GREATER**LONDON**AUTHORITY

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2876

LLAQM review, Heathrow consultancy and woodburning campaign

Programme: Cleaning London's Air

Executive summary:

This decision seeks approval for expenditure to support three key pieces of work as part of the Cleaning London's Air Delivery plan:

- the review and update of the London Local Air Quality Management (LLAQM) framework
- the GLA's response to proposals for the expansion of Heathrow Airport
- the delivery of a woodburning campaign this winter.

These pieces of work will ensure that both the GLA's strategic air quality framework, and its response to nationally significant aviation infrastructure proposals, are supported by robust evidence and independent expert advice. These projects all support key strands of the Cleaning London's Air Delivery Plan.

Decision:

That the Assistant Director of Connectivity, Air Quality, Transport and Infrastructure approves the expenditure of up to £60,000, to:

- commission an Integrated Impact Assessment of the proposed revisions to the London Local Air Quality Management framework (£5,000)
- commission an independent review of the draft London Local Air Quality Management Policy guidance by external Counsel (£5,000)
- commission specialist consultancy support to review Heathrow's planning submissions and provide technical advice to inform the GLA's response to the application (£25,000)
- create a woodburning campaign through redeveloping market assets and purchasing advertising space on social media (£25,000).

AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Elliot Treharne	**Position:** Assistant Director of Connectivity, Air Quality, Transport and Infrastructure
Signature: 	**Date:** 26 October 2026

PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

LLAQM review

1.1. The legal basis for London Local Air Quality Management (LLAQM) is Part IV of the Environment Act 1995 as amended by the Environment Act 2021. The LLAQM framework:

- sets out the Mayor's expectations as to the actions boroughs will take to improve air quality in London
- indicates where he would be minded to intervene and use his formal powers of direction under the Environment Act if appropriate action were not taken.

The Secretary of State for the Department of Environment, Food and Rural Affairs has issued formal guidance to the London boroughs (including the City of London) that they are to participate in the LLAQM and have regard to any guidance issued by the Mayor.

1.2. The GLA is responsible for updating the LLAQM framework and guidance to reflect the latest evidence, policy priorities and legislative requirements. This work helps boroughs to deliver effective local action, and contribute to London-wide air-quality objectives. The Mayor established the LLAQM framework in 2016. The guidance was revised in 2019, through the same statutory process that is now being followed for the proposed revisions.

1.3. The proposed 2026 revision to the LLAQM guidance is designed to:

- ensure boroughs are taking suitably ambitious action that:
  - is properly coordinated at the regional level
  - supports Mayoral objectives
- encourage London boroughs to continue working to achieve the World Health Organization (WHO) air-quality guidelines for pollutants, even when legal limits are met
- update information in the guidance documents to reflect new research, policies and priorities.

1.4. Given the framework's role in shaping local air-quality management across the capital, it is important that the revised guidance is supported by a robust assessment of its impacts and is legally sound. To support this, the GLA will commission an Integrated Impact Assessment (IIA) and an independent legal review of the draft updated guidance documents.

1.5. Previous approvals relevant to this matter are:

- Mayoral Decisions (MDs) 1506 and 1652: related to the consultation and initiation of the LLAQM in 2016
- MDs 2438 and 2507: related to the revision and finalisation of the LLAQM guidance in 2019.

A new MD will be prepared to proceed with consultation on the review of the LLAQM guidance later this year.

1.6. A competitive procurement process will be undertaken to appoint a qualified consultant to complete the IIA. In line with TfL Legal advice, the Legal Counsel review of the revised policy guidance will be

commissioned through a direct award to a specialist provider, given the specific expertise required and the nature of the work.

1.7. GLA officers are seeking approval through this decision to spend up to £10,000 from the Air Quality revenue budget to deliver this work.

Heathrow DCO Consultation

1.8. Heathrow Airport is the UK's largest airport, and serves as a nationally significant transport hub. Proposals for expansion through the construction of a northwest runway have the potential to result in significant impacts for London, including:

- increased aircraft movements
- changes to flight paths
- increased passenger and employee trips
- additional emissions
- wider environmental effects.

1.9. The government has invited Heathrow Airport Ltd to bring forward proposals for a third runway at Heathrow Airport, with a Development Consent Order (DCO) application expected in due course.

1.10. Previous assessments of the Heathrow expansion identified concerns relating to air quality, noise, carbon emissions, public health and pressure on London's transport networks. As Heathrow develops and submits updated planning documentation, it is important that the GLA can undertake a robust and evidence-led review of the airport's proposals and supporting assessments.

1.11. The planning application is expected to comprise a substantial volume of highly technical documentation, covering:

- aviation forecasts
- surface access strategies
- environmental statements
- air quality assessments
- noise modelling
- carbon assessments
- health impact analyses.

Given the specialist nature of this material, external technical expertise is required to ensure that the GLA can effectively:

- scrutinise Heathrow's evidence
- assess compliance with relevant planning legislation and policy
- identify any risks, uncertainties or deficiencies in the proposed mitigation measures.

1.12. The commission is intended to supplement, rather than duplicate, existing GLA and TfL technical expertise. The emphasis of the commission is on:

- planning
- regulatory and DCO-related interpretation of air quality evidence
- supporting the preparation of submissions, representations and technical positions throughout the DCO process.

1.13. The commission will be procured through a competitive process. Quotations will be sought from three suppliers appointed to the relevant framework. This is to ensure value for money, and secure the consultancy support best suited to our requirements.

1.14. GLA officers are seeking approval, through this decision, to spend up to £25,000 from the Air Quality revenue budget to deliver this work.

Woodburning campaign

1.15. The main pollutant released when burning solid fuels, such as wood is, $PM_{2.5}$. This is widely acknowledged as the air pollutant with the greatest impact on human health.

1.16. Woodburning is the second largest source of $PM_{2.5}$ in London after road transport. It is estimated to contribute 15 per cent of $PM_{2.5}$ emissions in the city (London Atmospheric Emissions Inventory, 2022).

1.17. While strong air-quality policies in London are driving major reductions in road transport emissions, reductions from woodburning are happening at a much slower pace. In order to meet the Mayor's 2030 WHO interim target of 10ug/m^3 for $PM_{2.5}$, the GLA must act to reduce woodburning emissions.

1.18. As the Mayor does not have powers to place an outright ban on burning wood and solid fuel, it is important that he continues to raise awareness of its health impacts.

1.19. The Mayor, and the Deputy Mayor for Environment and Energy, have previously supported and funded a London-wide campaign on Clean Air Night (CAN). This a nationwide initiative, delivered by Global Action Plan (GAP), to raise awareness of the health harms of woodburning; and encourage positive behavioural change. Clean Air Night is on 17 November 2026, and GAP will be running its own campaign as usual.

1.20. This year, we are proposing to develop an awareness-raising campaign in-house as a more cost-effective approach, providing a suite of assets that can be reused and adapted in future years. An in-house campaign will maximise value for money, maintain message control, last longer than CAN, and support the Mayor's commitment to reduce woodburning emissions. The £25,000 would include:

- redeveloping market assets, including repurposing/adapting digital assets from GAP
- purchasing advertising space on social media.

1.21. The Mayor's Office has signed off on this approach. The Air Quality team is currently in conversation with them to discuss branding, design and advertising.

1.22. GLA officers are seeking approval through this decision to spend up to £25,000 from the Air Quality revenue budget to deliver this work.

2. Objectives and expected outcomes

LLAQM review

2.1 The objectives of the project are to:

- ensure that the proposed amendments to the LLAQM framework are evidence-based and legally robust; and support the Mayor's air quality objectives
- assess the likely impacts of the proposed amendments across air quality and equalities considerations.

2.2 The objectives will be achieved by commissioning:

- an IIA to assess the likely costs and impacts of the proposed amendments
- an independent legal review of the draft LLAQM Policy Guidance by external Counsel.

2.3 The specific outcomes of the project are expected to:

- provide the GLA with an assessment of the likely impacts of the proposed amendments, to inform policy development and decision-making
- ensure that the proposed updates to the LLAQM framework are legally sound
- support consultation with London boroughs and other stakeholders on the proposed amendments.

Heathrow DCO consultation

2.4 The objectives of the commission are to:

- provide independent specialist air-quality planning and DCO advice on Heathrow Airport's expansion proposals
- supplement, rather than duplicate, the existing technical expertise within the GLA and TfL
- support the GLA in understanding the planning, regulatory and legal implications of Heathrow's air-quality evidence
- ensure air-quality issues are robustly considered throughout consultation, pre-application, DCO submission and examination stages
- identify material planning risks, evidence gaps, uncertainties and weaknesses in Heathrow's assessments
- assist the GLA in developing evidence-based positions, representations and submissions during the DCO process
- support preparation of Statements of Common Ground; Principal Areas of Disagreement Summary Statements; and other examination documents
- help ensure that Heathrow's proposals are assessed against relevant policy; environmental assessment requirements; and air-quality obligations.

2.5 The objectives will be achieved through:

- reviewing consultation, pre-application and DCO documentation, including environmental reports, air-quality assessments, modelling methodologies and supporting technical evidence
- providing expert advice on the significance of construction and operational air-quality impacts
- assessing whether Heathrow's conclusions are adequately supported by the available evidence

- identifying risks, uncertainties, assumptions and potential weaknesses in assessments or proposed mitigation measures
- reviewing compliance with relevant planning policy, environmental assessment requirements, air quality objectives and best-practice guidance
- translating complex technical air-quality evidence into clear planning, policy and regulatory advice
- supporting GLA and TfL officers in the preparation of technical comments, representations and examination submissions
- reviewing DCO application documents and advising on areas of agreement, disagreement and further evidence requirements
- providing examination support where required, including technical reports, representations and expert witness assistance.

2.6 The specific outcomes of the project are:

- a robust and independent assessment of Heathrow's air-quality evidence from a planning and consenting perspective
- early identification of key air-quality risks and issues that may affect the GLA's position
- clear understanding of whether Heathrow's assessments, methodologies and mitigation proposals are acceptable within the DCO framework
- identification of any evidence gaps requiring further clarification, information or mitigation
- stronger Statements of Common Ground, and better clarity around areas of disagreement
- improved understanding of the implications of emerging issues, including ultrafine particles and future monitoring requirements
- clear recommendations for addressing air-quality concerns and managing residual risks.

Woodburning campaign

2.7 The objectives of the project are to:

- raise awareness among Londoners of the health and air-quality impacts of domestic woodburning, particularly during the winter heating season
- support the Mayor's commitment to reducing $PM_{2.5}$ emissions.

2.8 The objectives will be achieved through redeveloping marketing assets; and purchasing advertising space on social media.

2.9 The specific outcomes of the project are:

- increased public awareness of the contribution of woodburning to London's $PM_{2.5}$ emissions and the associated health impacts, leading to behaviour change
- a suite of reusable campaign assets that can be deployed and adapted in future years, providing ongoing value for money and supporting continued public engagement.

3. Equality comments

3.1. The GLA and other public authorities must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and to advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not, under section 149 of the Equality Act 2010. This involves having due regard to the need to remove or minimise any disadvantage suffered by those who share a relevant protected characteristic; taking steps to meet the different needs of such people; and encouraging them to participate in public life or in any other activity where their participation is disproportionately low.

3.2. The protected characteristics and groups are age, disability, gender reassignment, pregnancy and maternity, race, sex, religion or belief, sexual orientation and marriage/civil partnership status. Compliance with the Equality Act may involve treating people with a protected characteristic more favourably than those without the characteristic. The duty must be exercised with an open mind, and at the time a decision is taken in the exercise of the GLA's functions. Conscientious regard must be had that is appropriate in all of the circumstances.

3.3. In June 2023 the GLA published updated analysis on exposure to air pollution showing not only that there are huge health impacts of pollution, but also that they disproportionately impact the most vulnerable; more deprived people; and Black, Asian and Minority Ethnic communities. It also established that those who contribute the least to poor air quality suffer the most from it. This means that improving air quality is fundamentally about tackling social injustice and health inequalities.

3.4. The proposed updates to the LLAQM framework are intended to benefit all Londoners by supporting more ambitious action on air quality by London boroughs.

3.5. The Heathrow Airport expansion has the potential to affect a wide range of London communities through changes in aircraft noise, air pollution, transport movements and associated environmental impacts. Evidence from previous assessments has indicated that some of these impacts may fall disproportionately on particular groups, including children; older people; disabled people; more deprived communities; and certain Black, Asian and Minority Ethnic communities.

3.6. The proposed woodburning campaign is intended to benefit all Londoners by raising awareness of the health impacts of woodburning and discouraging unnecessary woodburning this winter.

3.7. The proposed technical consultancy support will assist the GLA in assessing Heathrow Airport Ltd's planning documentation. This includes the extent to which impacts on protected groups and other disproportionately affected communities have been identified, assessed and appropriately mitigated. This will support the GLA in ensuring that due regard is given to its Public Sector Equality Duty; and that equality considerations are fully reflected in its response to the proposals.

4. Other considerations

Key risks and issues

4.1. The key risks and issues, and their mitigating actions, are outlined in the table below:

Risk description	Likelihood	Impact	Mitigating action	Residual RAG rating
Heathrow DCO consultation: Not meeting statutory consultation timescales.	Medium	High	Ongoing engagement with key stakeholders to establish a clear timeline for submitting responses.	Low
Heathrow DCO consultation: New evidence emerges requiring additional review.	Medium	Medium	Build flexibility into the commission; and prioritise review of key technical issues.	Low
LLAQM review, Heathrow DCO consultation and woodburning campaign: Exceeding budget allocation.	Low	Medium	Agree scope and deliverables in advance; and undertake regular budget monitoring.	Low

Links to Mayoral strategies and priorities

4.2. These projects will contribute towards delivering:

- the Cleaning London's Air strategic programme
- the Mayor's London Environment Strategy
- the London Plan
- the Equality, Diversity and Inclusion Strategy.

4.3. The delivery plan for the strategic programme, Cleaning London's Air, describes how the GLA will work in close collaboration with partners to ensure that London has the best air quality of any major world city. This work aligns with the following strands of the Cleaning London's Air delivery plan:

- 2: Cutting pollution from all sources to improve health outcomes and reduce health inequality for Londoners.
- 2.3: Using the planning system to promote air-quality improvements
- 3: Working with London boroughs, and other partners, to take effective action to reduce exposure and emissions
- 3.1: Providing borough oversight and support to ensure boroughs are delivering Mayoral air quality policies, taking action on air quality and fulfilling their statutory duties
- 4: Raising awareness amongst London's communities of the health impacts of air pollution and empowering them to advocate for local action.

4.4. The Mayor's London Environment Strategy sets the goal of London having the best air quality of any major city in the world. This work aligns with the following proposals and policies from the London Environment Strategy:

- Policy 4.3.1: The Mayor will establish new targets for PM and other pollutants where needed. The Mayor will seek to meet these targets as soon as possible, working with government and other partners
- policy 4.2.4: The Mayor will work with the government, the London boroughs and other partners to accelerate the achievement of legal limits in Greater London and improve air quality.

- Proposal 4.2.4.a: The Mayor will use the LLAQM framework to assist boroughs and require them to exercise their statutory duties to improve air quality in accordance with that framework and will exercise statutory powers as required

- Policy 4.3.3.c: The Mayor, working with London's boroughs and other partners, will seek to reduce emissions from wood and other solid fuel burning in London.

4.5. The London Plan provides the statutory spatial development strategy for London. Policy T8 of the London Plan recognises that airport activity has significant environmental impacts, including air quality, carbon emissions and noise; and requires these impacts to be taken into account when considering airport-related development. The supporting evidence for Policy T8 explicitly notes that airports have environmental impacts beyond host borough boundaries, including air-quality effects.

4.6. The Mayor's Equality, Diversity and Inclusion Strategy sets out how he will work to create a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential. Objective 4 of the Equality, Diversity and Inclusion Strategy is to "improve Londoners' air quality and access to green space and lower the city's carbon emissions so that inequalities in exposure to harmful pollution and climate risks are reduced".

Conflicts of interest

4.7. There are no known conflicts to declare regarding those involved in the drafting or clearance of this form.

5. Financial comments

5.1. Approval is sought to spend up to £60,000 to:

- commission an IIA and external legal review of the LLAQM guidance documents

- commission specialist consultancy support to review Heathrow's planning submissions

- provide technical advice to inform the GLA's response to the application

- prepare and deliver a campaign on woodburning.

5.2. The expenditure on the London Local Air Quality Management framework is part of the effective action to reduce risk exposure project. The expenditure on Heathrow is part of the policies, interventions, powers and resources project. The expenditure on the woodburning campaign is part of the raise awareness of the health impacts of air pollution project, All are part of the Cleaning London's Air programme.

5.3. The proposed spending is financed by GLA resources, as agreed in the budget for this financial year. The budget is held and managed within the GLA's Connectivity, Air Quality, Transport and Infrastructure Unit.

5.4. Any further changes to the scope of this project will be subject to further approval via the Authority's decision-making process. All appropriate budget adjustments will be made.

6. Planned delivery approach and next steps

6.1. Key milestones for the transfer of the budget are set out below:

LLAQM Review

Activity	Timeline
Legal review completed and comments provided	November 2026
Final report delivered for Integrated Impact Assessment	December 2026

Heathrow DCO Consultation

Activity	Timeline
Public consultation on Heathrow's expansion plans opens	27 October 2026
Public consultation on Heathrow's expansion plans closes	22 December 2026

Woodburning Campaign

Activity	Timeline
Marketing assets redeveloped and advertising space on social media purchased	16 November 2026
Campaign launch	17 November 2026

Appendices and supporting papers:
None.

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Strategic Programmes

Does this decision seek approval for activity falling within the remit of a programme delivery plan? YES

If YES, which programme/s does this fall within: Cleaning London's Air

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? NO

ORIGINATING OFFICER DECLARATION:	Drafting officer to confirm the following (✓)
Drafting officer: Matthew Browning has drafted this report in accordance with GLA procedures and confirms the following:	✓
Mayoral Delivery Board A summary of this decision was reviewed by the Mayoral Delivery Board on 26 October 2026.	

ASSISTANT DIRECTOR, FINANCIAL SERVICES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature



Date

26 October 2026