



TITLE OF REPORT HCE S701 Submission of Final Air Quality Action Plan (2026-2030) with Amendments to Mayor of London for Approval and Adoption	
REPORT OF Sam Kirk, Assistant Director, Climate, Sustainability & Environmental Services	
DATE 15 May 2026	CLASSIFICATION: Open
WARDS AFFECTED All Wards	
REASON KEY DECISION Affects two or more wards	
DIRECTOR Geeta Subramaniam-Mooney, Director, Environment and Climate Change	

1. SUMMARY

- 1.1 This report is being put forward with a recommendation to accept minor amendments and submit the final version of the Air Quality Action Plan (AQAP) 2026-2030 to the Mayor of London for approval, using authority delegated to the Director of Environment and Climate Change by Cabinet on 26 January 2026.
- 1.2 Hackney Council declared an Air Quality Management Area (AQMA) in 2006 under the London Local Air Quality Management (LLAQM) framework. Local authorities must produce an AQAP once an AQMA has been declared.
- 1.3 Hackney Council's existing AQAP runs for the period 2021-2025. LLAQM policy guidance recommends that AQAPs are updated every five years to ensure plans remain responsive to current air quality issues. The Council has been developing a revised AQAP, known as the AQAP 2026-2030, since July 2024.

- 1.4 Extensive consultation and engagement has taken place on the development of the AQAP 2026-2030, including statutory consultation between July and September 2025.
- 1.5 On 26 January 2026, Cabinet agreed (Key Decision No. HCE S652) to submit the Post-Consultation AQAP 2026-2030 to the Mayor of London. Cabinet also agreed to delegate authority to the Director of Environment and Climate Change to make any minor amendments to the Air Quality Action Plan as requested by the Mayor of London, and to formally adopt the final version.
- 1.6 The Council received a small number of requested amendments following submission of the Post-Consultation AQAP 2026-2030 to the Mayor of London. This report outlines the nature of the amendments that have been proposed and the reasons for adoption of these via delegated authority.
- 1.7 The final version of the AQAP 2026-2030 will be submitted to the Mayor of London for final approval following approval of this decision. If approved by the Mayor of London, the AQAP 2026-2030 will be adopted as Council policy.
- 1.8 The final version of the AQAP 2026-2030 is appended to this report for reference. A final Equality Impact Assessment (EqIA) in support of the AQAP is also appended.

2. RECOMMENDATION

The Director of Environment and Climate Change is recommended:

- 2.1 **To approve the submission of the final version of the Air Quality Action Plan 2026-2030 to the Mayor of London for approval, using authority delegated by Cabinet (Key Decision No. HCE S652) on 26 January 2026.**

3. REASONS FOR DECISION

- 3.1 The Council's existing AQAP is for the period 2021-2025, and has thus now lapsed. The AQAP 2026-2030 has been in development since June 2024, to ensure that it remains up-to-date and that the Council continues to respond to the borough's most important air quality issues. A period of early engagement took place between June and November 2024, followed by a statutory consultation between July and September 2025; more details are provided in Paragraphs 5.11 to 5.17.
- 3.2 Cabinet agreed (Key Decision No. HCE S652) to submit the Post-Consultation AQAP 2026-2030 to the Mayor of London on 26 January 2026. With this decision, Cabinet also agreed to delegate authority to the Director of Environment and Climate Change to make any minor amendments to the AQAP as requested by the Mayor of London, and to formally adopt the final version.

- 3.3 The Post-Consultation Draft AQAP 2026-2030 was subsequently submitted to the Mayor of London. The Council then received a small number of comments from the Mayor of London. The Council reviewed these comments, and proposed a small number of minor amendments to the AQAP. A response was provided to the Mayor of London where a comment was considered, but an amendment to the AQAP was not made.
- 3.4 The Council has proposed **five** amendments to the AQAP, which are all within Section 6 (in the AQAP Matrix). These cover Action nos. 2, 3, 4, 11 and 32. These amendments are considered minor overall, and therefore acceptable to be adopted by delegated authority, for the following reasons:
- there have been no amendments to any of the actions themselves;
 - there has been no change in the policy direction or ‘spirit’ of the Plan;
 - the wording of some measures has been amended to reduce any ambiguity or be more specific, but has not altered the measure itself; and/or
 - the targets to support some actions have been amended to be more specific or time-bound for progress reporting purposes.
- 3.5 A small number of updates to supporting evidence in Section 2 of the AQAP have also been made. These account for the publication of more recent statistics by external sources since the production of the Post-Consultation Draft and do not affect the actions in the AQAP in any way.
- 3.6 Therefore, this decision is now being taken following the completion of all necessary previous steps in the production and adoption of the AQAP 2026-2030, and following delegation of approval by Cabinet. Once approved by the Mayor of London, the AQAP 2026-2030 will become Council policy.
- 3.7 There will be no new financial implications as a result of this decision.

4. DETAILS OF ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

- 4.1 The Council is required to have an up-to-date AQAP given its declaration of an AQMA under the Environment Act 1995 (as amended).
- 4.2 The proposed amendments are minor in nature, as outlined in Paragraph 3.5, and do not materially alter any policy aspect of the AQAP 2026-2030. As Cabinet agreed to submit the Post-Consultation Draft to the Mayor of London, and delegate authority to the Director of Environment and Climate Change to accept minor amendments, no alternative options have been considered.

5. BACKGROUND

Policy context

- 5.1 The Environment Act 1995 (as amended) ('the 1995 Act') requires local authorities to review and assess air quality in their area and identify where air quality standards and objectives may not be achieved. If such an area is identified, local authorities must designate an AQMA and subsequently prepare an action plan to ensure the standards and objectives are secured.
- 5.2 Hackney declared an AQMA in 2006 for exceedances of air quality objectives for the pollutants nitrogen dioxide (NO₂) and particulate matter (PM₁₀). Hackney subsequently produced an action plan that has been periodically updated. The latest plan was adopted in 2021 (the 'AQAP 2021-2025').
- 5.3 In London, Part IV functions of the 1995 Act are undertaken by the Mayor of London under the LLAQM framework. LLAQM policy guidance (LLAQM PG(19)) requires that local authorities review their action plans at least every five years. LLAQM PG(19) states that final approval of a London borough's action plan lies with the Mayor of London.
- 5.4 The AQAP 2026-2030 supports and compliments a number of local policies and strategies, including the Local Plan, the Transport Strategy and the Climate Action Plan.
- 5.5 An update of the AQAP supports the Hackney Labour Manifesto commitment to tackle air pollution, and enable people to track our progress with delivering improvements to air quality. It also supports the Mayoral priority to prioritise the environment and improve quality of life by tackling air pollution.

Air quality in Hackney

- 5.6 The main pollutants of concern in Hackney are NO₂ and particulate matter (PM₁₀ and PM_{2.5}), which is reflected in Hackney's AQMA designation. Evidence for the wide-ranging health effects of these pollutants, particularly PM, has developed significantly in recent years. In 2021, the World Health Organization revised down their air quality guideline values to reflect the development in evidence of impacts on health. As such, there is a need to reduce concentrations of these pollutants to as low a level as possible.
- 5.7 There has been a significant downward trend in concentrations of NO₂ in Hackney since 2017, with reductions in concentrations of around a half. This is reflected across London, believed to be primarily due to decreases in emissions from road traffic.
- 5.9 However, concentrations of PM₁₀ and PM_{2.5} have not shown the same downward trend. It is likely this is due to the more varied sources of PM and possible

increases in emissions from certain sources (e.g. non-exhaust traffic emissions, construction, wood burning and commercial cooking). There are also indications of an increase in levels of ozone.

- 5.10 There is thus a need to ensure that Hackney's AQAP accounts for the changing makeup of pollutant emissions in the borough, namely to better reflect the growing proportion of non-traffic emissions (to the total burden) and the evolving evidence base of health effects of air pollution for all pollutants.

Consultation and engagement

- 5.11 Development of the AQAP 2026-2030 began in July 2024, and has included extensive consultation and engagement.
- 5.12 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, prior to the drafting of the revised AQAP. 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. A Draft for Consultation was subsequently prepared.
- 5.13 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 for Consultation AQAP 2026-2030. This took place between 7 July 2025 and 26 September 2025. This consultation was carried out in consideration of the requirements of Section 83A and Schedule 11 of the Environment Act 1995 (as amended).
- 5.14 During the preparation of the AQAP, consultation with relevant Council officers took place on a regular basis. Officers were consulted at the early draft stage, prior to publication of the Draft for Consultation, and again following the statutory consultation.
- 5.15 A total of 178 written responses were received at the early engagement phase, which were collated alongside feedback received during in-person engagement events. A total of 245 responses to an online survey, plus six separate written submissions, were received during the statutory consultation. Further details regarding consultation and engagement are provided in the report supporting Cabinet Decision HCE S652.
- 5.16 There has been no further consultation specifically related to this delegated decision given the minor nature of the amendments to be adopted.

- 5.17 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.

Equalities considerations

- 5.18 Equalities considerations have been proactively considered throughout the development of the AQAP 2026-2030 using an iterative Equality Impact Assessment (EqIA) process. The EqIA was first undertaken following the early engagement phase in 2024, and revised following the production of both the Draft for Consultation and the Post-Consultation Draft.
- 5.19 Feedback has been received at multiple stages on how the AQAP 2026-2030 may affect different groups, in some cases raising additional equalities issues to be considered. The EqIA has been substantially revised from its first iteration to take account both of this feedback, and to account for any of the changes made to the AQAP itself as a result of consultation. Paragraphs 5.25 to 5.33 of the Cabinet decision report outline this process in detail.
- 5.20 Having considered the proposed amendments to the AQAP 2026-2030, it has been determined that there will be no material impact on equalities issues. A final EqIA will be prepared and published alongside the final version of the AQAP 2026-2030, although there will be very few material changes to the Post-Consultation Draft version.

Sustainability

- 5.21 The AQAP 2026-2030 aims to improve air quality in Hackney and reduce the exposure of those most vulnerable to the health impacts of air pollution. It also actively considers the implications of measures to improve air quality on climate change and sustainability, to ensure these policies are working in tandem.
- 5.22 The environmental and sustainability implications of the AQAP 2026-2030 have been robustly appraised throughout its development and have been scrutinised by Cabinet. The proposed minor amendments to the AQAP 2026-2030 do not lead to any material change in environmental and sustainability outcomes.

Risk Assessment

- 5.23 **AQAP is not accepted by the Mayor of London, further delaying adoption -** Suitable consultation with the Mayor of London has taken place on both a formal and informal basis. Comments were addressed in turn, suggestions incorporated where appropriate and any suggestion not accepted has been fully explained. The risk that the AQAP is not accepted by the Mayor of London once submitted is low.

- 5.24 **Air quality objectives or standards are not met; deterioration of air quality** - The Council undertakes extensive and ongoing review and assessment of air quality, which provides an evidence base to target measures where they are required. Substantial consultation with all service areas where policies and projects will affect air quality has taken place. There are specific commitments in the AQAP to monitoring the most significant schemes, e.g. traffic management schemes. Advocacy and lobbying measures have been included in the AQAP where control of air pollution sources outside of the Council's control, e.g. UK Government and the Environment Agency.
- 5.25 **Risks to impacts on those with protected characteristics, or in different areas of the community** - An EqIA has been produced iteratively throughout the development of the AQAP; details are provided in Paragraphs 5.18 to 5.20. Where possible issues have been identified, project- or scheme-specific assessments, exemptions or further engagement and consultation may be considered. Hackney will also continue to 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.
- 5.26 **Reputational risks** - 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.
- 5.27 **Financial risks** - There are unlikely to be any substantial financial risks associated with this specific decision. However, there are significant social and health costs associated with exposure to air pollution. These need to be balanced with the direct costs of delivering the actions within the AQAP. The AQAP sets out indicative costs of delivering each of the actions in the plan. Extensive consultation took place with all service areas of the Council to ensure that the actions were affordable and deliverable.

6. COMMENTS OF THE GROUP DIRECTOR OF FINANCE AND CORPORATE RESOURCES

- 6.1 This report outlines the amendments made to the final proposed version of 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.

7. COMMENTS OF THE DIRECTOR, LEGAL & GOVERNANCE SERVICES

- 7.1 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.

- 7.2 On the 26th January 2026 Cabinet approved the content of the Post-Consultation Draft Air Quality Action Plan 2026-2030, and approved its submission to the Mayor of London for approval. Cabinet also delegated 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.

- 7.3 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.

- 7.4 The Director for Environment and Climate Change is able to approve the recommendations carried out in this report, in line with the Delegation from Cabinet approved on the 26th January 2026.

APPENDICES

- [Air Quality Action Plan 2026-2030](#)
- [Equalities Impact Assessment](#)
- [Cabinet decision - HCE S652 Submission of Air Quality Action Plan \(2026-2030\) to Mayor of London for Approval](#)

BACKGROUND PAPERS

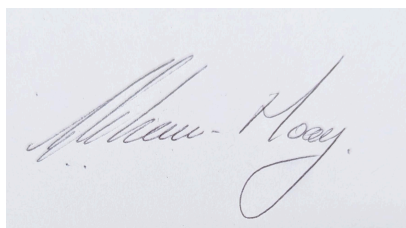
In accordance with The Local Authorities (Executive Arrangements) (Meetings and Access to Information) England Regulations 2012 publication of Background Papers used in the preparation of reports is required.

There are no unpublished documents considered 'Background Papers' that have been used in the preparation of this report.

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