Report to Cabinet

Wednesday, 23 September 2026

By the Cabinet Member for Environmental Health, Recycling and Waste

DECISION REQUIRED

Not Exempt

Air Quality Action Plan 2026-2031

Executive Summary:

The Air Quality Action Plan (AQAP) has been produced as part of the Council's statutory duties in relation to the Storrington Air Quality Management Area (AQMA). It outlines the actions the Council and its partners will take to improve air quality in the Storrington AQMA, as well as in the wider Horsham District, between 2026-2031. The AQAP sets out how the Council will exercise its functions in order to secure the achievement of the air quality objectives.

Recommendations:

That the Cabinet is recommended to approve the Air Quality Action Plan 2026-2031 contained in Appendix A to this report.

Reasons for Recommendations:

The AQAP has been prepared as part of the Council's statutory duties in relation to the Storrington AQMA. It sets out the actions that the Council and its partners will take to improve air quality in the Storrington AQMA, as well as in the wider Horsham District, during the period 2026-2031. The AQAP provides an updated framework for delivering air quality improvements, reflects current evidence and local priorities, and supports the achievement of national air quality objectives. Approval of the AQAP will enable the Council to fulfil its responsibilities under the Environment Act 1995 and associated statutory guidance, and provide a coordinated approach to improving air quality and protecting public health through partnership working and ongoing monitoring of progress.

Background Papers:

Horsham District Air Quality Action Plan 2026-2031

Wards Affected: All Wards

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Use of AI: This report has been prepared with the support of artificial intelligence tools. All content has been reviewed and approved by the report author to ensure accuracy, appropriateness and compliance with council policies.

1. Proposal:

1.1 The Air Quality Action Plan (AQAP) has been prepared to fulfil Horsham District Council's statutory duties under the Environment Act 1995 and associated statutory guidance. The AQAP sets out the actions the Council will take between 2026 and 2031 to improve air quality, protect public health, and secure compliance with air quality objectives.

1.2 The relevant Air Quality Management Area (AQMA) addressed by this action plan is outlined below:

- Horsham AQMA No1: Storrington town centre – declared for exceedances of the annual mean objective for nitrogen dioxide (NO_2) in December 2010.

1.3 The AQAP also addresses the wider Horsham District.

1.4 Air quality in Horsham has continued to improve, with annual mean NO_2 concentrations decreasing across the District, including after the exceptional circumstances of the COVID-19 pandemic. Reflecting these improvements, the Cowfold AQMA was revoked in February 2026 and is therefore not included in this Action Plan.

1.5 Since the declaration of the Storrington AQMA, monitoring locations have recorded reductions in NO_2 concentrations of up to 48%. Monitoring data from 2024 and 2025 showed annual mean NO_2 concentrations below the national objective at all locations within the Storrington AQMA for the first time since its declaration. Current trends indicate that compliance is likely to continue, and it is anticipated that the AQMA may be revoked during the lifetime of this Plan, subject to continued compliance and confidence that concentrations will remain below the relevant objectives.

1.6 Despite this progress, air pollution remains a public health concern. Compliance with UK Air Quality Objectives does not eliminate all health impacts associated with air pollution, and concentrations remain above the more stringent World Health Organization (WHO) Air Quality Guidelines in some locations. Continued action is therefore required to maintain compliance, reduce exposure to air pollution where possible, and support wider health, transport and environmental objectives.

1.7 The proposed AQAP builds upon the progress achieved through the previous plan, and includes:

- Increase active travel, support mode shift, and reduce the need to travel
- Encourage and support uptake of ultra-low and zero exhaust vehicles
- Reduce emissions from buildings and new development
- Improve monitoring and public awareness
- Partnership working
- Traffic schemes

1.8 The Council has developed measures to improve air quality that can be considered under five broad topics:

- Alternatives to private vehicle use
- Policy guidance and development control

- Promoting low emission transport
- Public information
- Traffic management

1.9 It is recommended that the Cabinet approves the adoption of the Action Plan, replacing the previous Action Plan which has been in place since 2020.

1.10 Approval of the Action Plan will enable the Council to continue meeting its statutory responsibilities, maintain progress achieved to date, and support further improvements in air quality and public health outcomes across the District. The approved Action Plan will be implemented by the Council and progress will be monitored and reported through the annual air quality reporting process.

2. Council Policy Alignment:

2.1 The AQAP is consistent with the 2023-2027 Council Plan themes of “supporting people and communities” and “inspiring greener futures”.

2.2 The AQAP is also consistent with the Council's wider policy approach to sustainable development, environmental protection and climate change mitigation. It supports policies and initiatives that aim to:

- Promote sustainable design and construction;
- Reduce traffic and congestion through increased use of sustainable transport modes;
- Maximise opportunities for walking and cycling;
- Encourage the uptake of cleaner transport technologies and fuels, including electric vehicles and associated charging infrastructure;
- Mitigate the impacts of pollution arising from development, including particulates, dust, smoke, pollutant gases and odour;
- Ensure that the cumulative impacts of development and associated traffic are appropriately assessed; and
- Secure appropriate air quality mitigation measures through the planning process.

2.3 The AQAP also supports the implementation of the adopted Local Plan (2015), particularly **Policy 24**:

Strategic Policy: Environmental Protection
The high quality of the district’s environment will be protected through the planning process and the provision of local guidance documents. Taking into account any relevant Planning Guidance Documents, developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution and ensure that they:
…
4. Minimise the air pollution and greenhouse gas emissions in order to protect human health and the environment;
5. Contribute to the implementation of local Air Quality Action Plans and do not conflict with its objectives;
6. Maintain or reduce the number of people exposed to poor air quality including odour. Consideration should be given to development that will result in new public exposure, particularly where vulnerable people (e.g. the elderly, care homes or schools) would be exposed to the areas of poor air quality …

2.4 The AQAP also supports the Council's climate change ambitions by promoting measures that can deliver co-benefits for both air quality and carbon reduction, complementing the Council's wider climate change policies and objectives and supporting the transition towards a cleaner, healthier and more sustainable district.

3. Next Steps:

3.1 Once adopted, the AQAP will be submitted to the Department for Environment, Food and Rural Affairs (Defra) and published on the Council's website.

3.2 The Council will continue to work with relevant internal departments and external partners to deliver the actions identified within the Plan.

3.3 Progress against the AQAP will be monitored and reported through the Air Quality Annual Status Report in accordance with Defra guidance. Individual actions will be implemented in line with the timescales set out in the Plan and will be reviewed periodically to ensure they remain effective, achievable and aligned with local priorities, available resources and emerging evidence.

4. Consultation and Engagement:

4.1 An Air Quality Steering Group was formed following the declaration of the Storrington AQMA. It includes councillors and officers from Horsham District Council (HDC), West Sussex County Council (WSCC), and representatives from Storrington Parish Council. Its role is to review air quality issues, monitor progress against the AQAP, and make recommendations to the relevant authorities on measures that could be taken forward. Individual AQAP measures are subject to feasibility, deliverability and business case assessments, with decisions on implementation made by the relevant lead authority (e.g. HDC, WSCC or other partner organisations). The Group typically meets twice a year, with regular communication and information sharing maintained between meetings to support the ongoing development and delivery of measures, address implementation challenges, and review progress of ongoing schemes.

4.2 In addition to engagement undertaken specifically for the Storrington AQMA, HDC works collaboratively with a range of partner organisations on wider air quality issues. HDC is a member of the Sussex Air Quality Partnership (Sussex-air), which supports coordinated air quality monitoring across the region, knowledge sharing, and the dissemination of best practice. Partnership members work together to develop and deliver initiatives aimed at improving local air quality and reducing exposure to air pollution. This collaborative approach includes engagement with local authority air quality officers, highways authorities, public health teams, and the UK Health Security Agency (UKHSA).

4.3 A public consultation on the draft AQAP was undertaken between 26 May and 20 July 2026. The consultation was promoted through a range of channels including Council and community websites, newsletters, local media, social media, and direct engagement with local businesses and stakeholders.

4.4 A total of 225 survey responses and nine email submissions were received. The majority of respondents were local residents (94%), with approximately 60% residing in Storrington.

4.5 The consultation process has informed the content of the updated AQAP and helped ensure that the proposed actions reflect local concerns, evidence and stakeholder input. Ongoing engagement with the Air Quality Steering Group, partner organisations and the local community will continue as the AQAP is implemented and monitored.

5. Other Courses of Action Considered but Rejected:

5.1 **Option 1: Retain the existing Air Quality Action Plan without update**
This option was rejected because local authorities are required to regularly review and update their Air Quality Action Plans to ensure that actions remain relevant, evidence-based, and aligned with current local air quality challenges, legislation, national policy, and funding opportunities. Retaining the existing plan would not reflect current conditions and could result in the Council failing to meet its statutory obligations.

5.2 **Option 2: Limiting the AQAP to the Storrington AQMA only**
This option was rejected because air pollution is not confined to the AQMA boundary and some pollutants can be transported over wider geographical areas. A district-wide approach enables the Council to address both local and wider sources of pollution, recognising that improvements achieved elsewhere in the District may contribute to improved air quality within the AQMA. It also provides a more strategic and preventative framework for protecting public health and improving air quality across the District.

5.3 **Option 3: Delay adoption of the updated Air Quality Action Plan**
This option was rejected as it would postpone the implementation of updated measures designed to improve air quality and protect public health. Delaying adoption could also hinder the Council's ability to demonstrate progress in addressing air quality issues and meeting obligations under the statutory guidance, including the requirement to revise the action plan every five years.

5.4 **Option 4: Take no further action following completion of the review**
This option was rejected because the review identified the need for an updated action plan to reflect current evidence, priorities, and partnership working arrangements. Failure to adopt an updated AQAP would limit the Council's strategic approach to improving air quality and could have adverse implications for compliance with national guidance and public health objectives.

6. Resource Consequences:

Financial:

6.1 The AQAP sets out a range of measures intended to improve local air quality over the lifetime of the Plan. Section 5 of the AQAP identifies the lead departments and partner organisations responsible for delivery of each action, together with estimated implementation costs, funding sources, funding status, anticipated benefits, implementation timescales and monitoring arrangements.

6.2 **Revenue Consequences**
The approval of the AQAP does not create any immediate additional revenue expenditure commitments. Delivery of individual actions may have revenue

implications, which will be considered through the Council's normal budget-setting and decision-making processes and subject to the availability of funding.

6.3 **Capital Consequences**
The approval of the AQAP does not commit the Council to any capital expenditure. Some actions identified within the Plan may require capital investment in the future. Any such requirements will be subject to separate approval processes and the identification of appropriate funding sources.

6.4 **Budget Implications**
Funding requirements for individual actions will be met through existing approved budgets where available, external funding opportunities, partner contributions, or future budget bids, as appropriate. Approval of the AQAP does not require additional funding outside of existing budgets at this stage.

7. Legal Considerations:

7.1 The Council is required by section 83A(2) of the Environment Act ('EA') 1995 to prepare an action plan for the Storrington AQMA for the purpose of securing that air quality standards and objectives are achieved in that area.

7.2 Section 83A(3) and (4) of the EA 1995 provide that the action plan must be a written plan setting out how the Council will exercise its functions in order to secure that air quality standards in the area are (i) achieved and (ii) maintained.

7.3 Section 83A(5) of the EA 1995 provides that the action plan must set out particular measures the Council will take and the date by which such measures will be carried out.

7.4 The Council is authorised by section 83A(6) of the EA 1995 to revise the action plan at any time and is required by section 83A(6) of the EA 1995 to revise the action plan if it considers that there is a need for further or different measures to be taken to secure that air quality standards and objectives are achieved or maintained.

7.5 The Council is required by section 88(2) of the EA 1995 to have regard to any statutory guidance when preparing the action plan. The statutory guidance ("Local Air Quality Management Policy Guidance (PG22)") provides, amongst other things, that local authorities should, as a minimum, revise their action plans every five years.

7.6 The Council has the power under section 1(1) of the Localism Act 2011 to do anything that individuals generally may do. The Council therefore has the power to prepare an action plan covering the areas of the Horsham District that are not covered by an AQMA.

8. Risk Analysis and Mitigation:

8.1 The adoption of the AQAP does not expose the Council to any significant new financial, legal, or operational risks.

8.2 No medium or high risks associated with the approval of the AQAP have been identified. The Plan has been developed in accordance with statutory requirements and includes clear actions, lead organisations, estimated costs, implementation timescales, expected outcomes, and monitoring arrangements.

8.3 To minimise risk, the AQAP includes a framework for ongoing monitoring and review of progress against the identified actions. Delivery of individual actions will be subject to the Council's established governance arrangements, including separate approvals, funding decisions, and project-specific risk assessments where required. Regular progress reporting and partnership working will help ensure that risks relating to implementation, funding availability, and delivery timescales are identified and managed appropriately.

9. Procurement Implications:

9.1 There are no immediate procurement implications arising from this decision.

9.2 No alternative procurement options were considered as the proposal relates solely to the adoption of a strategic policy document. Any future actions arising from the AQAP that require the procurement of goods, services, or works will be subject to separate approval processes and will be undertaken in accordance with the Council's Contract Procedure Rules, Procurement Code, and relevant procurement legislation in force at the time.

10. Equalities, Human Rights & Public Sector Equality Duty Considerations:

10.1 The adoption of the AQAP is not anticipated to have any adverse impact on groups sharing protected characteristics under the Equality Act 2010.

10.2 Poor air quality can disproportionately affect vulnerable groups, including children, older people, pregnant women, and individuals with existing respiratory or cardiovascular conditions. The measures contained within the AQAP are intended to contribute positively to reducing exposure to air pollution and improving health outcomes across the community.

11. Environmental Implications:

11.1 The adoption of the AQAP itself does not directly result in changes to the use of natural resources, waste generation, or emissions beyond those associated with the implementation of individual actions. Any specific environmental impacts arising from individual projects or measures delivered under the AQAP will be assessed as part of their development and approval processes, ensuring that opportunities to maximise environmental benefits and minimise adverse impacts are considered.

11.2 Overall, the proposed adoption of the AQAP is expected to have a positive environmental impact through its contribution to reducing air pollution and improving environmental quality across the District.

12. Other Considerations:

12.1 Approval of the AQAP does not, in itself, give rise to any direct implications relating to data protection, GDPR, information governance, crime and disorder, or community safety.

13. Urgency:

13.1 This decision is being treated as urgent on the basis that any delay in its implementation would pose a risk of harm to residents and/or prejudice the interests of the Council.