etc. on a regular basis. You should have done a representative survey of stove/chimney burning to gain local data? • I'm not convinced also by the statistics in the document. 1 in 12 houses has a wood burner. 	<p>The consultation was designed to encapsulate public understanding about the health risks of wood smoke, raise awareness of the issues and assess opinion of the proposed widening of the pre-existing Smoke Control Areas. Responses were recorded from every town in Sandwell, and an additional public pre-consultation survey was carried out in July/August 2021.</p> <p>The statistics used in the consultation were sourced from the UK government's 'Clean Air Strategy 2019' that cited sources from recent scientific research papers as well as Defra's research on Burning in UK Homes and Gardens (December 2020) http://randd.defra.gov.uk/Document.aspx?Document=14972_Finalreport-BurninginUKhomesandgardens.pdf</p>
	The proposal is a waste of money as it is not a significant issue and there are other issues we should be focussing on	
15.	<ul style="list-style-type: none"> • There are more beneficial things which the Council could spend their money on. This is just making money from residents and businesses who are just trying to get by. 	<p>The social and economic benefits of implementing a boroughwide smoke control area are wide reaching and their potential impact far outweighs the initial set up costs or its enforcement.</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<ul style="list-style-type: none"> • The proposed blanket order would be a heavy-handed limit on what can and cannot be burnt, especially at a time when people are burning alternative fuels because gas and electricity prices are at all-time highs. The air quality in elevated areas such as much of Rowley Regis is excellent and further restrictions are completely unnecessary. We remember the 'smogs' in the 1960s and understood the reasons for the introduction of the original Clean Air Act, but we do not support its extension to all areas without incontrovertible cause. • Maybe concentrate on the people in the community rather than doing the latest tick box exercise, and no doubt paying extortionate salaries and wasting tax payer's money. • Many people will have poorer lungs after Covid but unless the bigger issues around the environment, public health, employment, housing includes poorer health amongst BAME populations then improvements with this will be minimal • In 5 years things will be the same unless there's better roads, better public transport (Including school buses) that is cheap, safe and reliable, better work environments (less commuting) and reductions in smoking and vaping. • You're targeting households instead of taking responsibility for improving roads and the environment. • Prohibiting the use of open fires and non-DEFRA approved stoves, even if they are burning smokeless 	<p>The initial set up costs for the creation of a boroughwide Smoke Control Area are approximately £6,000 (this includes the formal advertising of the proposal as well as advertising its declaration, and publicity necessary to raise awareness along with staff time to ensure correct legal process is followed). Once in place there are no additional staffing costs in relation to its operation as staff are already in post who would extend their existing regulatory powers to encompass the rest of the borough.</p> <p>However, air pollution created from wood burning in homes is responsible for £0.9bn a year in health-related damages in the UK, according to analysis by the European Public Health Alliance (2022) https://cedelft.eu/publications/health-related-social-costs-of-air-pollution-due-to-residential-heating-and-cooking/</p> <p>This report estimates that the average yearly social health-related costs of heating a household using a wood burning stove using data from 2018 was £670.00, whilst it was £26.50 for a non-condensing gas boiler and £17.55 for a condensing gas boiler.</p> <p>Although wood burning stoves in the UK only account for 6% of energy consumption they make up to 40% of the UK's health related costs from home heating. Health related social costs include direct (health care) expenditures (e.g. hospital admissions, loss of working days) and indirect health impacts and accompanied welfare loss (e.g. managing diseases such as COPD, increased mortality risk and reduced life expectancy due to air pollution).</p> <p>A rough and indicative estimate of health-related social costs per diesel car and heating appliances reveals that driving a diesel car for one-year causes health-related social costs of £185.85, whilst a wood burning stove is over £670.00.</p> <p>These figures are also an underestimation of the total health costs because it only includes outdoor pollution. The costs due to indoor air pollution have not been quantified by this study. Yet, indoor air is often more polluted than outdoor air due to higher concentrations of certain pollutants and that residents tend to spend the majority of their time indoors.</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<p>fuels, removes alternative heating methods & will increase the use of gas & electric heating which - in the case of older gas appliances - is not necessarily a cleaner alternative.</p> <ul style="list-style-type: none"> I am amazed that Sandwell thinks this is an important issue. I strongly suspect the number of households in the borough who actually use solid fuel burning equipment to heat their homes is minimal. And the percentage of those who do not burn smokeless fuel must be a small percentage of those with the equipment. If it is such a tiny problem, then criminalising and imposing ludicrously large punitive fines for a few particles of smoke is in reality bullying - a sledgehammer to crack a nut. I must also comment I have not witnessed any Mary Poppins-type Chim Chim Cheree smoke-filled skies since the 1970s. 	<p>The cost-benefits for health are clearly evidenced for ensuring that we both encourage people to avoid wood burning stoves or fire places or use DEFRA exempt appliances or authorised fuels to minimise these harmful emissions.</p>
	<p>Traffic is a bigger problem for air pollution than wood burning stoves</p>	
16.	<ul style="list-style-type: none"> The Council should stop wasting money on projects like the one-way system in Wednesbury and increase bus routes and cycle lanes to reduce car usage. I am more concerned at vehicle emissions, particularly diesel, caused by traffic congestion on the Dudley Road. Why not follow Birmingham's example and impose a low emissions zone? I think there is far more air pollution from traffic within Sandwell than from those who have wood burners. Sandwell council should put more efforts 	<p>The proposal for a boroughwide Smoke Control Area is about reducing the emission of harmful smoke in our local neighbourhoods from wood and coal burning stoves and fireplaces and is not being suggested as an alternative to tackling vehicle emissions.</p> <p>Surprisingly the main source of man-made PM_{2.5} in an urban area like Sandwell, is from the domestic burning of wood and coal - approximately 38%, while road transport makes up about 12%. This smoke control area proposal is not being suggested as an alternative to encouraging and improving sustainable travel options or efforts to reduce car usage or the reduction in congestion and pollution created by vehicle emissions. These travel options and traffic management proposals still form a key part of Sandwell's Air Quality Action Plan 2020-2025.</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<p>into traffic pollution. I have lived on the Wolverhampton Road for over 20 years and the council has never been interested in cutting pollution before.</p> <ul style="list-style-type: none"> • Need a better cycle infrastructure. • Many thousands of times more pollution comes from diesel particulates & Nitrous Oxide emissions from old and poorly maintained trucks & buses using Sandwell's roads; and from vehicles stuck in unnecessary traffic jams due to poorly timed traffic lights (the mile-long jams caused by Holyhead Road lights, Morrisons, Wednesbury for example); and from illegal cars and motorbikes without MOTs and some with failing engines being driven at lethal speeds on urban roads and never caught due to the utter lack of police. Surely some of these are a priority before attacking the tiny minority using smokeless fuel in non-compliant burners. 	<p>With regards to tackling roadside air quality, Sandwell Council has undertaken NO₂ monitoring across the borough for over twenty years and also has five continuous air quality monitoring stations. Sandwell was declared as an Air Quality Management Area in 2005 and over the last twenty years a variety of measures have been taken to dramatically improve traffic-based pollution. Measures the introduction of bus lanes, traffic signalling improvements, the Midland Metro, cycle lanes, and bus upgrades/retrofits to Euro VI standards. Air quality data from Sandwell along with other local authorities helps form central government policies for air quality improvements, including new vehicle emission standards and scrappage schemes. Sandwell has seen a significant overall downward trend in NO₂ in the last twenty years. Sandwell's Air Quality Annual Status Report 2022 (available to download from the Council's Air Quality webpage) confirmed that in 2021 99.2% of the borough was compliant with the national air quality objective for NO₂.</p> <p>The introduction of a Clean Air Zone/s in Sandwell is beyond the scope of this consultation – although it should be noted that this option was discussed and dismissed by the leader of the Council in 2018.</p>
17.	<ul style="list-style-type: none"> • Living by the motorway is a bigger risk factor to health, but concern growing about the increasing smoke pollution from wood burners. 	<p>Nitrogen dioxide levels across the borough have been declining in Sandwell since 2012, this is due to improvements in car technology to reduce harmful emissions, rather than a reduction in traffic. Unlike particulate matter, concentrations of NO₂ do drop quite significantly when you move just a few metres away a from busy road. However, fine particulate matter, associated with wood and coal burning, not only pollutes the air where it is produced, often in densely areas but also travels long distances, so that even those living away from busy roads can be impacted.</p>
	<p>The proposal is a knee jerk reaction to the expected increase in residents using solid fuel stoves and</p>	

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	fireplaces as a result of the rise in gas and electricity costs	
18.	<ul style="list-style-type: none"> • This is a knee jerk consultation that has suddenly made its way to the forefront due to the fact that people may now use fuel burning stoves in order to avoid CRIPPLING energy costs. And now they are being targeted. This is not a priority, with minimal real-life impact on Sandwell Residents. • This is not the time to bring in this law when the cost other forms of fuel are skyrocketing. Really poor timing!! • Your timing in launching this proposal, a mere 1 month after the most financially damaging rise in domestic heating fuel costs in living memory, is astonishing. I wonder if you have any concept what occurs outside of the council house in Oldbury? Do you understand the hardships residents are now facing in terms of heating their homes? 	<p>Sandwell Pollution Control Officers first began looking seriously at the creation of a boroughwide Smoke Control Area in January 2021. This was in response to mounting scientific evidence of a growing potential health crisis linked to air pollution from solid fuel burning stoves. The Public Consultation was not a knee jerk reaction to the cost of living crisis, but a considered process that began eighteen months ago, to ensure that appropriate scrutiny and legal process was followed. A brief timeline below explains the actions taken and when:</p> <ul style="list-style-type: none"> • January 2019 - The Clean Air Strategy 2019 is published and confirms air pollution concerns linked to homes using open fires and stoves, and links to both indoor air pollution, and outdoor air pollution with its potential to affect those far away from the source. Section 6.2 states, '<i>...we have seen the growth of biomass boilers for home heating. This increase in burning is having an impact on our air quality and now makes up the single largest contributor to our national PM emissions at 38%'. Smoke Control Areas remain an important mechanism by which to reduce local emissions from burning.</i>' As a local authority we have a duty to assess air quality and where necessary take appropriate action to protect the health of those living and working in the borough. • January 2021- Research into the existing patchwork of 51 separate Smoke Control Areas. Discussions held with Dudley and Birmingham Councils who already have boroughwide smoke control areas. • March 2021 – Legal advice sort with Sandwell’s legal team re. potential to create boroughwide SCA. • June 2021 – Meeting with Cabinet Member Suzanne Hartwell and Leader of the Council to present the proposal for their consideration and request agreement to do an initial survey. • July/August 2021 - Three surveys were completed on the proposal for a boroughwide SCA, one for residents, businesses and young people.

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
		<ul style="list-style-type: none"> • August 2021 – Councillor Workshop – ‘Should the whole of Sandwell be designated as a Smoke Control Area?’ • September 2021 – Presentation of the proposal to create a boroughwide Smoke Control Area at the Health and Wellbeing Scrutiny Board • October 2021 – Presentation and report to Cabinet regarding the proposal to and create a boroughwide Smoke Control Area, and to request agreement to undertake a Public Consultation on the proposal. Agreed by Cabinet and to be heard by full Council for agreement. • December 2021 – Report to full Council for agreement to undertake a formal public consultation on the proposal to create a boroughwide smoke control area. Unanimous full council agreement was given. • January - March 2022 – Delays incurred due to legal process and ensuring correct delegations of authorities to Directors and Officers. A decision was then made to delay the consultation until May to avoid the pre-election period. • May – June 2022 – Formal advertising period and public consultation goes ahead May 9th to June 20th.
	Who and how will this proposal be enforced?	
19.	<ul style="list-style-type: none"> • I think it’s a brilliant idea, however I don’t know how you would enforce this. • Are over-stretched environmental health officers going to be tasked with enforcement? 	<p>The staff are already in post who would extend their existing regulatory powers to encompass the rest of the borough. All pollution control officers investigating a non-compliant household once the SCA comes into force will be required to follow the steps set down in the Regulators Code (Section 23, Legislative and Regulatory Reform Act 2006) to ensure that enforcement is proportionate and meets various legal tests. Although the enforcement of existing smoke control areas is well managed at present, it will be subject to review by senior management to ensure adequate staff are in place to ensure its effective enforcement.</p>
20.	<ul style="list-style-type: none"> • I strongly agree with the principal of controlling these emissions on health grounds. It would be great if there was more transparency about the continuous monitoring and enforcement of these 	<p>The council currently maintains a comprehensive record of both formal and informal actions in relation to smoke complaints on its CIVICA database. This information is reviewed on a regular basis by managers within the team to identify numbers and trends in complaints and to ensure</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	controls, too, to demonstrate the value of these controls through reduced emissions (or lack thereof), or issues where enforcement capability could be improved.	there is adequate officer capacity to respond. Anonymised data on informal and formal action taken is available to any interested party via a Freedom of Information request.
21.	<ul style="list-style-type: none"> In recent years there have been a proliferation of household installations of wood burning stoves. I have two properties close to me who had such Installations in the last few years. During winter time, the fumes, smell and pollution directly enters my home. I have reported this to Sandwell MBC, but still they are operating them. 	Wood burning stove installations are not banned in a Smoke Control Area, provided either authorised fuels or exempt stoves are installed then they can be used. Although these fuels and stoves still produce some emissions they will produce less than unauthorised fuels and non-exempt appliances.
	Narrow boats are not significant polluters	
22.	<ul style="list-style-type: none"> The M5 /M6 is a major polluter in Sandwell not narrow boats! 	This consultation is about protecting public health from exposure to harmful particulate matter that is emitted from all open fireplaces and small solid fuel stoves whether they are produced on land or on inland waterways. Although motorways are responsible for the emission of particulate matter this consultation is not addressing that issue. Other policies are being implemented within Sandwell to reduce pollution from motorway traffic, including the 'Third Wave' NO2 reduction programme for motorway link roads and the National Highways 60mph speed limit for air quality between Junction 1 and Junction 2 on the M5 in Oldbury.
	This proposal will result in people being forced into fuel poverty	
23.	<ul style="list-style-type: none"> With the cost of fuel smoke free zones at present are a ridiculous idea where people use open fires and wood burners to keep their families warm. This plan would send some people further into fuel poverty I know the council could not care less about this and want people to pay through the teeth for fuel. Most people don't have open fires 	The council intention with this boroughwide proposal, is not about putting people into fuel poverty, but about helping people find safer ways to keep themselves warm that doesn't result in them sacrificing their own health, their family's health, and the health of the wider community. This is because cheap heating using non-authorized fuels and stoves comes at a huge cost to health.

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<p>and wood burners only a very small percentage of the Sandwell area so why persecute them?</p> <ul style="list-style-type: none"> I consider that the council is completely out of tune with this initiative. Are you not aware of the current crisis affecting Sandwell residents regarding the outrageous and immoral increases in energy prices. Some people, including myself, will only be able to use open fires or wood burning stoves, which will be their only source of heating because they cannot afford to use central heating. You really do need to reconsider your intentions and put them on the back burner until this crisis is sorted out. With the price of electric, oil and gas getting too expensive to use the only thing we will use in the future will be wood. Stop penalising a few people who are using wood burners, especially when gas and electricity prices are unaffordable. Schemes that help or would help householders to improve insulation etc are virtually non-existent that would benefit the economy and lives of many. 	<p>For people already using authorised fuels and exempt appliances then the boroughwide smoke control area will have very little impact on them. For those who aren't currently compliant with the smoke control area rules, then yes, they will be required to buy authorised fuels should they want to use an open fireplace or solid fuel stove which is not exempt. Authorised fuels are more expensive than basic wood off cuts or foraged wood, but they do burn much more efficiently, so will last longer and give out more heat. The Council has no financial gain from the type of fuel people purchase.</p> <p>We want to assist all our residents in finding the necessary help to make their homes more energy efficient and to be able to access cleaner and safer fuels. For example, improving home insulation is extremely important in reducing fuel costs with year on year savings. Insulating lofts can reduce bills by over £300 each year, whilst draught proofing doors and windows saves £45 a year and blocking up an open chimney with a chimney sheep saves £65 a year. Replacing inefficient gas boilers or installing more energy efficient heating systems is also important. Residents on a low income and in receipt of government benefits may be entitled to help towards insulation and boiler replacement and are being directed to the website Simple Energy Advice UK</p> <p>For those who are struggling to pay their energy bills, there is information on the Council website. This includes a link to the Citizens Advice Bureau webpage where there is detailed information for those experiencing fuel poverty.</p>
	<p>Commercial businesses are a bigger problem for smoke emissions</p>	
24.	<ul style="list-style-type: none"> Lots of local businesses, little back street places have lots of incinerators which burn all sorts of old rubbish, this can stink on a cold day 	<p>A boroughwide Smoke Control Area includes all commercial biomass boilers that burn wood and coal, and they are required to use Defra 'exempt appliances' or authorised fuels. A list of exempt appliances is listed on the Website: Defra Exempt Appliances. All commercial biomass</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<ul style="list-style-type: none"> • Why not concentrate on commercial businesses that kicks out more smoke? • There needs to be much more control and action taken against industrial pollutants, particularly from the increase in large scale recycling processes that are purported as having green credentials, but which are emitting particulates into our atmosphere that are going unnoticed. 'Green' is not necessarily always clean. 	<p>boiler manufacturers are required to meet Defra exemption requirements under the Clean Air Act 1993, more information on specific requirements is provided at environmentalprotection.org.uk.</p> <p>All other commercial and industrial activities that have the potential for creating significant emissions to air, land and/or water are regulated as 'Permitted Processes' by either Sandwell MBC or the Environment Agency under the Environmental Permitting (England & Wales) Regulations 2016.</p>
	<p>Grants should be provided for fireplace/stove conversions</p>	
25.	<ul style="list-style-type: none"> • You should ensure that inland water vessels won't be expected to pay for really expensive fuel conversion (more than a couple of £100). If this is required it should be supported with grants, especially for those who live on them full time and who have a low income. 	<p>Section 24 of the Clean Air Act 1993 gives local authorities the power to require adaptation of fireplaces in private dwellings to ensure compliance with emissions as required under Section 20. Where solid fuel burning is the only form of heating for a property. This includes the payment of a grant if necessary to assist with the adaptation. Those with non-compliant stoves and open fireplaces should not require any adaptation other than to switch to burning authorised fuel and using 'smokeless' firelighters, i.e. gas poker or smokeless BBQ lighters. In some cases, original fireplace grates are sometimes required to be changed for thicker fire-bars which can withstand higher heat intensities from authorised fuels.</p>
26.	<ul style="list-style-type: none"> • To replace non-compliant wood-burning stoves runs to many thousands of pounds which many residents can ill afford when combined with the colossal energy cost increases. In many cases -mine in particular - these open fires or stoves would have been in the house when the occupiers moved in. 	<p>The Smoke Control Area order does not affect non-compliant stoves from burning smokeless authorised fuels. Those with non-compliant stoves are still permitted to use them with smokeless authorised fuels, as they do not emit excessive amounts of smoke. There should be no requirement to replace a non-compliant stove, only a requirement to use authorised fuel. If a fireplace is the only means of heat for a property, then Section 24 of the Clean Air Act 1993 gives local authorities the power to require adaptation of fireplaces in private dwellings to ensure compliance with emissions as required under Section 20. Where solid fuel burning is the only form of heating for a property. This includes the payment of a grant if necessary to assist with the adaptation. Those with non-compliant stoves and open fireplaces should not require any adaptation other than to switch to burning authorised fuel and using 'smokeless' firelighters, i.e. gas poker or smokeless BBQ lighters. In some cases, original fireplace grates</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
		are sometimes required to be changed for thicker fire-bars which can withstand higher heat intensities from authorised fuels.
	The proposal will increase the cost of authorised fuels	
27.	<ul style="list-style-type: none"> We spent a lot of money installing a Defra approved appliance and use authorised fuel and worried for what this all means especially if it pushes up the costs of authorised fuel because suppliers know customers are limited with options/more demand. 	<p>Although it is recognised that demand for authorised fuels is likely to increase this winter, this increase in demand is likely to be across the UK. Sandwell declaring a boroughwide Smoke Control Area is unlikely to have a massive impact on this market because;</p> <ol style="list-style-type: none"> I. The Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020 now require that only authorised ‘ready to burn’ dry fuels can be sold in England in volumes of less than 2m³. This means that small volumes of wood being sold for domestic burning from any retailers are now authorised fuels, so the choice is now limited for anyone whether they live in a smoke control area or not. II. As there are other local authorities in the West Midlands that already have boroughwide Smoke Control Areas in place including Dudley and Birmingham, and then other authorities such as Walsall and Wolverhampton that also have parts of their boroughs designated as Smoke Control Areas, there is already existing demand for authorised fuels. The increase in demand will be driven by residents across the West Midlands and further afield who also want to use fireplaces and stoves in SCAs, so Sandwell’s declaration is unlikely to have a huge additional impact on demand. <p>It should also be noted that some Defra approved appliances can burn home seasoned wood, provided it has less than 20% moisture content. Expanding the existing smoke control areas is one of many measures that can be used to tackle existing health inequalities across the borough and to ensure that all communities in Sandwell benefit from these regulations.</p>
	Issues raised outside the scope of the Consultation	

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
28.	<ul style="list-style-type: none"> We need to stop this Green agenda. We need to start getting our fuel from cheap gas under our feet, i.e. fracking. Alternatively, we need to start getting more from North Sea exploration. STOP putting the burden on British homes and families. 	<p>The proposal for a boroughwide Smoke Control Area has not been generated as part of a 'Green Agenda' or about responding to the national policy on energy affordability. The policy is about protecting public health from exposure to harmful particulate matter to which there is no safe level of exposure. Health inequalities will continue to grow between households and communities if we continue with only approximately 1/5th of the borough being protected by Smoke Control Orders. Wood burning stoves are still permitted in Smoke Control Areas, just when used with approved fuel that emits significantly less smoke or certified stoves can be used with normal fuel.</p>
29.	<ul style="list-style-type: none"> The smoke control area should cover bonfires, barbeques and fire pits. We have constant nuisance from outdoor fires being regularly lit. They cause health issues and more should be done to control them. On Whitehall road every time it's nice sunny weather people in the allotments always light a fire and then go home and then we are left with smoke It should also not prohibit or make overly difficult things such as outdoor barbecues, bonfires, chimeneas and camping stoves (gas can, meth etc fuelled). I don't think it's just wood burning stoves that should be targeted, people who have garden fires should be banned from doing so. When we have such an excellent recycling system in the area there should be absolutely no need for anyone to be burning anything in their back gardens. Most times people do this when it's a nice day and other residents have our washing out & windows open hence causing a major smoke nuisance & sometimes 	<p>Smoke Control Areas are designated under the Clean Air Act 1993 and the regulations do not extend to outdoor residential fires including bonfires, BBQs, fire pits etc. Outdoor domestic fires are regulated under S.79 of the Environmental Protection Act 1990. Under s.79 recurring smoky fires or a fire that is particularly toxic in nature can be classified as a 'Statutory nuisance' and enforcement action can be taken to abate the nuisance. Residents can report potential 'statutory nuisances' to the Pollution Control Team through the Council's pollution https://www.sandwell.gov.uk/info/200274/pollution/.</p> <p>The Clean Air Act 1993 (as amended) does not allow local authorities to ban domestic wood burners but allows local authorities to minimise the emission of harmful smoke from them by requiring the use of either authorised fuels or Defra Exempt appliances.</p> <p>There are currently laws surrounding fireworks in place in the UK and these are enforced by the police. Fireworks cannot be set off in the street or in public places. Fireworks should also not be set off between 11pm and 7am except for Bonfire Night, where the cut off is midnight, and New Year's Eve, Diwali and Chinese New Year, when the cut off is 1am.</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	<p>potential fire hazards. To my mind this should be classed as Anti-Social Behaviour.</p> <ul style="list-style-type: none"> You need to make it a priority to ban all these home installations. I wish you could do something about the number of fireworks set off in Sandwell from August, through to the End of January. Bonfires, barbeques, chimeneas and wood-fired pizza ovens are not covered by this legislation. Why not? I would wager bonfires annually cause hundreds of times more particulate pollution than the relatively few who burn smokeless fuel in a stove. Had this legislation been in place would Sandwell have been able to light beacons for Queen Elizabeth's Platinum Jubilee? 	
30.	<ul style="list-style-type: none"> I feel tackling the antisocial behaviour linked to "in your face" vehicle-based drug dealing on Sandwell estates should be more of a priority with this having a more negative impact on Sandwell resident's lives than the effect of the odd garden stove. 	<p>This consultation is regarding the proposal for a boroughwide Smoke Control Area and reducing the emission of harmful smoke in local neighbourhoods from wood and coal burning stoves and fireplaces. We are therefore not able to respond to concerns about drugs and anti-social behaviour.</p>
31.	<ul style="list-style-type: none"> More should be done to tackle businesses burning things like tyres and oil, especially the garages in Wednesbury and the units next to Screwfix. You should crack down on burning of rubbish at industrial premises not to mention the frequent fires at scrap yards. Of course, these measures require more effort than the proposed regulation, which smacks of virtue signalling. 	<p>This consultation is about protecting public health from exposure to harmful particulate matter that is emitted from open fireplaces and small solid fuel stoves used inside homes and businesses. All complaints received about burning outside on business premises are currently investigated by Consumer and Citizen Protection Officers in Regulatory Services.</p>
32.	<ul style="list-style-type: none"> I live near the M6 Junction 8, and a railway line behind my house. I get lots of black dust in my 	<p>Although particulate matter is generated by motorway traffic and diesel trains, this consultation is specifically about reducing the emission of harmful smoke in our local</p>

	Summary of Comments Received from the Formal Public Consultation	Sandwell MBC Response
	house. It does bother me that I am breathing this in.	neighbourhoods from small domestic and business wood and coal burning stoves and fireplaces.
33.	<ul style="list-style-type: none"> • Reductions in green space has an impact (yet spaces like Brandhall could reduce) when in fact we need more green space for communities to connect and improve public health opportunities. 	The proposal for a boroughwide Smoke Control Area is about reducing the emission of harmful smoke in our local neighbourhoods from wood and coal burning stoves and fireplaces. This is not about responding to Sandwell's green spaces policy.

Summary of Comments on Facebook and Twitter and Sandwell Council’s Responses

Summary of Comments Raised on Sandwell’s Environmental Health Facebook Page Re. the Smoke Control Area Public Consultation (423 Views)		Response
1.	Considering how much electric/gas has gone up by, wood burning stoves may be the only way some people will be able to afford to heat their homes.	See response no. 23 provided in the formal consultation responses.
2.	I’d worry more about all the fly tipping and lack of dog waste bins being emptied	The proposal for a boroughwide Smoke Control Area is about reducing the emission of harmful smoke in our local neighbourhoods from wood and coal burning stoves and fireplaces. This consultation is not about responding to concerns about fly tipping and dog fouling.

Summary of Comments Raised on Sandwell MBC’s Facebook Page re. Smoke Control Area Public Consultation Post Engagement = 754 Post Impressions = 9,150 Post Reach = 9,070		Response
1.	<ul style="list-style-type: none"> Don’t know why they are bothering no one seems to take notice. Not enough police on duty for anything. 	The Smoke Control Area order is enforced by the Council, not the police.

	<p>Summary of Comments Raised on Sandwell MBC's Facebook Page re. Smoke Control Area Public Consultation</p> <p>Post Engagement = 754 Post Impressions = 9,150 Post Reach = 9,070</p>	<p>Response</p>
<p>2.</p>	<ul style="list-style-type: none"> • What about garden fires • I really don't see how this will have any impact when so many people have chimeneas, fire pits, barbecues, braziers and garden fires. Seems another waste of funds. 	<p>Smoke Control Areas are designated under the Clean Air Act 1993 and the regulations do not extend to outdoor residential fires including bonfires, BBQs, fire pits etc.</p> <p>See response no.29 in the formal consultation responses.</p>
<p>3.</p>	<p>You could cut more pollution by removing the ridiculous improvements you made to West Bromwich high Street. I was taught that the shortest distance between 2 points is a straight line. Not a zig zag.</p> <p>Making local roads 20mph doesn't help either. You never get out of third gear. Your going slower but the engines going faster.</p> <p>If you just want to make revenue from fines. You could always just enforce the laws you already have. You could make a fortune in hill top from people throwing litter on the floor and not removing dog mess</p>	<p>The proposal for a boroughwide Smoke Control Area is about reducing the emission of harmful smoke in our local neighbourhoods from wood and coal burning stoves and fireplaces and is not being suggested as an alternative to tackling vehicle emissions.</p> <p>See response no.16 in the formal consultation responses.</p>
<p>4.</p>	<p>Like Birmingham's clean air zone, what a joke.</p>	<p>The proposal for a boroughwide Smoke Control Area is about reducing the emission of harmful smoke in our local neighbourhoods from wood and coal burning stoves and fireplaces. This is not like Birmingham's Clean Air Zone which has been created to reduce air pollution from traffic.</p>
<p>6.</p>	<p>If you're that worried about air quality, why did you allow the quarry in Rowley to re-open for soil management?! The trucks coming in and out of there are filthy and the amount of dust they produce is horrible. The air quality around there is shockingly bad!</p>	<p>The proposal for a boroughwide Smoke Control Area is about reducing the emission of harmful smoke in our local neighbourhoods from wood and coal burning stoves and fireplaces. All commercial and industrial activities that have the potential for creating significant emissions to air, land and/or water are regulated as 'Permitted</p>

Summary of Comments Raised on Sandwell MBC's Facebook Page re. Smoke Control Area Public Consultation Post Engagement = 754 Post Impressions = 9,150 Post Reach = 9,070		Response
		Processes' by either Sandwell MBC or the Environment Agency under the Environmental Permitting (England & Wales) Regulations 2016.
7.	Is this to stop people trying to save money on their gas bills	See response no. 23 provided in the formal consultation responses.
8.	Why do this when folk will need an alternative to gas and electric heating. Do we not have enough of a nanny state as it is? There are very few properties with traditional wood burners and coal fires in this area, just leave them be. Authorised fuel means more expensive fuel!	See response no. 15 provided in the formal public consultation responses
9.	I wonder why businesses located in Sandwell who cause these issues on a larger scale are not being "targeted" first instead of people during an energy cost crisis trying to heat their home	See response no.14 in the formal public consultation responses
10.	Save green spaces, plant more trees, surely that's more important than the odd household chimney...	See response no.33 in the formal public consultation responses

Summary of Comments Raised on Sandwell Council's Twitter Page re. Smoke Control Area Public Consultation Post Impressions = 1,916 Post Engagements = 50		Response
1.	Don't you know the majority of Sandwell has been a smokeless zone since the 60s it's just you never bothered to implement the law.	Currently the minority, about one fifth of Sandwell is covered by Smoke Control Areas and these are enforced and regulated by our Pollution Control Officers. Expanding the existing smoke control areas is one of many measures that we are trying to use to tackle existing health inequalities across the borough. We want to ensure that all communities in Sandwell benefit from these regulations.

	Emails sent to Pollution Control Inbox in Response to Smoke Control Area Public Consultation	Response
1.	Due to the rise in heating costs do you think this is a time for this people are desperate right now come winter people will not be able to warm their houses and now you're thinking of restrictions on them!! This is a bad idea.	See response no. 23 provided in the formal public consultation responses.
2.	I have been reading online about your new proposals, I find it hard to understand that you can use BBQ's, chimeneas, and have a bonfire which are exempt from the rules, people have more of these than people have log burners. People who have log burners or open fires, myself included, already use smokeless fuel, I buy mine from a reputable supplier, as I'm sure most people do as that is mainly all you can buy. How much money is being spent on putting this in place? Wouldn't this money be better spent on other services as these rules and regulations already exist. At this moment in time everyone is having a hard-enough time trying to keep up with ever rising fuel bills and general cost of living without having local authorities wasting money when it could be put to better use. Is there an incentive for Sandwell council to enforce this so-called initiative at this present time bearing in mind there is still such thing as accountability?	See responses no.15 and no.29 provided in the formal public consultation responses.