

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2679

Title: Clean Air Night 2024

Executive Summary:

Fine particulate matter (PM_{2.5}) are tiny particles or droplets suspended in the air that, once inhaled, can settle in the airway and deep in the lungs and cause health problems. In order to reduce PM_{2.5} emissions and achieve the previous (and now interim) World Health Organization (WHO) recommended guideline of 10 µg/m³ by 2030 we need to tackle non-transport sources of PM_{2.5}. The most recent data in the 2019 London Atmospheric Emissions Inventory shows that 19 per cent of London's particulate matter pollution can be attributed to domestic wood burning.

Officers have been in discussions with Global Action Plan (GAP) about supporting the first ever national Clean Air Night (CAN) campaign in January 2024. This is a sister campaign to Clean Air Day. Analysis from GAP shows that the Clean Air Day brand is known by 56% of Londoners. Those who were aware of the 2022 campaign were three times more likely to increase their conversations about air pollution than those who were not. The objectives of the CAN campaign are to build public awareness of the impacts of wood burning on public health, building on the positive brand and public awareness of Clean Air Day. GAP is leading a nation-wide campaign, funded by Hertfordshire Council.

We are looking to contribute £30,000 to support GAP's delivery of Clean Air Night. This will be to specifically support delivery of the marketing and communications strategy as part of a London-wide campaign. It will also support the nation-wide campaign, from which London will also benefit.

The campaign will seek to shift public behaviour to reduce the negative health impacts of air pollution associated with indoor burning using woodstoves or open fireplaces and consequently to achieve a reduction in PM_{2.5} emissions from domestic wood-burning.

Decision:

That the Assistant Director – Connectivity, Air Quality, Transport and Infrastructure approves the expenditure of up to £30,000 via a grant to Global Action Plan to support its delivery of Clean Air Night 2024.

AUTHORISING ASSISTANT DIRECTOR

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Elliot Treharne

Position: Assistant Director –
Connectivity, Air Quality, Transport and
Infrastructure

Signature:



Date:

13/12/2023

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. Despite recent improvements in air quality, air pollution is still the biggest environmental risk to the health of Londoners. We estimated that in 2019 there were between 3,600 to 4,100 premature deaths attributable to air pollution. Based on current evidence, PM_{2.5} is understood to be the air pollutant which has the greatest impact on human health. Both short and long-term exposure to PM_{2.5} increases the risk of mortality from lung and heart diseases as well as increased hospital admissions. There is currently no safe level for PM_{2.5}. In recognition of this, WHO has recently lowered its guideline limits for PM_{2.5} to 5 µg/m³.
- 1.2. Around a third of the PM_{2.5} emitted in London comes from road transport, with a large proportion also coming from construction, wood burning and commercial cooking. Efforts to reduce PM_{2.5} from transport and construction sources have been successful with the recent expansion of the Ultra Low Emission Zone and the tightening of standards for the Non-Road Mobile Machinery Low Emission Zone. In 2016, the whole of London exceeded the previous WHO guideline limit for PM_{2.5} of 10 µg/m³. There are now 1.1 million Londoners living in areas below the 10 µg/m³ limit (LAEI 2019). However, with the WHO guideline limit for PM_{2.5} reducing to 5 µg/m³, there is still much work to be done to ensure Londoners can breathe clean air.
- 1.3. A recent King's College London study indicates that biomass wood burning accounts for between 23 and 31 per cent of the urban derived PM_{2.5} in London. Addressing this source is therefore crucial in achieving the London Environment Strategy aim of meeting the original WHO recommended limit (and now WHO interim target) of 10 µg/m³ for PM_{2.5} by 2030.
- 1.4. At the start of 2021 the GLA established a local authority wood burning working group to work more closely with boroughs to raise awareness of the impacts of wood-burning and to reduce emissions from the combustion of solid fuels.
- 1.5. In recent months the GLA has been working with Impact on Urban Health and Kantar to inform the development of a strategy aimed at shifting public behaviour to reduce the negative health impacts associated with woodburning. GLA officers have co-created a series of creative messaging platforms and explored these with the public in a series of focus groups. The next phase of work involves creating and testing campaign materials which will inform a London-wide communications campaign in Autumn 2022.
- 1.6. The GLA have been working with Global Action Plan (GAP) who are launching the first Clean Air Night on 24 January 2024. This is a sister campaign to Clean Air Day. The objectives of the Clean Air Night campaign are to build public awareness of the impacts of wood burning on public health. GAP is leading a nation-wide campaign, funded by Hertfordshire Council.
- 1.7. The GLA is looking to contribute £30,000 as grant funding to support GAP's delivery of Clean Air Night. This will be to specifically support delivery of the marketing and communications strategy as part of a London-wide campaign. It will also support the nation-wide campaign, from which London will also benefit.
- 1.8. GLA officers are therefore seeking approval to spend up to £30,000 from the 2023-2024 Air Quality budget to support a London-wide communications campaign as part of Clean Air Night in January 2024. £25,000 to support wood burning communications was approved as part of MD2985 which has been carried over from last financial year. The additional £5k of funding is provided through FY 23/24 budgets, under MD3139.

2. Objectives and expected outcomes

- 2.1 The objective of this project is to shift public behaviour to reduce the negative health impacts of air pollution associated with indoor burning using woodstoves or open fireplaces and consequently to achieve a reduction in PM_{2.5} emissions from domestic wood-burning.
- 2.2 Specifically, the outcomes of the project are to:
- improve levels of public understanding and knowledge that domestic burning creates air pollution and harms health;
 - increase the number of local authorities, public sector bodies, businesses, schools and individuals communicating effectively and confidently on the issue; and
 - increase the conversation and coverage in the media and among other cultural influencers, on the health harms of domestic burning

3. Equality comments

- 3.1. The Mayor, GLA and TfL are subject to the “public sector equality duty” contained in s149 of the Equality Act 2010. This duty requires each body to have due regard to three outcomes when exercising their functions: (1) the need to eliminate unlawful discrimination, harassment and victimisation;¹ (2) to advance equality of opportunity between those who share a protected characteristic¹ and those who do not; and (3) to foster good relations between.
- 3.2. There is currently significant exposure of the London population to air pollution. Recent monitoring results show that in 2019 all of London exceeds the new WHO guidance limit of 5 µg/m³ for PM_{2.5}.
- 3.3. Populations living in the most deprived areas are on average currently more exposed to poor air quality than those in less deprived areas. For PM_{2.5}, the most deprived areas had an annual average concentration 0.7 µg/m³ in 2019, six per cent higher than the least deprived.
- 3.4. Data taken from the GLA database of Energy Performance Certificate records, which contains energy use and efficiency information for 1,326,715 properties in London, show that over 1,200 households in London rely on solid fuel appliances for their primary source of heating and over 170,000 properties in the database have one or more open fireplaces. By raising awareness of the health impacts of wood burning and by shifting public behaviour to reduce the prevalence of wood burning activity, we can reduce the personal pollution exposure of wood burner users and contribute to improving air quality in London. A report by Aether showed that while everyone will benefit from improved air quality, those living in the most deprived areas would benefit the most on average.
- 3.5. However, we are conscious that the campaign should not shame those on low-incomes who solely rely on solid fuel appliances for heating. We have raised this with GAP and it will be a consideration in any marketing materials. They have emphasised that communications will target Londoners burning wood as a secondary heat source (who are most likely to be in affluent areas) and Londoners in higher social groups in urban areas, who are more likely to be looking to purchase a wood burner.

4. Other considerations

Risks and issues

¹ The protected characteristics covered by section 149 are: age; disability; gender reassignment; pregnancy and maternity; race; sex; religion or belief; and sexual orientation, and in certain circumstances civil partnership or marriage. Compliance with the PSED may involve, in particular, removing or minimising any disadvantage suffered by those who share a relevant protected characteristic, taking steps to meet the needs of such people and encouraging them to participate in public life or in any other activity where their participation is disproportionately low, including tackling prejudice and promoting understanding.

- 4.1. At this stage details are limited as to the content and delivery of the London wide targeted behaviour change and awareness campaign. GAP will work with us to develop the communications plan, and we will specifically work together on the purpose and content of planned media and public engagement activities. Previous research and strategy will inform this campaign, and the messages have been tested. We are establishing an internal steering group with colleagues from marketing and communications to ensure that any messaging aligns with GLA's position.
- 4.2. There could be sensitivities around the GLA telling Londoners which fuels to use during a year of high energy prices and given the wider cost of living crisis. By using messaging informed from previous research, focus groups and creative testing, we can ensure the messaging is appropriate and does not alienate Londoners. The purpose of this campaign is to build awareness of the health impacts of woodburning, and not telling people to stop burning wood.

Links to Mayoral Strategies and priorities

London Environment Strategy

- 4.3. The Mayor's London Environment Strategy prioritises reaching legal air pollutant levels as soon as possible by the most effective route through a number of proposals. These proposals include aiming to reduce emissions by revitalising smoke control areas, address wood burner emissions through a new fit-for-purpose testing regime and working with government and other partners to seek reductions in emissions from wood and other solid fuel burning in London.
- 4.4. Proposal 4.2.4.b states:

"The Mayor will work with the government to achieve full legal compliance with UK and EU legal limits as soon as possible. Comprehensive and coordinated action is needed at a national level to achieve legal limits as quickly and effectively as possible. The Mayor calls on the Government:

- *to revitalise smoke control zones by making it easier to declare them, strengthening and bringing up to date local authority enforcement powers and conferring the ability to create zero emission zones where no combustion is allowed on certain, time limited occasions. This should include new powers to require appropriate abatement of significant combustion related sources of PM2.5 in London*
- *address wood burner emissions through a new fit-for-purpose testing regime and information on appropriate technology/ fuels for smoke control zones at point of sale as well as new powers for the Mayor to set tighter minimum emission standards for wood burning stoves sold in London (for example, eco-design standard), or other standards based on contemporary understanding of pollutants such as PM2.5, rather than "dark smoke" or "grit and dust".*

- 4.5. Proposal 4.3.3.c states:

"The Mayor, working with London's boroughs and other partners, will seek to reduce emissions from wood and other solid fuel burning in London".

Mayor's Equality, Diversity and Inclusion Strategy

- 4.6. The Mayor's Equality, Diversity and Inclusion Strategy sets out how he will work to create a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential.

Objective 4 states:

"Improve Londoners' air quality and access to green space and lower the city's carbon emissions so that inequalities in exposure to harmful pollution and climate risks are reduced."

Objective 5 states:

“To ensure that investment in London’s high streets is delivered in a way that can benefit the most deprived parts of London and can meet the expressed priorities of society’s most marginalised or underrepresented groups.”

Conflicts of interest

- 4.7. There are no known conflicts to declare regarding those involved in the drafting or clearance of this form.

5. Financial comments

- 5.1 Approval is sought for expenditure of up to £30,000 to contribute to the Clean Air Night campaign led by Global Action Plan.
- 5.2 This expenditure will be funded from the Air Quality programme budget within the Mayor’s approved budget for 2023-24.
- 5.3 All expenditure will be incurred within the 2023-24 financial year.

6. Planned delivery approach and next steps

- 6.1. Key milestones for the transfer of the budget are set out below

Activity	Timeline
Complete Grant funding agreement	November 2023
Secure digital advertising and PR marketing assets	December 2023
Deliver Clean Air Night Campaign	January 2024

Appendices and supporting papers:

None

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Oliver Palethorpe has drafted this report in accordance with GLA procedures and confirms the following:

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 27 November 2023.

✓

ASSISTANT DIRECTOR FINANCIAL SERVICES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:

Ana Eastcott

Date:

13/12/2023