

Title of Report	Submission of Air Quality Action Plan (2026-2030) to Mayor of London for Approval	
Key Decision No	HCE S652	
For Consideration By	Cabinet	
Meeting Date	26 January 2026	
Cabinet Member	Cllr Sarah Young, Cabinet Member for Climate Change, Environment and Transport	
Classification	Open	
Ward(s) Affected	All	
Key Decision & Reason	Yes	Significant in terms of its effects on communities living or working in an area comprising two or more wards
Implementation Date if Not Called In	3 February 2026	
Group Director	Rickardo Hyatt, Group Director, Housing, Climate and Economy	
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1. Cabinet Member's introduction

- 1.1. We have made huge progress in improving air quality in Hackney, thanks to our bold commitment to environmental policies and delivery on our promises, together with our partners and residents. From school streets and low traffic and liveable neighbourhoods, to bike hangars and cycle lanes, street trees and rain gardens, to the Zero Emissions Network supporting people to shift to active and low emissions transport, to rolling out a network of EV charging

points and a new combined Smoke Control Order, Hackney is making sure that we have clean air to breathe. Our air quality monitors are showing significant improvements so that we are now close to meeting National Air Quality Objectives for air quality at all sites, a huge achievement, and we want to do more.

- 1.2. This paper brings to Cabinet the post-consultation draft of Hackney's Air Quality Action Plan following a period of statutory consultation between July and September 2025. This is a revision to the current 2021-2025 Action Plan, and the proposal is to submit this draft to the Mayor of London for approval, as is required under the system of London Local Air Quality Management.
- 1.3. Air pollution is recognised as being the largest environmental threat to human health. It impacts people at every stage of life with it being linked to low birthweight, decreased lung capacity, asthma and other respiratory conditions, heart disease and dementia. Public concern about air pollution is regularly demonstrated and it often ranks as a top concern in surveys among Londoners.
- 1.4. It is pleasing to see how our air quality monitoring data is providing evidence to show how nitrogen dioxide concentrations have reduced significantly over this period. However, we know there is more work to do. Particulate matter concentrations are not showing the same decline and the World Health Organization has revised its guidelines to take account of emerging evidence showing health effects even at lower levels.
- 1.5. The update of the Action Plan is welcome as it takes account of changes over the last five years, including the revised guidelines and the greater body of evidence showing the links between exposure to air pollution and people's quality of life.

2. **Group Director's introduction**

- 2.1. Hackney has been declared an Air Quality Management Area as a result of Air Quality Objectives for nitrogen dioxide and particulate matter being exceeded. We are required to have an Air Quality Action Plan that is reviewed and updated at least every five years.
- 2.2. The Action Plan reflects on what has been achieved and looks at how the Council can build on our successes, but also adapt our approach to take account of changes which have occurred over the lifetime of the current Plan. This is especially pertinent given that significant changes occurred during the Covid-19 pandemic which affected levels of air pollution in the borough. The Council has the opportunity to learn from these and build on those changes which had a positive impact on air quality.
- 2.3. An Action Plan needs support and buy-in from all stakeholders. The engagement of residents and community groups has been an inherent part of the process right from the early stages of development of this draft. The

changes made to the Action Plan following consultation are set out in the consultation report and this shows how we have aimed to listen to, and respond, to residents' feedback. It is clear that people in Hackney are concerned about the impacts of air pollution on health. While action to improve air quality is almost universally supported, opinions vary on how this can best be achieved. Ensuring that we collect good quality monitoring data will help to evaluate the effectiveness of measures and we need to be clear and transparent with this data.

- 2.4. Air pollution does not recognise boundaries and air quality is affected by emissions from various sources. This Action Plan contains a package of 54 actions which will be delivered by teams across the Council over the next five years aimed at improving air quality further. This requires a coordinated effort across multiple Directorates and Services and the creation of this Action Plan is a demonstration of the effective collaboration that has taken place during its development. In this way, the Air Quality Action Plan links to, and supports other Council Strategies and Plans including the Climate Action Plan, Transport Strategy and the Green Infrastructure Strategy.
- 2.5. Hackney like many other Local Authorities is under significant financial pressure. While some of the actions in the Action Plan are dependent on funding being secured, the costs and benefits for each action are clearly outlined to ensure that resources are directed in the most cost effective ways.

3. **Recommendations**

- 3.1. **To agree the content of the Post-Consultation Draft Air Quality Action Plan 2026-2030, and approve its submission to the Mayor of London for approval.**
- 3.2. **To delegate authority to the Director for Environment and Climate Change to make any minor amendments to the Air Quality Action Plan requested by the Mayor of London and to formally adopt the final version.**

4. **Reason(s) for decision**

- 4.1. Air pollution is the largest environmental risk to public health in the UK. The health effects of exposure to air pollution are wide-ranging, and can affect everyone throughout the life course. Children and young people, the elderly, those who are pregnant and those with long-term health issues are particularly vulnerable. The main air pollutants in Hackney include nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}) and ozone.
- 4.2. Local authorities are required to review and assess air quality as part of their responsibilities under Part IV of the Environment Act 1995 (as amended). Local authorities are required to declare an Air Quality Management Area (AQMA) where air quality standards and objectives are exceeded in their

area. The whole of Hackney has been declared an AQMA since 2006, for exceedances of air quality objectives for NO₂ and PM₁₀.

- 4.3. When an AQMA is declared, local authorities must produce an Air Quality Action Plan (AQAP), setting out how the borough will exercise its functions to achieve the air quality standards and objectives. Policy guidance of the London Local Air Quality Management (LLAQM) framework requires Councils to update their AQAP at least every five years. Hackney adopted its current AQAP (the 'AQAP 2021-2025') in 2021, and so an update to the AQAP is due by 2026.
- 4.4. The AQAP 2026-2030 sets out the actions and measures that the Council will implement up to the year 2030 to achieve clean air for all in Hackney. It takes account of the most up-to-date information and data (including local monitoring data) to ensure that the Council is responding to changes in the air pollution environment. This includes responding to sources of pollution making up a greater proportion of pollution than in the past (such as non-exhaust road traffic emissions, wood burning and commercial cooking), and considering the latest evidence on the health effects of pollution at all levels. The AQAP 2026-2030 also aims to improve consistency in the level of details of each action while providing flexibility with regards to how the Plan is delivered up to, and including, 2030.
- 4.5. The AQAP 2026-2030 has been organised into eight themes. These have been reorganised compared to the current AQAP, in order to focus on either the most important sources of emissions of air pollution in the borough, or the types of activities we will undertake to reduce exposure to poor air quality. Each action is grouped under one of the following themes:
 - Air quality monitoring and statutory duties
 - Planning and construction
 - Buildings, heating and solid fuel
 - Cleaner transport
 - Schools, communities and the local environment
 - Public health and awareness raising
 - Advocacy and partnership working
 - Indoor air quality - included for the first time in the AQAP
- 4.6. In addition, 10 'priorities' have been identified in the AQAP. These summarise the actions that are considered to deliver the most significant improvements to air quality within the Council's control. The most significant policy and project changes proposed in the AQAP 2026-2030 include:
 - A commitment to meet an annual mean NO₂ target of 30 µg/m³ across Hackney by 2030 (the current UK air quality objective is 40 µg/m³).
 - An increased focus on emissions from construction sites, including from construction dust, construction vehicles and equipment, and odours from land remediation.
 - A more detailed plan on how we will manage wood burning within our current legislative powers.

- A reflection of the Council's decarbonisation, retrofitting and energy efficiency projects that will have dual benefits in reducing air pollution.
- Proposals to manage emissions from commercial cooking.
- A commitment to a review of the Parking and Enforcement Plan to tackle non-exhaust emissions.
- A review of the feasibility of managing idling through additional enforcement approaches.
- New approaches to tackle emissions from filming, events and mobile sources (e.g. emissions from mobile generators)
- Investigating the most effective methods to improve air quality on the waterways.
- Further integration of air quality and public health, including working more closely with NHS ICBs on projects with a clearer healthcare focus.
- Projects relating to indoor air quality, including an indoor air quality monitor loan scheme.

- 4.7. A period of early engagement took place between July and November 2024. This engagement provided an opportunity for those with an interest in air quality in Hackney to provide comments and feedback in an open, deliberative manner. This was followed by a period of statutory consultation on the Draft AQAP 2026-2030, which took place between 7 July 2025 and 26 September 2025. At both stages, respondents were asked for their opinion on how air quality affects them and how the Council manages air quality, alongside providing feedback on specific proposals.
- 4.8. A high level of engagement of consultation took place in the development of the AQAP 2026-2030, following feedback on the development of the current AQAP. A number of steps were taken in order to ensure a high level of transparency on how the Council has considered the feedback received. Further details of the consultation and engagement processes undertaken are provided in Section 6 of this report.
- 4.9. The delivery of actions in the AQAP will require support and resources from teams and departments across the Council. Thus, throughout the development of the AQAP, and following engagement and consultation processes, relevant officers have been made aware of the proposals and amendments. This ensures deliverability of the actions and consistency with all other plans, policies and strategies.
- 4.10. The AQAP has considered the financial impact of the proposed actions to improve air quality, acknowledging the current constrained financial position of the Council. An anticipated cost range has been provided for each action, and detailed in the matrix within the document. As actions to improve air quality are to be taken across many areas of the Council, costs will be met in various ways, including from planning contributions (e.g. the Carbon Offset Fund), external grant funding or funding from bodies such as Transport for London. In some cases, actions are provisional on securing additional or

alternative funding sources. Where this is the case, this has been made clear, as well as possible sources for this funding.

- 4.11. Extensive correspondence with the Mayor of London has taken place throughout the development of the AQAP 2026-2030. Therefore, the Post-Consultation Draft AQAP appended to this report and for submission to the Mayor of London has already considered and incorporated substantive comments that have been received. However, there remains a possibility of a small number of minor amendments. Therefore, this decision requests a delegation of the formal adoption of the AQAP 2026-2030 to the Director of Environment and Climate Change to ensure a timely adoption.

5. **Background**

- 5.1. In Hackney, there has been a sustained, significant downward trend in NO₂ - a reduction of 55-60% since 2017. This has been seen across London, believed to be primarily driven by reductions in emissions from road traffic (due to tightening emissions standards and turnover of vehicles, London-wide policies such as ULEZ, and local traffic management policies). There are now only a small number of areas of the borough that exceed the NO₂ air quality objective.
- 5.2. On the other hand, there has been no clear trend in concentrations of either PM₁₀ or PM_{2.5} in recent years. This is likely to reflect more varied sources of PM and increases in emissions from certain sources, including construction, non-exhaust traffic emissions (e.g. brake, tyre and road wear), wood burning and commercial cooking. At present, levels of PM₁₀ and PM_{2.5} in Hackney are close to the target adopted in the AQAP 2021-2025, but are not consistently below it.
- 5.3. In addition, there has been a notable increase in ozone where this pollutant is monitored. This is likely due to the effects of climate change-induced hotter sunnier weather and the effect of pollutants imported from outside of Hackney.
- 5.4. Hackney has made much progress on air quality over the period of the current AQAP. Some key achievements, delivered by teams across the Council, include:
- Expansion of the air quality monitoring network, tripling the reference-level monitoring capability for PM_{2.5}, adding new monitors to robustly assess traffic and transport schemes and implementing new low-cost sensor technology.
 - Adoption of Hackney's Code of Construction Practice to set out our expectations to developers to help reduce emissions of pollutants from construction sites, and participation in the non-road mobile machinery audit programme for construction sites.
 - Launch of the Hackney Community Energy Fund, investing almost £1m in energy-saving projects and renewable energy systems for community groups.

- The Defra-funded Air Aware project, with a tool co-created with Air Quality Champions to better inform local residents on air quality and empower them with information in a format best suited to them.
- Helping businesses shift to low emission deliveries and freight as part of the Zero Emissions Network.
- The rollout of new low traffic areas to support walking, cycling and public transport in the borough, with an accompanying air quality monitoring programme for all schemes.
- Delivery of the Parking and Enforcement Plan with emissions-based parking charge bands.
- The roll out of around 50 School Streets and new green screens at schools, to reduce the exposure of young people to pollution at the school gates and in the playground.

5.5. The revised AQAP will continue the direction of travel where this has been successful. However, due to reduction in exhaust emissions from road traffic, the AQAP will increase the focus on reducing emissions from other sources, which now make up a much larger proportion of the total than in many previous years. It also proposes a larger emphasis on working closer with public health and healthcare colleagues, and will include actions related to indoor air pollution for the first time.

Strategic Policy Context

5.6. Local authorities are required to review and assess air quality in their area under Part IV of the Environment Act 1995, as amended by the Environment Act 2021. Local authorities have a statutory requirement to meet the air quality objectives, standards and targets of the national Air Quality Strategy. Hackney assesses air quality through air quality monitoring and modelling. Table 1 below shows the air quality standards and objectives that apply in UK regulations.

Pollutant	Objective / Target / Limit	Type / Averaging period	Regulation
NO ₂	40 µg/m ³	Annual mean	Air Quality (England) Regulations 2000
	200 µg/m ³ (not to be exceeded more than 18 times per year)	1-hour mean	
PM ₁₀	40 µg/m ³	Annual mean	Air Quality Standards Regulations 2010
	50 µg/m ³ (not to be exceeded more than 35 times per year)	24-hour mean	
PM _{2.5}	10 µg/m ³ (by 2040)	Annual mean concentration target	Environmental Targets (Fine Particulate)
	12 µg/m ³ (interim target by 2028)		

	35% reduction in population exposure (by 2040)	Population exposure reduction target	Matter (England) Regulations 2023
	<i>22% reduction in population exposure (interim target by 2028)</i>		
O ₃	100 µg/m ³ (not to be exceeded more than 10 times per year)	Daily max 8-hour mean	Air Quality Strategy

Table 1: Air quality objectives and standards for NO₂, PM₁₀, PM_{2.5} and O₃ in UK regulations

- 5.7. Local authorities have a duty under Section 83(1) of the 1995 Act to declare an AQMA where an air quality objective or standard is exceeded, or is predicted to exceed. This must cover at least the area of exceedance. Hackney declared the entire borough an AQMA in June 2006, for exceedances of objectives for the pollutants NO₂ and PM₁₀. Since this time, there have been significant improvements in air quality, although there are still some areas where the air quality objectives of the national Air Quality Strategy are exceeded. In particular, there are still some small areas of the borough that exceed the annual mean objective for NO₂.
- 5.8. Where an AQMA is declared, Section 83A(2) of the 1995 Act, as amended, requires an action plan to be prepared, setting out how the authority will exercise its functions to achieve the air quality objectives, standards and targets.
- 5.9. Responsibility for managing air quality in London has been devolved to the Mayor of London under Part IV of the Environment Act 1995 (as amended) since 2016. The Mayor has established the London Local Air Quality Management (LLAQM) framework to coordinate boroughs' responsibilities for local air quality, including action plans. London boroughs are required to consult with the Mayor of London when revising their AQAPs and refer to the guidance and recommendations issued by the Greater London Authority. All AQAPs produced by London boroughs must also receive final approval from the Mayor of London.
- 5.10. Policy guidance of the LLAQM framework (known as LLAQM PG(19)) requires boroughs to update their AQAP at least every five years. Hackney adopted its current AQAP (the 'AQAP 2021-2025') in 2021, and is therefore required to update its AQAP by 2026.
- 5.11. In addition to the UK air quality regulatory framework, the World Health Organization (WHO) publishes air quality guidelines. These are based solely on the evidence of health impacts, whereas UK (and EU) regulations also consider the feasibility of achieving the target within a timeframe.
- 5.12. In 2021, the Coroner published their Prevention of Future Deaths report, following the inquest into the death of Ella Adoo Kissi-Debrah. It was found that exposure to excessive air pollution contributed to her death. The report

set out key recommendations, including those that should be taken forward by local government in relation to air pollution. The report noted that:

- National limits for PM are currently set at a level far higher than the WHO guidelines.
- There is low public awareness of the sources of information about air pollution levels.
- The adverse effects of air pollution on health are not sufficiently communicated to patients and their carers by medical and nursing professionals, and this needs to be addressed at all levels.

5.13. The most recent WHO guideline values were published in 2021, just after Hackney's AQAP 2021-2025 was adopted. These guidelines highlight that there is no safe level of PM_{2.5}, and that health impacts occur even at concentrations well below the current UK regulations. Hackney adopted the 2005 WHO guideline values in its AQAP 2021-2025, but the updated WHO levels are significantly stricter, creating a clear need to revise the AQAP and move towards alignment with the best available public health science. Table 2 shows the 2005 and 2021 WHO guidelines compared with objectives and targets in UK regulations.

Pollutant	Averaging period	Concentration (µg/m ³)		
		UK objective / limit / target	2005 WHO guideline value	2021 WHO guideline value
NO ₂	Annual mean	40	40	10
	24-hour mean	–	–	25
	1-hour mean	200	200	200
PM ₁₀	Annual mean	40	20	15
	24-hour mean	50	50	45
PM _{2.5}	Annual mean	10	10	5
	24-hour mean	–	25	15
O ₃	8-hour mean	100	100	100

Table 2: Comparison of the targets in the National Air Quality Strategy with WHO Guideline Values for 2005 and 2021

5.14. The WHO also publishes interim targets. These are levels that are higher than the guideline values, but are associated with a specific and evidence-based decrease in health risk. These can be useful as incremental targets when current air pollution concentrations are much higher than the guideline values. The interim targets are shown in Table 3.

Pollutant	Averaging period	Interim target (µg/m ³)				Guideline value (µg/m ³)
		1st	2nd	3rd	4th	

NO ₂	Annual mean	40	30	20	–	10
	24-hour mean	120	50	–	–	25
PM ₁₀	Annual mean	70	50	30	20	15
	24-hour mean	150	100	75	50	45
PM _{2.5}	Annual mean	35	25	15	10	5
	24-hour mean	75	50	37.5	25	15
O ₃	8-hour mean	160	120	–	–	100

Table 3: WHO 2021 Guideline Values showing the interim targets

5.15. The AQAP 2026-2030 proposes the adoption of targets for NO₂, PM₁₀ and PM_{2.5}, to be met by 2030, that are based on the WHO interim targets. These have been selected as ambitious but achievable, to help drive action to improve air quality in Hackney. There is a commitment to review these again in 2030. They are:

- NO₂ - 30 µg/m³ (2nd interim target)
- PM₁₀ - 20 µg/m³ (4th interim target)
- PM_{2.5} - 10 µg/m³ (4th interim target)

5.16. The adoption of these targets, alongside other actions in the AQAP 2026-2030, seeks to address the recommendations to local governments in the 2021 Coroner's report.

5.17. Schedule 11 of the Environment Act 1995 requires local authorities to consult with specific groups and organisations in the preparation of an action plan under Section 83A. Statutory consultation took place between 7 July 2025 and 26 September 2025. The organisations that were contacted as specified in Schedule 11 are listed in Table 4 below, alongside whether they responded to the consultation.

Statutory Consultee	Responded
The Secretary of State for Environment, Food and Rural Affairs (Defra)	No
Environment Agency	Yes
Transport for London (the highways authority)	Yes
The Mayor of London	Yes
City of London Corporation	No
LB Haringey	No
LB Islington	No
LB Newham	No
LB Tower Hamlets	No

LB Waltham Forest	No
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Table 4: List of statutory consultees and whether they responded

- 5.18. Schedule 11 also requires authorities to consult bodies or persons appearing to be representative of persons with business interests in the area, and other bodies or persons that the authority considers appropriate. However, this requirement is not further prescriptive. Further information about the consultation and engagement that took place in the preparation of the AQAP 2026-2030, is provided in paragraphs 5.39 to 5.51.
- 5.19. Alongside statutory duties, the AQAP has been developed to support Hackney Council's Strategic Plan, working together for a greener, healthier Hackney. It is also consistent with a range of other strategies and policies, including the Climate Action Plan, Transport Strategy, Parking and Enforcement Plan, Economic Development Plan, Green Infrastructure Strategy, Local Plan 2033, and the Joint Health and Wellbeing Strategy. Special care has been taken to ensure the AQAP aligns with all these strategies and reflects Hackney's ambitions for public health, climate, sustainable transport, and growth management.

Appraisal of options

- 5.20. **Do nothing.** This option was discounted as Hackney has been declared an AQMA and so there is a statutory requirement for the borough to have an AQAP in place. The current AQAP is for the period 2021 to 2025. Under LLAQM policy guidance, the Mayor of London requires boroughs to revise and update their AQAP at least every five years. Failing to revise the AQAP would mean that Hackney's AQAP is out-of-date and it would not meet the Mayor of London's timeframe for revision. The GLA publishes a report each year which includes information on the dates of borough's AQAPs. Failing to have an up-to-date AQAP would have reputational consequences for the borough, which could lead to a loss of trust among the public and potentially the loss of opportunities to bid for air quality funding (e.g. the Mayor's Air Quality Fund).
- 5.21. In addition, an up-to-date AQAP is essential for ensuring the Council's actions are appropriate and proportional to the current air quality issues in the borough. An up-to-date AQAP can take account of the most recent air quality monitoring data and wider research on air pollution issues in London. Therefore, the option to not revise and update the AQAP was rejected.
- 5.22. **Revise AQAP without adopting measures recommended by the Mayor of London.** The Mayor of London provides a recommended 'action matrix' for boroughs, outlining the actions that he expects boroughs to include in their AQAP. There is flexibility in how individual boroughs adopt these into their AQAPs, in order to reflect the different circumstances for each borough. However, there is no requirement to adopt these measures in full.

- 5.23. In this instance, it was decided to incorporate all of the actions from the action matrix into the AQAP 2026-2030, taking account of Hackney's specific circumstances in each instance. This is because the action matrix has been extensively appraised, and, upon review, all of the measures within it were considered appropriate for inclusion into Hackney's AQAP. The alternative option would be to develop the AQAP, but not include the actions recommended by the Mayor of London.
- 5.24. As final approval of the AQAP 2026-2030 lies with the Mayor of London, the alternative option was not considered feasible or necessary. Hackney's AQAP has thus been developed to both take account of the actions recommended in the Mayor of London's matrix, while also ensuring that it responds to Hackney's individual circumstances and reflects the goals and ambitions of the borough.

Equality, inclusion, diversity and belonging (including any statutory equality impact assessment)

- 5.25. An iterative Equality Impact Assessment (EqIA) process was undertaken throughout the development of the AQAP to meet the duties of the Council under Section 149 of the Equality Act 2010. The EqIA considers: the potential impacts of the adoption of the AQAP on people with the nine protected characteristics of the Equality Act; the socio-economic duty; and the potential impact on additional groups identified in the Council's Equality Plan 2024-2026.
- 5.26. The EqIA was first undertaken following the early engagement phase of developing the Plan, in collaboration with officers from Corporate Strategy. In this way, any significant equality issues arising from the first draft of the proposed actions of the AQAP could be considered at an early stage and mitigated. The EqIA was then revised following the production of the Draft AQAP 2026-2030, and published alongside the Draft AQAP for statutory consultation.
- 5.27. The statutory consultation period, as well as the earlier period of engagement, provided valuable feedback on people's views on air pollution. Feedback was also received on how the proposals may affect them, in some cases raising additional equalities issues to be considered. Following the statutory consultation, the EqIA was revised again to take account both of this feedback, and to account for any of the changes made to the AQAP itself as a result of the consultation.
- 5.28. It is known that those most at risk of health impacts from air pollution are children and young people, including the unborn; those who are pregnant and new parents; the elderly; and those with chronic illnesses and disabilities. There is also evidence to suggest that those from Black and global majority backgrounds tend to be disproportionately exposed to higher levels of air pollution. There is also a link between deprivation and low income, and exposure to higher levels of poor air quality.

- 5.29. Due to overall improvements to air quality in Hackney, the AQAP is likely to have strong, positive benefits for these groups. Actions proposed across transport, buildings, construction, public health and indoor air quality are also expected to reduce inequalities related to disproportionate exposure to poor air quality.
- 5.30. The AQAP is an overarching framework for delivering improvement to air quality, and will be delivered by many services areas across the Council. The assessment concludes that no protected group is expected to experience disproportionate or systematic harm due to the high level actions detailed in the AQAP. However, further consideration will be required at the project-specific stage to avoid any impacts. This could include, for example, the individual details of schemes that affect traffic access, or changes to rules on solid fuel burning. Any possible impacts will be managed through project- or scheme-specific assessments, exemptions, further engagement and consultation.
- 5.31. The EqIA highlights the need to work closely with groups who could experience these specific impacts. Particularly of note are:
- People with disabilities who are particularly reliant on vehicles;
 - Those who use wood and coal for heating, including boat dwellers, the elderly and other socioeconomically disadvantaged people reliant on solid fuel;
 - Those who are more likely to be disproportionately exposed to poor air quality, including Black and global majority residents, and/or socioeconomically disadvantaged people, where a scheme or project might impact on air quality.
- 5.32. The Plan commits to continued dialogue, targeted engagement and tailored mitigations to ensure accessibility, affordability and fairness. Overall, the EqIA concludes that the AQAP advances equality of opportunity, supports those most vulnerable to the impacts of pollution, and provides a proportionate and evidence-based approach that balances the wider benefits of cleaner air with the needs of all communities.
- 5.33. The EqIA also includes a list of actions that will be taken forward should the AQAP be approved for adoption. These actions are identified to ensure equalities needs continue to be considered as the AQAP is implemented. They include:
- Accounting for the high-level equalities issues identified in the EqIA are taken forward in individual projects, and the needs of individual groups are addressed.
 - Actively seeking the views of underrepresented groups on air quality and actions within the AQAP, to ensure a representative breadth of feedback is received.
 - Continuing with projects currently being undertaken to understand the views of populations that are not traditionally represented in

consultation with the Council (e.g. the Healthy Waterways project for boat dwellers).

- Continue to monitor air quality and assess the impacts of any actions or schemes to avoid any potential adverse impacts as they are implemented.

Sustainability and climate change

- 5.34. The AQAP 2026-2030 aims to improve air quality in the borough and reduce the exposure of those most vulnerable to the health impacts of air pollution. This aim supports the Mayoral priority for a greener, healthier Hackney, and will help to deliver a cleaner and safer environment for all those in the borough.
- 5.35. The AQAP 2026-2030 supports, and is supported by, other Council strategies and policies that will further sustainability and environmental objectives. These include, for example, the Climate Action Plan, the Transport Strategy, the Green Infrastructure Strategy and the Parks and Green Spaces Strategy.
- 5.36. Ensuring that air quality is not considered in isolation from other environmental and sustainability considerations has been a key tenet of the AQAP 2026-2030. The majority of actions that will improve air quality will also have co-benefits for sustainability and climate change. For example, actions relating to cleaner transport to improve air quality will also lead to a reduction in carbon emissions, especially those that focus on promoting active travel and improving public transport. In addition, actions that focus on reducing pollutant emissions from buildings and heating systems, may also reduce carbon emissions (e.g. through improving efficiency and reducing fossil fuel use).
- 5.37. There may be a small number of cases where there is a potential conflict between sustainability and air quality. For example, the trend in direction towards electric vehicles, which typically have lower on-road carbon emissions, can lead to increased non-exhaust emissions due to vehicle size and weight (e.g. from brake, tyre and road wear). Where these conflicts could arise, these have been carefully considered, e.g. with a commitment to further monitoring and research.
- 5.38. The AQAP includes explicit information about whether each action contributes to climate change mitigation, and whether the action also forms part of the Council's Climate Action Plan.

Consultation and Engagement

- 5.39. As the AQAP is wide-ranging, cutting across a number of areas of the Council's work, consultation activities were considered key to the success of the Plan.

- 5.40. A period of early engagement took place between July and November 2024. This provided an opportunity for anyone with an interest in air quality in Hackney to provide comments and feedback in an open, deliberative manner, prior to the production of the new AQAP.
- 5.41. The Council undertook this engagement on a non-statutory basis in response to feedback on the development of the AQAP 2021-2025, specifically that the consultation activities did not enable sufficient scope for change or input from the public at an early stage. Early engagement activities included an online survey (which received 178 responses), a deliberative engagement workshop and a number of other in-person, informal interactions. See Appendix 3 for Early Engagement Report.
- 5.42. During the preparation of the Draft AQAP, consultation with relevant Council officers took place on a regular basis. This included representatives from Climate, Sustainability and Environmental Services, Streetscene, Parking Services, Planning, Fleet Management, Public Health, Housing, Hackney Light and Power, Energy and Utilities, Parks and Green Spaces, Enforcement, Procurement, Communications and Corporate Strategy. Officers were consulted at the early draft stage, prior to publication of the Draft AQAP for consultation and following the statutory consultation.
- 5.43. Following Officer Key Decision CHE S574, delegated to the Director of Environment and Climate Change and taken on 4 July 2025, a period of statutory consultation was undertaken on the Draft AQAP 2026-2030. This took place between 7 July 2025 and 26 September 2025. As described in paragraph 5.17, this consultation was carried out in consideration of the requirements of Section 83A and Schedule 11 of the Environment Act 1995 (as amended).
- 5.44. Consultation media were prepared in conjunction with the Council's Consultation and Engagement team. The Draft AQAP 2026-2030 was published, alongside the Equalities Impact Assessment, on the Council's Consultation and Engagement Hub (Citizen Space). Printed surveys with an accompanying freepost reply envelope were also made available on request and were available with stationery at all in-person events. In addition, respondents who wished to do so were able to provide a written, free-text response, which could be submitted by email or post. The consultation was publicised through a range of media and in-person events. Full details are included in the Consultation Report (Appendix 4a).
- 5.45. Groups representing charities, voluntary organisations and community groups were contacted directly due to their interest or expertise, or because they represented groups that are potentially more vulnerable to the health effects of air pollution. Representatives of 62 Tenant and Residents Associations (or similar) across Hackney were contacted directly. See a full list of organisations in Appendix 4b.

- 5.46. The consultation and engagement surveys aimed to develop the understanding of people's views on air pollution, how they feel impacted and how proposals to tackle air pollution may affect them. It also sought to gauge a level of support for the identified priorities and the proposals in the AQAP. It also included monitoring questions to assess the demographic spread of responses. See consultation questions in Appendix 4c.
- 5.47. In total, 245 responses to the survey were received. Three responses were received from named statutory consultees, and three further written responses were received by email from campaign groups, and an individual.
- 5.48. The findings were generally similar during both phases of engagement and consultation. Some of the key findings:
- Almost 9 in 10 respondents (89%) were residents of Hackney, with others including visitors, workers and business-owners.
 - The vast majority (84%) considered air quality to be very or fairly important, although almost half (48%) were dissatisfied with the Council's current approach.
 - Road traffic, solid fuel burning, emissions from construction sites and air quality on the waterways were chosen as the top sources of pollution that Hackney should prioritise.
 - The majority of respondents supported or strongly supported all 10 of the chosen priorities in the AQAP, although levels of support varied. Most supported included those related to construction sites (84%), improving air quality on the waterways (81%), indoor air quality (80%) and working with public health and healthcare colleagues (80%). The least supported (62%) was related to 'reducing traffic' on Hackney's roads.
 - Responses around road traffic and congestion remained a major theme and made up the majority of free-text responses. It is clear this issue is strongly associated with air quality. Around one-third of free text responses expressed dissatisfaction with perceived air quality issues arising from the Council's traffic management measures. This view is not unanimously shared, with other respondents raising other concerns about pollution from road traffic, with suggestions relating to parking policy, improving walking and cycle infrastructure, and enforcing anti-idling regulations.
 - Concern around emissions from buildings or from solid fuel use (including from canal boats), construction sites, air quality around schools, and air quality in green spaces formed the other major themes of free text answers. There were also suggestions relating to air quality monitoring, enforcement and awareness raising.
- 5.49. It was considered essential to ensure a high level of transparency on how the Council has responded to feedback received on the AQAP, given previous concerns raised on this issue. The following steps were taken to ensure transparency of how consultation responses were considered:

- The Draft AQAP 2026-2030 (Appendix 1a) includes a line-by-line response to all the substantive themes raised during the early engagement period.
- The Expanded AQAP Matrix (Appendix 1b) clearly details the changes that have been made to each action as a result of the statutory consultation.
- The Early Engagement Report and Consultation Report have been published in full. These include a full analysis of responses received.

5.50. Substantially more detailed information on targets, timescales and KPIs has been added into the Post-Consultation Draft AQAP 2026-2030, principally to address comments from the Mayor of London on this topic. Changes made to each action are also detailed in the Expanded AQAP Matrix (Appendix 1b). Some of the key changes are summarised as follows:

- Commitment to review the WHO-based targets in 2030.
- Clarification of the approach to complaints made under the Environmental Protection Act (i.e. statutory nuisance), to avoid confusion.
- Further explanation of how measures relating to buildings, construction and planning will be delivered, which are typically to be delivered through planning policy reviews and other planning powers.
- Introduced targets relating to backup diesel generators and a commitment to consult in relation to data centres.
- Further information about managing solid fuel burning, including how complaints will be handled and the proposals for awareness-raising and data gathering.
- Explanation of funding sources and possible limitations of the actions on retrofit, energy efficiency and decarbonisation of buildings.
- Greater detail on actions under 'Cleaner Transport', including details of schemes to be delivered under the most recent Local Implementation Plan. This is in response to the high level of interest on this theme raised during the consultation.
- Targets and further details on schemes including School Streets, green screens and cooperation with the Mayor of London's programmes such as school filters.
- Greater detail in relation to how air quality policies and projects will be integrated with public health.
- Firmed up commitments to deliver the indoor air quality monitor loan scheme.

5.51. Once the AQAP is formally adopted and published, progress with delivering the measures contained within it will be reported to the Mayor of London annually in Hackney's Air Quality Annual Status Report.

Risk assessment

5.52. The risks and mitigation measures associated with the AQAP are detailed below.

Risk	Mitigation
AQAP is not adopted in time	<p>The governance procedure recommended for adoption of the AQAP includes a delegation to approve minor amendments. This will prevent additional delays should the Mayor of London suggest amendments.</p> <p>The Council will continue to work under the framework of the current AQAP until the revised AQAP is adopted. The delivery of actions to improve air quality will therefore continue under the current framework while the revised AQAP remains unadopted. The Council will also continue to undertake its statutory duties relating to air pollution.</p>
Air quality objectives or standards are not met; deterioration of air quality	<p>The Council undertakes extensive and ongoing review and assessment of air quality, including using air quality monitoring. Modelling has also been carried out identifying the areas of the borough where levels of air pollution remain the highest. This will provide an evidence base to target measures where they are required.</p> <p>Substantial consultation with all service areas where policies and projects will affect air quality (e.g. streetscene, planning and public health) has taken place. This working relationship will continue. There are specific commitments in the AQAP to monitoring the most significant schemes, e.g. traffic management schemes.</p> <p>Advocacy and lobbying measures have been included in the AQAP to work with organisations who have a more substantial influence over air pollution sources outside of the Council's control, e.g. UK Government and the Environment Agency for agricultural and industrial sources.</p>
Financial risks	<p>There is a significant social and health cost associated with exposure to air pollution. This needs to be balanced with the direct costs of delivering the actions within the AQAP.</p> <p>The AQAP sets out indicative costs of delivering each of the actions in the plan. These range from actions that can be delivered with existing staff and financial resources (i.e. business-as-usual actions), to those that require significant capital investment.</p> <p>Extensive consultation took place with all service areas of the Council to ensure that the actions were affordable and deliverable. This ensures that actions link to corporate priorities and service plans, which further ensures that they can be driven forward.</p> <p>In some cases, high cost actions are already funded, being delivered under existing plans and proposals. Some actions, e.g. those relating to decarbonisation and retrofit, are being delivered using external funding sources or ring-fenced budgets (e.g. planning contributions).</p> <p>Some actions in the AQAP are not funded and would be</p>

	<p>subject to a capital funding bid, or external funding sources. Where this is the case, this has been explicitly stated. The Council will pursue funding opportunities where available and required.</p>
<p>Risks to impacts on those with protected characteristics, or in different areas of the community</p>	<p>An Equalities Impact Assessment has been produced iteratively throughout the development of the AQAP. While the overall impact is likely to be positive, especially on those most at risk of adverse health effects from air pollution, some groups have been identified who may be negatively impacted by the implementation of some actions.</p> <p>Where possible issues have been identified, project- or scheme-specific assessments, exemptions or further engagement and consultation may be considered.</p> <p>Hackney will also maintain its monitoring network to assess any changes in air quality that may arise as a result of any project or scheme, to ensure any adverse impacts are mitigated.</p>
<p>Reputational risks</p>	<p>Failure to adopt an up-to-date AQAP in good time may risk Hackney's reputation as a borough that is ambitious in its environmental goals and objectives.</p> <p>Although WHO targets are not statutory, Hackney has committed to meeting them. Failure to make progress would undermine our credibility as a health-led, ambitious borough and lead to a weakening of confidence from stakeholders (including the public).</p>

6. **Financial implications**

- 6.1. This report outlines the governance approach to adopting the proposed Air Quality Action Plan for the period 2026-2030. The plan includes an expanded matrix that provides at high level the actions proposed and assigns each of these actions an estimated value. The matrix of actions are cross council and are informed by a number of other strategies and plans.
- 6.2. A number of the actions are recorded as business as usual where the assumption is that the financial impact would be contained within existing budgets with no additional resource required.
- 6.3. Some of the actions may require additional funding. The plan includes comments around other potential sources of funding such as grants and other contributions. Any action that requires resources beyond current, planned budgets would need to be subject to the normal council financial processes for additional funding such as capital bids or revenue business cases so each can be costed on a whole life basis and considered against available resources.
- 6.4. The council owns a number of air quality meters. The cost of maintenance of these assets is within existing budgets within the Housing, Climate and

Economy directorate and the anticipated remaining life of the assets is beyond the period of this action plan. Any capital investment required for renewal or improvement of these assets would need to follow the normal capital bid processes.

Financial Implications prepared on behalf of the Group Director Finance & Resources by John Holden, Assistant Director of Finance - Sustainability, Public Realm and Special Projects, john.holden@hackney.gov.uk,
12/1/2026

7. **HR/OD implications**

7.1. There are no HR /OD implications arising from this Report.

HR/OD implications prepared on behalf of the Director of HR/OD by Steve Swain Strategic HR OD Business Partner, Steve.Swain@hackney.gov.uk
22/12/2025

8. **Legal implications**

8.1. The Council is under a statutory duty to monitor air pollution and to determine whether the Air Quality Objectives are being met. The Air Quality Action Plan is a methodology to assist compliance.

8.2. In accordance with Article 5 of the Council's constitution, the Mayor and Cabinet, when approving policies for the Council (or in this case approving the draft Policy to the Mayor of London for approval), seek to balance the interests of the community and set priorities that contribute to the life and development of the borough.

8.3. A key decision is a Cabinet decision which is likely to:

i) Result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decisions relates, or

ii) Be significant in terms of its effects on communities living or working in an area comprising two or more wards in the area of the Council.

8.4. Recommendation 3.1 of this report recommends that Cabinet approves the content of the Post-Consultation Draft Air Quality Action Plan 2026-2030, and approves its submission to the Mayor of London for approval.

8.5. Currently the Mayor's scheme of delegation reserves to the Mayor and Cabinet approval of: all corporate policies and strategies and all formal service strategies. The Mayor and Cabinet are permitted to approve the recommendation set out in Paragraph 3.1 of this report.

- 8.6. The recommendation set out in 3.2 of this report recommends that Cabinet Delegates authority to the Director for Environment and Climate Change to make any minor amendments to the Air Quality Action Plan requested by the Mayor of London and to formally adopt the final version. Paragraph 2.2 (Sub-delegation of Cabinet Functions) i) of the Cabinet Procedure Rules states that "If the Elected Mayor delegates functions to the Cabinet, unless they direct otherwise, then the Cabinet may delegate further to a Committee of the Cabinet, to an officer, to any joint arrangements, to another authority or to area committees". Cabinet is therefore permitted to approve and delegate functions as per the recommendation in 3.2 of this report.

Legal implications prepared on behalf of the Director of Legal, Democratic & Electoral Services by: Josephine Sterakides, Team Leader, josephine.sterakides@hackney.gov.uk 16th January 2026

Appendices

- Appendix 1a - Air Quality Action Plan 2026-2030 Post-Consultation Draft
- Appendix 1b - AQAP Expanded Matrix Post-Consultation Version
- Appendix 2 - Equality Impact Assessment
- Appendix 3 - Early Engagement Report
- Appendix 4a - Consultation Report
- Appendix 4b - Consultee List
- Appendix 4c - Consultation Questions

Reasons for exemption

None of the reports or appendices are exempt.

Background documents

In accordance with The Local Authorities (Executive Arrangements) (Meetings and Access to Information) England Regulations 2012 the following background papers were used in the preparation of this report:

- [Officer Key Decision CHE S574 Draft Air Quality Action Plan 2026-2030 - Statutory Consultation](#)
- [Hackney Air Quality Annual Status Report for 2024](#)
- [London Local Air Quality Management Policy Guidance 2019 \(LLAQM.PG \(19\)\)](#)