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OXFORD CITY COUNCIL

To:	**Cabinet**
Date:	**22nd October 2025**
Report of:	**Director of Economy, Regeneration and Sustainability (Clive Tritton)**
Title of Report:	**Draft Air Quality Action Plan**

Summary and recommendations	
Purpose of report:	To approve the draft Air Quality Action Plan 2026-2030 for public consultation
Key decision:	Yes
Cabinet Members:	Councillor Anna Railton - Cabinet Member for Zero Carbon Oxford and Climate Justice
Corporate Priority:	Zero Carbon
Policy Framework:	No
Recommendation(s): That Cabinet resolves to:	
1. Approve the Air Quality Action Plan 2026-2030 for Public Consultation	

Appendices	
Appendix 1	Air Quality Action Plan 2026-2030 (Draft)
Appendix 2	Risk Assessment
Appendix 3	Equalities Impact Assessment

Introduction and background

1. Air pollution poses a significant global health burden, contributing to millions of deaths and years of healthy life lost each year. Its impact is now considered comparable to other major health risks such as poor diet and tobacco use. Recognised as the single greatest environmental threat to human health, air pollution demands urgent and sustained action worldwide.
2. Air pollution disproportionately affects society's most vulnerable groups, including children, the elderly, and individuals with pre-existing heart and lung conditions. Low-income communities also face greater exposure to poor air quality, further deepening health and social inequalities.

3. In September 2021[1], the World Health Organisation (WHO) presented robust evidence showing that adverse health effects from air pollution occur at concentrations significantly lower than the UK's current legal limits for various pollutants.
4. In January 2021, recognising the need to go beyond legal compliance, Oxford City Council became the first local authority in the UK to adopt a more ambitious air quality target for nitrogen dioxide (NO_2). The Council introduced a stringent local annual mean target, committing to achieve this across the city by the end of 2025 in all locations relevant to public exposure.
5. In December 2024, the European commission also introduced more stringent legal limits[2] for air pollution, with a target for compliance across Europe by 2030. This move aims to narrow the gap between existing legal targets and the levels considered safest by the WHO. It highlights that the UK is now lagging behind the EU in the adoption of progressive air quality standards.
6. According to the Committee on the Medical Effects of Air Pollutants (COMEAP), a reduction of just 1 µg/m^3 in NO_2, could result in an estimated 420,000 to 903,000 life years saved across the UK over the next 106 years. This improvement is associated with an increase in life expectancy at birth of approximately 2 to 5 days.
7. As part of its statutory responsibilities, Oxford City Council is preparing to publish a new Air Quality Action Plan (AQAP) for the city, covering the period 2026 - 2030. The plan will outline a proposed set of measures aimed at addressing the ongoing challenge of poor air quality and its impact on the health of local residents and visitors.
8. This work has been developed by Oxford City Council, with the contribution of Oxfordshire County Council, reflecting its key role as Oxford's Transport Authority. To support the plan's development, a joint Local Authority Officer Steering Group (comprising officers from both councils) was established in January 2025. The group met a few times and worked collaboratively to review key evidence, to help define the plan's key areas of intervention, and to finalise the full list of proposed actions contained in this draft.

Assessing Oxford's Air Quality and Progress on the Local NO_2 Reduction Target

9. Air quality is generally poorer in urban areas, and Oxford, like many UK cities, continues to experience elevated levels of air pollution.
10. Nitrogen dioxide (NO_2) is the pollutant of greatest concern in Oxford. It is primarily emitted from high-temperature combustion processes, such as road transport and energy generation. Due to its relatively short atmospheric lifetime (typically just a

[1] The WHO global air quality guidelines offer quantitative health-based recommendations for air quality management for the various pollutants. They serve as a global target for national, regional and city governments to work towards improving their citizen's health by reducing air pollution.

[2] The revised Ambient Air Quality European Directive cuts the allowed legal annual mean limit value for NO_2 by half (from 40 µg/m^3 to 20 µg/m^3), in complete alignment with WHO's interim target II.

few hours) NO_2 tends to remain concentrated near its sources, resulting in a distinct localised pattern, particularly in urban areas and along busy roads**.**

11. Since 2010, the entire city of Oxford has been designated as an Air Quality Management Area (AQMA) for nitrogen dioxide (NO_2), due to persistent exceedances of the legal annual mean limit in several locations. As a result, the City Council has a statutory duty to develop and implement an Air Quality Action Plans (AQAP) aimed at directly addressing NO_2 levels across the city.

12. In January 2021, Oxford City Council adopted an Air Quality Action Plan (AQAP) comprising a comprehensive set of 30 measures, jointly agreed with key partners. These measures were designed to improve air quality across the city during the 2021–2025 period.

13. Key air quality measures delivered under the current AQAP included the launch of the Energy Superhub (2021), the Zero Emission Zone Pilot (2022), the implementation of Low Traffic Neighbourhoods (2023), the city-wide expansion of Oxford's Smoke Control Area (2024), and, more recently, the electrification of Oxford's bus fleet through the ZEBRA scheme (2024).

14. Over the past decade (2014–2024), nitrogen dioxide (NO_2) levels across Oxford have decreased by approximately 50% on average, with 25% of that reduction occurring since 2021 (the year the current AQAP was adopted). While this progress is encouraging, Oxford City Council recognises that much more remains to be done, especially in light of compelling evidence from the World Health Organisation and the wider scientific community indicating that there is no safe level of air pollution.

15. In 2019[3], 47% of Oxford's air quality monitoring sites recorded nitrogen dioxide (NO_2) levels above the city's local annual mean target of 30 µg/m³ (to be achieved by 2025). By 2024, that figure had dropped to just 3%. This significant improvement indicates that Oxford City Council is on track to meet its commitment of achieving the local NO_2 target citywide by the end of 2025.

16. Air pollution is not limited to nitrogen dioxide (NO_2); particulate matter ($PM_{2.5}$) is also a major concern. $PM_{2.5}$ refers to tiny airborne particles (around 20 times smaller than the width of a human hair) that are not gases. On an urban environment, these particles originate from residential combustion (especially wood burning), transport, and construction activities. Once emitted, $PM_{2.5}$ can remain suspended in the air for days or even weeks, travelling hundreds of miles and posing serious health risks**.**

17. Oxford is currently fully compliant with UK legal limits for $PM_{2.5}$ in all monitored locations - limits that are expected to be met nationally by 2040. The city's $PM_{2.5}$ levels are only slightly above the current World Health Organisation advisory thresholds. Between 2014 and 2024, Oxford has achieved a 40% reduction in $PM_{2.5}$ concentrations, with 14% of that progress occurring since 2021.

[3] Although the AQAP was published in January 2021, the year 2019 was used as the baseline for this comparison because 2020 and 2021 were significantly affected by the COVID-19 pandemic. During those years, lockdowns and traffic restrictions led to an artificial and temporary improvement in air quality. As a result, comparing data from those years with 2024 would not provide a realistic assessment of long-term trends and improvements.

Overview

18. Under the local air quality management framework established by Part IV of the Environment Act 1995 (as amended by the Environment Act 2021), Oxford City Council has a statutory duty to prepare a written Air Quality Action Plan aimed at achieving national air quality standards and objectives within the designated city-wide Air Quality Management Area.

19. The new Air Quality Action Plan (AQAP) must set out the actions that Oxford City Council and its partners will undertake to improve air quality across the city during the 2026–2030 period.

20. Oxford City Council's new AQAP sets out a clear vision: to ***Deliver Clean Air for everyone who lives in, works in, or visits the city of Oxford.*** To achieve this, the plan is built around three core aims:

a) Alignment with the World Health Organisation Air Quality Guidelines - These guidelines will serve as the city's reference standard and long-term target. This AQAP commits to pursuing WHO's Interim Target III for NO_2.

b) Raising Public Awareness - The plan aims to increase understanding of the health impacts of air pollution, empowering residents with information and encouraging behavioural change.

c) Leading by example -Through local action and policy, the Council will demonstrate its commitment to cleaner air and healthier communities, influencing broader change.

21. The main priorities for the 2026–2030 period focus on continuing the reduction of transport emissions. These priorities take in consideration three major schemes that are currently being led and developed by Oxfordshire County Council, the highways authority for Oxford: the Traffic Filters trials, the introduction of a Workplace Parking Levy, and the expansion of the Zero Emission Zone (ZEZ). The first two initiatives aim to reduce the number of private vehicles on the city's roads, while the ZEZ expansion targets emissions from vehicles operating in central areas of the city. Note that many elements of these schemes are still subject to public consultation and political approval, meaning their scope and final design may evolve as the process unfolds.

22. The new AQAP will build on existing proposals and identify additional measures to complement and integrate them.

23. The draft Air Quality Action Plan (AQAP) also introduces a new local air pollution reduction target for Oxford: an annual mean NO_2 concentration of 20 µg/m³ to be pursued citywide by the end of 2030, in all locations relevant to public exposure. This builds on the work initiated in January 2021 under the city's current AQAP.

24. The proposed NO_2 target of 20 µg/m³ marks a substantial tightening relative to both the UK's current legal limit of 40 µg/m³ and Oxford's existing local target of 30 µg/m³, established in the previous Air Quality Action Plan. This new target is fully aligned with the World Health Organisation's Interim Target II and the European Union's recently adopted legal standard - both set at 20 µg/m³, with the EU standard also expected to be met by 2030.

25. Oxford City Council was the first local authority in the UK to set its own, more stringent local NO_2 target back in 2021. Now, it is once again leading the way - becoming the first to actively close the gap between the UK's current legal limit and the World Health Organisation's guideline values for NO_2.
26. By taking this step, Oxford City Council reinforces its commitment to clean air and sends a clear message about the importance of going beyond mere legal compliance. It continues to champion efforts to improve air quality for everyone who lives in or visits the city, advocating for healthier, safer environments through sustained pollution reduction.
27. While the city's proposed new NO_2 local target is legally non-binding and does not supersede any current or future national standards, Oxford City Council will regularly monitor progress toward its achievement. Annual updates will be provided through the Air Quality Annual Status Report, ensuring transparency and accountability.

Policy Context and Alignment with Oxford City Council's Strategic Objectives

28. In 2019, Oxford City Council declared a Climate Emergency and convened the Oxford Citizens' Assembly on Climate Change. The Assembly delivered a clear mandate: residents want the city to continue leading efforts to reduce carbon emissions and enhance biodiversity across Oxford.
29. The draft Air Quality Action Plan included in Appendix 1, is fully integrated with Oxford's draft Local Plan 2042, Oxfordshire's Local Transport and Connectivity Plan, and the Central Oxfordshire Travel Plan. It also aligns with the outcomes of Oxford's Citizens' Assembly on Climate Change and supports the objectives of the Oxfordshire Zero Carbon Partnership.
30. The draft AQAP also supports the delivery of two of Oxford City Council's corporate priorities:
    a. **Pursuing a Zero Carbon Oxford** – This priority aims for city-wide zero carbon emissions by 2040. The proposed AQAP contributes directly to this goal by improving air quality and supporting climate action.
    b. **Supporting Thriving Communities** – Healthy communities are built on clean air. By reducing air pollution, the AQAP helps mitigate its harmful health impacts, address health and social inequalities, and prevent both physical and mental health conditions - recognising the established link between air pollution exposure and increased risk of mental illness

Actions

31. According to the latest Source Apportionment Study conducted by Ricardo Energy & Environment in February 2025, the transport sector remains the dominant source of NOx emissions in Oxford, accounting for 44% of the total. This is followed by emissions from industry and services (30%), domestic combustion (26%), and other minor sources - including waste, agriculture, solvents, and nature – collectively contributing less than 1%.

32. The draft AQAP outlines a comprehensive set of actions and measures, structured around four key priority areas for intervention:

- Promoting Sustainable Travel and Reducing the Need to Drive
- Accelerating the Transition to Low and Zero Emission Transport
- Reducing Emissions from Domestic Hesting, Industry, and Services
- Facilitating behaviour change by enhancing public awareness and fostering collaborative partnerships

33. The actions outlined in the draft AQAP will be delivered through collaboration with a range of partners, including Oxfordshire County Council, which has played an active role in its development due to its responsibilities as the local transport authority.

34. Although DEFRA requires this proposed Air Quality Action Plan to focus primarily on reducing NO_2 concentrations (so that Oxford's Air Quality Management Area for NO_2 can eventually be revoked) it is important to highlight that several of the proposed measures will also deliver co-benefits by indirectly reducing $PM_{2.5}$ emissions.

Monitoring and Assessment

35. The key to the success of the new Air Quality Action Plan will be the ability to monitor and report the progress of measures and assess their impact. This will allow the AQAP to be further developed and ensure transparency and accountability.

36. The new AQAP will be subject to an annual review. Progress each year will be reported in the Annual Status Reports (ASRs) produced by Oxford City Council as part of its statutory Local Air Quality Management duties. The Council will endeavour to share the annual updates with the largest number of citizens and give them the most robust scrutiny through the Council's scrutiny function.

Public Consultation

37. In March 2025, a Citizens' Assembly[4] made up of 40 randomly selected Oxfordshire residents overwhelmingly voted in favour of bold changes to the city's transport system. The results of this assembly indicate a growing public appetite for cleaner, more accessible, and people friendly streets.

38. On the 29th April 2025, Oxford City Council and Oxfordshire County Council have jointly delivered an Air Quality Workshop (hosted at the Westgate Collaboration Space) where there was active engagement with 20+ local residents and representatives of local community action groups, with the objective of gathering views that could help inform the process of shaping this draft version of AQAP.

[4] The full Citizens' Assembly report—detailing the discussions, key outcomes, and conclusions reached by participants - is available for download/consultation here

39. There is also a statutory duty to conduct a more formal public consultation on this draft AQAP. It is proposed that this will be carried out from the 24th October to the 30th November 2025 (5 weeks).

40. The consultation will be widely publicised, and responses can be made in both paper and online formats.

41. Each individual scheme proposed within this Air Quality Action Plan will be subject to its own detailed design, planning, and construction process. Implementation of these schemes will be carried out independently, ensuring that appropriate assessments, approvals, and stakeholder engagement are undertaken for each project prior to commencement.

Carbon and Environmental Considerations

42. The draft AQAP includes targeted measures and emissions reduction goals across a range of Council-led programmes aimed at tackling both climate change (through carbon reduction) and air pollution.

Financial Implications

43. The draft AQAP includes a list of 30 actions which are aimed at achieving compliance with legal and local limits of air pollution.

44. Three important actions outlined in this draft AQAP (Zero Emission Zone Expansion, Traffic Filters, and Workplace Parking Levy) are of the single responsibility of Oxfordshire County Council to deliver and hence present no financial burden for the City Council. They have been included in this proposed AQAP following extensive engagement with Oxfordshire County Council through a joint AQAP steering group and are the result of current transport planning strategies and already on-going work.

45. Many of the actions proposed in this AQAP are already embedded within existing internal workstreams being developed by various teams across Oxford City Council and Oxfordshire County Council. As such, they are currently already being pursued using available funding and resources.

46. For certain actions not yet fully funded, the draft Air Quality Action Plan (AQAP) includes a commitment to *exploring opportunities* for delivery. It is anticipated that external grant funding will be necessary to implement these measures. The Council has a strong track record of securing external funding to support its sustainability objectives and will continue to build on this success. This includes seeking partnerships with innovation-focused organisations. However, it is important to note the significant reduction in UK Government funding for local air quality initiatives in recent years - particularly following the cancellation of DEFRA's Air Quality Grant programme, which previously supported local authorities in delivering air quality improvements.

47. The delivery of this Air Quality Action Plan may also face financial and operational risks linked to the proposed reorganisation of local government in Oxfordshire. Currently, air quality improvements are supported through a two-tier

governance model, with Oxfordshire County Council acting as the transport authority and Oxford City Council leading on statutory air quality duties.

48. The anticipated redistribution of responsibilities and budgets resulting from the proposed local government reorganisation (expected to be finalised by 2026 and implemented by 2028) could significantly affect the prioritisation and funding of key measures within the AQAP.

49. Existing initiatives may need to be re-evaluated or re-approved under new governance structures, potentially altering their scope, design, and pace of delivery. These uncertainties must be carefully considered to ensure the continuity and effectiveness of air quality improvements in Oxford.

Legal Issues

50. Section 82 of the Environment Act 1995, (as amended by the Environment Act 2021) provides that every local authority in England shall review the air quality within its area, both at the present time and the likely future air quality within the programme of Local Air Quality Management established under requirements within Part IV of that Act.

51. Local authorities have also a duty under Section 83 (1) of the Act to designate those areas where the air quality objectives (as set out in the Air Quality (England) Regulations 2010) are not being met (or are likely to be shown to be at risk of not meeting them) and where people are likely to be regularly present, as Air Quality Management Areas (AQMAS).

52. Once an AQMA has been designated, Section 83A requires the local authority to develop an Air Quality Action Plan (AQAP), to include public consultation, and detailing the list of remedial measures to tackle the problem within the AQMA. The Council may amend or revoke an area as appropriate in the light of subsequent reviews.

53. In August 2022, DEFRA published the Local Air Quality Management (LAQM) Statutory Policy Guidance 2022 and introduced a new warning process for overdue AQAPs which came into effect on 30 June 2023. If AQAP submission requirements are missed, the enforcement approach sets out an escalation process, ultimately end as a Section 85 Secretary of State direction to the relevant Local Authority Chief Executive specifying action.

54. The city's proposed new local annual mean target for NO_2 is legally non-binding and does not override any current or future legal targets set by central government.

Level of risk

55. A risk assessment is available for review at Appendix 2

Equalities Impact

56. Air pollution disproportionately affects the most vulnerable members of society—including children, older adults, and individuals with heart and lung conditions. There is also a strong correlation with social and economic inequalities, as areas with poorer air quality are often less affluent. Moreover, minority groups and low-income households may face heightened exposure and health risks, making air pollution not only an environmental issue but also a matter of social justice.

57. Older adults face approximately twice the risk of hospitalisation and death linked to poor air quality, while babies and children are also particularly vulnerable due to their developing respiratory systems. Individuals with pre-existing conditions such as asthma or chronic obstructive pulmonary disease (COPD) are especially susceptible to the harmful effects of air pollution. Additionally, obesity (particularly in children) has been identified as a factor that can increase sensitivity to air pollution, further compounding health risks.

58. While air pollution levels across the UK are often highest in areas of deprivation, this pattern is less evident in Oxford, largely because many lower-income neighbourhoods (such as housing estates) are located away from major traffic routes. However, elevated pollution levels are still present along routes frequently used by children and in areas with high concentrations of young people, such as the city centre, which has a large student population. Air pollution affects different groups in different ways, and minority communities and low-income households may still be disproportionately impacted.

59. The implementation of the measures outlined in this draft AQAP is expected to reduce air pollution levels across Oxford, contributing to improved public health and a reduction in health inequalities. By targeting pollution sources city-wide, the plan will help ensure that vulnerable and disadvantaged communities benefit from cleaner air, thereby supporting a more equitable and inclusive urban environment.

    An Equality Impact Assessment is included in Appendix 3.

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Background Papers: None