

## London Borough of Hackney

### Equality Impact Assessment

<b>Title of Equality Impact Assessment</b>	Air Quality Action Plan 2026-2030 - Draft for Consultation
<b>Name of Lead Report Author</b>	Tom Richardson
<b>Job Title</b>	Environmental Projects Officer
<b>Date</b>	May 2025
<b>Service Area</b>	Land Water Air Team – Climate, Sustainability and Environmental Services
<b>Name of Director</b>	Geeta Subramanian-Mooney Director of Environment and Climate Change

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# 1. Proposal

## 1.1. Background

The entirety of Hackney is an Air Quality Management Area (AQMA), which was declared in 2006 due to exceedances of national air quality objectives for the pollutants nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). Under the Environment Act 1995 and the London Local Air Quality Management (LLAQM) framework, local authorities that declare an AQMA are required to produce an Air Quality Action Plan (AQAP). Policy guidance requires the Council to review the AQAP at least every five years.

There is evidence that exposure to poor air quality can have significant impacts on health.<sup>1,2</sup> Research in recent years has shown that air pollution not only causes and exacerbates cardiovascular and respiratory conditions, but can also lead to issues such as poor mental health, cognitive decline and dementia.<sup>3</sup> While there is clear evidence that air pollution can impact people throughout their life course, the health effects also tend to disproportionately impact the elderly, children and the very young.<sup>4</sup>

Significant changes in the air quality landscape have taken place since Hackney adopted its current AQAP in 2021. Hackney adopted the 2005 World Health Organization (WHO) guideline values for these pollutants with the existing AQAP in 2021, with a commitment to meet these by 2030. However, WHO guidelines were revised just after Hackney's adoption of the current AQAP and made significantly tighter. As such, there is an urgent need to reduce both emissions and concentrations of all major pollutants to as low a level as possible for the protection of health.

There has been a significant downward trend in concentrations of NO<sub>2</sub>, which have reduced around 45% since 2017 in Hackney. This is reflected across London, believed to be primarily due to decreases in emissions from road traffic. We can attribute this to the turnover of the vehicle fleet, London-wide policies such as ULEZ and local policies such as Low Traffic Neighbourhoods. With the exception of the most central London locations, the expected 'rebound' in levels of NO<sub>2</sub> after 2021 (following the Covid lockdowns) has not been observed.

However, monitoring data for PM<sub>10</sub> and PM<sub>2.5</sub> has not reflected the same downward trend and concentrations have plateaued in recent years. The reasons for this are unclear, but are likely to reflect the more varied sources of PM and increases in emissions from certain

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<sup>1</sup> Office for Health Improvement & Disparities (2022). Air pollution: applying All Our Health.

<https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health>

<sup>2</sup> Environmental Research Group, Imperial College London (2021). London Health Burden of Current Air Pollution and Future Health Benefits of Mayoral Air Quality Policies.

<https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/environment-publications/health-burden-air-pollution-london>

<sup>3</sup> COMEAP (2022). Cognitive decline, dementia and air pollution. A report by the Committee on the Medical Effects of Air Pollutants.

<https://assets.publishing.service.gov.uk/media/62ceccdc8fa8f50c012d1406/COMEAP-dementia-report-2022.pdf>

<sup>4</sup> Environmental Research Group, Imperial College London (2023). Impacts of air pollution across the life course – evidence highlight note.

<https://www.london.gov.uk/New%20review%20shows%20harmful%20health%20impacts%20of%20pollution%20before%20birth%20through%20to%20old%20age>

activities, including: construction; non-exhaust traffic emissions (e.g. brake and tyre wear and resuspension from heavier vehicles); wood burning; and commercial cooking. There are also indications that levels of ozone (i.e. photochemical smog) are increasing, potentially due to hotter summer weather and other atmospheric factors.

## 1.2. Proposal

The proposed revision of the AQAP outlines the actions that the Council will take to improve air quality in Hackney from 2026 to 2030. It is required to better account for the evolving evidence base of health effects for all pollutants and the changing makeup of emissions in the borough (including the proportion of non-traffic emissions).

The Draft AQAP 2026-2030 is a wide-ranging policy document. It covers actions that will be taken across several service areas in the Council, reflecting the broad range of sources of air pollution that are influenced by different Council services. The revised AQAP must take account of the range of Council plans, policies and strategies that have been published since 2021, including the Climate Action Plan, the Parking and Enforcement Plan, the Local Implementation Plan and the Green Infrastructure Strategy.

The actions of the Draft AQAP 2026-2030 are broadly split into the following eight 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

This Equality Impact Assessment (EqIA) will review the impact on each group within each of the themes in turn. This approach has been chosen due to the wide-ranging nature of the AQAP; actions under each of the eight themes are likely to have different impacts on different groups. These will need to be examined separately.

The AQAP 2026-2030 is a key policy document of the Council. The final AQAP will be approved by Cabinet, following a period of statutory consultation on the Draft AQAP. The AQAP must also be agreed and approved by the Greater London Authority.

Authority to produce the Draft AQAP, and to carry out statutory consultation, has been delegated to the Director of Environment and Climate Change.

The key documents that have been produced are as follows:

- **Draft Air Quality Action Plan 2026 - 2030** - key policy document
- **Equality Impact Assessment** - this document

The statutory consultation on these documents launches in June 2025. The responses to the consultation will then be considered, collated and reported, and a final AQAP produced. It is envisaged that the final AQAP will be adopted by the end of 2025 or the start of 2026.

### **1.3. Consultation and Engagement**

Preliminary discussions on the production of a revised AQAP began in May 2024. Very high level engagement exercises were carried out during public events in summer 2024 where the Land Water Air team could have a presence (e.g. Sustainability Day and events hosted by the Recycling Team).

Informal discussions took place with relevant officers who would be responsible for the delivery of actions within the AQAP in summer 2024. These included departments such as Streetscene, Planning, Parks and Energy.

A formal early engagement online survey ran between 6th September 2024 to 1st November 2024, which received 178 responses. A number of other activities and events that aimed to gather the views and opinions of the public also took place up until 19th November 2024. This included a workshop session with 9 attendees, where in-depth discussions on the direction of policy took place.

The Draft AQAP was then produced, taking account of all of the consultation to date. This draft was then again circulated to internal officers for substantive approval and comment. The appended Draft AQAP 2026-2030 thus reflects the most recent comments made by relevant officers.

The outcomes of the early engagement survey and workshop were published in a report, which is currently available at: <https://consultation.hackney.gov.uk/public-realm/copy-of-air-quality-action-plan-2020-2025/>. This report summarises the views expressed during the engagement. How the Council has considered these views is outlined in Appendix 1 of the Draft AQAP, rather than in the engagement report itself.

While the level of response to the early engagement was relatively good, with highly valuable feedback, it was not considered representative of the demographics of Hackney as a whole. This under-representation of certain groups has shaped the statutory consultation process, with the aim of hearing from a wider cross-section of Hackney residents.

### **1.4. Other sources of data**

Data from the following other sources has informed the production of the Draft AQAP 2026-2030 and this EqlA.

- Hackney Strategic Plan 2022-2026
- Hackney Equality Plan
- A Profile of Hackney, its People and Place (May 2024)
- Air Quality Action Plan 2021-2025
- Air Quality Annual Status Reports (the latest of which is for 2023)
- The Local Plan 2033
- Community Strategy
- Climate Action Plan
- Transport Strategy and Local Implementation Plan
- Parking and Enforcement Plan
- Green Infrastructure Strategy

- Local Nature Recovery Plan
- Parks and Green Spaces Strategy
- Joint Health and Wellbeing Strategy
- Sustainable Procurement and Insourcing Strategy

## 1.5 Review

<b>Previous review date</b>	<ul style="list-style-type: none"> <li>• AQAP 2021-2025: October 2020</li> <li>• AQAP 2026-2030: This is the first review</li> </ul>
<b>Next review date</b>	This EqlA will be reviewed to support the final AQAP 2026-2030, to be produced following statutory consultation (approx. September 2025).
<b>Responsibility for equality impact monitoring</b>	Land Water Air Manager Climate, Sustainability and Environmental Services

## 2. Impact Analysis

### 2.1. Protected Characteristics

There are nine Protected Characteristics outlined in the Equality Act 2010. When assessing the impact of decisions public authorities have a duty to:

- Eliminate unlawful [discrimination, harassment and victimisation](#) and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

This is known as the **Public Sector Equality Duty**.

The impact of the AQAP will be borough-wide, and affect almost all residents, workers, businesses and visitors in Hackney, although to varying extents. The details of populations with protected characteristics in Hackney are outlined below, with data broadly taken from ONS census data, unless otherwise stated.

The 2024 population estimate for Hackney is 284,799, projected to increase to 291,555 by 2030.<sup>5</sup>

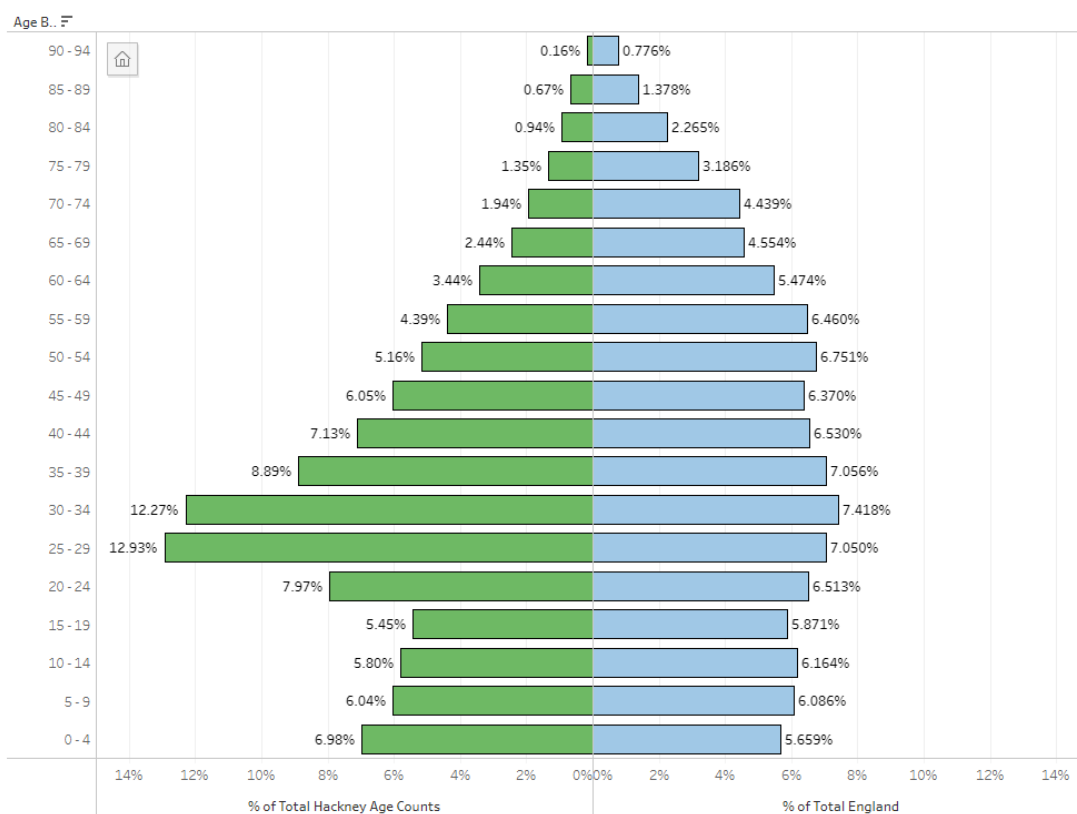
#### a. Age

Hackney's median age is 32, which is below both the median for England (40) and the median for London (35). Almost half of Hackney's population are aged between 22 and 45. Hackney's population is thus younger than the average for England, and there are proportionally fewer older people compared to the England average. However, the population of older adults is increasing, while the population of children and young adults is decreasing. The age structure of Hackney is shown in **Figure 1**.

Age groups are broadly evenly distributed across the borough, with the exception of areas in the north-east of the borough, where there is a significantly larger proportion of under 14s.

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<sup>5</sup> Greater London Authority (2022). London's Population Projections Explorer. Available: <https://apps.london.gov.uk/population-projections/>



**Figure 1: Age structure in Hackney, in five-year bands, compared with England**

People of all ages can be affected by poor air quality. However, it tends to be the very young, children and the elderly who are the most vulnerable. Those under 15 and adults over 50 represent around 40% of Hackney's total population.

- Air pollution can adversely affect lung development in children and young people, and may lead to higher incidences of conditions such as asthma.
- Unborn babies can be harmed by their parent's exposure to air pollution during pregnancy.
- The elderly are more sensitive to air pollution, leading to increased care, including hospitalisation. Exposure to air pollution can also increase the rate of cognitive decline, and exacerbate conditions such as dementia.
- Those with chronic conditions, such as asthma, chronic obstructive pulmonary disease (COPD) or cardiovascular disease are likely to be most adversely affected by exposure to air pollution. These diseases are more prevalent in older people.

As such, actions to improve air quality are therefore likely to have overall **positive** impacts on these groups. However, how these actions are taken may have non-health impacts. The additional impacts are considered below.

Theme	Potential impact	Explanation / mitigation
Air quality monitoring and statutory duties	No specific impacts (overall <b>positive</b> ).	Actions ensuring robust air quality monitoring and the undertaking of statutory functions will lead to overall improvements in air quality, which will benefit this group.



Planning and construction	No specific impacts (overall <b>positive</b> ).	Actions taken to reduce emissions from new developments and construction will lead to overall improvements in air quality, which will benefit this group.
Buildings, heating and solid fuel	Actions will broadly reduce emissions associated with buildings and heating emissions, which will have a <b>positive</b> impact.	Actions taken to reduce emissions from this source will lead to overall improvement in air quality, which will benefit this group. Many of these actions are funded and will not result in any financial burden.
	Actions taken to reduce emissions from solid fuel may <b>negatively</b> impact upon older people, who continue to use this type of fuel to heat their homes. Consider the impact on fuel poverty.	People can continue to use solid fuel as a heating source provided it complies with the rules of the Smoke Control Order (SCO), which have been in place since the 1960s. Substantial engagement and consultation has already taken place and will continue to take place for any changes in SCO rules.
Cleaner transport	Actions will broadly reduce emissions from transport sources, which will have a <b>positive</b> impact on the young and the elderly.	Actions that improve street accessibility, reduce road danger and car dominance on the highway are likely to have positive impacts on the young and the elderly. Children are particularly vulnerable to exhaust emissions, as they are physically closer to the emissions source. They will be positively impacted by any reductions.
	Some actions restrict or change the use of private motor vehicles, which may <b>negatively</b> impact some elderly people who rely on cars or taxis.	Schemes that restrict motor vehicle use, such as bus gates or low traffic neighbourhoods, will undergo scheme-specific consultations and an evaluation of their impacts on certain groups. Mitigations, such as exceptions or changes to design, can be designed in. Improvements in public transport and the walking and cycling environment may also help to mitigate the disbenefits to this group.
Schools, communities and the local environment	Actions aim to reduce emissions and exposure around schools, healthcare facilities. These will have <b>positive</b> benefits on the very young, children, and the elderly who attend these locations.	Children and young people are more susceptible to air pollution, so improvements targeted at schools will have positive impacts on this group. Elderly people are more likely to attend hospital and healthcare facilities, so improvements targeted here will have positive impacts on this group.
	Some actions (e.g. School Streets) restrict or change the use of private motor vehicles, which may <b>negatively</b> impact some elderly people who rely on cars or taxis.	Schemes that restrict motor vehicle use will undergo a scheme-specific evaluation. School Streets in particular have exemptions for residents and are time-limited. Other mitigations can be designed in, as required. Improvements in the local environment may encourage mode shift to reduce the use of private vehicles.
Public health and awareness	Actions are expected to have an overall <b>positive</b> impact, especially on those that are	Children, young people and the elderly are most susceptible to the health impacts of air pollution. Efforts to raise awareness and

raising	most vulnerable to air pollution.	improve health outcomes will have broad positive impacts on these people.
Advocacy and partnership working	No specific impacts (overall <b>positive</b> ).	Working with partners and advocating to improve air quality will benefit this group.
Indoor air quality	No specific impacts (overall <b>positive</b> ).	Advice, guidance and monitoring of the impact of indoor air pollution will benefit this group.

## **b. Disability**

In Hackney, 19.2% of people considered themselves to be disabled under the Equality Act. This compared to 15.6% for London, and 17.7% for England. As such, there is a greater proportion of the population who consider themselves disabled in Hackney compared to both London and England.

In Hackney, the total percentage comprised 9.6% who considered their day-to-day activities limited a lot; and 9.6% who considered their day-to-date activities limited a little.

The impact of improved air quality on those with disabilities, in particular chronic health conditions exacerbated by exposure to air pollution, is likely to be **positive**. However, the range of disabilities is diverse. The actions and measures we take to improve air quality may have consequences for people living with certain types of disability. These impacts are outlined below.

Theme	Potential impact	Explanation / mitigation
Air quality monitoring and statutory duties	Very minimal impact. The expansion of air quality monitoring may reduce pavement space, <b>negatively</b> impacting on those with reduced mobility or vision.	Any new infrastructure affecting the pavement will proactively consider the access needs of those with reduced mobility or vision to eliminate any adverse impacts.
Planning and construction	Reductions in air pollution from new developments and construction will <b>positively</b> impact those with disabilities or chronic illnesses that make them more vulnerable.	Actions taken to reduce emissions from new developments and construction will lead to overall improvements in air quality, which will benefit this group.
	Policies to reduce emissions from new developments may reduce accessibility by vehicle to these developments, which may <b>negatively</b> impact those relying on private cars and taxis.	There are a number of planning policies in place to ensure new developments, while car-free, have adequate mitigations for those with access requirements and mobility impairments (e.g. blue badge parking). These policies will continue.
Buildings, heating and solid fuel	Reductions in air pollution from buildings will <b>positively</b> impact those with disabilities or chronic illnesses that make them more vulnerable.	Actions taken to reduce emissions from this source will lead to overall improvement in air quality, which will benefit this group. Many of these actions are funded and will not result in any financial burden.

	Actions that reduce or limit solid fuel burning in homes may <b>negatively</b> impact those with disabilities or chronic conditions who heat their homes in this way.	People can continue to use solid fuel as a heating source provided it complies with the rules of the Smoke Control Order (SCO). Substantial engagement and consultation has already taken place and will continue to take place for any changes in SCO rules.
	New technologies may be more expensive, or not meet the needs of those requiring warmer homes, <b>negatively</b> impacting this group.	There is generally no <i>obligation</i> for the replacement of existing heating systems with cleaner technology. Any replacements and upgrades will be subject to suitability assessments. All energy options are appraised to ensure suitability and affordability. Many upgrade schemes are subject to funding and will not place any financial obligation on residents.
Cleaner transport	Reductions in levels of air pollution from traffic will <b>positively</b> impact those travelling or using the road with disabilities or chronic illnesses that make them more vulnerable.	Many people live with disabilities caused by chronic illnesses, that are exacerbated by air pollution (e.g. asthma, COPD). Reducing emissions from transport will positively impact these groups by providing a healthier environment in which to travel, reducing the likelihood of acute (and chronic) health effects.
	Improved pedestrian environments and safe active travel infrastructure can <b>positively</b> impact disabled people who rely on walking, cycling or micro-mobility.	Reduced road danger, quieter streets and safer, accessible active travel infrastructure can provide more travel options for certain disabled people, e.g. slower moving pedestrians, those using mobility vehicles or adapted cycles, those with sight or hearing impairments, and those with intellectual disabilities.
	Improved public transport can <b>positively</b> impact disabled people who rely on buses, trains etc.	Improvements and more reliable public transport options will benefit disabled people who rely on these services, and who cannot or choose not to drive.
	Some actions restrict or change the use of private motor vehicles, which may <b>negatively</b> impact disabled people who rely on cars or taxis.	No traffic schemes in Hackney remove access to residences and other premises by vehicle. However, it is acknowledged that some schemes (e.g. LTNs) will increase journey times taken by cars. Each traffic scheme undergoes a period of consultation so that any disruption to disabled people is minimised or designed out. Hackney operates the HAC01 exemption scheme for blue badge holders. This scheme provides an exemption to some traffic filter restrictions for disabled people with qualifying conditions, mitigating the longer journey times that schemes such as LTNs may cause. Many bus lanes or restricted vehicle lanes have exceptions for taxis, improving taxi journey reliability.

Schools, communities and the local environment	Actions to reduce vehicle dominance around schools, healthcare settings etc. is likely to <b>positively</b> impact disabled people accessing these facilities.	Many people live with disabilities caused by chronic illnesses that are exacerbated by air pollution. Reducing exposure to pollution at education and healthcare settings, including those that are likely to be more frequently visited by disabled people, can improve the environment for these people and reduce the likelihood of health effects. Reduced road danger and facilitating better access without using a vehicle can improve the environment for disabled people who have sight and hearing impairments or sensory, learning or mobility issues.
	Improved and expanded green infrastructure is likely to have a <b>positive</b> impact on those with intellectual, learning or developmental disabilities and improve mental wellbeing.	Quieter, greener and less polluted environments can provide a calmer and less stressful and distracting experience for certain people with intellectual or developmental disabilities (e.g. autism spectrum disorder or developmental delay).
	Restrictions on vehicle access, e.g. School Streets, and expansion of green infrastructure in the highway, may have a <b>mixed</b> impact on those with a mobility-related disability.	Restrictions on vehicle access may hinder certain disabled people's access to schools, doctors surgeries and hospitals, if they rely on private vehicles. However, individual schemes will be assessed on their own merits and can be mitigated through providing exemptions for those who have no other option for access. On the other hand, vehicle restrictions may improve accessibility for those who do not drive, e.g. slower moving pedestrians, those using mobility vehicles or adapted cycles, those with sight or hearing impairments, and those with intellectual disabilities.
Public health and awareness raising	Actions are expected to have an overall <b>positive</b> impact, especially those living with conditions that make them more vulnerable to air pollution.	Many people with chronic health conditions are most susceptible to the health impacts of air pollution. Efforts to raise awareness and improve health outcomes will have broad positive impacts on these people.
Advocacy and partnership working	No specific impacts (overall <b>positive</b> ).	Working with partners and advocating to improve air quality will benefit this group.
Indoor air quality	No specific impacts (overall <b>positive</b> ).	Advice, guidance and monitoring of the impact of indoor air pollution will benefit this group.

### c. Gender Reassignment

Data on gender identity was estimated at borough level for the first time in the Census 2021, although there is uncertainty due to concerns over the quality of responses. Hackney has a slightly higher reported proportion of residents (1.1%) with a transgender identity by comparison to London and England. There is also a lower proportion of residents (89.3%)

with a cisgender identity in comparison to London and England. However, there was also a higher proportion (9.7%) of respondents in Hackney who did not answer this question compared to both London and England.

There are **no specific needs that have been identified** for those who have undergone or are undergoing gender reassignment in relation to the AQAP. However, they may fall into other vulnerable groups or in a group with other protected characteristics.

#### **d. Marriage or Civil Partnership Status**

Marriage is defined as a 'union between two people'. Same-sex couples can also have their relationships legally recognised as a 'civil partnership'. Civil partners must be treated the same as married couples on a wide range of legal matters including protection under the Equality Act. Hackney has fewer pensioner households, couples who are married or in a same sex civil partnership and cohabiting couples with children than the London and England averages.

There are **no specific needs that have been identified** for people who are married or in a civil partnership in relation to the AQAP. However, they may fall into other vulnerable groups or in a group with other protected characteristics.

#### **e. Pregnancy and Maternity**

The total fertility rate has been dropping over the past ten years in Hackney, similar to London and England. In 2022, it was 1.31 in Hackney, lower than London (1.39) and England and Wales (1.49). The 3,482 live births in 2022. However, these were not evenly distributed across the borough. Three wards in the north (Cazenove, Springfield and Stamford Hill West) had a birth rate more than double the borough average.

The proportion of people in Hackney accessing their first antenatal care appointment before 13 weeks is very low (34.1%), compared to the London (47.8%) and England (57.8%) averages.

There is evidence to show that exposure to air pollution can lead to low birth weight, which can increase the risk of childhood mortality, developmental problems and poor health in later life. In 2021, there were 3.1% of babies in Hackney with low birth weight among term babies. This was similar to London (3.3%) and England (2.8%).

It is therefore considered that any improvements to air quality will have significant **positive** impacts on this protected characteristic, although it is necessary to consider any unintended consequences of how this goal is achieved.

<b>Theme</b>	<b>Potential impact</b>	<b>Explanation / mitigation</b>
Air quality monitoring and statutory duties	No specific impacts (overall <b>positive</b> ).	Actions ensuring robust air quality monitoring and the undertaking of statutory functions will lead to overall improvements in air quality, which will benefit this group.
Planning and construction	No specific impacts (overall <b>positive</b> ).	Actions taken to reduce emissions from new developments and construction will

		lead to overall improvements in air quality, which will benefit this group.
Buildings, heating and solid fuel	No specific impacts (overall <b>positive</b> ).	Actions taken to reduce emissions from this source will lead to overall improvement in air quality, which will benefit this group.
Cleaner transport	Reductions in levels of air pollution from traffic will <b>positively</b> impact those travelling or using the road who are pregnant.	Exposure to air pollution during pregnancy can increase the risk of health impacts on the unborn child and make people more vulnerable to health impacts. Reducing levels of air pollution will therefore reduce the risk of potential health impacts on this group.
	Improvements in public transport (incl. reliability) and expansion of alternative transport options will have a <b>positive</b> impact on those who are pregnant or newly parenting, who do not use a car.	Those in late stages of pregnancy, or new parents, may be less able or willing to travel using a car. In addition, a high proportion of trips made in Hackney are by non-car modes, many of which will be made by expectant and new parents. Improving the reliability and accessibility of these travel options will therefore have positive impacts on this group.
	Restrictions on private vehicles may have a <b>negative</b> impact on those who are pregnant or newly parenting, if they rely on a car or taxi.	If expectant or new parents routinely use private vehicles to travel, or have large families, restrictions may increase journey times or decrease accessibility of travel for this group. However, it is worth noting that no transport scheme removes access to properties or premises. In addition, high levels of car traffic can negatively impact travel times. Each transport scheme will also undertake a specific assessment of the impacts on this group, to minimise adverse effects.
Schools, communities and the local environment	Measures to reduce exposure to poor air quality around schools and hospitals are expected to have a <b>positive</b> impact on this group.	Expectant and new parents are more likely to attend schools and hospitals, and are also more likely to be vulnerable to negative health impacts of air pollution. Any measures targeting improvements in these sensitive locations are therefore likely to have a beneficial impact on the health of this group.
Public health and awareness raising	Measures to improve awareness of air quality on public health are expected to have a <b>positive</b> impact.	Pregnant women and new parents are more susceptible to the health impacts of air pollution. Efforts to raise awareness and improve health outcomes will have broad positive impacts on these people.
Advocacy and partnership working	No specific impacts (overall <b>positive</b> ).	Working with partners and advocating to improve air quality will benefit this group.
Indoor air quality	No specific impacts (overall <b>positive</b> ).	Advice, guidance and monitoring of the impact of indoor air pollution will benefit

		this group.
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#### f. **Race / Ethnicity**

Race or ethnicity refers to a group of people defined by their race, colour, nationality (including citizenship), ethnic or national origins. The percentage of respondents to Census 2021, broken down by ethnic group in Hackney, London and England, is provided in **Table 1**.

<b>Ethnic group</b>	<b>Hackney</b>	<b>London</b>	<b>England</b>
Asian / Asian British: Bangladeshi	2.5%	3.7%	1.1%
Asian / Asian British: Chinese	1.3%	1.7%	0.8%
Asian / Asian British: Indian	3.4%	7.5%	3.3%
Asian / Asian British: Pakistani	0.9%	3.3%	2.8%
Asian / Asian British: Other Asian	2.2%	4.6%	1.7%
<b>Asian / Asian British</b>	<b>10.4%</b>	<b>20.7%</b>	<b>9.6%</b>
Black / Black British / Caribbean / African: African	11.4%	7.9%	2.6%
Black / Black British / Caribbean / African: Caribbean	6.9%	3.9%	1.1%
Black / Black British / Caribbean / African: Other Black	2.8%	1.7%	0.5%
<b>Black / Black British / Caribbean / African</b>	<b>21.1%</b>	<b>13.5%</b>	<b>4.2%</b>
Mixed or multiple ethnic groups: White and Asian	1.4%	1.4%	0.8%
Mixed or multiple ethnic groups: White and Black African	1.1%	0.9%	0.4%
Mixed or multiple ethnic groups: White and Black Caribbean	1.8%	1.5%	0.9%
Mixed or multiple ethnic groups: Other Mixed or multiple ethnic groups	2.4%	1.9%	0.8%
<b>Mixed or multiple ethnic groups</b>	<b>6.7%</b>	<b>5.8%</b>	<b>3.0%</b>
White: English, Welsh, Scottish, Northern Irish or British	33.9%	36.8%	73.5%
White: Irish	2.2%	1.8%	0.9%
White: Gypsy or Irish Traveller	0.1%	0.1%	0.1%
White: Roma	0.3%	0.4%	0.2%
White: Other White	16.6%	14.7%	6.3%
<b>White</b>	<b>53.1%</b>	<b>53.8%</b>	<b>81.0%</b>
Other ethnic group: Arab	0.9%	1.6%	0.6%
Other ethnic group: Any other ethnic group	7.7%	4.7%	1.6%
<b>Other ethnic group</b>	<b>8.7%</b>	<b>6.3%</b>	<b>2.2%</b>

**Table 1: Percentage of population by ethnic group - Hackney, London and England - Census 2021**

Approximately one-third (33.9%) of Census 2021 respondents describe themselves as White British (or other White UK national identity), slightly lower than the London average and significantly lower than the England average. Hackney is home to a higher proportion of Black / Black British / Caribbean / African respondents (21.1%) than the London average (13.5%), but a lower proportion of Asian / Asian British respondents (10.4%) compared to the London average (20.7%).

There is a slightly higher proportion of people describing themselves within the 'Other ethnic group' category (8.7%) than the London average (6.3%). A further breakdown of these responses is shown in **Table 2**. These responses reflect Hackney's significant Turkish, Turkish Cypriot and Kurdish communities, as well as the large Orthodox (Charedi) Jewish population, who mainly reside in the north of the borough. However, it is important to note that responses from these groups may also be captured in other census ethnic groups, such as 'Other White'.

Ethnic group	Number	%
Turkish	5,213	2.0%
Jewish	3,169	1.2%
Hispanic or Latin American	2,383	0.9%
Arab	2,342	0.9%
Kurdish	2,173	0.8%
Any other ethnic group	1,328	0.5%
Turkish Cypriot	915	0.4%
European Mixed, European unspecified, other European	463	0.2%
African (unspecified)	286	0.1%
Iranian	263	0.1%

**Table 2: Breakdown of population identifying as 'Other ethnic group' in Hackney - Census 2021**

There is evidence to suggest that those from ethnic minority backgrounds tend to be disproportionately exposed to higher levels of air pollution, with a link between poor air quality and greater deprivation.<sup>6</sup> Those living in more deprived areas may have less access to green space or live closer to busy roads, with a greater exposure to air pollution.

Therefore, any overall improvements in air quality would **positively** impact this group. However, it is important that actions taken in pursuit of this goal do not have unexpected or unequally distributed impacts, or worsen levels of air pollutants in areas where they are already high.

Theme	Potential impact	Explanation / mitigation
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<sup>6</sup> Greater London Authority (2023). Air Pollution and Inequalities in London - update 2023. <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/air-pollution-and-inequalities-london-update-2023>



Air quality monitoring and statutory duties	No specific impacts (overall <b>positive</b> ).	Actions ensuring robust air quality monitoring and the undertaking of statutory functions will lead to overall improvements in air quality, which will benefit this group.
Planning and construction	No specific impacts (overall <b>positive</b> ).	Actions taken to reduce emissions from new developments and construction will lead to overall improvements in air quality, which will benefit this group.
Buildings, heating and solid fuel	No specific impacts (overall <b>positive</b> ).	There is no evidence to suggest that measures relating to emissions from buildings that affect those from any ethnic background disproportionately.
Cleaner transport	Reductions in levels of air pollution from traffic will <b>positively</b> impact this group overall.	Reductions in air pollution from traffic are likely to have a positive impact on this group, especially considering that non-white communities are frequently found to be disproportionately exposed to high levels of air pollution.
	Actions to promote and improve active travel and public transport will <b>positively</b> impact this group.	The 'Travel in London: Understanding our diverse communities 2019' report states that Black and global majority communities are less likely to drive and are more likely to use public transport, especially buses (although acknowledging that non-white communities are not homogenous). <sup>7</sup> Therefore, improvements in active travel and public transport will have positive impacts upon this group.
	Schemes that restrict or displace motor vehicle traffic may have a <b>mixed (including negative)</b> impact on this group, depending on the specific location of the scheme.	Research has found that, in Hackney, non-white people are just as likely as white people to live within an LTN. <sup>8</sup> The impact on traffic levels on scheme boundary roads (e.g. due to 'displacement') is also mixed. However, almost all air quality monitoring locations on boundary roads in Hackney have shown reductions in levels of air pollutants since 2020. There is thus limited evidence to suggest that traffic schemes have had a disproportionate impact on any ethnic group. Each scheme will undergo a specific assessment of its impacts, including on ethnic groups, which will enable mitigations to be designed in.
Schools, communities	There is likely to be an overall <b>positive</b> impact on this group if	Reductions in air pollution around schools and healthcare facilities are likely to have a

<sup>7</sup> Transport for London (2019). Travel in London: Understanding our diverse communities 2019. <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

<sup>8</sup> Aldred, R. et al. (2021). Equity in new active travel infrastructure: A spatial analysis of London's new Low Traffic Neighbourhoods. Journal of Transport Geography, 96, Article 103194. <https://doi.org/10.1016/j.jtrangeo.2021.103194>

and the local environment	emissions around schools, healthcare settings and in local communities are reduced.	positive impact on this group, especially considering that non-white communities are frequently found to be disproportionately exposed to high levels of air pollution. In addition, action around healthcare facilities will positively impact this group, given the higher prevalence of chronic health conditions related to exposure to air pollution.
	Actions that improve school travel options (including making walking to school more attractive) will have a <b>positive</b> impact on this group.	The 'Travel in London: Understanding our diverse communities 2019' report found that non-white Londoners are more likely to walk to school. Therefore, improvements in school travel options will likely positively benefit this group.
	Actions that focus on controlling emissions from street vendors and commercial cooking (due to use of certain methods such as deep frying, charcoal grilling and barbeque) may have a <b>negative</b> impact on certain ethnic groups.	There is a possibility that controlling emissions from certain commercial cooking methods, including street food vendors, may impact certain ethnic groups more than others. However will not have a uniform and systematic impact, and these issues are likely to be location dependent and highly specific. The Council will work to support any impacted vendors to find lower emission cooking methods or achieve better controls over their emissions.
Public health and awareness raising	Measures to improve awareness of air quality on public health are expected to have a <b>positive</b> impact.	Given the evidence to suggest that those from ethnic minority backgrounds are disproportionately impacted by air pollution and related chronic health conditions, this impact is likely to be overwhelmingly positive.
Advocacy and partnership working	No specific impacts (overall <b>positive</b> ).	Working with partners and advocating to improve air quality will benefit this group.
Indoor air quality	No specific impacts (overall <b>positive</b> ).	Advice, guidance and monitoring of the impact of indoor air pollution will benefit this group.

#### **g. Religion and Belief**

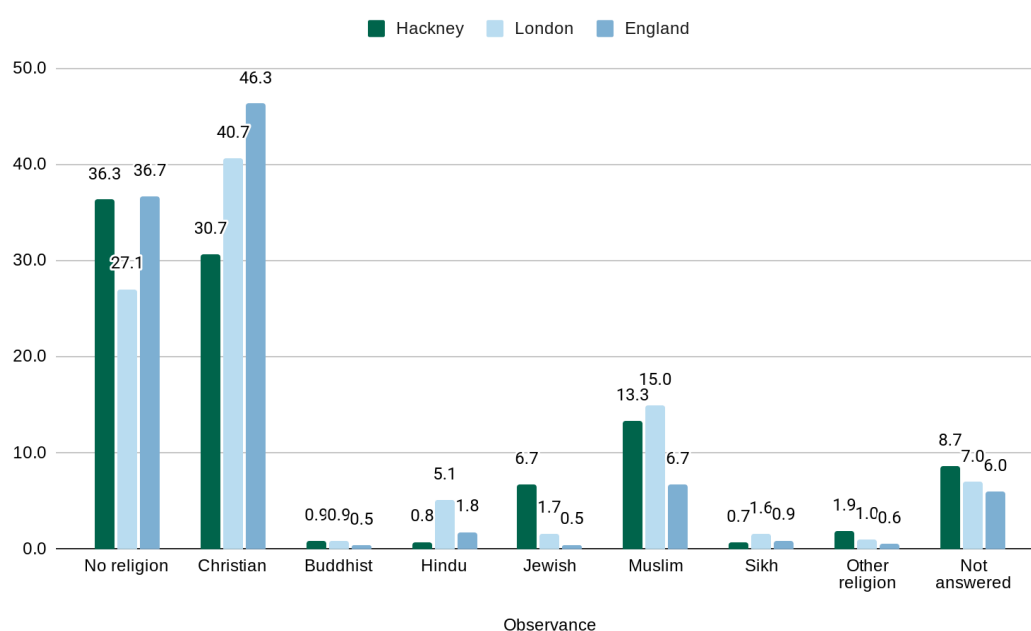
In the 2021 Census, the largest group of respondents in Hackney (36.3%) stated they had 'no religion'. This was above the London average but around the same as for England as a whole. Fewer than a third of Hackney residents identify as Christian (30.7%), lower than both London and England. Muslims represent 13.3% of Hackney's population, slightly lower than the London average (15.0%), but greater than the England average (6.7%).

Hackney has considerably more people of the Jewish faith (6.7%) than both the London (1.7%) and England (0.5%) averages. There is a significant Charedi (Orthodox) Jewish community in Hackney, who mainly live in the north of the borough. The Census did not

distinguish between Orthodox and Non-Orthodox Jewish people, so all are categorised as ‘Jewish’ in the Census.

Charedi communities tend to live in larger, multi-generational households, leading a highly observant and communal religious life. Therefore, they often have specific needs that are different to non-Charedi groups, including healthcare needs.<sup>9,10</sup>

Religious observance in Hackney, London and England is shown in **Figure 2**.



**Figure 2: Population by religion or belief in Hackney, London and England - Census 2021**

Theme	Potential impact	Explanation / mitigation
Air quality monitoring and statutory duties	No specific impacts.	Actions ensuring robust air quality monitoring and the undertaking of statutory functions will lead to overall improvements in air quality.
Planning and construction	No specific impacts.	Actions taken to reduce emissions from new developments and construction will lead to overall improvements in air quality.
Buildings, heating and solid fuel	No specific impacts.	There is no evidence to suggest that measures relating to emissions from buildings will affect those from any religion disproportionately.

<sup>9</sup> Local Government Association (2020). London Borough of Hackney: Charedi Orthodox Jewish community engagement.  
<https://www.local.gov.uk/case-studies/london-borough-hackney-charedi-orthodox-jewish-community-engagement>

<sup>10</sup> City and Hackney Public Health Intelligence Team (2018). Health needs assessment Orthodox Jewish community in Stamford Hill, north Hackney.  
<https://www.cityhackneyhealth.org.uk/wp-content/uploads/2019/08/Orthodox-Jewish-Health-Needs-Assessment-2018.pdf>

Cleaner transport	Actions will broadly reduce emissions from transport sources, which will have a <b>positive</b> impact on health.	While there are no group-specific healthcare needs identified in religious groups, improvements in air quality will have an overall positive impact on the health of these groups.
	Actions that restrict or alter motor vehicle use may have a <b>negative</b> impact on those who have a greater reliance on motor vehicles, such as large families.	Larger families, which are more common in some religious communities (e.g. Charedi), may rely on private vehicles for transport more than other groups. Restrictions may therefore increase journey times or decrease accessibility of travel for those using private vehicles. However, it is worth noting that no transport scheme removes access to properties or premises. In addition, while there may be a higher prevalence of car use in certain communities, this is not necessarily applicable to all members of this group; there may be other factors (e.g. socioeconomic) which mean that car travel is not accessible. Furthermore, high levels of car traffic can negatively impact travel times, as well as lead to other negative impacts such as road danger and a worsening of health effects of increased pollution. It is considered that certain traffic restrictions are a proportionate means of achieving a legitimate aim. Each individual transport scheme will also undertake a specific assessment of the impacts on this group, to minimise adverse effects.
	Actions that restrict or alter motor vehicle use may have a <b>negative</b> impact on the sense of safety of certain religious groups who prefer to travel using private vehicles.	There is generally no measure proposed that will ban the use of private vehicles, and no transport scheme removes access to properties or premises. A balance is therefore required between a preference of certain communities to use private vehicles vs. the potential impacts of vehicle use on public health and road safety in the wider environment. Improvements achieved through certain transport schemes may also increase the appeal of walking, cycling etc. which may increase passive surveillance of roads and increase a sense of safety for certain groups.
Schools, communities and the local environment	Actions to improve air quality around schools will have <b>positive</b> impacts on families with larger numbers of children, who are vulnerable to the health impacts of air pollution.	Children are more vulnerable to the health impacts of air pollution. Therefore, improved air quality around schools (or any location frequented by younger people) will have benefits for larger families with more children.
	Actions to improve the environment for walking and cycling to school	Families with larger numbers of children are more likely to attend schools, nurseries

	will have <b>positive</b> impacts on families with larger numbers of children.	and other locations. Actions that encourage healthier and safer travel options will have positive impacts on children's health, with children more vulnerable to the health impacts of air pollution.
	Actions that restrict or alter motor vehicle use may have a <b>negative</b> impact on those who travel further to religious schools or healthcare facilities using cars.	There is generally no measure proposed that will ban the use of private vehicles, and no transport scheme removes access to properties or premises. A balance is required between the choice to travel by private vehicle vs. the impact of vehicles on the wider environment and public health, such as outside schools and nurseries.
	Actions to reduce emissions from events (e.g. fireworks, bonfires) may <b>negatively</b> impact certain religious communities and the celebration of festivals.	It is unlikely that measures to reduce emissions at events will directly impact upon the responsible celebration of religious festivals, unless it is demonstrated that the festivals are having a significant negative impact on the environment (and therefore likely on safety and amenity of others).
Public health and awareness raising	Measures to improve awareness of air quality on public health are expected to have a <b>positive</b> impact on communities that may be more vulnerable.	The evidence to suggest that health conditions exacerbated by air pollution are more prevalent in certain religious communities is sparse. However, efforts to raise awareness and improve health outcomes will have positive impacts on this group.
Advocacy and partnership working	No specific impacts.	Working with partners and advocating to improve air quality will benefit this group.
Indoor air quality	No specific impacts.	Advice, guidance and monitoring of the impact of indoor air pollution will benefit this group.

#### h. Sex

According to the Census 2021, there are proportionally more women living in Hackney than men - 52.2% female and 47.8% male. The proportion of males under 20 is slightly higher than females, but there are higher proportions of females in all age groups over 55 years than males. However, London Councils does urge some caution when using Census 2021 data, given the impact of the Covid-19 pandemic; previous mid-year estimates placed the male and female populations more evenly split.<sup>11</sup>

<sup>11</sup> London Councils (2022). 2021 Census First Data Release.  
<https://archive.londoncouncils.gov.uk/members-area/member-briefings/local-government-finance/2021-census-first-data-release>

There is little evidence to suggest that exposure to air pollution itself affects men and women differently. However, some actions that are taken to achieve this may have some differential impacts due to sex.

Theme	Potential impact	Explanation / mitigation
Air quality monitoring and statutory duties	No specific impacts.	Actions ensuring robust air quality monitoring and the undertaking of statutory functions will lead to overall improvements in air quality.
Planning and construction	No specific impacts.	Actions taken to reduce emissions from new developments and construction will lead to overall improvements in air quality.
Buildings, heating and solid fuel	No specific impacts.	There is no evidence to suggest that measures relating to emissions from buildings will affect men and women differently.
Cleaner transport	Improvements to safety and reliability of public transport, expansion of alternative transport options and improvements to the street scene will likely have a <b>positive</b> impact on women's safety and choice.	Improvements in public transport options, accessibility and quality, as well as an expansion of the options and safety in active travel, is likely to have a positive impact on women's safety. There is a possibility of a mixed perception on changes in safety due to pedestrianisation, low traffic or other street scene changes/projects. However, an increase in passive surveillance on the street (as opposed to passing vehicle traffic) is likely to have a positive impact on perceptions of safety.
	Actions that restrict or alter motor vehicle use may have a <b>negative</b> impact on the sense of safety for women who prefer to use a private vehicle.	There is generally no measure proposed that will ban the use of private vehicles, and no transport scheme removes access to properties or premises. A balance is required between the choice to travel by private vehicle vs. the impact of vehicles on the wider environment and public health, as well on the safety and reliability of alternative travel options.
Schools, communities and the local environment	No specific impacts.	Actions to reduce emissions in the local community will likely lead to overall improvements in air quality.
Public health and awareness raising	No specific impacts.	Efforts to raise awareness and improve health outcomes will have broad positive impacts on this group.
Advocacy and partnership working	No specific impacts.	Working with partners and advocating to improve air quality will benefit this group.
Indoor air	No specific impacts.	Advice, guidance and monitoring of the

quality		impact of indoor air pollution will benefit this group.
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### i. **Sexual Orientation**

Data on sexual orientation was collected in the Census 2021 for the first time. In Hackney, 79.6% of the usual resident population identified as straight/heterosexual, while 7.8% have a lesbian, gay, bisexual or other non-heterosexual identity. 12.6% of Hackney residents did not answer this voluntary question. Hackney has the fifth-highest proportion of LGB+ residents out of all London boroughs.

There are **no specific needs that have been identified** for this group in Hackney, and it is unlikely this group would be disproportionately impacted by the AQAP.

## 2.2. **Additional Groups**

This EqIA also seeks to address the Socio-Economic Duty, and other groups identified locally to be facing inequality. These include those identified in the [Equality Plan 2024-2026](#) and those identified during engagement and consultation.

The Socio-Economic Duty extends [Due Regard](#) under the Equality Act; that public bodies adopt transparent and effective measures to address the inequalities that result from differences in occupation, education, place of residence or social class.

The duty states that when making decisions of a strategic nature about how to exercise its functions, public authorities must do so in a way that is designed to reduce inequalities of outcome which result from socio-economic disadvantage.

### **Identifying Additional Groups**

An initial screen has been undertaken to explore the potential impacts of the AQAP on additional groups. This is detailed in the table below. A further analysis has been undertaken if there is a potential for significant impacts on any of the groups.

Group	Requires further analysis?	Explanation
Socioeconomic equalities	Y	Some of the actions in the AQAP require a more detailed analysis of their impacts on those from lower socio-economic backgrounds. This includes actions related to car and vehicle use, and actions related to solid fuel and heating homes. <b>Further analysis is required.</b>
Looked after children, care experienced people and care leavers	N	Actions relating to 'Schools, communities and the local environment' may affect this group. However, it is likely to be positive, as no action would place any onus on looked after children, care experienced people and care leavers. In addition, there will be no specific impacts beyond those identified due to age.
Single parents and	N	There is no action in the AQAP that would

teen parents		specifically impact this group.
People with insecure immigration status	N	There is no action in the AQAP that would specifically impact this group.
Ex-armed forces	N	There is no action in the AQAP that would specifically impact this group.
People with multiple interconnected challenges	N	It is not considered likely that any actions in the AQAP will specifically impact people with multiple interconnected challenges, beyond those identified under protected characteristics and socioeconomic inequalities.
People experiencing menopause or perimenopause	N	There is no action in the AQAP that will have a significant impact on this group, beyond those identified due to sex and gender reassignment.
People in insecure housing, temporary accommodation or at risk of homelessness	Y	Actions relating to 'Buildings, heating and solid fuel' and 'Indoor air quality' may affect this group. However, it is likely to be positive, as no action would place any onus on renters or occupants of insecure/temporary accommodation. However, actions in the AQAP related to solid fuel burning and diesel use may have an impact on travelling boat dwellers and continuous cruisers, and <b>further analysis is required.</b>
Domestic abuse victims and survivors	N	There is no action in the AQAP that would specifically impact this group.
People with an offending history	N	There is no action in the AQAP that would specifically impact this group.

#### a. **Socio-economic Inequalities**

Hackney's [Poverty Reduction Framework](#) uses the best available data to understand the situation regarding socioeconomic inequality in the borough. In general, poverty (including child poverty and older people in poverty) is higher in Hackney than the inner London average.

- Around 1 in 3 households are in poverty after housing costs.
- An estimated 43% of children are in poverty after housing costs.
- 41% of residents aged 60 or over are living in income deprivation.
- Poverty is more common in disabled households: 35% vs 26% in households where no one is disabled
- Poverty is relatively evenly distributed across the borough, with some concentration in the centre and east
- There has been an increase in in-work poverty, with a higher proportion compared to London and England averages.

In London, the most deprived communities more commonly live in the most polluted areas. These groups often experience greater ill health due to deprivation and economic worries,



which can be exacerbated by air pollution. However, concentrations have declined faster in London in areas of greater deprivation.<sup>12</sup>

Any improvements in air quality will have overall positive impacts on those with a more deprived socioeconomic background. This is especially the case if poverty and socioeconomic hardship intersects with other characteristics, such as age and disability. Nevertheless, the methods of achieving improved air quality must also be considered carefully, to mitigate any unintended consequences on these groups.

Theme	Potential impact	Explanation / mitigation
Air quality monitoring and statutory duties	No specific impacts (overall <b>positive</b> ).	Actions ensuring robust air quality monitoring and the undertaking of statutory functions will lead to overall improvements in air quality, which will benefit this group.
Planning and construction	No specific impacts (overall <b>positive</b> ).	Actions taken to reduce emissions from new developments and construction will lead to overall improvements in air quality, which will benefit this group.
Buildings, heating and solid fuel	Actions will broadly reduce emissions associated with buildings and heating emissions, which will have a <b>positive</b> impact.	Actions taken to reduce emissions from this source will lead to overall improvement in air quality, which will benefit this group. Many of these actions are funded and will not result in any financial burden.
	Actions taken to reduce emissions from solid fuel may <b>negatively</b> impact upon those who use this fuel to heat their homes, particularly as a primary heat source. Consider the impact on fuel poverty.	People can continue to use solid fuel as a heating source provided it complies with the rules of the Smoke Control Order (SCO), which have been in place since the 1960s. Substantial engagement and consultation has already taken place and will continue to take place for any changes in SCO rules.
Cleaner transport	Reductions in levels of air pollution from traffic will <b>positively</b> impact this group overall.	Overall improvements in air quality are likely to benefit the health of those of lower socioeconomic backgrounds, who are more likely to experience health impacts from air pollution.
	Actions to promote and improve active travel and public transport will <b>positively</b> impact this group.	People from lower socioeconomic groups are more likely to travel on foot or using the bus. <sup>6</sup> Actions that improve public transport facilities and reliability, or the pedestrian environment, will positively impact this group.
	Actions that restrict or alter motor vehicle use may have a <b>negative</b> impact on those with older and	According to the London Travel Demand Survey <sup>13</sup> , lower income households are less likely to have any access to a car, with

<sup>12</sup> Mayor of London (2023). Air Pollution and Inequalities in London - update 2023. Available: <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/air-pollution-and-inequalities-london-update-2023>

<sup>13</sup> Transport for London (2024). Travel in London 2024 Focus report: Car ownership trends. Available: <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports>

	more polluting vehicles, or those who rely on such vehicles for work.	the highest income households more likely to have access to two or more cars. Therefore, lower income households are less likely to use a vehicle at all. A balance is required between the needs of those who rely on vehicles, vs. the impact of vehicles on the wider environment and public health, as well on the safety and reliability of alternative travel options.
Schools, communities and the local environment	No specific impacts (overall <b>positive</b> ).	Actions taken under this theme will likely lead to overall improvements in air quality, which will benefit this group.
Public health and awareness raising	No specific impacts (overall <b>positive</b> ).	People from more deprived socioeconomic backgrounds are more likely to experience ill health due to air pollution. Efforts to raise awareness and improve health outcomes will have broad positive impacts on these people.
Advocacy and partnership working	No specific impacts (overall <b>positive</b> ).	Working with partners and advocating to improve air quality will benefit this group.
Indoor air quality	Actions taken to improve indoor air quality, or raise awareness of indoor air pollutants, are likely to have <b>positive</b> impacts on this group.	People from lower socioeconomic backgrounds may have less influence over air quality indoors (e.g. in their home), such as if they are in rented accommodation, unable to move home or lack the financial resources to make improvements. Actions to raise awareness of indoor air quality will enable people to make changes to improve their environment. The Council's damp and mould action plan, and efforts to minimise indoor air pollution in Council-owned buildings and estates, will have further benefits for this group.

## **b. Travelling Boat Dwellers and Continuous Cruisers**

Hackney's waterways, such as the Regent's Canal and the River Lea, are home to those who live on moored vessels. Some of these residents have a permanent mooring location, while others are continuous cruisers. Continuous cruisers are required by their licence conditions to move every 2 weeks, and thus do not have a fixed address. A 2016 survey by the Canal and River Trust<sup>14</sup> found that many boaters live on their vessel for financial reasons. As such, some continuous cruisers can be considered to be in a precarious housing situation and/or on low incomes.

<sup>14</sup> Canal and River Trust (2016). Who's on London's Boats survey - summary report. Available: [https://canalrivertrust.org.uk/media/document/UbdK77bCyKZxZbLJCaj5Sw/QNGKm95TS2E3\\_wITYRwKkWLhO1j3fBP1VQBkej7i-XE/aHR0cHM6Ly9jcjRwcm9kY21zdWtzMDEuYmxvYi5jb3JlLndpbmRvd3MubmV0L2RvY3VtZW50Lw/0189aca9-84ee-794e-8d59-4763a865ef59.pdf](https://canalrivertrust.org.uk/media/document/UbdK77bCyKZxZbLJCaj5Sw/QNGKm95TS2E3_wITYRwKkWLhO1j3fBP1VQBkej7i-XE/aHR0cHM6Ly9jcjRwcm9kY21zdWtzMDEuYmxvYi5jb3JlLndpbmRvd3MubmV0L2RvY3VtZW50Lw/0189aca9-84ee-794e-8d59-4763a865ef59.pdf)

Theme	Potential impact	Explanation / mitigation
Air quality monitoring and statutory duties	No specific impacts (overall <b>positive</b> ).	Actions ensuring robust air quality monitoring and the undertaking of statutory functions will lead to overall improvements in air quality.
Planning and construction	No specific impacts (overall <b>positive</b> ).	Actions taken to reduce emissions from new developments and construction will lead to overall improvements in air quality.
Buildings, heating and solid fuel	Boaters are much more likely to use solid fuels, such as wood and coal, as their primary heat source. Actions taken to reduce emissions from solid fuel may <b>negatively</b> impact this group. Consider the impact on fuel poverty.	Boaters as a group are far more reliant on solid fuels for their heating needs than land-based residents, and often do not have an alternative (e.g. mains gas or electricity of sufficiently high power). Currently, Smoke Control Area (SCA) rules do not extend to moored vessels, but this may change in the future. This would bring boaters within the scope of SCA regulations on smoke emissions, which are far more likely with the use of solid fuel. However, the use of solid fuel is not banned within SCAs, as long as either approved fuels or an exempt appliance is used. In such cases and with appropriate maintenance of equipment, smoke emissions are likely to be low. Substantial engagement has already taken place with boaters to understand the impact of changes to SCA rules and there is a commitment in the AQAP to continue to work with this group to understand how best to minimise the impact of solid fuel use on air quality. This includes exploring how boaters can protect their own health with the use of solid fuels. In addition, an assessment of the impact of any changes to the SCO has been carried out separately.
Cleaner transport	Actions to improve walking, cycling and public transport are likely to have an overall <b>positive</b> impact on this group.	Many boaters live on the waterways due to economic reasons, and continuous cruisers are required to move their vessel regularly. It is therefore considered much less likely for this group to rely on private vehicles. Improvements and prioritisation of alternative means of transport will therefore benefit this group.
Schools, communities and the local environment	Actions taken to improve air quality along the waterways through planning and investment are likely to <b>positively</b> impact boaters.	Proposed measures to improve air quality along the waterways include the use of planning conditions and obligations to improve facilities for boaters to reduce their reliance on higher polluting equipment. Measures also include collaborative, cross-borough projects to better understand the needs of the boating community. These could result in

		improvements to the environment and facilities available to this group.
	Actions to improve air quality in certain locations close to the waterways, e.g. around schools, could <b>negatively</b> impact those using solid fuel for heating and power.	See response above on the theme 'Buildings, heating and solid fuel'.
Public health and awareness raising	No specific impacts (overall <b>positive</b> ).	Efforts to raise awareness and improve health outcomes will have overall positive impacts on this group.
Advocacy and partnership working	No specific impacts (overall <b>positive</b> ).	Working with partners and advocating to improve air quality will benefit this group.
Indoor air quality	Actions to increase awareness about indoor air quality will have a <b>positive</b> impact on this group.	Raising awareness of indoor air quality will enable people to make positive changes to improve their environment, such as increasing ventilation. This is especially the case for users of solid fuel, which can result in increased indoor air pollution.

### 2.3. Intersectional Analysis

Taking an Intersectional Approach means that we are alert to how intersections of different characteristics can create very different experiences for different people due to the interaction of different types of systemic discrimination.

An intersectional approach in an Equality Impact Assessment requires that we don't just look at each characteristic in isolation, but explore, understand and record how we have considered impacts of discrimination across multiple characteristics.

This will vary depending on the decision being made, the communities affected and the type of evidence explored.

The common impacts that have been identified across multiple groups, along with the evidence for these and the mitigations employed, are as follows.

Impact	Groups	Impacts, evidence and mitigation
Improvements to air quality will have a <b>positive</b> impact on those more susceptible to the health effects of air pollution	Age, disability, pregnancy and maternity, socioeconomic factors	While the positive impacts to health are likely to positively affect all people, it is likely to have a greater positive impact to those who fall into one or more of the groups identified.
Improvements to air quality will have a <b>positive</b> impact on	Race, socioeconomic factors	Overall improvements in air quality will have an outsized benefit to groups who tend to be disproportionately exposed to high levels in air

those disproportionately exposed to higher levels of air pollution		pollution.
Changes to Smoke Control Area rules may <b>negatively</b> impact those who rely on solid fuel for heating	Age, disability, socioeconomic factors, boat dwellers	The impacts on these groups have been extensively reviewed in Section 2.1 and 2.2. It is not considered that there will be any exceptional or disproportionate impact on any group, subject to the mitigations previously described.
Actions to reduce air pollution from transport may <b>negatively</b> affect those who rely on private vehicles	Age, disability, pregnancy and maternity, sex, religion	The justifications for policies and measures relating to road traffic and private vehicle use have been reviewed in Section 2.1. It is not considered that there will be any exceptional or disproportionate impact on any group that has not been considered and/or mitigated. Examples of mitigations include: maintenance of access to all properties, the HAC01 permit scheme, and the benefits of policies for those who do not use vehicles.

## 2.4. Community Impact Analysis

Public Sector Equality Duty requires us to have due regard to fostering good relations between those that share a relevant protected characteristic and person who do not share it. This aligns with creating an inclusive borough with strong community cohesion.

Many of the actions taken as part of the AQAP will deliver improvements to air quality without a major impact on community cohesion. Examples of such actions include:

- Planning policies to reduce emissions from construction and development
- Supporting the energy transition and decarbonisation of public and commercial buildings
- Improvements to buses, trains etc., such as new vehicles with reduced emissions
- Improvements to the Council's own vehicle fleet
- Actions to improve public health and awareness
- Working with partners such as neighbouring boroughs and the Mayor of London
- Actions to improve indoor air quality

However, some measures may have a more direct impact on residents' daily lives and on community cohesion. These outcomes have been brought to the Council's attention through a number of channels, including direct correspondence (to the Land Water Air team, as well as other Council teams), Freedom of Information and Environmental Information Regulations requests, feedback in the early engagement activities and responses to formal consultations, such as the Smoke Control Order consultation.

The potential impacts on the AQAP on community cohesion are described in the table below. How the Council addresses these will focus on:

- What is the issue that may affect community cohesion?
- What is the potential impact (positive or negative) and the evidence for this?
- What actions will be taken to mitigate negative impacts and maximise positive impacts? What could be put in place to measure community impact and the

cumulative impact on communities when changes resulting from other interventions are taken into account?

Theme	Community cohesion issue	Impact and evidence	Explanation / mitigation
Air quality monitoring and statutory duties	Enforcement of certain regulations is unequally impacting certain communities	Complaints and reports to the Council may have a <b>negative</b> impact on community cohesion.	The AQAP will not broadly change the current regime in dealing with reported pollution issues. In addition, enforcement to achieve a cleaner environment may benefit community cohesion. We will ensure that communications on our enforcement approach are clear in this regard.
Planning and construction	Planning applications and construction are concentrated in certain areas of the borough	Feedback has suggested that certain communities experience outsized, persistent <b>negative</b> impacts due to the concentration of development in certain locations.	Planning policies and allocations (the Local Plan) broadly direct where high levels of construction occur in the borough, which underwent an Integrated Impact Assessment. Planning policy and regulations of building sites attempt to balance the requirement for construction in the borough with the amenity of neighbours.
Buildings, heating and solid fuel	Implementation of Smoke Control Order changes will have a disproportionate impact on boat dwellers	Consultation on changes to SCO found that extension of rules could have a <b>negative</b> economic impact on boat dwellers who use solid fuel as a primary heat source, and these communities are already on lower incomes.	The Council has carefully considered the representations of this group. Further information on this is available in the EqlA completed in support of the SCO changes policy.
	Perception that Smoke Control Area rules are not being enforced equally	The consultation on changes to SCO found there could be a <b>negative</b> impact on those using solid fuel as a result of additional complaints and reports made to the Council.	The Council follows a phased approach to enforcement of the SCA rules. This will continue to be applied equally if complaints are received from any type of chimney. There has been extensive engagement and communications regarding changes to the SCO, and the approach to engaging all affected community groups will continue. The approach to communications will evolve to ensure all affected parties are kept informed on the Council's approach to enforcement.
Cleaner transport	Traffic schemes are resulting in a	Residents on these roads are experiencing	Each scheme undertakes its own assessment of its impacts

	re-routing traffic to certain roads	<b>negative</b> impacts of increased traffic, while other residents experience <b>positive</b>	on the road network, including a scheme of monitoring (e.g. air quality and traffic counts). This ensures that any adverse impacts of the scheme can be mitigated.
	Schemes are not being applied equally geographically across the borough	Some neighbourhoods might experience <b>positive</b> impacts (lower air pollution, traffic) while others experience <b>worsening</b> impacts (more air pollution, traffic).	The Council has outlined its approach to traffic schemes across all areas of the borough in its Transport Strategy. Each scheme will be subject to consultation.
	Perception of preferential treatment of certain residents or neighbourhoods	Other areas of the borough are unaffected by changes.	
	Non-consideration of the needs of vehicle users	Vehicle drivers experience <b>worsening</b> impacts, while pedestrians and cyclists see <b>improvements</b> . This can have economic and other impacts on those who have no alternative but to drive.	The Council's Transport Strategy describes the adopted movement hierarchy, which places the needs of pedestrians, cyclists and public transport users first. The impacts of high levels of traffic are wide ranging, including air pollution, road danger, noise, severance and climate change, and therefore must be managed appropriately.
	Investment in EV infrastructure	Investment is to the <b>detriment</b> of those who do not own an EV.	The Council is undertaking a suite of transport measures, including improvements in walking, cycling and public transport, alongside investment in EV infrastructure.
Schools, communities and the local environment	Creating lower traffic environments outside schools, hospitals etc.	There is a <b>positive</b> impact on community cohesion by providing quieter, safer environments in community areas, e.g. outside the school gates. There is a <b>negative</b> impact on people who rely on vehicles or residents in areas where restrictions come into force.	A balance is required between the use of private vehicles, and the impact of these vehicles on air pollution, road safety and the local environment. This is particularly the case in sensitive locations such as schools and hospitals, where health effects of air pollution are likely to be more profoundly felt.
Public health and awareness raising	Unlikely to have an impact on community cohesion.		
Advocacy	Unlikely to have an impact on community cohesion.		

and partnership working	
Indoor air quality	Unlikely to have an impact on community cohesion.



### 3. Action Plan

The AQAP is a broad strategy that identifies many other policies and actions that will be delivered to improve air quality in Hackney. Section 2 has explained or identified any mitigations to ensure that, broadly, the AQAP meets the Public Sector Equality Duty and considerations of additional groups.

Many actions of the AQAP outline other projects, plans and strategies. Each of these will need to take into account equalities considerations as they progress, for example the implementation of streetscene projects, or changes to Smoke Control Area rules.

The Draft AQAP undergoes statutory consultation from 2 June 2025 for 10 weeks. The following actions will be taken to address equalities issues highlighted in Section 2 of this EqlA.

Action	Date
A number of projects are currently being undertaken to understand the views of populations that are not traditionally represented in consultation with the Council (e.g. boat dwellers). These projects are not contingent on the adoption of the AQAP 2026-2030 and will continually inform the work of the Land Water Air team.	Ongoing
Statutory consultation to focus on questions where possible equalities issues have been identified ( <b>Section 2</b> ).	June 2025 – August 2025
Additional targeting of groups will be undertaken as necessary, to ensure the response to the statutory consultation is representative of Hackney's population. This may include in-person events or door-to-door surveying.	June 2025 – August 2025
The final AQAP will take account of responses to the consultation, which will consider the Draft AQAP and this EqlA. A report on this consultation will be made available by October 2025.	October 2025

## 4. Evaluation

The Equality Impact Assessment undertaken to support the AQAP has been undertaken in a continuous, iterative process. This has meant that equalities considerations were accounted for at the earliest stage of development of the AQAP. Further details of this process are provided in the table below.

Date	Stage of Process	How the EqlA has affected the AQAP
November 2024	Pre-drafting and early (non-statutory) engagement	Identification of groups that may be affected by the general direction of policy decisions. At this stage, no decision had yet been made on the specific actions within the AQAP, although there is a general sense of the policy direction. By identifying possible impacts on protected groups (and additional groups), engagement activities could be directed appropriately and policies with significant adverse impacts avoided.
March 2025	Draft Plan	Actions have been formulated and the AQAP drafted. The potential impacts of each of the actions has been assessed, and any mitigation measures required have been considered.
TBD	Final Plan	Not yet concluded. Any equalities impacts that are raised in the statutory consultation will be considered in this revised version of the AQAP.

### Changes made as a result of the assessment

The aim of the AQAP is to bring about improvements to air quality. This will have a positive impact on all groups, but especially on certain groups with protected characteristics that are more sensitive to the deleterious health impacts of air pollution.

This assessment identifies that some of the projects and programmes to improve air quality may have negative impacts on certain groups. These impacts, and how they will be managed and mitigated, are described in Section 2.

The negative impacts that have been identified across multiple groups are broadly categorised in the Table below, alongside how these have been considered.

Negative impact identified	Mitigation, change made or justification
Negative impacts on users of solid fuel	There are no plans in place to ban the use of solid fuel. Users must ensure that they comply with the rules of the Smoke Control Order, which has been in place for many decades. Substantial engagement and consultation has already taken place and will continue to take place for any changes in SCO rules, included with the most impacted groups.
Negative impacts on	It is acknowledged that changes to how roads and streets are

people who use or rely on private vehicles	<p>used will have impacts on those using private vehicles. However, there are no plans to ban or restrict the use of private vehicles entirely, or to restrict access to any properties. Those who continue to need to use a vehicle will continue to be able to do so.</p> <p>At this stage, it is not possible to determine the specific impact of each individual traffic management scheme. Each of these schemes will undergo its own analysis of impacts, including an impact on groups with protected characteristics. This will enable impacts to be mitigated and designed out as far as possible. However, it is noted that the needs of the use of vehicle users must be balanced with the needs of pedestrians, cyclists, users of public transport, and other people with protected characteristics who may be impacted by high levels of traffic and vehicle use (e.g. the elderly, those with sight and sensory impairments, those without access to a vehicle). It is considered that schemes to reduce traffic and prioritise other means of transport which have lower impacts on the wider environment is a proportionate means of achieving a legitimate aim.</p>
Negative impacts on street food vendors (etc.) using highly emitting equipment	<p>Measures to reduce emissions from street food vendors will be highly localised and bespoke to the situation. Given this impact has been identified, the Council's approach on this issue will be to work with and support impacted vendors, rather than enforcement.</p>
Negative impacts on groups using fireworks, bonfires etc.	<p>It is unlikely that measures to reduce emissions at events will directly impact upon the responsible celebration of religious festivals, unless it is demonstrated that the festivals are having a significant negative impact on the environment. Any enforcement activity is considered to be a proportionate means of achieving a legitimate aim. In this instance, this will be to protect the safety and health of others, or to protect amenity when the impacts are substantial. This will be carried out in line with existing powers, e.g. under the Environmental Protection Act 1990.</p>

The Council will use the upcoming statutory consultation period to gather feedback on any further impacts on groups that have not been identified in this version of the EqlA. These will be carefully considered prior to the production and adoption of the final AQAP.