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Dear Burning Consultation Team

**Countryside Alliance consultation response
Defra Consultation on Solid Fuel Burning**

The Countryside Alliance welcomes the opportunity to respond to the consultation on Solid Fuel Burning.

The Countryside Alliance is a UK-wide organisation representing rural communities, businesses and the rural way of life. Many households in the countryside, particularly those not connected to mains gas, rely on solid fuel appliances such as wood-burning stoves as an essential, affordable, and reliable means of heating and providing hot water. We support efforts to improve air quality, but policy must fully recognise rural realities and ensure that environmental ambition does not inadvertently cause hardship.

General comments

1. Air quality objectives and rural realities

We support the government's ambition to reduce harmful particulate (PM2.5) emissions and improve public health. However, many rural households use wood-burning and other solid fuel appliances out of necessity rather than choice. Policies that restrict access to these essential heating options without realistic alternatives risk pushing households into fuel poverty or leaving them without adequate heating.

2. Economic pressures and access to alternative heat sources

Recent spikes in heating oil costs have placed significant pressure on rural households reliant on oil-fired central heating. Until practical, cost-effective alternatives, such as heat pumps with adequate subsidy support, are accessible to all rural homes, solid fuels remain a vital part of the rural heating mix. Many rural dwellings, due to age or construction, are not suitable for current heat pump technology. Policies must reflect this context and avoid placing disproportionate burdens on rural communities.

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Our response below focuses on the consultation areas most relevant to rural households, including emissions standards, labelling, and enforcement.

Part 1 - Emissions limits for new appliances

The consultation proposes stricter emission standards for new solid fuel appliances. We recognise the importance of encouraging cleaner technology, but:

- Standards should not increase costs to manufacturers, retailers, or consumers to the point that upgrading old appliances becomes prohibitive.
- Transitional arrangements must be clear, with adequate lead-in times and practical support. We consider the proposed 3 - 5 year period reasonable.
- Policies must reflect rural heating realities, recognising that urban usage patterns and housing densities do not apply uniformly.

Part 2 - Mandatory labelling of appliances and fuels

We support measures that improve consumer information, including labelling emissions details and permitted fuels. However:

- Labels must be practical and informative, not alarmist, and recognise the variation between urban and rural use.
- Health statements should be evidence-based and avoid deterring responsible use.
- Rural-specific guidance should be developed to ensure labelling supports informed, responsible use in communities that depend on these appliances.
- Labelling and guidance should align with standards applied to other heating sources to maintain consistency.

Part 3 - Enforcement and penalties

We recognise the role of enforcement in maintaining standards, but caution against overly punitive approaches:

- Enforcement must be fair, proportionate, and accompanied by clear guidance and support for compliance (e.g. accessing approved fuels).
- Local authorities should be equipped with guidance reflecting rural circumstances, particularly regarding smoke control areas and permitted appliance use.

Recommendations

In addition to the above responses, the Countryside Alliance urges Defra to:

1. **Introduce Rural Impact Assessments** for any future policy options to ensure they do not inadvertently disadvantage rural households or worsen fuel poverty, as recommended in our own policy work.

2. **Ensure adequate transitional support**, including realistic timescales, financial support for lower-emission technologies and exemptions where necessary.
3. Recognise the **continued reliance on a mix of heating options**, including solid fuels and oil, especially given the recent energy price volatility.
4. Engage proactively with rural stakeholders to better reflect how households actually heat their homes in different parts of the UK.

The Countryside Alliance supports efforts to reduce harmful emissions and improve air quality. However, policies that affect domestic burning must be developed with a clear understanding of rural and off-grid heating realities. We encourage Defra to adopt a balanced and practical approach that supports environmental goals while safeguarding the needs and wellbeing of rural households. We would strongly oppose any attempt to apply these new standards and requirements retrospectively to existing appliances.

We appreciate the opportunity to provide our feedback and hope that Defra will consider the points raised in this response. Should you require further clarification or wish to discuss any aspects of this submission, please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T.P.C.' followed by a stylized flourish.

Tim Bonner
Chief Executive