

GREATER LONDON AUTHORITY

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2740

Clean Air Night 2025

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. 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 also tackle non-transport sources of PM_{2.5}. The 2019 London Atmospheric Emissions Inventory (the most recent data) shows that 19 per cent of London's particulate matter pollution can be attributed to domestic wood burning.

The GLA supported the first Clear Air Night (CAN) in January 2024. A post-campaign survey found that 28 per cent of the London public had heard of CAN; and 37 per cent were aware of the health harms of wood burning. Officers have been in discussions with Global Action Plan (GAP) to support the second CAN in January 2025. GAP will be delivering a nation-wide campaign, part-funded by Impact on Urban Health; Hertfordshire County Council; and the communications agency, Dentsu.

The objective of this year's CAN campaign is 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, the sister campaign to CAN. 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. It will consequently seek to reduce PM_{2.5} emissions from domestic wood-burning.

This decision seeks approval for expenditure, against the Air Quality budget, to contribute £45,000 to support CAN in 2025. This will be to specifically support delivery of GAP's marketing and communications strategy, as part of a London-wide campaign.

Decision:

That the Assistant Director of Transport, Infrastructure and Connectivity approves expenditure of up to £45,000, from the 2024-25 Air Quality budget to Global Action Plan to support a communication and marketing campaign for Clean Air Night on 22 January 2025.

AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT

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 –
Transport, Infrastructure and
Connectivity

Signature:



Date:

16/12/2024

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 Londoners' health. We estimate that, in 2019, there were between 3,600 and 4,100 premature deaths attributable to air pollution. Based on current evidence, PM_{2.5} is understood to be the air pollutant with 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, the World Health Organization (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. A large proportion comes 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 1.1m Londoners living in areas below the 10 µg/m³ limit (London Atmospheric Emissions Inventory, 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 study by King's College London indicates that biomass wood-burning accounts for between 23 and 31 per cent of London's urban-derived PM_{2.5}. Addressing this source is therefore crucial in achieving the London Environment Strategy aim of meeting the original WHO-recommended limit (now the WHO interim target) of 10 µg/m³ for PM_{2.5} by 2030.
- 1.4. At the start of 2021, the GLA established a borough wood-burning working group. This group was set up to work more closely with London boroughs to raise awareness of the impacts of wood-burning, and to reduce emissions from the combustion of solid fuels.
- 1.5. Through the Mayor's Air Quality Fund, the GLA is funding the [London Wood Burning Project](#) (LWBP) to create a London-wide training scheme. This develops training assets for borough officers, to help them enforce smoke-control areas. It is also building on previous project success to reduce wood-burning emissions. The GLA is currently working with the LWBP to discuss what messaging and materials will be promoted this winter.
- 1.6. Global Action Plan (GAP) is delivering Clean Air Night (CAN) on 22 January 2025. The objective of the CAN campaign is 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, the sister campaign to CAN. 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. It will consequently seek to reduce PM_{2.5} emissions from domestic wood-burning.
- 1.7. GAP is delivering a nationwide campaign, part-funded by Impact on Urban Health; Hertfordshire County Council; and the communications agency, Dentsu. The GLA is looking to contribute £45,000 as grant funding to support GAP's delivery of CAN. This will specifically support delivery of the marketing and communications strategy, as part of a London-wide campaign.
- 1.8. GLA officers are therefore seeking approval to spend up to £45,000, from the Air Quality budget, to support GAP's delivery of CAN in 2025. The £45,000 is provided through Air Quality budgets for the 2024-25 financial year.

2. Objectives and expected outcomes

- 2.1. The project's objectives are 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 reduce PM_{2.5} emissions from domestic wood-burning.
- 2.2. The objectives will be achieved via a marketing and communications strategy, as part of a London-wide campaign for CAN. This includes developing campaign materials; mobilising stakeholders in London; implementing digital advertising; and producing a London-focused media story.
- 2.3. The specific outcomes of the project are expected to be:
 - improved levels of public understanding and knowledge that domestic burning creates air pollution and harms health
 - more local authorities, public-sector bodies, businesses, schools and individuals communicating effectively and confidently on the issue
 - increased conversation and coverage in the media, and among other cultural influencers, on the health harms of domestic burning.

3. Equality comments

- 3.1. The GLA and other public authorities must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and to advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not, under section 149 of the Equality Act 2010. This involves: having due regard to the need to remove or minimise any disadvantage suffered by those who share a relevant protected characteristic; taking steps to meet the different needs of such people; and encouraging them to participate in public life or in any other activity where their participation is disproportionately low.
- 3.2. The protected characteristics and groups are: age, disability, gender reassignment, pregnancy and maternity, race, sex, religion or belief, sexual orientation and marriage/civil partnership status. Compliance with the Equality Act 2010 may involve treating people with a protected characteristic more favourably than those without one. The duty must be exercised with an open mind, and at the time a decision is taken in the exercise of the GLA's functions. Conscientious regard must be had that is appropriate in all circumstances.
- 3.3. In June 2023, the GLA published updated analysis on exposure to air pollution. This showed not only that pollution has huge health impacts, but also that these fall disproportionately on: the most vulnerable; more deprived people; and Black, Asian and Minority Ethnic communities. It also established that those who contribute the least to poor air quality suffer the most from it. This means that improving air quality is fundamentally about tackling social injustice and health inequalities.
- 3.4. 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 of 0.7 µg/m₃ in 2019. This is 6 per cent higher than the least deprived.
- 3.5. 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 London households rely on solid fuel appliances for their primary source of heating. It also shows that over 170,000 properties have one or more open fireplaces. By raising awareness of the health impacts of wood burning, and by shifting public behaviour to reduce wood-burning activity, we can reduce the personal pollution exposure of those using wood burners; and we can 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.

3.6. However, we are conscious that the campaign should not target those on low incomes who rely solely on solid fuel appliances for heating. We will work with GAP to ensure any marketing materials take this into consideration. GAP has emphasised that communications will target: Londoners who are 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 buy a wood burner.

4. Other considerations

Risks and issues

4.1. The key risks and issues, and their mitigating actions, are outlined in the table below.

Risk description	Likelihood	Impact	Mitigating action
Messaging is not appropriate for a public body	Low	Medium	GAP will work with us to develop the communications plan. We will specifically work together on the purpose and content of planned media and public engagement activities. An internal steering group, with colleagues from marketing and communications, will ensure the messaging is appropriate.
Messaging isn't effective and does not reflect current concerns (e.g. cost-of-living crisis)	Low	Low	By using messaging informed from previous research, focus groups and creative testing, we can ensure the messaging is appropriate and does not alienate Londoners – especially during a year of high energy prices, and given the wider cost-of-living crisis. The campaign aims to build awareness of the health impacts of wood burning, rather than telling people to stop burning wood.

Links to Mayoral strategies and priorities

4.2. This programme will contribute towards delivering the Mayor's London Environment Strategy; the Equality, Diversion and Inclusion Strategy; and the London Plan. It will help deliver on the following policies.

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 several proposals. These include: revitalising smoke-control areas; addressing wood-burner emissions through a new fit-for-purpose testing regime; and working with the government, and other partners, to reduce emissions from wood and other solid fuel-burning in London.

4.4. Proposal 4.2.4b 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 take the following actions:

- 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 PM_{2.5} 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 PM_{2.5}, rather than ‘dark smoke’ or ‘grit and dust’.”

4.5. Proposal 4.3.3c 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.”

The 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 is as follows:

“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.”

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 £45,000 to contribute to the CAN campaign delivered by GAP.
- 5.2. This expenditure will be funded from the Air Quality Programme budget within the Mayor’s approved budget for 2024-25.
- 5.3. All expenditure will be incurred within 2024-25.

6. Planned delivery approach and next steps

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

Activity	Timeline
Delivery start date	December 2024
Secure digital advertising and marketing assets	December 2024 – January 2025
Deliver CAN campaign	January 2025
Evaluation of campaign and delivery end date	February 2025

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 be published either 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 the 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:

Sylvia Moffatt has drafted this report in accordance with GLA procedures and confirms the following:

✓

Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 16 December 2024.

✓

ASSISTANT DIRECTOR, FINANCIAL SERVICES:

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

Signature:

Sara Eastcott

Date:

16/12/2024