

# Climate Change and Ecology Policy and Accountability Committee

## Agenda

Tuesday 1 July 2025 at 7.00 pm

145 King Street (Ground Floor), Hammersmith, W6 9XY

Watch the meeting live:

<https://www.youtube.com/hammersmithandfulham>

### MEMBERSHIP

Administration	Opposition
Councillor Nicole Trehy (Chair) Councillor Callum Nimmo Councillor Trey Campbell-Simon Councillor Omid Miri	Councillor Amanda Lloyd-Harris

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**Note:** This meeting is open to members of the public. A loop system for hearing impairment is provided, along with disabled access to the building.

Date Issued: 18 June 2025

# Climate Change and Ecology Policy and Accountability Committee

## Agenda

1 July 2025

<u>Item</u>		<u>Pages</u>
<b>1. APOLOGIES FOR ABSENCE</b>		
<b>2. DECLARATIONS OF INTEREST</b>	<p>If a Councillor has a disclosable pecuniary interest in a particular item, whether or not it is entered in the Authority's register of interests, or any other significant interest which they consider should be declared in the public interest, they should declare the existence and, unless it is a sensitive interest as defined in the Member Code of Conduct, the nature of the interest at the commencement of the consideration of that item or as soon as it becomes apparent.</p> <p>Where Members of the public are not allowed to be in attendance and speak, then the Councillor with a disclosable pecuniary interest should withdraw from the meeting whilst the matter is under consideration. Councillors who have declared other significant interests should also withdraw from the meeting if they consider their continued participation in the matter would not be reasonable in the circumstances and may give rise to a perception of a conflict of interest.</p> <p>Councillors are not obliged to withdraw from the meeting where a dispensation to that effect has been obtained from the Standards Committee.</p>	
<b>3. MINUTES</b>	<p>To approve the minutes of the previous meeting and note any outstanding actions.</p>	4 - 12
<b>4. TACKLING AIR POLLUTION IN HAMMERSMITH &amp; FULHAM</b>	<p>This report and accompanying presentation provide an overview of the Council's numerous workstreams aimed at improving air quality across the borough.</p>	13 - 55
<b>5. DATES OF FUTURE MEETINGS</b>	<p>To note the dates of future meetings:</p> <ul style="list-style-type: none"><li>• 24<sup>th</sup> September 2025</li><li>• 2<sup>nd</sup> February 2025</li><li>• 21<sup>st</sup> April 2025</li></ul>	

## **6. WORK PROGRAMME**

The Committee is asked to consider items for inclusion in its work programme.

London Borough of Hammersmith & Fulham

## Climate Change and Ecology Policy and Accountability Committee Minutes



Wednesday 7 May 2025

### **PRESENT**

**Committee members:** Councillors Nicole Trehy (Chair), Stala Antoniades, Laura Janes, Callum Nimmo and Jose Afonso

**Other Councillors:** Councillors Wesley Harcourt (Cabinet Member for Climate Change and Ecology) and Sharon Holder (Cabinet Member for Public Realm)

**Officers:** Hinesh Mehta (Assistant Director Climate Change), Bram Kainth (Executive Director of Place), John Galsworthy (Director of Climate Change and Transport), Ben Kennedy (Senior Service Manager – Climate Change and Transport), Philippa Robb (Senior Smarter Transport Officer) and Amrita White (Committee Coordinator)

### **External:**

Sam Bailey (YoGo)

James Taylor (Zip Car)

Douglas Leroy (OurBikes)

Casey Abaraonye (Chair, Hammersmith and Fulham Cycling)

14 members of the public were in attendance

### **1. APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillor Callum Nimmo

### **2. DECLARATIONS OF INTEREST**

There were no declarations of interest.

### **3. MINUTES**



**RESOLVED:**

That the minutes of the meeting held on 28<sup>th</sup> January 2025 were agreed as an accurate record.

**4. ACTIVE TRAVEL IN HAMMERSMITH & FULHAM**

Ben Kennedy (Senior Service Manager – Climate Change and Transport) gave a presentation on the Council's Net Zero Transport Strategy and Active Travel. He showed slides that highlighted the following key aspects:

- Net Zero Transport Strategy (SWOT analysis, vision, objectives, challenges, issues, priorities)
- That a separate Active Travel Strategy would be developed as a subsidiary document to the Transport Strategy. This would look at walking, cycling and wheeling.
- The Council would continue engagement with the Inclusive Environment Disabled Residents Team.
- The role active travel played in addressing the many transport challenges facing the H&F.
- The context for active travel in the borough and how we compared to the rest of London and neighbouring boroughs. Including active travel initiatives and schemes Hammersmith and Fulham (H&F) was currently delivering.

The Chair thanked officers for their presentation and asked what actions were being taken to improve pedestrian safety. Ben Kennedy explained that officers were developing a road danger reduction plan, which would involve a detailed analysis of accident data, to understand where, to who and why incidents were occurring. Allowing targeted interventions to address key safety issues.

Councillor Laura Janes asked a follow up question, requesting more information on the main causes of fatalities and the affected groups. In response Ben Kennedy noted that many pedestrian deaths involved older individuals, often occurring at crossings, and were mainly caused by cars and larger vehicles. He added that further investigation was needed to understand the underlying factors. Councillor Laura Janes emphasised that this was an important priority for the Council to better understand the causes and explore ways to protect older residents.

Councillor Stala Antoniadou, in response to concerns raised about safety, requested further clarification regarding injuries associated with the use of electric bikes. Ben Kennedy noted that one of the main challenges relating to e-bikes was their classification as e-scooters or other vehicle types, which made it more difficult to gather specific data. As part of the danger reduction plan, officers would investigate this further to obtain accurate information.

He added that anecdotal evidence suggested that accidents involving e-bikes were occurring. Furthermore, officers had secured funding from Transport for London (TfL) to implement a behaviour change campaign aimed at raising awareness of the safety challenges and addressing related issues.

The Chair raised a query, regarding floating bus stops and cycle lanes, asking whether there had been an increase in accidents as a result of these measures, or if such reports were anecdotal. In response Ben Kennedy responded that it was difficult to determine the impact due to the delay in the data received from the Police, which was 18 months out of date. He noted that there were specific junctions, such as River Court and King Street, where issues had been identified, and interventions had been implemented. These measures had improved the situation and led to a reduction in collision. However, he acknowledged that further work was needed to investigate this matter in more detail.

**Action: Ben Kennedy**

Councillor Jose Afonso raised a series of questions. He began by expressing his support for the Council's focus on cycle safety. However, he noted concerns that the Cycleway 9 lane on King Street appeared to be more dangerous than the previous cycle infrastructure it replaced. He also highlighted safety concerns regarding the parklets installed on Wandsworth Bridge Road, which posed as a hazard to cyclists according to the Council's safety auditors. He queried why the Council continued to implement such schemes despite these concerns. In response John Galsworthy (Director of Climate Change and Transport) explained that the increase in cycling incidents was largely due to a rise in the overall number of cycling trips. He noted that when safety audits were conducted, officers assessed whether the proposed design offered an improvement over the existing infrastructure. The key consideration was whether the new scheme provided a safer environment than what was previously in place.

Councillor Jose Afonso referring to the Holland Park Roundabout, asked what engagement had taken place at officer or Cabinet level with the Royal Borough of Kensington and Chelsea (RBKC), given that the scheme extended into their junction. Ben Kennedy responded that the scheme was led, sponsored and funded by TfL, who were responsible for carrying out consultation and engagement. He noted that officers would encourage TfL to engage directly with the Royal Borough of Kensington and Chelsea as part of their process.

Councillor Jose Afonso raised a question regarding the Clean Air Neighbourhoods scheme, specifically asking why a high number of fines were being cancelled, John Galsworthy explained that the system automatically issued fines when a vehicle was detected by the cameras. However, residents and registered visitors were entitled to exemptions. Once their exemption status was verified, the Council cancelled the fine accordingly. He added that this was a normal part of how the system operated.

Councillor Jose Afonso noted that according to TfL statistics, car ownership in the borough had increased by 10% over the past eight years, in contrast to a 2% decrease across the London average. He questioned how this trend aligned with the Council's Climate Policy. Ben Kennedy responded that the increase in car ownership could partly be attributed to population growth and the development of new dwellings within the borough. He acknowledged the need for further analysis in this area and noted that officers would explore these issues in more detail as part of the development of the new Transport Strategy, with the aim of addressing them through future schemes.

Douglas Leroy (OurBike), gave a short presentation on the OurBike cargo bike sharing scheme and highlighted the following key aspects:

- This was the largest electric cargos bike sharing scheme, offering a socially sensitive, cheap and sustainable alternative to car trips.
- 64% of the users replaced car trips with OurBike.
- Where to find the scheme and how it worked.
- This was a back-back model which meant the bike must always be returned to the location it was collected from.
- Hammersmith and Fulham ourBike statistics:
  - +1,300 kilometres ridden with the OurBike fleet in the past year
  - +600 hours of bookings in the past year
  - 46% of users were women

The Chair asked how the Council could support the expansion of electric cargo bikes, particularly in the North of the borough. Casey Abaraonye (Chair, Hammersmith and Fulham Cycling) outlined the benefits of electric cargo bikes, highlighting the convenience they offered. He expressed willingness to help support the schemes expansion in the North of the borough. Douglas Leroy added that there was already a strong community of OurBike users and several enthusiastic potential hosts. It was noted that both residents and businesses were eligible to apply to become hosts, and that further attention would be given to expanding the scheme in the Northern area of the borough.

James Taylor (Zipcar) gave a short presentation on Zipcar, a scheme designed to promote car clubs within the borough. It was noted that Zipcar was the UK's largest car club with +600,000 members (approx. 22,5000 members were from the borough). He showed slides that outlined the benefits of car sharing. This included less car usage, reduced congestion, changed behaviour and improved air quality. Furthermore, Zipcar enabled trips that couldn't have happened without a car and made access to electric vehicles easier and affordable for all. An overview was also provided on ways that the Council could support car club growth.

Councillor Stala Antoniadis asked about the level of uptake among local businesses using Zipcar. In response James Taylor noted that Zipcar currently served around 13000 businesses in London, many of which were sole traders or start-ups. Supporting these types of businesses was a core part of Zipcar's mission. He added that Zipcar was keen to work with local authorities to identify businesses already engaged with the Council, where the service could offer additional support.

Councillor Laura Janes asked whether Zipcar had any clients from local or public authorities. James Taylor responded that some of their larger clients included Croydon and Brent Councils. He added that Zipcar was keen to work with local authorities, as their direct use of the service helped demonstrate a strong commitment to promoting car sharing initiatives.

Councillor Jose Afonso requested further clarification on the distribution of Zipcar membership across Hammersmith and Fulham specifically, whether it was concentrated in certain areas or more evenly spread. James Taylor noted that while he did not have the exact figures at hand, membership appeared to be well

distributed across the borough. He added that there was a clear opportunity for growth in the Northern area.

Sam Bailey (YoGo), gave a presentation on the insights from the Hammersmith and Fulham Yo-Go scheme and highlighted the following key aspects:

- Yo-Go's mission was to make cities quieter, safer and friendlier for everyone.
- Buggies had been in operation in the borough since 2024, with over 1500 trips completed successfully.
- A generational shift away from private cars in urban areas had been complemented since 2020 by explosive growth in shared mobility.
- Residents of cities desired alternatives given the 'hassle' of car ownership, worsening congestion and negative environment.
- Mini mobility could support this shift and enable a wide variety of use cases for local residents.
- Yo-Go had developed an in-house app for residents to access buggies and pay for rides.
- Yo-Go had achieved a new reduction in carbon emissions of 74% from modal shift.

Councillor Stala Antoniadis noted that this was an excellent idea and enquired about the ease of booking a Yo-Go buggy. In response Sam Bailey noted that there were currently 10 vehicles available with plans to increase the number to between 70-80 across the borough within the next 6 to 9 months. He explained that achieving greater vehicle density was essential, as the service currently received around 400 app searches per day, far exceeding the available supply.

Casey Abaraonye (Chair, Hammersmith and Fulham Cycling) gave a verbal presentation on transforming the school run. He emphasised the significant responsibility we held in safeguarding the younger generation, as it was their futures being shaped. Drawing on recent reports, he highlighted a notable trend: while car sales overall were rising, private car ownership particularly among younger people was declining. This generational shift presented an opportunity to reshape long standing travel habits. He highlighted the importance of school streets and the way children travelled to school and advocated for limiting vehicle access in this area to encourage active travel methods such as walking and cycling. Embedding these habits early in life, he argued could help establish long term behaviour changes, leading to reduced reliance on cars in the future.

### **Resident questions**

A resident expressed appreciation for the discussions around street safety, but voiced concerns about the lack of detailed investigation into safety data, specifically who was causing harm, where incidents were occurring and who was being affected. She emphasised the importance of including disabled people in conversations around active travel, noting that their needs were often overlooked. Highlighting the need to examine collision data more closely, she urged the Council to act more swiftly in delivering safer infrastructure.

Additionally, she called for improved street safety for all users and asked whether there was a plan to ensure that proposed cycleways would be properly segregated and safe for everyone.

Ben Kennedy acknowledged the resident's concerns regarding data collection and agreed that more comprehensive data needed to be gathered. He explained that officers were in the early stages of analysing a substantial volume of data but explained that the work was progressing as quickly as possible. It was noted that accidents and collisions would be prioritised and that efforts to address these issues would be fast tracked. Additionally, he added that as part of the Council's Transport Strategy officers would be establishing key principles and outcomes and identifying priority routes. Public consultation was scheduled to take place in autumn, with final plans expected to be published in 2026, depending on the feedback received. The Chair requested that officers to return to present an update on the Transport Strategy to the Committee in April 2026.

**Action: Ben Kennedy**

A resident enquired about how the Council intended to address the increasing number of SUVs in the borough, highlighting the environmental and social impacts associated with them. In response Ben Kennedy noted that the Council currently operated an emissions-based parking charge system. He added that while only a few local authorities were beginning to explore policies targeting vehicle size and specific impact of SUV's, this was an area that could be reviewed as part of the ongoing Transport Strategy work.

A resident asked what could be done to improve cyclist safety on Kings Road. In response Ben Kennedy explained that as part of the ongoing review of the Transport Strategy, officers would be examining key corridors and areas of high cycling demand to identify the most appropriate interventions for each route.

The resident then asked a follow up question related to the 'transforming the school run presentation'. She emphasised that children were our future, and that the Council should focus on increasing street awareness and knowledge among young people. She suggested it would be valuable for children to learn the Highway Code by the end of primary school to become safe pedestrians and cyclists. She asked how the Council could encourage this across schools.

Philippa Robb (Senior Smarter Transport Officer) explained that the Council currently delivered Bikeability training in primary schools, with many of its outcomes aligned with the Highway Code. The programme was designed to equip children with the skills to cycle safely and independently on quiet roads. She also highlighted that this borough was the only one in London that consistently delivered Bikeability training in secondary schools across the borough throughout the academic year.

The resident asked what percentage of each year group participated in the training. Philippa Robb responded that in primary schools where the programme was delivered it typically reached 100% of either year 5 or year 6 pupils. In secondary schools due to the larger cohort sizes the training was delivered to approximately 50 pupils per year group.

A resident raised concerns about safety, particularly regarding exposure to nitrous oxide, air pollution, and other environmental pollutants. He noted that a key piece of missing data was the estimated reduction in life expectancy and years of healthy life lost due to prolonged exposure to pollutants, as well as the potential years gained through active travel. He asked whether this information was currently available and if it could be incorporated into future discussions. In response John Galsworthy explained that the Council collaborated with the NHS Trust and Imperial College on this issue. While the data in this area was limited due to the complexity of the subject, officers were actively working to explore and improve understanding.

Ben Kennedy added that the Transport Strategy, Active Travel and Air Quality Teams were now being brought together under the same service. This integration was enabling closer collaboration, and a stronger focus on health impacts. He confirmed that efforts were being made to ensure data on the health implications of air quality and active travel was captured and embedded in the strategy moving forward.

**Action: Ben Kennedy**

A resident requested further clarification regarding the maintenance of cycle infrastructure in the borough, highlighting concerns about the condition of the Uxbridge Road cycle lane. The resident noted that the lane was in a poor and potentially unsafe state, with at least 20 protective wands missing. This had allowed vehicles to park in the cycle lane, creating significant safety risks for cyclists. Councillor Wesley Harcourt (Cabinet Member for Climate Change and Ecology) responded by acknowledging the concerns raised about the condition of the Uxbridge Road cycle lane, noting that he regularly visited the area. He recognised the importance of maintaining the infrastructure and emphasised the significant effort initially invested by the Council to ensure proper segregation between cyclists and general traffic. He also noted that maintenance was a key priority, but highlighted those delays had been partly due to funding challenges and disagreements over design plans.

John Galsworthy added that the Uxbridge Road cycle lanes were currently under consideration for future investments by TfL. However, this funding may not be allocated to the Council until 2027/28. In the meantime, any enhancements would be limited to interim measures. Officers noted that they would explore options to replace the missing protective wands as part of these short-term improvements.

**Action: John Galsworthy**

A resident asked for further clarification to be provided on the Council's vision for active travel at a political level, including more detail on the strategic objectives. He expressed concern that the current strategy did not convey a strong sense of urgency and asked for information on the Council's timeline and key milestones for delivery. In response Councillor Wesley Harcourt acknowledged that active travel was a significant and wide-ranging topic. He offered to attend a meeting of the Climate Action Group to discuss the matter in more detail. He outlined the Council's commitment to becoming Net Carbon Zero by 2030, stating that all actions were guided by this vision. This ambition was closely aligned with broader Council

priorities, including public health, climate action, and improving air quality. It was noted that the motion to become net zero was passed in 2019, and the Council was now approximately halfway through the delivery timeline. At this stage he emphasised that the focus must shift from strategy development to implementation at pace.

Casey Abaraonye (Chair, Hammersmith and Fulham Cycling) asked what could be done to accelerate progress towards the Council's new zero goals. Councillor Wesley Harcourt agreed that the pace of delivery needed to increase if the Council was to meet its 2030 net zero target. He acknowledged the urgency of the situation but also highlighted several challenges currently facing the Council. These included funding, supply chain disruption affecting availability of materials and difficulties in securing tenders for certain projects. He reaffirmed the Council's commitment to progressing this work as effectively and efficiently as possible.

Ben Kennedy added that one of the most effective ways to accelerate progress was to involve the community as much as possible. He emphasised the importance of ensuring that residents were engaged and on board with the Council's plans. By adopting a co-production approach and actively seeking input and support from the community the Council could build greater consensus and streamline delivery.

A resident noted that she frequently travelled between Hammersmith and neighbouring boroughs and requested further clarification on how the Council was addressing accessibility within its active travel plans to ensure the needs of all residents. She emphasised the importance of designing infrastructure that benefitted everyone including those with differing mobility needs. In addition, she asked how the Council would ensure that meaningful representation of people with mobility challenges would be part of the Active Travel Working Group.

Ben Kennedy noted that the Active Travel Action Group was one of several stakeholder engagement groups the Council utilised. He explained that the Council was actively engaging and would continue to engage with disabled residents to ensure that accessibility was embedded in its transport planning. Regarding public transport accessibility, he clarified that this fell under the remit of TfL. However, Council officers worked closely with TfL to secure funding to improve accessibility on key services within the borough.

Councillor Sharon Holder added that the Council worked closely with co-production groups that included both disabled and non-disabled residents. These groups were responsible for reviewing and providing input on new services and policies, helping to ensure they were inclusive by design. She encouraged any disabled residents who were interested in getting involved to join these co-production groups.

The Chair concluded the meeting by summarising key actions and next steps:

- Officers to report back on the wider Transport strategy at a future meeting
- Officers to explore interim options for improving the condition and usability of the Uxbridge Road cycle lanes
- Encouragement for disabled residents to join co-production groups, ensuring that their voices were represented in the development of local services and infrastructure.

The Chair thanked all attended for their valuable contributions and emphasised the importance of active travel initiatives within the borough. The Chair also encouraged attendees to sign up to the Climate Connect newsletter to stay informed about the Council's ongoing work on climate action.

**RESOLVED:**

That the committee noted and commented on the report and presentations

**5. WORK PROGRAMME**

The Chair requested that any suggestions for future agenda items to submitted to her directly.

**6. DATE OF FUTURE MEETINGS**

It was noted that the next meeting would take place on 1<sup>st</sup> July 2025.

Meeting started: 7:02pm  
Meeting ended: 9:40pm

Chair .....

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**Report to:** Climate Change and Ecology Policy and Accountability Committee

**Date:** 1 July 2025

**Subject:** Tackling air pollution in Hammersmith & Fulham

**Report author:** Adam Webber, Air Quality Policy and Strategy Lead

**Responsible director:** Bram Kainth

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## SUMMARY

This report and accompanying presentation provide an overview of the Council's numerous workstreams aimed at improving air quality across the borough. Air pollution is the largest environmental risk to public health in the UK, with the adverse short- and long-term health impacts of pollution well understood. The Council has statutory duties related to air quality, and our work in this area also has strong synergies with our wider work on the climate and ecological emergency.

The first part of the report sets out the context of air pollution in Hammersmith & Fulham: pollution levels, sources of emissions and trends. It also summarises the health impacts of pollution, pollution as an inequalities issue, and the relationship between air pollution and the climate emergency and our Net Zero targets.

The second part of the report focuses on our approach to air pollution: our Air Quality Action Plan 2025-30, our ambitious commitment to meeting the World Health Organisation guidelines for pollution, and our Better Air Better Health partnership with key stakeholders Imperial College London and the Imperial College Healthcare NHS Trust.

Finally, the report looks at some of the key new areas of focus for the Council moving forward. This includes our approach to reducing emissions from outdoor burning, which was the topic of a recent paper to Cabinet.

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## RECOMMENDATIONS

1. For the committee to note and comment on the paper and the attached presentation.

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**Wards Affected:** (All)

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Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	Tackling air pollution will result in a cleaner, greener, healthier borough.
Creating a compassionate council	All residents across the Borough deserve the same opportunities to live in healthy and happy

	neighbourhoods. Tackling air pollution is a key component of our wider environmental work that will support our ambitions of being a net carbon zero borough by 2030.
Doing things with local residents, not to them	As well as consulting on our Air Quality Action Plan with residents, many of the policies and projects we're working on include strong elements of consultation and co-production.
Being ruthlessly financially efficient	Tackling air pollution will result in a healthier borough, with reduced associated healthcare costs.
Taking pride in H&F	Tackling air pollution will result in a cleaner, greener, healthier borough.
Rising to the challenge of the climate and ecological emergency	Tackling air pollution is a key component of our wider environmental work that will support our ambitions of being a net carbon zero borough by 2030. Whilst the health of residents is the primary driver of this proposal, this programme supports the Council's climate and ecological emergency commitments and supports our work to make our communities and environments more resilient.

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## Background Papers Used in Preparing This Report

None

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## DETAILED ANALYSIS

### Air Pollution in context

1. Air pollution is a complex mix of gases and particles of both natural and human origin. Our focus tends to be on two key types of pollutants: the gas nitrogen dioxide (NO<sub>2</sub> or NO<sub>x</sub>), and Particulate Matter, which is fine dust particles made up of a number of sources (with PM<sub>10</sub> and PM<sub>2.5</sub> the sizes of particulates we are most concerned with). Other pollutants such as sulphur dioxide and ground level ozone are also of concern. These pollutants are distinct from carbon dioxide and other greenhouse gas emissions that are the focus of our Net Zero work. The sources of air pollution emissions and carbon emissions are however often very similar.
2. According to Public Health England (PHE), poor air quality is the largest environmental risk to public health in the UK. Long term exposure to man-made air pollution in the UK has an estimated annual effect equivalent to 28,000-36,000 deaths. Air pollution can lead to a variety of health problems including cardiovascular disease and lung cancer<sup>1</sup>.
3. Air pollution is also an inequalities issue: PHE says that people at higher risk of negative health impact due to air pollution include older people (65 years and older), children, people with cardiovascular (heart) disease and/ or respiratory

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<sup>1</sup> [Health matters: air pollution, PHE](#)

(lung) disease, pregnant women, communities in areas of poor air quality, and poorer communities. PHE has also noted that “In 2010, the Environment Audit Committee considered that the cost of health impacts of air pollution was likely to exceed estimates of £8 to 20 billion”<sup>2</sup>.

4. Due to the main sources of pollution, London has the worst air quality in the UK. The level of population exposure to pollution is also highest within the capital. As a council, Hammersmith & Fulham is working towards Objective levels for pollutants set by national Government. The Council has also committed to an ambitious target of meeting World Health Organisation (WHO) guideline levels for air pollution by 2030, which are more stringent than our statutory requirements.
5. As part of our statutory duties as an Air Quality Management Area, air quality is monitored across the borough in real-time. We have a network of six air quality monitoring stations that meet the highest data standards. In addition, this is complemented by an extensive network of 60 ‘Breathe London’ air quality sensors, as well as a dense mesh network of Vortex pollution sensors.
6. Air pollution in H&F and across London is improving. Central London roadside levels of NO<sub>2</sub> have reduced by around 40% between 2019-24 (e.g. NO<sub>2</sub> has reduced by 38% over that period at our Hammersmith Town Centre monitoring station). Particulate Matter emissions are also reducing albeit at a slower rate, with construction emissions remaining the greatest source of PM in H&F (and elsewhere in London). However, there are no safe levels for pollutants, so reducing pollution as far as possible remains a council priority.
7. The sources of pollution vary between different pollutants. Historically for NO<sub>2</sub> there has been a rough split of around 60% transport emissions and 40% building emissions. However, in recent years transport emissions have been reducing at a far faster rate than building emissions, to the extent that building emissions now make up the largest single source of NO<sub>2</sub> emissions in the borough. For PM emissions, construction remains the largest source of emissions. The changing sources of emissions (due to policy interventions, technological change etc) are relevant to how we prioritise our work in order to maximise our impact.
8. Air pollution and carbon emissions are very different. However, many of the sources of pollution and carbon emissions are the same. Therefore, there are many synergies and co-benefits between our work on the climate emergency and on air pollution. Improving air quality across the borough will help reduce carbon emissions as well as improving the health and well-being of everyone who lives in, works in and visits our borough.

### **Our approach to tackling air pollution**

9. As part of our statutory duties, the Council has an Air Quality Action Plan (AQAP)<sup>3</sup>. The current 2025-30 version was signed off by Cabinet at the end of 2024, and contains 40 key themed actions across 7 priority areas, which are designated to us by the GLA:

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<sup>2</sup> [Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report](#)

<sup>3</sup> The AQAP 2025-30 can be viewed on our main webpage [Air quality | London Borough of Hammersmith & Fulham](#)

- Monitoring and other core statutory duties
  - Localised solutions
  - Emissions from developments and buildings
  - Public health and awareness raising
  - Delivery servicing and freight
  - Borough fleet actions
  - Cleaner transport
10. The actions in our Plan can be split into two key areas, addressing both systems change and behaviour change:
- Tackling the sources of pollution that the council can control – (e.g. our own properties and fleet, through our planning & transport policies, highways & maintenance.)
  - Raising residents’ and businesses’ awareness of what they can do to reduce their emissions and how to avoid exposing themselves to pollution.
11. These two priorities reflect that while we can act across a whole range of council activities to actively reduce pollution, there are many aspects of air pollution that are outside of the direct control of the council. This ranges from sources of pollution that are inside H&F but that we have no direct power over (e.g. bus and taxi emissions), to the fact that pollution is transboundary – pollution affecting us in H&F comes from not just the borough, but the rest of London, the UK, and further afield (e.g. multiple high pollution episodes in London in recent years have been the result of Saharan dust). As a result, it’s important that we raise awareness of pollution in our population to help people reduce their exposure to pollution.
12. Our approach also reflects efforts to tackle the inequalities aspect of pollution. On the one hand, because of the disproportionate impact of pollution generally, we know that all our work in this area will most benefit those most affected by pollution. However, we are also working to target interventions towards those who will benefit most. This includes programme such as School Streets Plus, which focuses not just on school streets but on other measures that can reduce the impact of pollution on children (such as green screens and mechanical ventilation). We are supporting the rollout of the awareness raising project Awair at GP surgeries and at H&F hospital sites, and much of the behaviour change pillar of our work is informed by using the right messages (and the right messengers) to communicate to our most at risk groups.
13. A key principle of our work that influences both the systems change and behaviour change pillars is collaboration and partnership working. In 2024 we entered a formal partnership with Imperial College London and the Imperial College Healthcare NHS Trust to bring together experts in local government, academia, and the health sector to tackle air pollution together. The Better Air Better Health partnership aims to raise the profile of pollution in the borough, deliver joint innovative and impactful projects, and allow each of the partners to achieve more than if they were working alone.

## **Priorities and summary of air quality workstreams**

14. Our Air Quality Action Plan 2025-30 contains actions across a huge range of activities and areas. Similar to our work on the wider Climate Emergency, actions directly or indirectly related to reducing pollution take place across almost every team in the Council. This table below summarises the key levers and challenges we have in tackling the main priority areas for the council.

15. It is worth noting the new challenge we are addressing from indoor pollution. This is a new workstream for many boroughs, and relevant as we spend up to 90% of our time indoors. Indoor pollution concerns pollution that both originates outside (and enters into buildings) and from indoor sources. Many of the same pollutants are of concern compared to outdoor pollution, but there are additional challenges indoors from VOCs (volatile organic compounds) and from traditionally well understood dangers such as carbon monoxide. H&F's 2025-30 Action Plan is the first time we have addressed indoor pollution in an air quality strategy document.

Theme	Levers	Challenges	Example AQAP Actions
<i>Building emissions</i>	Planning policy – including the forthcoming Local Plan  Carbon co-benefits  Strong existing council policies and strategies	Influencing building operations in-use is difficult  Slow timeframes on planning policy  Policy pivot from transport towards buildings	Baseline evidence gathering for the forthcoming Local Plan. This includes new policy on reducing dust emissions from construction sites.  Promoting a move towards all electric buildings through planning policy  Seek to fund next stage of Envimo, a Defra funded project looking at dust management on construction sites
<i>Transport emissions</i>	Parking policy  Infrastructure and urban realm – EV charging, cycling and walking infrastructure  Council's and contractors' fleets  Localised neighbourhood solutions	Emerging Transport Strategy  High political and financial implications to levers  Lack of direct control – lobbying and public affairs piece	Supporting active travel work throughout the borough  Implementing our School Streets Plus programme  Working on a green fleet policy for our own operations
<i>Indoor air quality</i>	Planning policy  Statutory powers on wood burning, permitted fuels etc  Strong community engagement and co-	New area of work – is the science / baseline data there  Difficulty of influencing peoples' behaviour in their own home	Establishing guidance for indoor air quality through planning  Working groups on commercial cooking with other central

	creation  Links to wider work on fuel poverty and energy efficiency		boroughs  Supporting any future elements of Wellhome and other indoor monitoring projects
<i>Behaviour change</i>	Strong relationship with partners – Better Air Better Health  Co-benefits of AQ action and health  Commissioned research, focus groups	Council comms has its limits  Need to get the messaging right  Translating the science  Quantifying the impacts	Future focus groups on Air Quality  Better Air Better Health proposals for branding, new website and publicity campaigns  Supporting the Awair pilot project

16. Earlier this year Cabinet approved a new workstream to look at prohibiting outdoor waste burning in the borough, potentially through a new byelaw. This policy would reduce harmful PM emissions, as well as increasing community resilience to risks of fires in hotter, dryer summers. The latest data for Hammersmith & Fulham shows that in 2019, 14.3% of the borough's particulate emissions for PM2.5 can be attributed to domestic wood burning. In London this figure was 17%. Domestic wood burning includes emissions from both indoor and outdoor sources: this includes emissions from indoor wood burning stoves, as well as outdoor fires. It is not currently possible to ascertain the precise split within this figure between household wood burning (such as from stoves) and outdoor fires.
17. While there is well established data on the impact of the air pollution produced by the burning of solid fuel on health, there has been less research on outdoor fires specifically. Work has tended to focus on wood burning as a wider source of emissions, particularly from indoor wood burning stoves in homes.
18. Officers are now putting together options for the timescales of this work. We will be highlighting the potential gaps in the evidence base for the policy and how we can address them. This policy has a number of features common in our work on air quality: identifying an issue, producing evidence-based policy, and future engagement with our communities on our proposals.

## LIST OF APPENDICES

**Appendix 1 – Presentation slide deck**

**Appendix 2 – Cabinet paper on 'Policy options for the boroughwide Prohibition of the Burning of Domestic Waste and Outdoor Fires in the London Borough of Hammersmith & Fulham'**



# Air Quality in Hammersmith & Fulham

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**Climate Change and Ecology Policy and Accountability Committee**

**1 July 2025**

**Adam Webber, Air Quality and Active Travel Lead**



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Pollution in H&F  
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Key levers and challenges  
Example policies and projects



01

# Air Pollution in context



*Photo of Cargo Bike as part of Parcels Not Pollution Scheme*

# What do we mean by air pollution

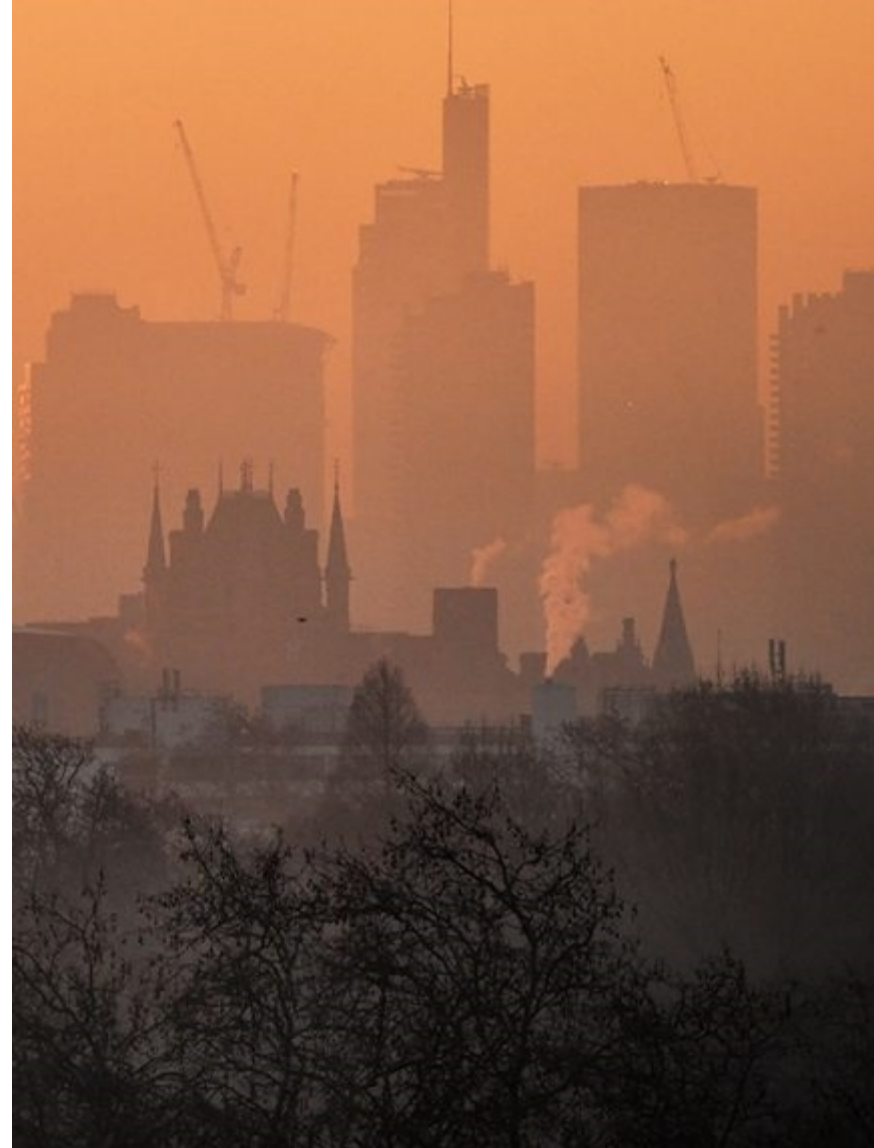
## *What air pollution is...*

- **Nitrogen dioxide**
- **Particulates**
- **Ozone**

## *... and what it isn't*

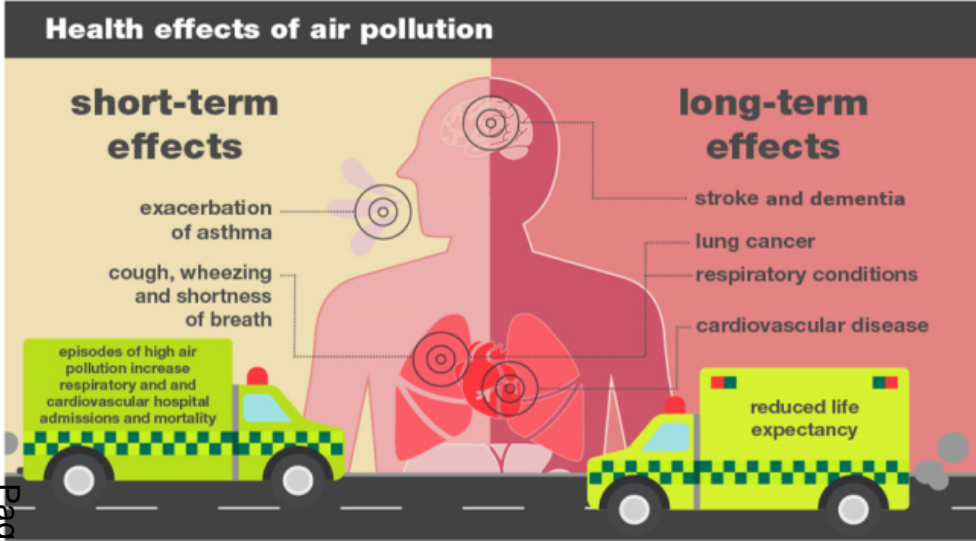
- **Carbon emissions**
- **Classic GHG emissions**

**Carbon and AQ emissions = two sides of the same coin**

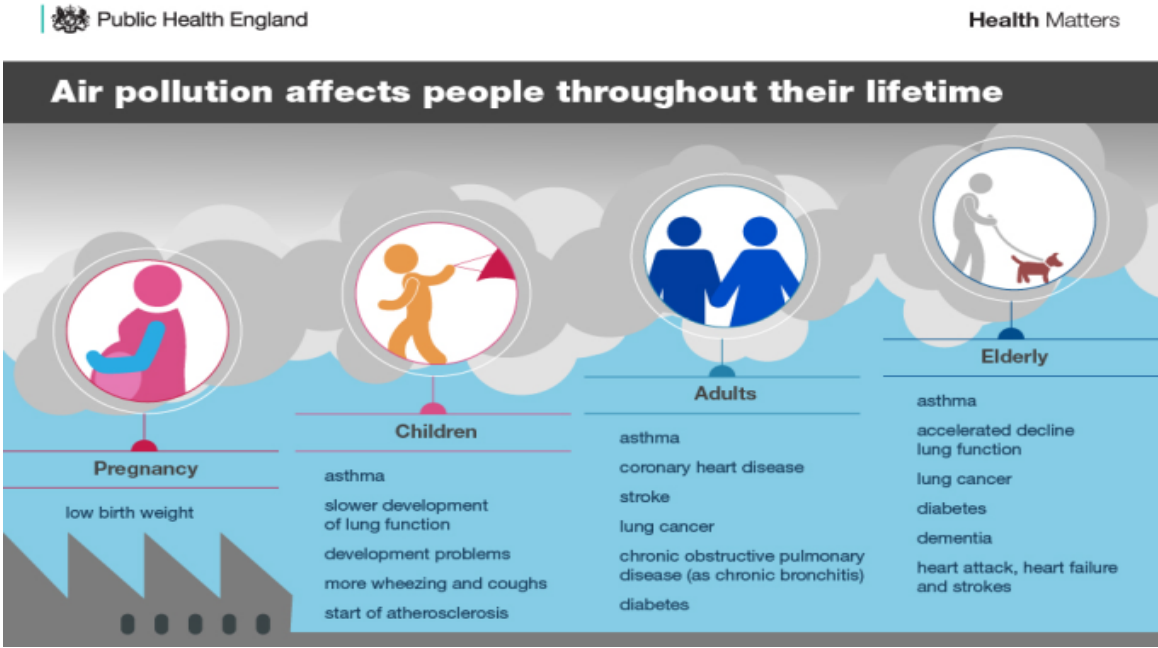
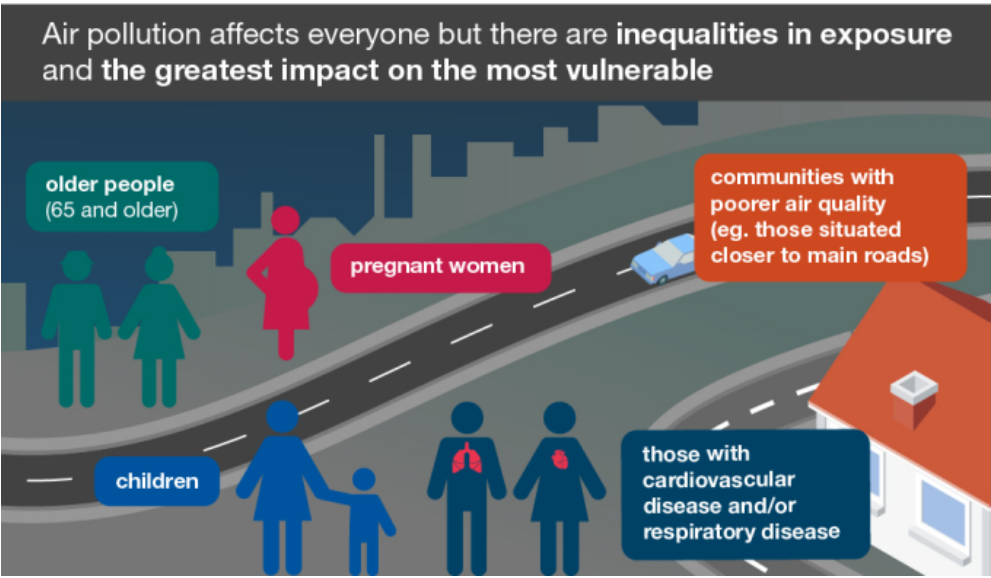


# Health impacts of pollution

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Public Health England Health Matters

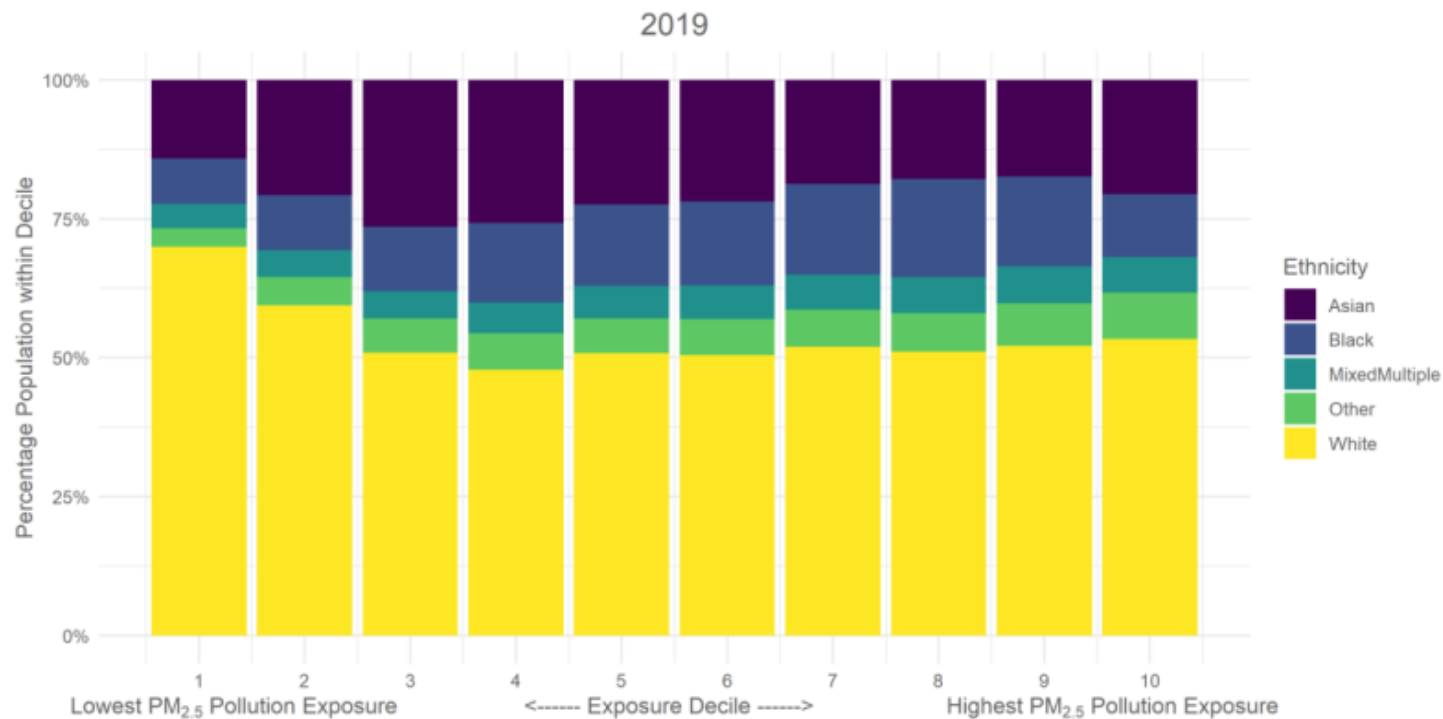




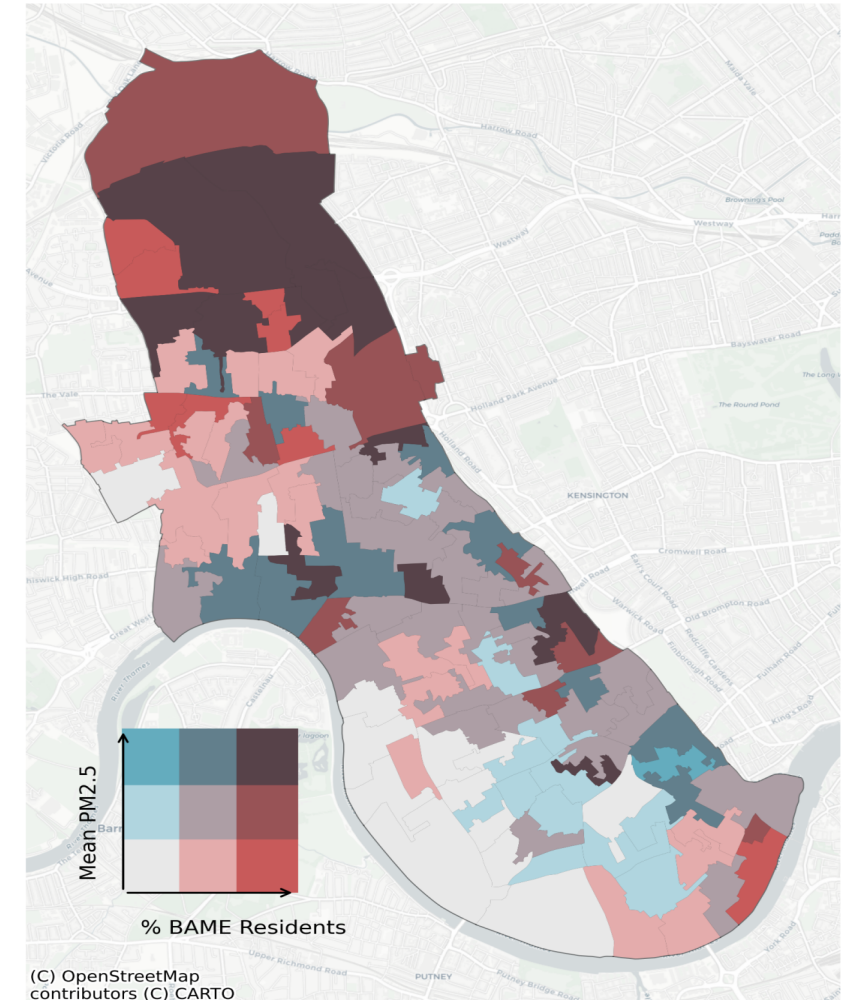
# Pollution as an inequalities issue

**Air pollution** particularly affects the most **vulnerable in society**: children and older people, and those with pre-existing conditions.

Air pollution also has a **disproportionate and inequitable impact** upon socio-economically deprived communities and Black, Asian and minority ethnic populations.



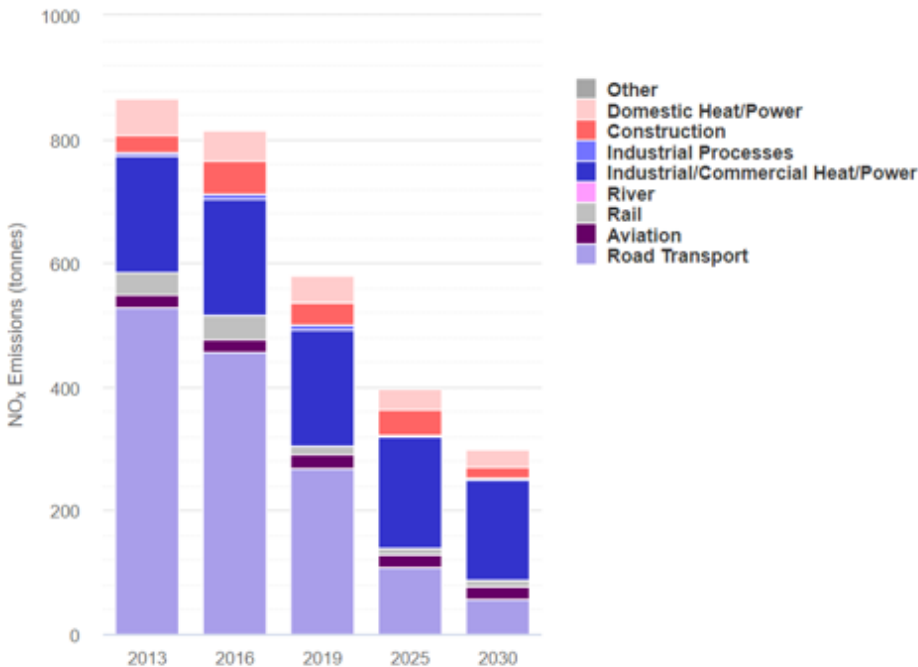
Mean PM<sub>2.5</sub> Concentration & Ethnicity - H&F



# What is the data telling us

## LAEI - Emissions Trend by Source

NO<sub>x</sub> Emissions, Hammersmith and Fulham



Emissions (Tonnes) from	2013	2016	2019	2025	2030
Road Transport	529	457	269	109	58
Aviation	20	20	22	21	20
Rail	36	38	13	9	9
River	0	0	0	0	0
Industrial/Commercial Heat/Power	189	189	188	181	163
Industrial Processes	5	6	6	3	3
Construction	28	54	37	42	19
Domestic Heat/Power	60	49	44	32	28
Other	1	1	1	1	1
Total	867	814	580	397	299

### Note

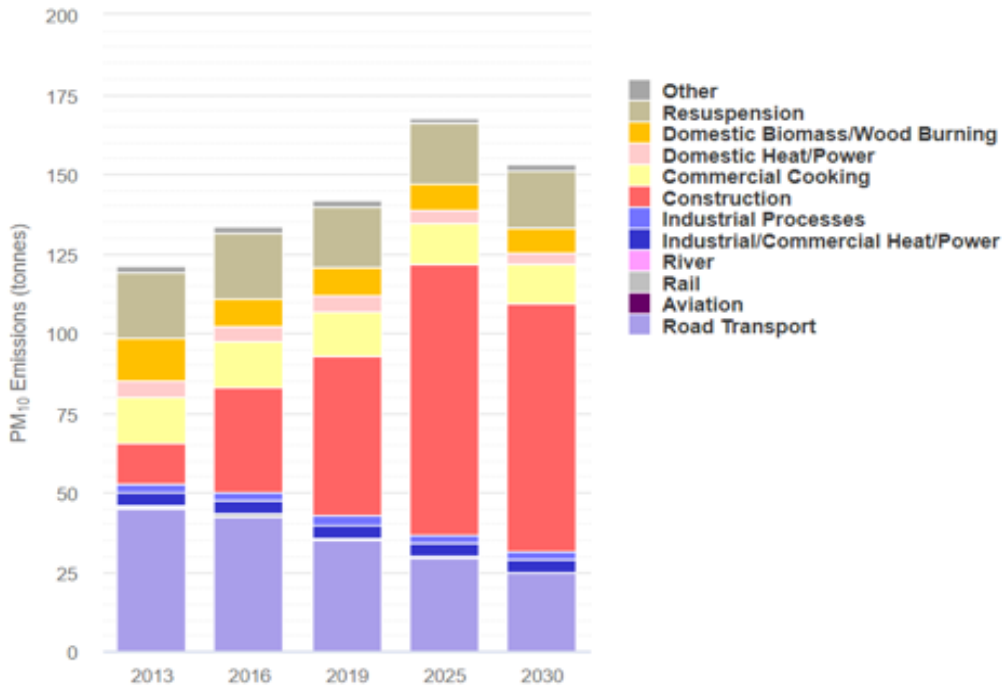
This summary dashboard is based on the London Atmospheric Emissions Inventory 2019. The charts show emissions from each air pollution source stacked on top of one another, with the total stack height equalling total emissions from all sources across the borough. The numbers in the table are those used to plot the graph and represent, for each year, the amount of pollutant emitted into the atmosphere (in tonnes/year).

- Industrial Processes: includes emissions from Part A1, A2/B processes, and Non-Road Mobile Machinery (NRMM) exhaust on industrial sites.
- Construction: includes emissions from construction dust (PM) and NRMM exhaust on construction sites.

# What is the data telling us

## LAEI - Emissions Trend by Source

PM<sub>10</sub> Emissions, Hammersmith and Fulham



Emissions (Tonnes) from	2013	2016	2019	2025	2030
Road Transport	45	42	35	29	25
Aviation	0	0	0	0	0
Rail	1	1	0	0	0
River	0	0	0	0	0
Industrial/Commercial Heat/Power	4	4	4	4	4
Industrial Processes	3	3	3	2	2
Construction	13	33	50	85	78
Commercial Cooking	14	14	14	13	12
Domestic Heat/Power	5	5	5	4	4
Domestic Biomass/Wood Burning	14	9	9	8	8
Resuspension	20	21	19	19	18
Other	2	2	2	2	2
Total	121	133	142	167	153

### Note

This summary dashboard is based on the London Atmospheric Emissions Inventory 2019. The charts show emissions from each air pollution source stacked on top of one another, with the total stack height equalling total emissions from all sources across the borough. The numbers in the table are those used to plot the graph and represent, for each year, the amount of pollutant emitted into the atmosphere (in tonnes/year).

- Industrial Processes: includes emissions from Part A1, A2/B processes, and Non-Road Mobile Machinery (NRMM) exhaust on industrial sites.
- Construction: includes emissions from construction dust (PM) and NRMM exhaust on construction sites.

# Synergies with our wider climate emergency work



## ***Air pollution and greenhouse gas emissions often come from the same source***

Emissions from road transport, energy and heat generation and domestic solid fuel burning are some of the most common sources that contribute to both climate change and air pollution.

## ***Climate change may make air pollution worse***

Hotter, drier summers can lead to increased ozone emissions, which have been steadily increasing in London for a number of years.

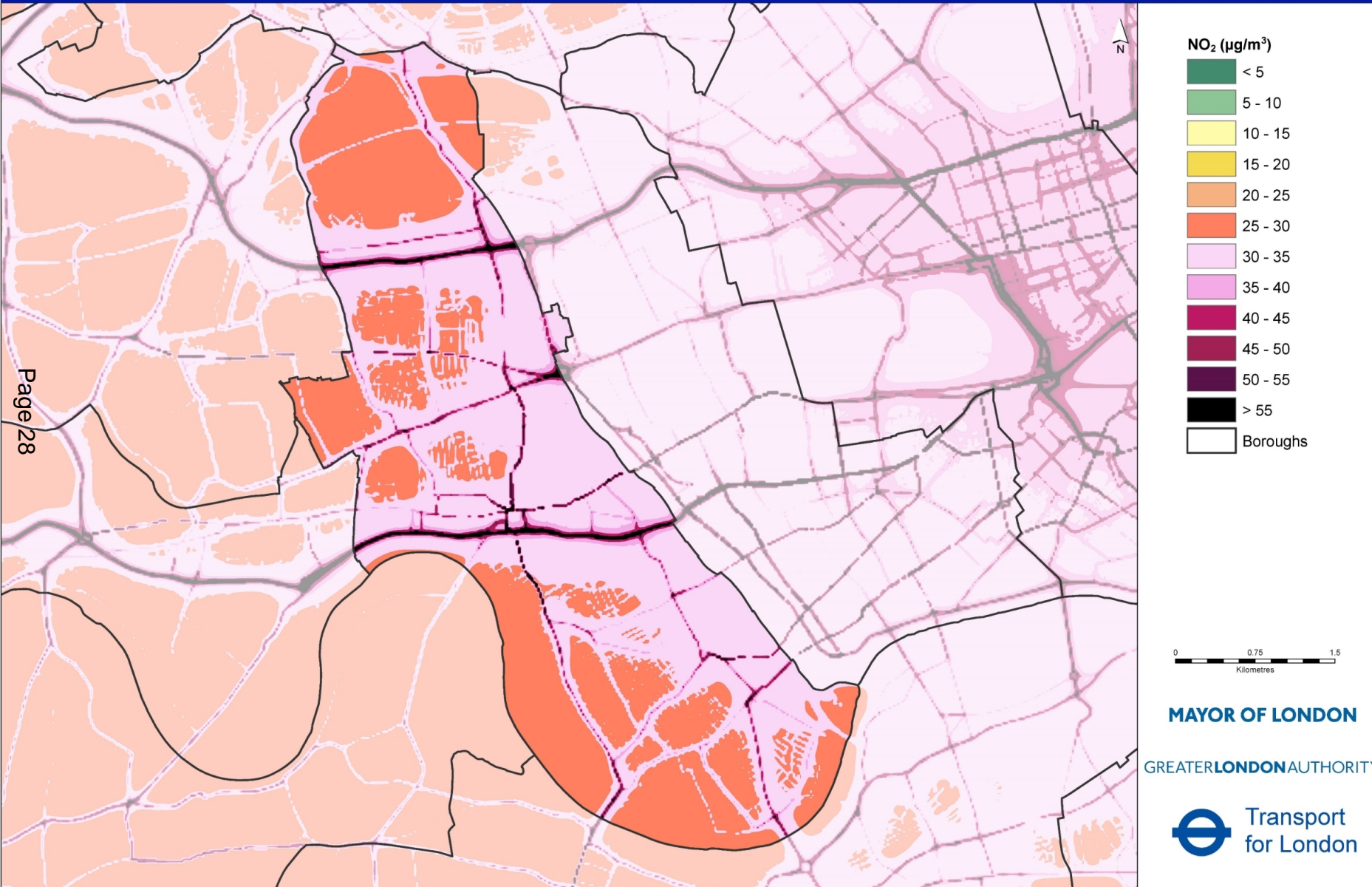
## ***Air pollution contributes to climate change***

As well as pollutants that impact the climate (such as black carbon, ozone, and methane), air pollution can also affect atmospheric processes such as cloud formation, as well as having negative impacts on water quality, soil fertility, and other measures that indirectly impact climate.

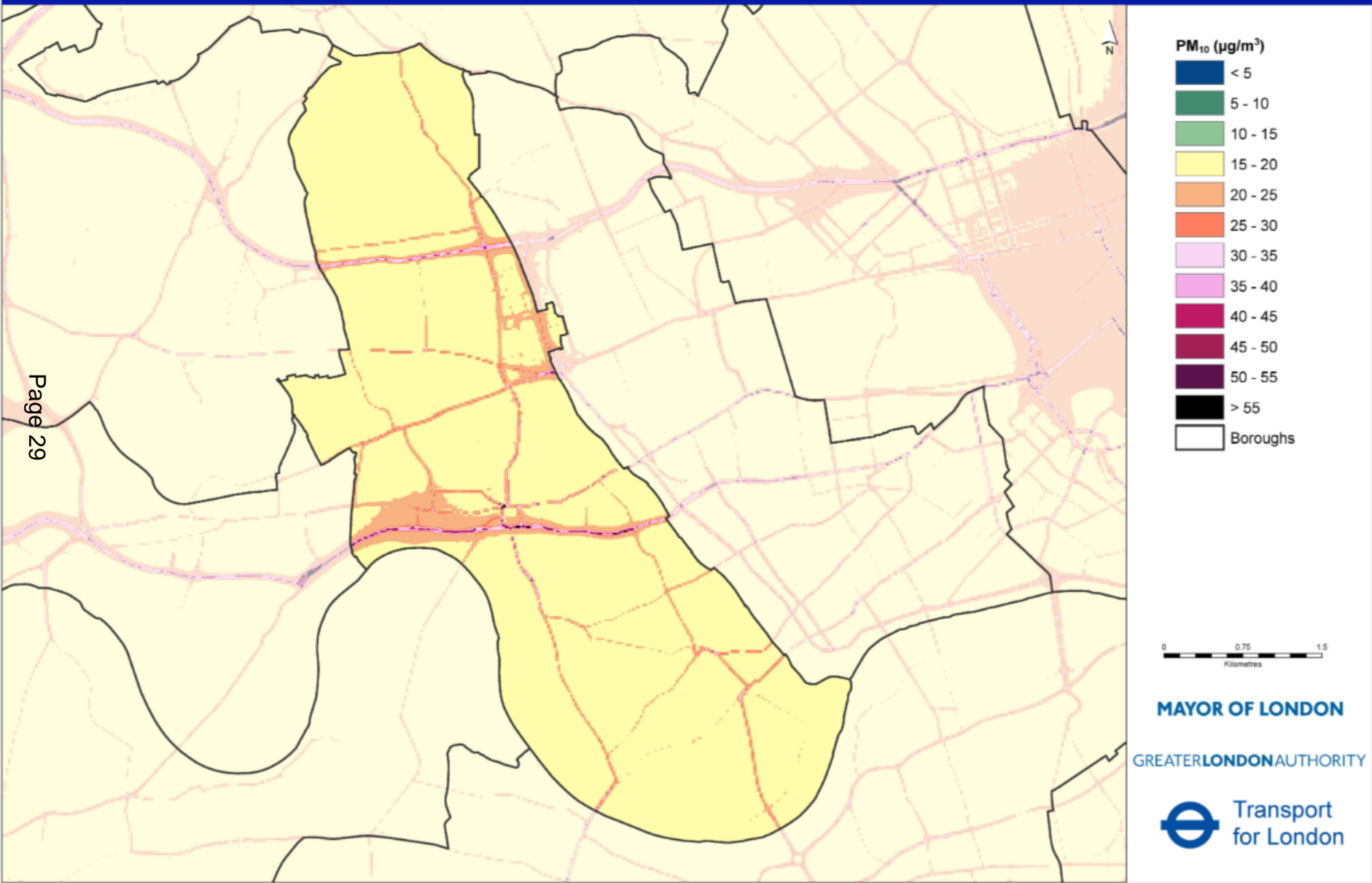


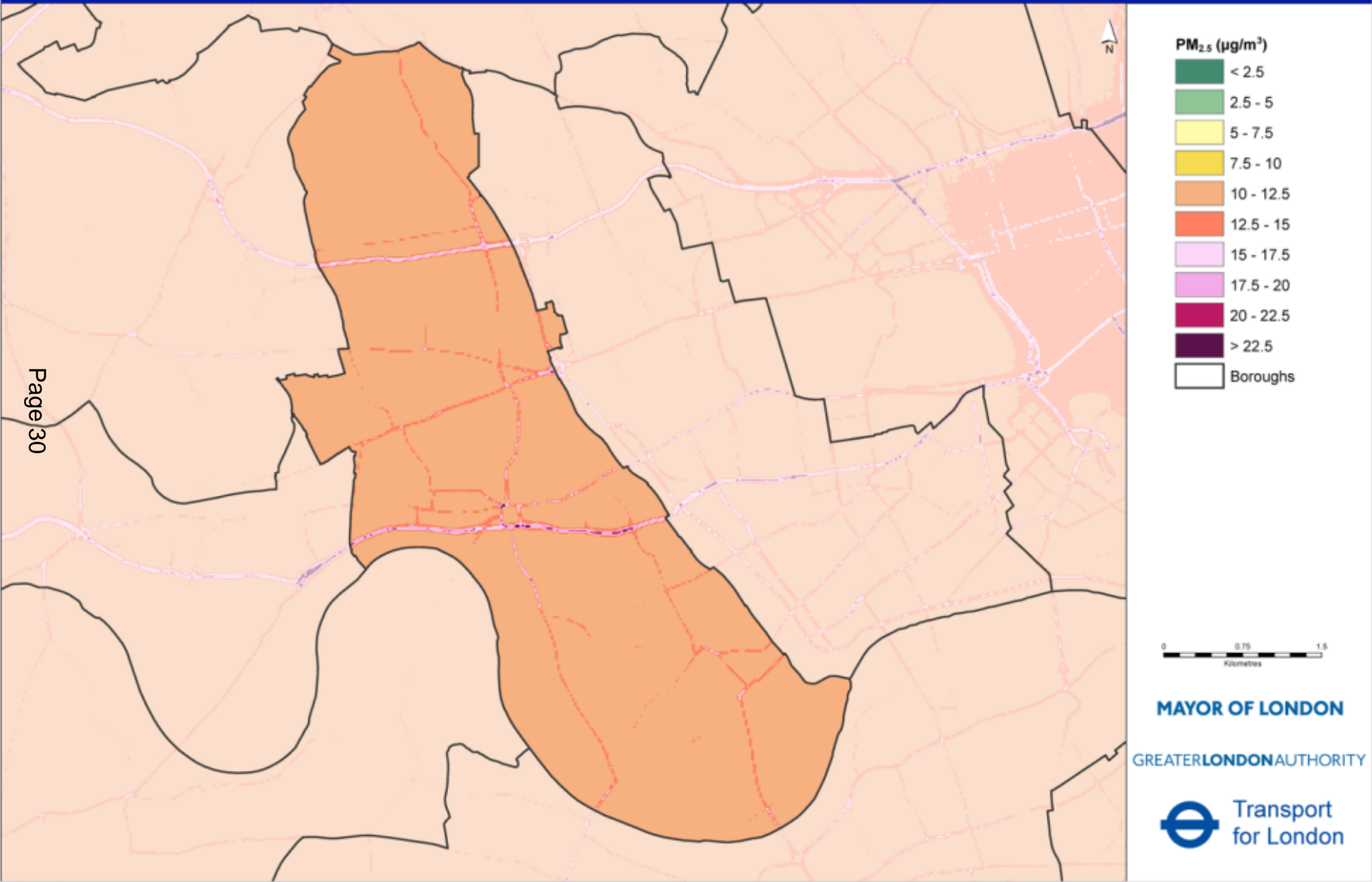
# London Borough of Hammersmith & Fulham Annual Mean NO<sub>2</sub> concentrations 2019

LAEI 2019









# What is the data telling us: trends



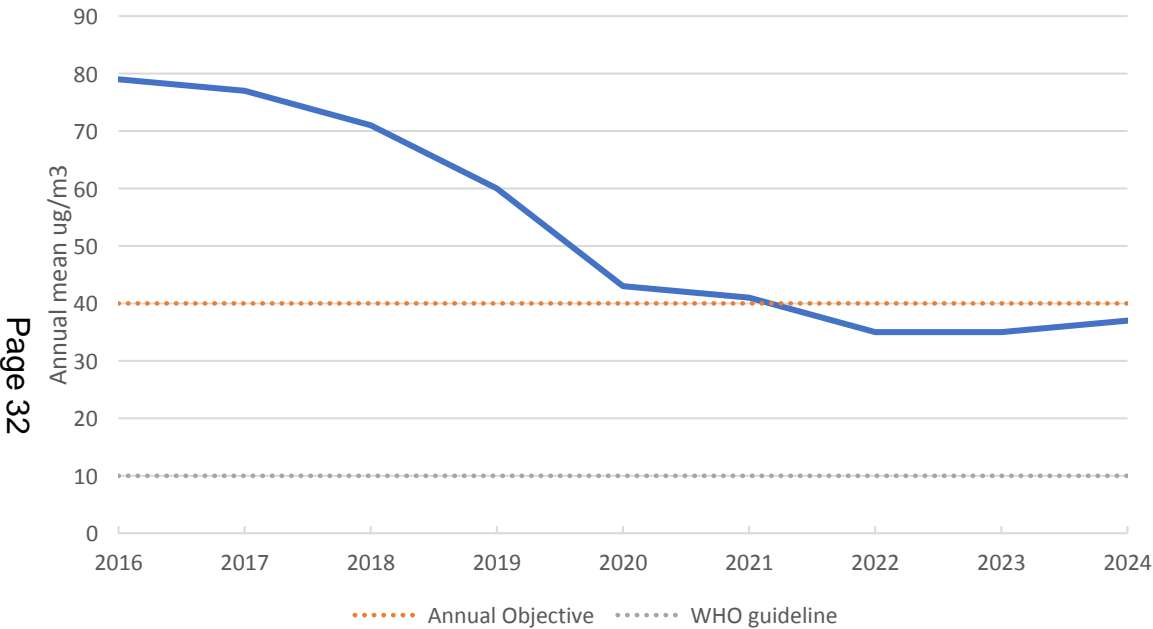
Pollutant	Air Quality Objective (Annual Mean) ug/m <sup>-3</sup>	WHO 2021 Air Quality Guideline ug/m <sup>-3</sup>	Shepherds Bush Town Centre (HF4)			Hammersmith Town Centre (HF5)		
			2019	2023	2024	2019	2023	2024
NO <sub>2</sub>	40	10	60	36	34	52	40	37
PM <sub>10</sub>	40	15	25	22	20	22	17	15
PM <sub>2.5</sub>	10 *	5	-	10	9	15	9	9

Monitoring Site	Ozone (O <sub>3</sub> )	Nitrogen Dioxide (NO <sub>2</sub> )	Sulphur Dioxide (SO <sub>2</sub> )	Particulate Matter (PM <sub>2.5</sub> )	Particulate Matter (PM <sub>10</sub> )	Highest Pollution Band	Last Updated
Fulham Town Centre	44 (2 Low)	28 (1 Low)	n/m	7 (1 Low)	12 (1 Low)	Low (Index 2)	16/06/2025 08:00
Hammersmith Town Centre	34 (2 Low)	36 (1 Low)	n/m	5 (1 Low)	13 (1 Low)	Low (Index 2)	16/06/2025 08:00
Riverwalk	38 (2 Low)	13 (1 Low)	n/m	6 (1 Low)	9 (1 Low)	Low (Index 2)	16/06/2025 08:00
Sands End	37 (2 Low)	16 (1 Low)	n/m	5 (1 Low)	9 (1 Low)	Low (Index 2)	16/06/2025 08:00
Shepherds Bush Town Centre	n/m	26 (1 Low)	n/m	7 (1 Low)	19 (2 Low)	Low (Index 2)	16/06/2025 08:00
Wormwood Scrubs	37 (2 Low)	15 (1 Low)	n/m	6 (1 Low)	10 (1 Low)	Low (Index 2)	16/06/2025 08:00

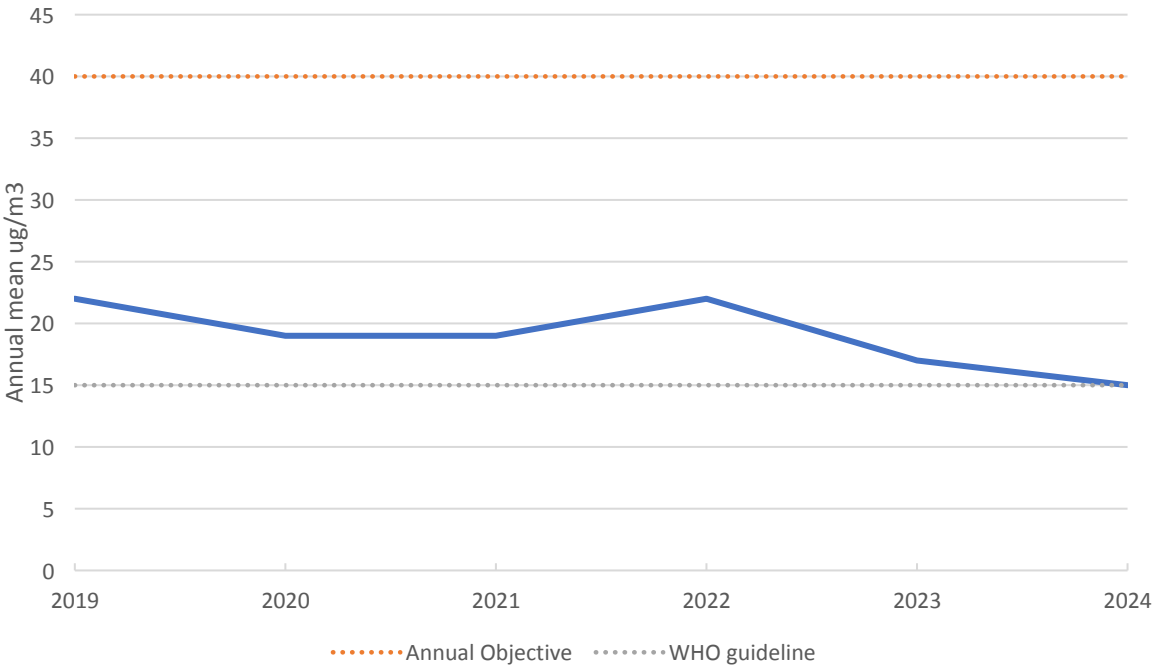
# What is the data telling us: trends



Hammersmith Town Centre: NO2 trends



Hammersmith Town Centre: PM10 trends





02

# Our principles and Action Plan



*Illustration of South Fulham Clean Air Neighbourhood*

# Air Quality Action Plan 2025-30



In 2025, the council adopted a new five-year **Air Quality Action Plan (AQAP)**. This is a statutory document as part of our legal duties as an Air Quality Management Area. The overarching goals of this AQAP:

1. **Tackling the sources of pollution that the council can control** – (e.g. our own properties and fleet, through our planning & transport policies, highways & maintenance.)
2. **Raising residents' and businesses' awareness of what they can do to reduce their emissions and how to avoid exposing themselves to pollution.**
3. Lobbying the government to make the changes needed to improve air quality across the country.
4. Working with the GLA and TfL to make the improvements needed to reduce pollution in the borough and across London.

Our AQAP also commits us to the ambitious target of meeting the World Health Organisation (WHO) guideline limits for air quality by 2030.

In tandem with the AQAP, there is political steer within H&F to deliver a **“dirty air” communications campaign**. This will focus on **public awareness and engagement**, encouraging behaviour change for improved air quality.

By “making the weather” on public perception of air quality and measures, there is also a wider ambition for this to build the resident buy-in needed to enable the council to implement systemic changes.

# Air Quality Action Plan 2025-30



The council's Air Quality Action Plan (AQAP) contains **a range of actions** that will be delivered by the council over the next five years.

The Plan has 40 headline actions across seven key themes:

- **Monitoring and other core statutory duties**
- **Localised solutions**
- **Emissions from developments and buildings**
- **Public health and awareness raising**
- **Delivery servicing and freight**
- **Borough fleet actions**
- **Cleaner transport**

The actions in our Plan can be split into two key areas, addressing both **systems change** and **behaviour change**:

1. **Tackling the sources of pollution that the council can control** – (e.g. our own properties and fleet, through our planning & transport policies, highways & maintenance.)
2. **Raising residents' and businesses' awareness of what they can do to reduce their emissions and how to avoid exposing themselves to pollution.**

# Priorities and principles



H&F's air quality work intersects with our wider values and priorities as a local council. As well as guiding our approach to tackling poor air quality, these values and priorities also focus on **leveraging our strengths as an LGA:**

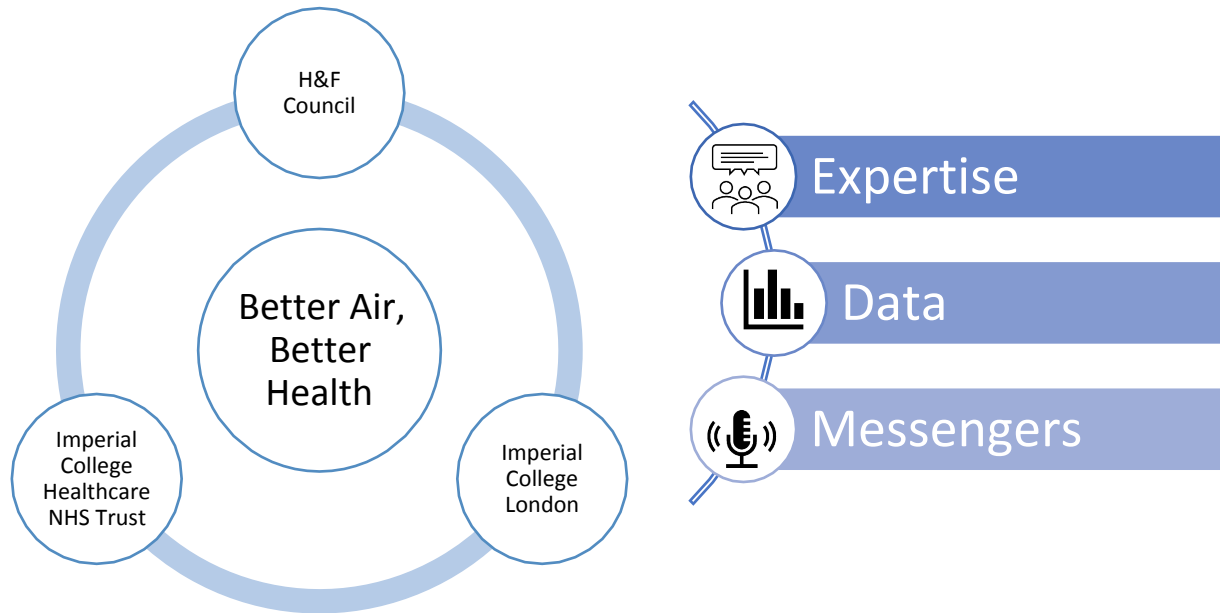
- **Connecting to the bigger picture**
  - Leveraging wide range of council departments
  - Connecting air quality to environment, public health, placemaking, and climate and transport strategies
- **Working with our community**
  - Ongoing work across council with community stakeholders, holding consultations, and maintaining open dialogue with residents, schools and businesses
  - Commitment to reaching previously underreached communities
- **Implementing and enabling action**
  - Outcomes focussed
  - Ensuring our actions also support resident-led action



# Working in partnership: Better Air Better Health



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# IMPERIAL



**Imperial College Healthcare**  
NHS Trust



Launched in February 2024, our year one priority was engagement, communication, and project development. The focus of year two is raising the profile and project delivery.

# Partnership Objectives



Develop an effective, evidence-based framework for **public engagement** and **behavioural change** regarding air quality issues.



To develop evidence-based solutions to **improve air quality** in the borough, and to **assess their effectiveness**.



Raise **public awareness** about air quality issues in the borough (e.g. different kinds of air pollutants and their sources, areas of high air pollutant concentration, and best practices to reduce personal exposure.)



To support the council's efforts to **comply with air quality standards** and regulations, and to **inform policy** and decision-making.



**Encourage behavioural changes** in residents in order to reduce their exposure to airborne pollutants.

Our partnership objectives look to tackle the impacts of poor air quality within the borough through both **behaviour change** and **systems change**.



03

# Workstreams and priorities



Image from School Streets Programme promoting active travel to schools

# What are the levers we have, the challenges, and key deliverables for our priority areas

**Building emissions**

**Transport emissions**

**Indoor air quality**

**Behaviour change**

## Levers

- Planning policy – new Local Plan
- Carbon co-benefits
- Strong existing council policies and strategies, especially around minimising PM emissions in construction

## Challenges

- Influencing building operations in-use is difficult
- Slow timeframes on planning policy
- Policy pivot from transport towards buildings



# What are the levers we have, the challenges, and key deliverables for our priority areas

Building emissions

Transport emissions

Indoor air quality

Behaviour change

## Levers

- Parking policy
- Infrastructure and urban realm – EV charging, but also cycling and walking infrastructure
- Council's and contractors' fleets
- Localised solutions – CLEAN, School Streets, neighbourhood improvement schemes

## Challenges

- Strategic overview of levers - Transport Strategy in development
- The levers are deeply political, and often have financial implications
- Lack of direct control – lobbying and public affairs piece

# School Streets Plus



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Plus measures could include green screens, cycle and scooter parking, raingardens, and more

School streets are temporary road closures at the beginning and end of the school day, which promotes active travel to and from schools, while making the roads around our schools less polluted and safer for everyone.

We currently have 4 school streets implemented (Sir John Lillie, Wendell Park, Holy Cross RC, Melcombe), with a consultation about to start on 2 more, and have tested the feasibility of all our primary schools.

## Measuring the impacts

We are currently monitoring the impact of the trials through Breathe London AQ monitoring, as well as assessing parking/traffic stress and road safety issues.

School streets have a measurable track record of success elsewhere. We know School Streets can reduce NO2 levels by up to 23%, and there are quantifiable road safety benefits.

# What are the levers we have, the challenges, and key deliverables for our priority areas

Building emissions

Transport emissions

Indoor air quality

Behaviour change

## Levers

- Planning policy
- Statutory powers on wood burning, permitted fuels etc
- Strong community engagement and co-creation
- Links to wider work on fuel poverty and energy efficiency

## Challenges

- New area of work – is the science / baseline data there
- Difficulty of influencing peoples' behaviour in their own home

# What are the levers we have, the challenges, and key deliverables for our priority areas

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Building emissions

Transport emissions

Indoor air quality

Behaviour change

## Levers

- Strong relationship with partners – Better Air Better Health – having access to different messengers
- Co-benefits of AQ action and health
- Commissioned research, focus groups

## Challenges

- Council comms has its limits
- Need to get the messaging right – a lot of groundwork and evidence gathering needed
- Translating the science
- Quantifying the impacts



# Outdoor waste burning

Cabinet paper in May 2025

Focus on reducing unnecessary PM emissions in the borough through outdoor fires, particularly the burning of garden and domestic waste

Links to climate adaptation and resilience

Likely enforcement route through the creation of a local byelaw

Strong behaviour change piece likely required to accompany any new byelaw or regulations



## Next steps

Mapping the evidence base required – breaking down sources of PM emissions

Routes to enforcement and associated behaviour change campaign

Timeframes for delivery

## LONDON BOROUGH OF HAMMERSMITH & FULHAM

**Report to:** Cabinet

**Date:** 12 May 2025

**Subject:** Policy options for the boroughwide Prohibition of the Burning of Domestic and Garden Waste in the London Borough of Hammersmith & Fulham

**Report of:** Cllr Max Schmid, Chief Whip

**Report authors:** Adam Webber, Air Quality Policy and Strategy Lead

**Key Decision:** Yes

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### SUMMARY

This report provides the context for the potential boroughwide prohibition of the burning of domestic and garden waste in Hammersmith & Fulham, as part of our work to reduce air pollution in the borough. This prohibition excludes barbeques and domestic fire-pits. It would also exclude any indoor wood burning.

Hammersmith & Fulham has committed to reducing Particulate Matter emissions (PM<sub>10</sub>, PM<sub>2.5</sub>) in the borough and to achieve compliance across the borough of the Annual Average World Health Organisation (WHO) Air Quality Guideline targets for Particulate PM<sub>10</sub> (20ug/m<sup>-3</sup>) and PM<sub>2.5</sub> (10 ug/m<sup>-3</sup>) by 2030.

The latest data for Hammersmith & Fulham shows that in 2019, 14% of the borough's particulate emissions for PM<sub>2.5</sub> can be attributed to domestic wood burning. In London this figure was 17%. Domestic wood burning includes emissions from both indoor and outdoor sources: this includes emissions from indoor wood burning stoves, as well as outdoor fires. It is not currently possible to ascertain the precise split within this figure between household wood burning (such as from stoves) and outdoor fires.

While the council has responsibilities to investigate complaints around smoke and fumes that could constitute a 'statutory nuisance' under the Environmental Protection Act 1990, these powers are reactive and do not prohibit burning. It is expected that a local byelaw will be required to enforce any prohibition. This paper outlines gaps where more data is required to move forward with a delivery programme for this policy.

A boroughwide prohibition on the burning of domestic and garden waste undertaken by means of adopting a new local Byelaw would be made under Section 235 of Local Government Act 1972. This report outlines the implementation plan of any potential new Local Byelaw for this purpose, subject to further baseline evidence gathering, and a finalised delivery programme for the formulation, consultation and eventual adoption.

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### RECOMMENDATIONS

1. To agree in principle with the approach of a boroughwide prohibition of the burning of domestic and garden waste within the London Borough of Hammersmith & Fulham.
2. To note the resource requirements of undertaking this work and make the recommendation above understanding that further baseline evidence gathering will be required to produce a full proposal. It is expected enforcement of any prohibition would be made through the means of provision and adoption of a new local byelaw under S.235 of the Local Government Act 1972.
3. To delegate responsibility to the Executive Director for Place for decision-making and defining the parameters of the boroughwide prohibition of the burning of domestic and garden waste in consultation with Cabinet Member for Climate Change and Ecology, including the delivery programme, consultation, and potential eventual adoption of the byelaw.

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### **Wards Affected:** (All)

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<b>Our Values</b>	<b>Summary of how this report aligns to the H&amp;F Values</b>
Building shared prosperity	All residents will benefit from this proposal, as it is intended to cover all wards and neighbourhoods, not just a select few.
Creating a compassionate council	All residents across the Borough deserve the same opportunities to live in healthy and happy neighbourhoods. Tackling air pollution is a key component of our wider environmental work that will support our ambitions of being a net carbon zero borough by 2030.
Doing things with local residents, not to them	Resident engagement will be a key feature of developing this programme,
Being ruthlessly financially efficient	Tackling air pollution is a key component of our wider environmental work that will support our ambitions of being a net carbon zero borough by 2030.
Taking pride in H&F	Tackling air pollution will result in a cleaner, greener, healthier borough.
Rising to the challenge of the climate and ecological emergency	Tackling air pollution is a key component of our wider environmental work that will support our ambitions of being a net carbon zero borough by 2030. Whilst the health of residents is the primary driver of this proposal, this programme supports the Council's climate and ecological emergency commitments and supports our work to make our communities and environments more resilient.

### **Financial Impact**

It is proposed to agree in principle the borough-wide prohibition of domestic and garden waste in Hammersmith & Fulham. A robust evidence base is required to inform the introduction of any new policy to ensure both its successful implementation and value for money (i.e. that should this be enforced through a

byelaw, that this is worth pursuing in terms of its likely impact on pollution and subsequently on health outcomes). As such, there will be one off implementation costs relating to evidence gathering and communications (which could be significant), and ongoing costs relating to enforcement of the byelaw (which is expected to be undertaken by the Council's existing Environmental Public Protection service at no additional cost). Any investment required that cannot be accommodated within existing budgets will need to be considered separately as the project develops. Any resulting enforcement income (from non-compliance fixed penalty notices) will be reinvested in the cost of the enforcement activity.

*Kellie Gooch, Head of Finance (Place), 20 March 2025*

*Verified by James Newman, AD Finance, 25 March 2025*

## **Legal Implications**

It is considered that a local byelaw may be the best approach to enforcing this policy.

Section 235 of the Local Government Act 1972 ("LGA" 1972") empowers local councils to make byelaws, stating as follows:

"...The council of a London Borough may make byelaws for the good rule and government of the whole or any part of the borough and for the prevention and suppression of nuisances therein."

The procedure for making byelaws is set out in section 236 of the LGA 1972. Section 236A provides for an alternative procedure. However, the alternative procedure in The Byelaws (Alternative Procedure) (England) Regulations 2016("2016 Regulations") does not apply in this instance as prohibition of the burning of outdoor fires is not one of the prescribed classes of byelaws listed in Schedule 1 of the 2016 Regulations or unless it applies just to open spaces.

It is imperative that the proposed byelaw is both necessary and proportionate. If the objective of the proposed byelaw can be achieved by way of alternative legislation, that alternative should be pursued.

Furthermore, the draft of the proposed byelaw submitted for the Secretary of States' consideration must be accurately and comprehensively drafted since only minor modifications can be made thereafter.

The creation of a byelaw is a non-executive function as it is listed in Schedule 1 Section F of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (SI 2000/2853) and therefore cannot, by virtue of Section 1 be the responsibility of the Cabinet.

The Local Authority constitution should set out whether the function of making a byelaw has been delegated to a committee or officer under LGA 1972, s 101. If it has not been delegated it remains a decision for full Council. As the Council's constitution does not delegate the power to any committee or officer the decision should be made by the full council.

The process is likely to require three decisions:

- to propose the byelaw;
- to seek Secretary of States approval; and

- the final stage confirming byelaw or not as the case may be.

The full council could delegate the subsequent decisions to a committee or officer.

Section 237 makes it an offence to contravene a byelaw that is in force. Section 237A provides for the Secretary of State to introduce fix penalty notices for certain type of byelaws but no such regulation has been made to date.

*Mrinalini Rajaratnam – Chief Solicitor Planning and Property – 21 March 2025*

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## **Background Papers Used in Preparing This Report**

None

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## **DETAILED ANALYSIS**

### **Public Health**

1. According to Public Health England (PHE), poor air quality is the largest environmental risk to public health in the UK. Long term exposure to man-made air pollution in the UK has an estimated annual effect equivalent to 28,000-36,000 deaths. Air pollution can lead to a variety of health problems including cardiovascular disease and lung cancer<sup>1</sup>.
2. PHE says that people at higher risk of negative health impact due to air pollution include older people (65 years and older), children, people with cardiovascular (heart) disease and/ or respiratory (lung) disease, pregnant women, communities in areas of poor air quality, and poorer communities. PHE has also note that “In 2010, the Environment Audit Committee considered that the cost of health impacts of air pollution was likely to exceed estimates of £8 to 20 billion”<sup>2</sup>.
3. The Committee on the Medical Effects of Air Pollutants (COMEAP) concluded in January 2022 that ‘The newer studies provide evidence of effects at low concentrations, and no evidence of a lower exposure threshold for the adverse health effects of PM<sub>2.5</sub>. Due to the smaller size of the particle, PM<sub>2.5</sub> is considered to have more adverse health impacts than PM<sub>10</sub> due to the ease with which it can travel deeper into the lungs and enter the bloodstream. Therefore, continuing efforts to reduce concentrations of PM<sub>2.5</sub>, even where exposures are already low, would be expected to have a benefit to public health. This is a particularly important point for policy and decision making, as it suggests that reducing population exposure is an important public health goal, even when concentration-based air quality standards or targets are met’<sup>3</sup>.
4. The Committee on the Medical Effects of Air Pollutants (COMEAP) concluded in July 2022 that there is evidence to suggest an association between ambient air pollutants and an acceleration of the decline in cognitive function often associated

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<sup>1</sup> [Health matters: air pollution, PHE](#)

<sup>2</sup> [Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report](#)

<sup>3</sup> [Summary of COMEAP views on the studies in populations with low-level exposures: Appendix B](#)

with ageing, and with the risk of developing dementia<sup>4</sup>. This is in addition to the well-understand and researched impacts of pollutants and lung function, heart function, and various other health issues throughout life.

5. Air Pollution and Inequalities in London report published in 2023 provides analyses of the relationship between exposure to air pollution, deprivation and ethnicity in London. It shows communities which have higher levels of deprivation, and a higher proportion of people from ethnic minority groups of residents within these deprived communities, are still more likely to be exposed to higher levels of air pollution<sup>5</sup>.
6. Data is available to us on the health impacts of pollution as a whole. However, it is more difficult for us to drill down to the precise health impact of specific sources of pollution, such as Particulate emissions from outdoor fires. In Hammersmith and Fulham, Public Health England data suggests that the fraction of mortality attributable to particulate air pollution was 6.3% in 2023<sup>6</sup>, compared to an England average of 5.3%. This places the borough as the 11th worst local authority in England for the health impacts of particulate pollution. An attributable fraction indicates the contribution of a risk factor (here, ambient air pollution) to mortality from a disease, and is estimated from the relative risk corresponding to the exposure. However, it is important to note that this is from all sources of particulate matter; emissions from outdoor fires are calculated as part of emissions from wood burning, which are in turn only part of the story of particulate emissions.

### **The health impact of outdoor fires / wood burning**

7. The latest data for Hammersmith & Fulham shows that in 2019, 14.3% of the borough's particulate emissions for PM<sub>2.5</sub> can be attributed to domestic wood burning<sup>7</sup>. In London this figure was 17%. Domestic wood burning includes emissions from both indoor and outdoor sources: this includes emissions from indoor wood burning stoves, as well as outdoor fires. It is not currently possible to ascertain the precise split within this figure between household wood burning (such as from stoves) and outdoor fires.
8. While there is well established data on the impact of the air pollution produced by the burning of solid fuel on health, there has been less research on outdoor fires specifically. Work has tended to focus on wood burning as a wider source of emissions, particularly from indoor wood burning stoves in homes. However, some of this research is salient to this paper's proposals:
  - A study published in 2022 of particulate matter data from wood burning emissions (from indoor wood burning stoves and outdoor fire emissions) was quantified at five air quality monitoring locations in the UK, comprising three rural and two urban sites (London, Glasgow) between 2009 and 2021. As expected, air pollution from wood burning was greatest in winter and almost absent in summer when residential heating is minimum and atmospheric dispersion is enhanced.

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<sup>4</sup> [Cognitive decline, dementia and air pollution: A report by the Committee on the Medical Effects of Air Pollutants](#)

<sup>5</sup> [Air Pollution and Inequalities in London - update 2023 | London City Hall](#)

<sup>6</sup> [Public Health Outcomes Framework - Data | Fingertips | Department of Health and Social Care](#)

<sup>7</sup> [London Atmospheric Emissions Inventory \(LAEI\) 2019 - London Datastore](#)

Average Particulate Matter (PM) emissions from wood burning during the heating season (November to March) were greatest in South-East England and London<sup>8</sup>.

- Outdoor fires also cause episodes of elevated PM<sub>2.5</sub> concentrations, as is evident in the peaks lasting for several hours that frequently occur around annual Bonfire night, which vary in magnitude due to meteorological conditions. Analysis has revealed that peaks around 5 November (Bonfire Night) are predominantly associated with PM<sub>2.5</sub>, and PM<sub>10</sub>. However, the impacts of bonfires are difficult to quantify, with figures in the LAEI acknowledged to be highly uncertain. Bonfires represent increased concentrations for a short duration<sup>9</sup>.
9. As such, we currently do not have data (monitored or modelled) that shows the precise proportion of the borough's particulate matter emissions that come from outdoor fires. As a result, we also do not have data that shows the precise health impact of outdoor fires. It would be anticipated that the health impacts of burning waste outdoors, which would be covered by any prohibition, would likely be worse than woodburning bonfires due to the materials being burned.

### **Other impacts of burning domestic and garden waste**

10. As part of the Council's commitments on the climate and ecological emergency, we are working to meet the challenges of climate adaptation, and to make our communities more resilient to a changing climate. The risk of outdoor fires spreading and becoming out of control will likely increase in future due to a warmer and drier climate. Prohibiting the burning of garden waste and other waste will reduce the potential for this.
11. Smoke, odours and antisocial behaviour are also associated with the burning of waste materials outdoors, which this policy would help to address. The section below outlines the Council's current powers to investigate nuisance caused by smoke.

### **Existing powers**

12. The Council, through the Environmental Protection Act 1990, has a responsibility to investigate complaints about smoke from premises that could be a 'statutory nuisance'. For the smoke to count as a statutory nuisance it must do one of the following:
- unreasonably and substantially interfere with the use or enjoyment of a home or other premises
  - injure health or be likely to injure health
13. If we agree that a statutory nuisance is happening, has happened or will happen in the future, we can serve an abatement notice. This requires whoever is responsible to stop or restrict the smoke. These powers are reactive and require us to respond to complaints. It is also considered that a fire could release harmful air pollutants, while also not being considered a 'statutory nuisance'. There is also a general requirement within the Environmental Protection Act 1990 that waste

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<sup>8</sup> [Long-term trends in particulate matter from wood burning in the United Kingdom: Dependence on weather and social factors, ScienceDirect, 2022](#)

<sup>9</sup> [Air Quality England Report: Bonfire Night 2022](#)



should not be kept, treated or disposed of in a manner likely to cause pollution to the environment or harm to human health.

14. There are also existing powers within the 1990 Act covering commercial waste. Businesses have a duty of care under the Environmental Protection Act 1990 to ensure that their waste is stored, collected, transported and disposed or recycled properly so that it does not cause pollution to the environment or harm human health.
15. The whole of Hammersmith & Fulham is a designated Smoke Control Area, which restricts the types of fuels that can be burned. However, these powers do not extend to outdoor fires.

### **Further research required**

16. The powers outlined above do not extend to fully minimising the impacts of outdoor fires, particularly from waste burning. If a local byelaw is considered, a robust evidence base is required. This is to both ensure the successful implementation of a new byelaw, and to ensure that the council resources required for implementation represent value for money, i.e. that the byelaw is worth pursuing in terms of its likely impact on pollution (and subsequently on health outcomes).
17. From the section above, there are two enabling pieces of work required to build the case for prohibiting domestic and garden waste through a byelaw in the borough:
  - Source apportionment: data is required to understand the breakdown of H&F's domestic wood burning emissions (6.1% of total particulate emissions) to isolate the true level of emissions in the borough from the burning of domestic and garden waste.
  - Health impacts: data is required to understand the short- and long-term health impacts of outdoor fires on public health. Short-term impacts could be quantified through ascertaining health data related to times of year where such activity is highest. Long-term impacts would need to be extrapolated from the source apportionment analysis outlined above, i.e. if we know the % of particulate emissions from the relevant outdoor fires, we could calculate the % of the overall health impact of particulates from them.

### **Required approach to the adoption and enforcement of new byelaws**

18. It is considered that a local byelaw may be the best approach to enforcing this policy. A summary of the required approach to adopting any new byelaws in the borough can be found in Appendix 1. This sets out the formal requirements for consultation, the role of the relevant Secretary of State, advertisement, amendment and adoption of the proposed byelaw.
19. A summary of the timeframes for the introduction of a new byelaw are set out below:

Element	Time required
Regulatory assessment of proposed	Not defined, but would need to be



byelaw	completed before public consultation
Public consultation	Minimum 12 weeks
Submission of byelaw 'scheme', including consultation response document and regulatory assessment, to Secretary of State	Within 12 weeks
Secretary of State response	Maximum 30 days
Formal consultation following public notice to make the byelaw	Minimum 28 days
Make the byelaw	After 28 days but before 6 months of formal public notice

20. Byelaws are enforced by the local authority through the magistrates' court and contravening a byelaw can result in a fine upon successful conviction. It is proposed that the Environmental Public Protection (Noise & Nuisance) team, which currently covers statutory nuisance complaints related to outdoor fires using powers under the Environmental Protection Act 1990 s79/80, would be responsible for investigating any complaints and enforcing the byelaw.

21. An English Devolution White Paper was published by the Secretary of State for Housing, Communities and Local Government in December 2024<sup>10</sup>. This Paper outlined potential changes to rules surrounding the implementation of byelaws by local authorities<sup>11</sup>. Officers will monitor any potential new legislation which would impact on the process for byelaws.

## Reasons for Decision

22. The aim of any restrictions of the burning of domestic and garden waste is to improve local air quality across the borough, and help our environments and communities adapt to a changing climate. It is considered this will not include barbeques or outdoor burners/heaters used by licensed properties such as pubs and restaurants, or domestic fire pits. It would also exclude any indoor wood burning.

23. This policy will support our work towards achieving the Council's policy agenda for Public Health and the Climate Emergency. However, further work is required to understand the impact of this work and whether the resources required to implement the policy will provide value for money.

24. Working with resident groups and engaging the wider community on project development proposals helps the Council to build a better understanding of local issues and proposals and design tailored and specific projects to best address the concerns of local communities.

25. The project can be amended, altered or abandoned without significant capital investment on legal enforcement of the proposals.

<sup>10</sup> [English Devolution White Paper - GOV.UK](#)

<sup>11</sup> [Devolution White Paper: On-the-day factual briefing | Local Government Association](#)

26. The collection of baseline data in generating a full project plan and proposals will inform decision making. This will include work to define 'domestic and garden waste' to keep any restrictions in line with existing powers related to commercial waste. Any future recommendation to make a project permanent or to abandon a project will need to be based on data and feedback collected during the project.
27. It is considered that a local byelaw may be the best approach to enforcing this policy. It is expected that a further report recommending the adoption of a byelaw will also include the following:
- The purpose of and need for the byelaw;
  - By reference to a map where necessary, the land to which the byelaw if made would apply;
  - The extent of the consultation that has been undertaken and the result of that consultation including a summary of the objections and responses (including all copies of correspondence dealing with such objections as an appendix)
  - The reasons why the byelaw is reasonable in its proposed application, including why any sanction specified in the proposed byelaw is necessary and proportionate;
  - Whether any other enactment already fulfils the purpose and if so, why the byelaw is still needed or if not, that the proposal does not conflict with any existing enactments;
  - That the guidance accompanying the model byelaws has been complied with;
  - Whether the byelaws terms are from the model byelaw guidance and if so what (if any) adjustments are contained.

## **Equality Implications**

28. At this stage, the Council is considering solely whether to approve the outline programme. As the specific scheme is developed in greater detail, further consideration will be given to the potential equalities impacts and a specific EQIA will be carried out. The equalities impact of the scheme will be further monitored and assessed following the implementation of any byelaw and considering the consultation that will take place at that stage before any decision as to whether any of the scheme should be made permanent is taken.

## **Risk Management Implications**

29. There is a significant reputational risk that the implementation of a ban without adequate communication about what is and what isn't being prohibited will lead to negative resident reaction and press coverage especially at Bonfire Night (Fireworks Night). This risk should be reduced by consideration of exclusions to the proposal including the burning of dry waste (as is practised in almost all other local authorities in the country) or for specific traditional events (including Bonfire Night, Holi and Diwali).

*Jules Binney. Risk and Assurance Manager, 10<sup>th</sup> March 2025*

## **Climate and Ecological Emergency Implications**

30. This policy will support our work towards achieving the Council's policy agenda for Public Health and the Climate Emergency. It will also support our commitment to meeting the World Health Organisation guideline levels for air pollution. Outdoor

fires and wood burning create harmful particulate matter emissions, for which it is considered there is no safe level. Short term exposure to high particulate matter emissions can cause asthma episodes and play a part in a multitude of other longer-term effects. Restricting outdoor fires in this way will also have climate adaptation and resilience benefits, through reducing the risk of fires becoming out of control in warmer and drier weather.

*Hinesh Mehta, Assistant Director of Climate Change, 24<sup>th</sup> March 2025*

### **Coproduction, Engagement and Monitoring**

31. The Council will follow all statutory requirements and guidance required for the making, implementation, consultation and monitoring of any new byelaw.

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### **LIST OF APPENDICES**

#### **Appendix 1 – Required approach to the adoption of new byelaws**