Lewes District Council

Air Quality Action Plan

In fulfilment of Part IV of the Environment Act 1995, as amended by the Environment Act 2021

Local Air Quality Management

December 2025

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Executive Summary

This action plan will be adopted from Winter 2025 outlining the actions that Lewes District Council will deliver between 2026 - 2030 in order to reduce concentrations of air pollutants and exposure to air pollution. Implementation of the outlined measures will result in the relevant objective(s) for air pollutants being attained by 2027 for the Newhaven Ring Road AQMA (subject to no significant increase in traffic count) and by 2026 within the current Lewes Town Centre AQMA.

The relevant Air Quality Management Areas (AQMAs) addressed by this action plan are outlined below:

- Lewes Town Centre AQMA, declared for the Nitrogen Dioxide (NO_2) annual mean Air Quality Objective (AQO) (declared since 30/06/2005)
- A259 Newhaven Ring Road AQMA, declared for the NO_2 annual mean AQO (declared since 16/07/2014)

This action plan replaces the previous action plans which ran from 2009 for Lewes Town Centre AQMA and 2016 for A259 Newhaven Ring Road AQMA. Projects have been delivered by key partners which have contributed to the aims of the past action plans (including schemes delivered as part of East Sussex Local Transport plans and National Highways Road Investment Strategy). These include:

- White Hill / Fisher Street / West Street Scheme completed in April 2013 with following monitoring indicating a reduction in NO_2 concentrations.
- Beddingham Crossing - Rebuilding the Southerham and Beddingham roundabouts on the A27 outside Lewes and a new railway bridge to avoid queuing at Beddingham rail crossing. This has reduced congestion and emissions on the A27.
- Lewes Town Centre 20 mph zone.
- The Living Cliffe - Creation of pedestrian zone in Cliffe High Street with restricted vehicular access. This has improved safety, walking and cycling facilities, and reduced impact of cars outside the AQMA.

- Offham Road Pedestrian Priority Scheme: Improvement to pedestrian facilities and vehicle speed management.
- Lewes Railway Station Forecourt Scheme: Improved facilities for pedestrians, buses and taxis.
- Car-sharing Database - Support car-sharing.
- Improved cycling facilities across the district.

Air pollution is associated with a number of adverse health impacts and is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent[1,2].

The UK Health Security Agency (formally Public Health England) has estimated that the costs of air pollution in England to health and social care services could reach between £5.3 and £18.6 billion between 2018 and 2035 [3]. Lewes District Council is committed to reducing the exposure of people in Lewes to poor air quality in order to improve health.

We have developed actions that can be considered under five broad topics:

1. Alternatives to private vehicle use
2. Promoting active travel and public transport
3. Public information
4. Transport planning and infrastructure
5. Traffic management

[1] Environmental equity, air quality, socioeconomic status and respiratory health, 2010

[2] Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

[3] Public Health England. Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report, May 2018

Our priorities are based on identifying measures that can lead to improvement in air pollution levels, raising the profile of air pollution issues within the district and working with partners and stakeholders to identify further measures.

In this AQAP, we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas outside of our influence (such as vehicle emissions standards) but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond the Council's direct influence.

Responsibilities and Commitment

Part IV (Sections 80 to 91) and Schedule 11 of the Environment Act sets out the legal obligations on local authorities in relation to LAQM. The Environment Act 2021 amends Part IV of the Act to clarify duties and enable greater cooperation between different levels of local government, neighbouring authorities and other relevant public authorities in the preparation of AQAPs so that a more strategic view is taken in respect of the achievement of air quality objectives.

This AQAP was prepared by the Regulatory Services Department of Lewes District Council and has been approved by:

- Emily O'Brien, Lead Member for Sustainability Lewes District Council
- Lewes District Council Cabinet
- Infrastructure Planning & Place, East Sussex County Council
- South Downs National Parks Authority

This AQAP has been signed off by Darrell Gale, Director of Public Health for East Sussex

The following Air Quality Partners / stakeholders have contributed to the development of the AQAP and will be committed to delivery of actions, subject to the availability of funding:

- East Sussex County Council (Infrastructure Planning & Place, Transport Hub, Road Safety, Asset Management)
- Lewes District Council Lead Member for Sustainability
- LDC Planning Policy Team Lead Officer
- LDC Sustainability Team
- LDC Newhaven Regeneration Team
- Lewes Town Council
- Newhaven Town Council
- Ouse Valley Climate Action
- Cycle Lewes
- Lewes Movement Strategy Project Board
- Cycle Seahaven

This AQAP will be subject to an annual review and appraisal of progress and will report to the Policy and Performance Advisory Committee. Progress each year will be reported in the Annual Status Reports (ASRs) produced by Lewes District Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP, please send them to Rachel Sadler at:

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1 Introduction

This report outlines the actions that Lewes District Council will deliver between 2026 - 2030 to reduce concentrations of air pollutants and exposure to air pollution thereby positively impacting on the health and quality of life of residents and visitors in the Lewes district. The purpose of the report is to set out how the local authority will exercise its functions to achieve the relevant air quality objectives with this action plan being adopted from Winter 2025.

It has been developed in recognition of the legal requirement on the local authority to achieve and maintain Air Quality Objectives under Part IV of the Environment Act 1995, as amended by the Environment Act 2021, and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within the Council's air quality Annual Status Report.

2 Summary of Current Air Quality in Lewes District Council

2.1 Air Quality Management Areas

The relevant Air Quality Management Areas (AQMAs) addressed by this AQAP are outlined below.

Table 2.1 Relevant Declared Air Quality Management Areas

AQMA Name	Date of Declaration	Pollutants and Air Quality Objectives	One Line Description	Is air quality within the AQMA influenced by National Highways roads?	Level of Exceedance: Declaration	Concentration Levels: 2024	Number of Years Compliant with Air Quality Objective
Lewes Town Centre AQMA	Declared 30/06/2005	Nitrogen dioxide (NO_2) Annual Mean	An area encompassing a section of Lewes Town Centre extending north to include the Police Station, south to St Andrews Place.	NO	53 µg/m^3	27.4 µg/m^3 *	5 years **
A259 Newhaven Ring Road AQMA	Declared 16/07/2014	Nitrogen dioxide (NO_2) Annual Mean	The designated area incorporates Newhaven Town Centre, Southway, Northway, and sections of the A259 Brighton Road, Lewes Road and the swing bridge.	NO	49 µg/m^3	33.2 µg/m^3	1 year

* There is an exceedance recorded close to Lewes Town Centre AQMA at monitoring site 21. **Further details are provided in section 6.3**.

** Number of years compliant includes 2020 and 2021, which are likely anomalies due to the impact of the COVID-19 pandemic and nationally imposed lockdowns on emissions. Excluding anomalous years, this is the third year that the AQMA has been compliant with the Air Quality Objective.

2.1.1 Lewes Town Centre AQMA

The Lewes Town Centre AQMA was declared in 2005 due to exceedances of the NO_2 annual mean AQS Objective. The NO_2 annual mean concentration of 53 µg/m^3 was recorded within the Lewes Town Centre AQMA at declaration, which exceeded the 40 µg/m^3 AQS Objective by 13 µg/m^3. The Lewes Town Centre AQMA encompasses a section of Lewes Town Centre extending north to include the Police Station, south to St Andrews Place.

There are seven diffusion tube sites within this AQMA, five diffusion tube sites adjacent to this AQMA and one continuous monitoring site within this AQMA; one continuous monitoring site LS5 located at the Needlemakers car park was decommissioned in 2022 and a new site LS8 at the Little East Street car park was installed. Annual mean NO_2 concentrations from these sites are presented in Table 2.2. Exceedance of the AQS Objective was reported in 2019 at Site ID 12 and Site ID 21. Annual mean NO_2 concentrations at all locations within the AQMA have achieved compliance since 2020 for five consecutive years.

However, one monitoring location (Site ID 21) which is on the High Street (known as School Hill) but not within the Lewes Town Centre AQMA, recorded exceedances of the AQS Objective with NO_2 concentrations of 45.7 µg/m^3 in 2023 and 50.7 µg/m^3 in 2024. It had been considered that this site may have been potentially impacted by a boiler outlet pipe and hence not representative of the local air quality however the tube has been relocated and review of 2025 data continues to show an exceedance similar to pre Covid levels. The Council considers that further analysis is necessary to determine whether the AQMA needs to be extended to cover the High Street area or whether the current AQMA should be revoked and a new AQMA declared.

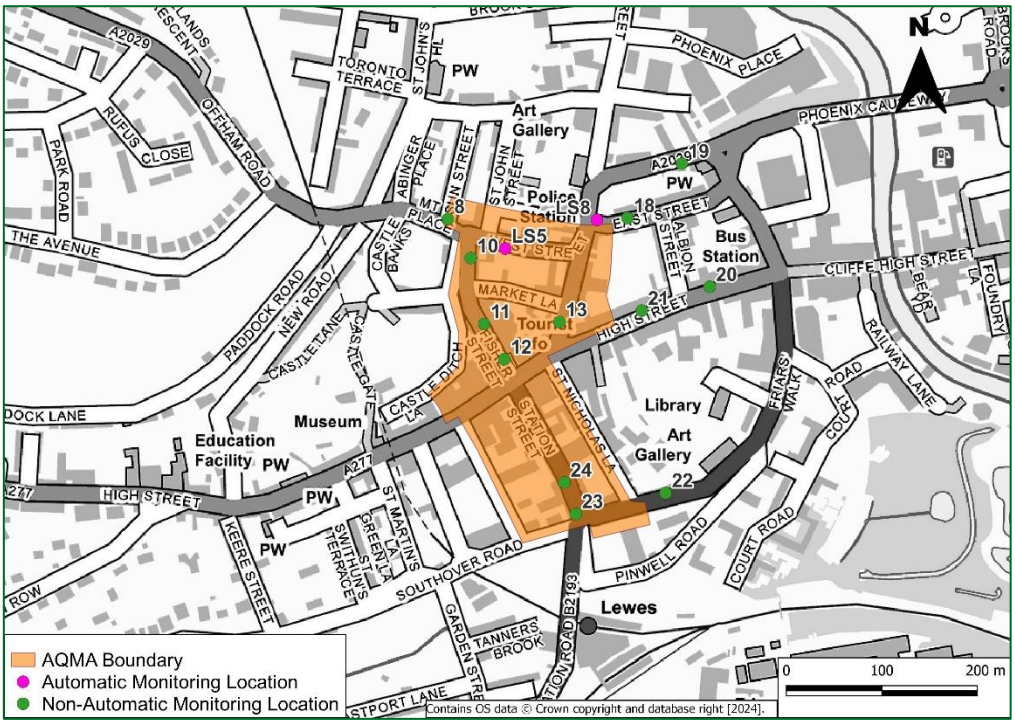
The locations of these monitoring sites are illustrated in Figure 2.1.

Table 2.2 Lewes Town Centre AQMA Annual Mean NO_2 Concentrations

Site ID	Site Location	In AQMA	Annual Mean NO_2 Concentration (µg/m^3)					
			2019	2020	2021	2022	2023	2024
LS5	Lewes Town West Street	Yes – Lewes Town Centre AQMA	19	16	14.7	-	-	-
LS8	Little East Street	Yes – Lewes Town Centre AQMA	-	-	-	13.8	13.5	12.8

8	LDC 26 - Mount Pleasant/Sun Street	Yes – Lewes Town Centre AQMA	23.7	14.9	18.0	16.0	17.3	16.2
10	LDC 18 - Fisher Street	Yes – Lewes Town Centre AQMA	24.1	15.5	16.8	17.4	17.0	14.9
11	LDC 36 - Fisher St West	Yes – Lewes Town Centre AQMA	32	20.6	24.1	32.4	23.0	21.8
12	LDC 1 - Fisher St East	Yes – Lewes Town Centre AQMA	**41.9**	27.6	30.0	29.3	29.7	27.4
13	LDC 29 - Market St	Yes – Lewes Town Centre AQMA	36.8	27.9	26.5	22.5	28.3	28.9
18	LDC 6 East Street	No - adjacent to AQMA	23.2	15.3	17.0	16.8	17.2	16.1
19	LDC 30 - Little East St	No - adjacent to AQMA	21.4	14.1	15.5	14.5	13.7	12.9
20	LDC 45 - School Hill	No - adjacent to AQMA	38.5	27.6	29.4	27.9	32.7	35.2
21	LDC 34 - 204 High St (School Hill)	No - adjacent to AQMA	**43.6**	31.6	33.0	35.3	**45.7**	**50.7**
22	LDC 35 - Walmer Lane/Lansdowne Terrace	No - adjacent to AQMA	20.4	13.5	14.8	12.7	13.0	12.7
23	LDC 23 - Station St/Lansdowne Terrace	Yes – Lewes Town Centre AQMA	24.7	16.1	19.1	17.7	18.6	-

Figure 2.1 Location of Monitoring Sites within Lewes Town Centre AQMA



2.1.2 A259 Newhaven Ring Road AQMA

The A259 Newhaven Ring Road AQMA was declared in 2014 due to exceedances of the NO_2 annual mean AQS Objective. The NO_2 annual mean concentration of 49 $\mu g/m^3$ was recorded within the Lewes Town Centre AQMA at declaration, which exceeded the 40 $\mu g/m^3$ AQS Objective by 9 $\mu g/m^3$. The A259 Newhaven Ring Road

AQMA incorporates Newhaven Town Centre, Southway, Northway, and sections of the A259 Brighton Road, Lewes Road and the swing bridge.

There are six diffusion tube sites within this AQMA, two diffusion tube sites adjacent to this AQMA and one continuous monitoring site within this AQMA (decommissioned since 2022). Annual mean NO_2 concentrations from these sites are presented in Table 2.3. Exceedance of the AQS Objective was reported in 2019 at Site ID 3, 40 and 50. Monitoring Locations Site ID 3 recorded exceedance of the annual mean AQS objective for NO_2 in 2022 as well, and recorded concentration within 10% of the exceedance value in 2021 and 2023.

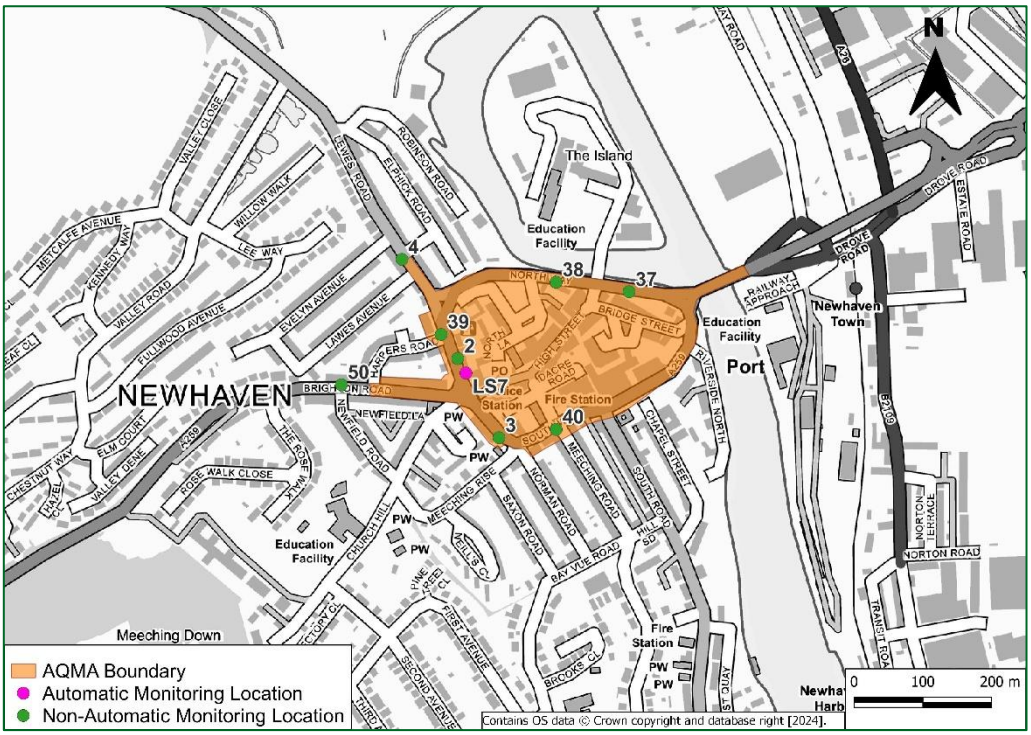
All monitored sites reported lower concentrations in 2020 and 2021 compared with previous years under the impact of lockdown during the COVID-19 pandemic. However, an upwards trend has been observed from the monitored data from 2022 to 2023 at Site ID 3, 13, 20, 21 and 24 due to the emissions from increasing traffic flows recovering from the impact of lockdown. The monitoring results at other sites remain at the low level from 2022 to 2024.

The locations of these monitoring sites are illustrated in Figure 2.2.

Table 2.3 A259 Newhaven Ring Road AQMA Annual Mean NO_2 Concentrations

Site ID	Site Location	In AQMA	Annual Mean NO_2 Concentration ($\mu g/m^3$)					
			2019	2020	2021	2022	2023	2024
LS7	Lewes Road, Newhaven	Yes – Newhaven AQMA	-	21	23.6	-	-	-
2	LDC 10 - 9 Southway – Newhaven	Yes - A259 Newhaven Ring Road AQMA	33.4	24.2	28.5	28.1	23.2	21.6
3	LDC - 16 Southway – Newhaven	Yes - A259 Newhaven Ring Road AQMA	**40.7**	31.6	36.9	**41.3**	38.2	33.2
4	LDC 11 - Lewes Rd – Newhaven	No - adjacent to AQMA	30.7	22	24.3	23.4	21.2	20.8
37	Newhaven - Bridge Pub	Yes - A259 Newhaven Ring Road AQMA	39.2	28.7	28.8	30.7	26.6	22.4
38	Newhaven- Essex Place	Yes - A259 Newhaven Ring Road AQMA	30.7	21.5	24.0	25.1	17.1	16.4
39	Newhaven - Rathan Court	Yes - A259 Newhaven Ring Road AQMA	27.1	19.9	21.8	22.4	20.2	18.7
40	Newhaven - The Old Chapel	Yes - A259 Newhaven Ring Road AQMA	**44.6**	34.1	35.8	33.7	34.5	31.9
50	O/S 64 Brighton Rd	No - adjacent to AQMA	**42.6**	25.8	29.1	29.1	27.7	25.7

Figure 2.2 Location of Monitoring Sites within A259 Newhaven Ring Road AQMA



2.2 Public Exposure

To understand the population exposed to poor air quality, a review of the estimated population of each AQMA has been undertaken. This has been completed using the Office for National Statistics 'Lower Super Output Area' (LSOA) information. Information from the Indices of Multiple Deprivation (IMD) are also included. The number for the IMD are based on deciles of multiple factors of deprivation. The larger the score, the more deprived the area.

Table 2.4 below shows that the A259 Newhaven Ring Road AQMA has higher population than the Lewes Town Centre AQMA. This could suggest potentially greater exposure to air pollution in the A259 Newhaven Ring Road AQMA.

Compared with Lewes Town Centre AQMA, Newhaven AQMA has a much lower average IMD decile. This may indicate increased vulnerability to the effects of air pollution due to higher levels of deprivation within Newhaven AQMA.

The median age of the population is 48 for the whole Lewes area, compared with 40 for England. The Lewes Town Centre AQMA has a slightly younger population than

the regional population. The Newhaven Ring Road AQMA has a younger population than both the regional population and national population. This age distribution can influence the susceptibility of these populations to the impact of air quality, with older age groups potentially being more vulnerable.

Table 2.4 Population and IMD

AQMA	Estimated Population in AQMA	Average IMD within AQMA	Median Age
Lewes Town Centre AQMA	99	8	47
A259 Newhaven Ring Road AQMA	569	3	36

3 Lewes District Council's Air Quality Priorities

3.1 Public Health Context

Mounting scientific evidence shows the scale of the impact of poor ambient air quality on health. Research shows that the most common air pollutants of concern, NO_2, PM_{10} and $PM_{2.5}$ (particulate matter in the fractions of less than 10 microns and 2.5 microns in diameter), are linked to various health complications, impacting the cardiovascular and respiratory systems. Exposure to these pollutants can bring about symptoms such as nose and throat irritation, followed by bronchoconstriction and dyspnoea, alongside increasing reactivity to natural allergens, increasing the risk of respiratory infections through the pollutants interaction with the immune system[4], and may lead to reduced lung function.

Alongside this, there is increasing interest and pressure from members of public for Local Authorities to actively tackle and reduce air pollution in their areas. Previously, there had been no deaths officially linked to air pollution, however in 2020 the first person in the UK had 'air pollution' listed as a cause of death. Although currently there are no legislative outcomes as a result of this, this further increases the pressure and duty of care that Local Authorities have in order to protect their residents. Poor air quality is considered to be a significant contributory factor to the loss of life, shortening lives by an average of 5 months. In 2010, the Department of Health's Committee on the Medical Effects of Air Pollutants (COMEAP) reported that long-term exposure to outdoor air pollution contributes to the equivalent of 29,000 deaths in 2008 in the UK, and an associated loss to the population of 340,000 life-years. A further report by the Royal College of Physicians reported in 2016 that it contributed to the equivalent of 40,000 deaths in 2015. A recently updated guidance

[4] Marilena Kampa and Elias Castanas, Human Health Effects of Air Pollution, June 2007

published by Office for Health Improvement and Disparities[5] concluded that the annual mortality of human-made air pollution in the UK is roughly equivalent to between 28,000 and 36,000 deaths every year. It is estimated that between 2017 and 2025 the total cost to the NHS and social care system of air pollutants (fine particulate matter and nitrogen dioxide), for which there is more robust evidence for an association, will be £1.6 billion.

Local authorities have a range of powers which can effectively help to improve air quality. However, the involvement of public health officials is crucial in playing a role to assess the public health impacts and providing advice and guidance on taking appropriate action to reduce exposure and improve the health of everyone within Lewes District Council.

The Air Quality Indicator in the Public Health Outcomes Framework (England) provides further impetus to join up action between the various local authority departments which impact on the delivery of air quality improvements. The "Air Quality – A Briefing for Directors of Public Health" document published in March 2017 provides a one-stop guide to the latest evidence on air pollution, guiding local authorities to use existing tools to appraise the scale of the air pollution issue in its area. It also advises local authorities how to appropriately prioritise air quality alongside other public health priorities to ensure it is on the local agenda.

The document comprises the following key guides:

- Getting to grips with air pollution – the latest evidence and techniques
- Understanding air pollution in your area
- Engaging local decision-makers about air pollution
- Communicating with the public during air pollution episodes
- Communicating with the public on the long-term impacts of air pollution
- Air Pollution: an emerging public health issue: Briefing for elected members

[5] Guidance - Air pollution: applying All Our Health, updated February 2022. Available: https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health

The Guidance on improving outdoor air pollution and health: review of interventions[6] published in March 2019 provides a review of interventions and in-depth evidence for a range of practical interventions to reduce harm from outdoor air pollution.

Besides NO_2, there is an increasing focus on fine particulate matter. Particulate matter which is 2.5 microns or less in diameter and known as $PM_{2.5}$ is a pollutant of concern. Neither AQMA has been declared for $PM_{2.5}$ and the modelling as part of the detailed assessment has shown predicted levels below the annual mean objective of 25 µg/m³. Whilst there are legal limits in place to protect human health it is recognised that there are no absolutely safe levels of $PM_{2.5}$. Negative health impacts associated with $PM_{2.5}$ exposure have been found well below current EU and UK limits.

The Public Health Outcomes Framework data tool[7] compiled by Public Heath England quantifies the mortality burden of $PM_{2.5}$ within England on a county and local authority scale. The 2022 fraction of mortality attributable to particulate air pollution across England is 5.8%. The fraction within Lewes District Council at 3.7% is significantly lower than the national average and the South East regional average of 5.7%.

It should be noted that this figure only accounts for one pollutant ($PM_{2.5}$) for which stronger scientific evidence on links with mortality exist, and not NO_2, for which the AQMAs are declared, so the true figure is possibly even higher. NO_2 has also been associated with adverse health effects at concentrations that were at or below current EU and UK limit values. Furthermore, following on from a review of research into the death burden associated with the air pollution mixture rather than single pollutants acting independently, COMEAP are currently reviewing the ability to link deaths to one specific pollutant.

[6] Guidance on improving outdoor air quality and health: review of interventions. Published March 2019. Available online at https://www.gov.uk/government/publications/improving-outdoor-air-quality-and-health-review-of-interventions

[7] Public Health Outcomes Framework, Public Health England. data tool available online at https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/0/gid/1000043/pat/6/par/E12000008/ati/202/are/E06000036/cid/4/page-options/ovw-do-0

It is expected that some of the measures implemented within this action plan for the achievement of reductions in NO_2 will have co-benefits in additionally reducing concentrations of PM_{10} and $PM_{2.5}$.

This action plan is aimed at improving air quality and achieving compliance within the AQMAs in Lewes. However, it is important to highlight that if there is not an AQMA in place, it does not mean there is not a public health concern around air quality.

3.2 Planning and Policy Context

There are a number of related policies and strategies at regional and local level that align directly with the aims of the AQAP. The majority of these policies and strategies are focused on development planning and transportation issues and opportunities and are therefore likely to help contribute to overall improvements in air quality across the LDC area. The review of these strategies and policies assists in preventing duplication of work within the AQAP and can instead work in concordance for mutual benefit whilst also focusing on direct measures outside those considered within the already developed strategies and policies. This section outlines the strategies and policies that have the most significant potential to impact on pollutant concentrations within LDC. The most relevant policies and strategic documents are detailed below.

3.2.1 Clean Air Strategy 2019 and Air Quality Strategy 2023

The UK government has published key strategies to improve air quality nationwide, including the Clean Air Strategy 2019 and Air Quality Strategy 2023. These set out actions to reduce emissions from major sources like road transport, industry and agriculture. Key measures include ending sales of new petrol/diesel cars by 2040, encouraging cleaner transport modes, and setting new emissions standards. The 2023 strategy provides a framework for local authorities to deliver air quality improvements, focusing on $PM_{2.5}$, NO_x and ammonia. It emphasizes treating air quality as a public health issue and encourages collaboration between public health, climate change and other relevant departments in developing local air quality plans and strategies.

3.2.2 South Downs Local Plan

The South Downs Local Plan[8] was adopted 2 July 2019 and covers the entire National Park. The Local Plan has been informed by a range of factors relating to the special qualities of the National Park, including landscape character, biodiversity and cultural heritage of the National Park, Neighbourhood Plans, local housing and economic needs and the impact of climate change. The core policies set out the framework for evaluating all development proposals in the National Park which is also relevant to the air quality and its impact to the local area. The relevant core policies are listed below.

Core Policy SD1: Sustainable Development sets out that:

"3. When determining any planning application, the Authority will consider the cumulative impacts of development.

4. Planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally:

a) The benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and

b) There is substantial compliance with other relevant policies in the development plan."

Core Policy SD2: Ecosystem Services sets out that:

" 1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:

[…](i) Reduce levels of pollution;

(j) Improve opportunities for peoples' health and wellbeing; […]

2. Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services."

Core Policy SD3: Major Development sets out that:

"1. In determining what constitutes major development the National Park Authority will consider whether the development, including temporary events should they be deemed to constitute development, by reason of its scale, character or nature, has

[8] South Downs Local Plan, adopted 2 July 2019. Available at: https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan/

the potential to have a significant adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park. The potential for significant adverse impact on the National Park will include the consideration of both the impact of cumulative development and the individual characteristics of each proposal and its context.

2. Planning permission will be refused for major developments in the National Park except in exceptional circumstances, and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of: […]

c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated […]"

3.2.3 Lewes Core Strategy: Local Plan

The Core Strategy[9] was adopted by Lewes District Council on 11 May 2016. The Core Strategy is Lewes District Council's central planning policy document for the Lewes district, outside of the South Downs National Park. It sets out the long-term spatial vision for the district and will guide development and change up to 2030. It is an important document to consider when developing the AQAP as it sets out the relevant air quality core policy for the council. The core policies within the plan that specifically address air quality are as follows:

"Core Policy 9 – Air Quality

Key Strategic Objective:

- *To reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, study in and visit the district.*
- *To ensure that the district reduces locally contributing causes of climate change and is pro-active regarding climate change initiatives.*

The local planning authority will seek to improve air quality, having particular regard to any Air Quality Management Area (AQMA) designations.

Applications for development that by virtue of their location, nature or scale could impact on an AQMA will be required to:

1. Have regard to any relevant Air Quality Action Plans (AQAP) and to seek improvements in air quality through implementation of measures in the AQAP.

2. Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.

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[9] Lewes Core Strategy: Local Plan. Adopted on 11 May 2016. Available at: https://www.lewes-eastbourne.gov.uk/media/1718/Adopted-Joint-Core-Strategy-2016/pdf/Adopted_Joint_Core_Strategy_2016.pdf?m=1682440920647

All applications for development will be required to:

3. Provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA.

4. Ensure that the development will not have a negative impact on the surrounding area in terms of its effect on health, the natural environment or general amenity, taking into account cumulative impacts.

5. Promote opportunities for walking, cycling and public transport and congestion management to reduce traffic levels in areas of reduced air quality, particularly in town centre locations, and promote the opportunity for cycling through the provision of cycleways.

6. Secure best practice methods to reduce levels of dust and other pollutants arising from the construction of development and/or from the use of the completed development."

"Core Policy 13 – Sustainable Travel

7.117 Transport issues remain a major concern for many local people. The rate of road casualties in the district is above the national average and 43% of residents in the Place Survey 2008 identified traffic congestion as a priority issue that needs to be addressed. An Air Quality Management Area has been declared in Lewes town centre, where most of the air pollution is generated by traffic. Levels of nitrogen dioxide in Newhaven town centre are also close to the national limits. On the A27, traffic levels are expected to reach capacity in the near future, particularly west of the Ashcombe Roundabout where the Highways Agency is forecasting 'highly stressed' road conditions by 2026.

7.118 Growth in the number and distance of journeys made by private car will therefore increasingly conflict with the local planning authority's aspirations for environmental enhancement, economic growth, and a better quality of life for residents. At the same time, accessibility issues for the district's rural communities are widely recognised, in particular the needs of the elderly, the disabled and young people in terms of accessing employment, education, health and entertainment facilities. The limited availability and frequency of public transport in the rural areas of the district has been identified as a key issue. Additionally, people on lower incomes are more likely to be reliant on public transport to access jobs and services.

7.119 An integrated approach to transport provision is therefore required to ensure that travel demand is managed in an effective and sustainable way, and that major new developments help to enhance travel choices and mitigate any adverse impacts they may otherwise have on the district's transport network. The local planning authority will work in partnership with East Sussex County Council, the local transport authority, to agree joint transport priorities in order to achieve these outcomes."

3.2.4 Towards a Lewes Local Plan: Spatial Strategy and Policy Directions

Lewes District Council is preparing a new Local Plan[10] for the areas outside of the South Downs National Park with the aim of providing the planning framework for the plan area to 2042. The new Local Plan will help to make sure that our plan area provides the homes, jobs, community facilities and services to meet the needs of people living, working in and visiting the plan area in a sustainable manner. The new Local Plan is expected to be submitted for independent examination by December 2026 in order to meet the government's deadline. The South Downs National Park Authority as the responsible planning authority is preparing a Local Plan for its area of the district and will address the air quality matters, in particular with regard to Lewes Town, through its Local Plan.

The latest Lewes Local Plan: Phase 1 Consultation Document presents the following policies which will help to address air quality within the plan area:

Draft Strategic Policy SDS2: Achieving Sustainable Development

Draft Strategic Policy CC1: Mitigating and Adapting to Climate Change

Draft Policy NE2: Green and Blue Infrastructure

Draft Strategic Policy HW1: Health and Wellbeing

Draft Policy HW2: Minimising Pollution Impacts

Draft Policy HW3: Healthy Vibrant Places

Draft Policy HW4: Designing for Health and Wellbeing.

DRAFT Strategic Policy SDS2: Achieving Sustainable Development

This is a strategic policy which helps to set the overall framework for the new Local Plan. Included within the policy is a requirement that development responds to climate change adaptation and mitigation needs and coastal change, that developments are well related to existing settlements, infrastructure and sustainable

[10] Emerging Local Plan - Lewes and Eastbourne Councils

transport modes, so as to reduce the need to travel and that they are able to support a choice of modes of active travel, with minimal reliance on the private car.

DRAFT Strategic Policy CC1: Mitigating and Adapting to Climate Change

This is a strategic policy which sets out the intended mitigation and adaptation measures which the council will seek to implement when considering development proposals. The mitigation measures set out in the policy that are particularly relevant to achieving good air quality include ensuring that new development prioritises active travel measures and enables low carbon transport and improving infrastructure to support sustainable development and help existing residents to reduce emissions.

Draft Policy NE2: Green and Blue Infrastructure

The policy sets out the council's approach to protecting and securing the network of Green and Blue Infrastructure within development proposals. Of relevance to good air quality is the requirement for all development proposals (with the exception of householder proposals) to be supported by a Green and Blue Infrastructure Plan which shows how the development will include Green and Blue Infrastructure, improve access to existing open spaces and maximising opportunities to green the urban environment.

Draft Strategic Policy HW1: Health and Wellbeing

This is a strategic policy which requires that all development proposals demonstrate how adverse impacts on health and wellbeing will be minimised. The policy also introduces Health Impact Assessments (HIA) as a tool to ensure that health impacts are addressed by developments that meet the policy thresholds. Smaller development will be required to undertake HIA screening with full HIA as appropriate while larger developments will be expected to undertake a full HIA.

An East Sussex Health Impact Assessment Toolkit is being developed by the East Sussex Planning for Health Working Group to support the implementation of HIAs across the county and provide a consistent approach. The working group includes representatives from all local planning authorities in East Sussex, the public health team and the highways authority. Once the toolkit is published it is expected that applicants will use the templates within the East Sussex toolkit and HIA manual to help identify and assess the likely health impacts of their proposals. This will ensure

that applicants understand where improvements to health outcomes can be made within their schemes.

Draft Policy HW2: Minimising Pollution Impacts

The policy sets out the position with respect to a wide variety of potential pollutants. The policy draws on the work of the Sussex-air partnership and the supporting text sets out the expectation that where applicants are required to submit an air quality assessment and an emissions mitigation assessment, that the assessment has regard to the Air Quality and Emissions Mitigation for Sussex guidance prepared by Sussex-air.

The policy requires that all development proposals avoid significant adverse impacts arising from noise, light, air, soil, water and odour pollutants and other pollutants as a result of the development at the time of implementation and in the future. Where significant adverse impacts from pollutants are anticipated, applicants will be expected to assess the extent of the impacts. Proposals will only be supported where applicants identify and agree to undertake such pollution mitigations as are determined to be appropriate to ensure that the health and quality of life of people, and the quality of the environment, are not affected. Where possible, applicants should contribute to the improvement of the impacts of existing pollutants on people's health and the environment.

Development proposals must include measures to minimise exposure to air pollution. Where a proposal will impact negatively on air quality an appropriate level of air quality mitigation should be included within the proposal. Where insufficient air pollution mitigation is incorporated on-site, the policy sets out the expectation that the council will seek a financial contribution to fund off-site measures to improve air quality.

The policy requires that proposals for major development (development of 10 or more homes or on a site of 0.5ha or more), B8 storage and distribution use class with a floorspace of 500m^2 or more, and development within a designated Air Quality Management Area are accompanied by an air quality assessment and an emissions mitigation assessment. Proposals within proximity of an AQMA or in areas identified

to be close to exceeding the National Air Quality Objective levels of pollution may also be required to prepare an air quality assessment and an emissions mitigation assessment.

All development proposals will be required to utilise best practice methods to reduce levels of dust and other pollutants arising during the construction phase and/or from the use of the completed development. Proposals for major development will be required to submit a copy of their Construction Environment Management Plan (CEMP) to the council prior to the commencement of the proposals.

Policy HW3: Healthy Vibrant Places

The policy sets out the approach to ensuring that the public realm is a healthy, inclusive and safe environment for all users. With respect to air quality, the policy requires that development proposals must create streets appropriate for their projected levels of use while not allowing vehicular traffic to dominate.

Policy HW4: Designing for Health and Wellbeing

The policy seeks to ensure that the design of buildings supports healthy lifestyles through a set of design criteria which includes ensuring that buildings are set back from roads and the number of windows and doors opening onto roads and habitable rooms facing roads, has been minimised. There is, however, an implicit tension between maintaining active frontages and natural surveillance with the achievement of this criterion which will need to be balanced when the final policy is drafted.

3.2.5 East Sussex Local Transport Plan 4 (LTP4) 2024 – 2050

The fourth East Sussex Local Transport Plan 2024 – 2050 (also known as LTP4)[11] was adopted at Full Council on 8 October 2024. LTP4 sets out how East Sussex County Council and partners will plan and provide transport for residents, businesses

[11] Local Transport Plan 4 - Fourth East Sussex Local Transport Plan. Adopted on 8 October 2024. Available at: https://www.eastsussex.gov.uk/roads-transport/transport-planning/local-transport-plan/local-transport-plan-4

and visitors in East Sussex now and for future generations, to help connect them with the places they need to go on a daily basis.

It sets out how The County Council and partners plan to:

- enable safer and more accessible journeys.
- develop healthy places to enable people to live well.
- decarbonise transport to help achieve net zero targets by 2050 at the latest.
- maintain and strengthen transport networks so that they are resilient.
- support a more equitable, inclusive, and sustainable economy within towns and local centres, and villages in more rural areas.

Within the East Sussex LTP4, Policy B5: Air Quality sets out below component policy measures:

- Investigating the potential for traffic management schemes in the centres of largest urban areas.
- Reducing the need to travel by higher polluting transport modes through better, integrated spatial and transport planning.
- Promoting less polluting forms of travel (for example, active travel, public transport, and electric vehicles) for people and goods movement.
- Assisting local planning authorities in the development and implementation of Air Quality Strategies and Action Plans to ensure agreed targets are met.
- Harnessing improvements to vehicle technology, including the use of ultra-low and zero emission vehicles and fuels.
- Further developing the County Council's School Streets programme to restrict vehicle access outside schools at drop off and pick-up times, thereby reducing levels of pollutants in their vicinity.
- Working with partners and communities to co-develop, seek funding and deliver travel behaviour change programmes, to support walking, wheeling and cycling.

There are other strategies and plans, focusing on specific modes of transport, that support the East Sussex LTP4 including the East Sussex Local Cycling & Walking Infrastructure Plan, the Bus Service Improvement Plan (BSIP), the updated Rail Strategy and the draft Freight Strategy which are listed below.

3.2.6 East Sussex Local Cycling & Walking Infrastructure Plan (LCWIP)

The East Sussex LCWIP[12] sets out proposed cycling and walking networks and measures within specific areas of the County.

The LCWIP focuses on areas of the County where there are the greatest opportunities to increase levels of cycling and walking. There is an emphasis on delivering infrastructure improvements which supports people who do not cycle or walk.

The plan specifies in paragraph 3.7 that:

"Exposure to poor air quality is not a lifestyle choice and often affects the health of people who are more vulnerable, including children and people with pre-existing health conditions, as well as those people that live or work nearer to congested roads. Initiatives to encourage more people to walk and cycle, particularly on the commute to work or to access education, is therefore important. Not only will this reduce congestion from vehicles on the road, thereby lowering toxic emission levels locally, but it will improve the physical health and wellbeing of people locally. This is especially important in our air quality management areas (AQMAs) within Newhaven and Lewes (both of which are managed by Lewes - Eastbourne – Council)."

The East Sussex LCWIP is currently being reviewed and is likely to be available for public consultation towards late autumn 2025. The update is being undertaken to ensure alignment with national Active Travel England guidance and the East Sussex LTP4.

3.2.7 East Sussex Bus Service Improvement Plan (BSIP)

The East Sussex Bus Service Improvement Plan (BSIP)[13] sets out the plans and supporting policies to improve bus services in the area, working in close cooperation with the neighbouring Local Transport Authorities and with stakeholders representing

[12] Local Cycling & Walking Infrastructure Plan. Published October 2020. Available at: https://www.eastsussex.gov.uk/roads-transport/cycling-walking-cycling-plans/cycling-walking-infrastructure-plan

[13] Bus Service Improvement Plan (BSIP). Published October 2021. Available at: https://www.eastsussex.gov.uk/roads-transport/public/bus-service-improvement-plan/bus-service-improvement-plan-for-east-sussex-county-council

local bus operators, statutory consultees, community and business voices, bus passengers, and the voluntary and health transport sectors.

The mission set out in the plan is to ensure that East Sussex residents and visitors enjoy the highest possible quality bus services that provide:

- A frequent and comprehensive choice.
- Reduce congestion.
- Make a positive contribution to better air quality and decarbonisation.

The BSIP covers a number of key service enhancements which will benefit the residents of East Sussex; coupled with infrastructure and other interventions such as more effective parking controls, enhanced bus priority and a fresh look at fares and ticketing – especially improving existing discount offers for young people - this will move the bus up the hierarchy and lead to transformational modal shift which in turn will lead to fewer car journeys, reduced congestion and improved air quality.

3.2.8 East Sussex Rail Strategy

The East Sussex Rail Strategy[14] has been used to influence rail investment decisions and the delivery of measures to support accessibility to rail stations in East Sussex.

The East Sussex Rail Strategy 2025-2050 sets out the future vision for the delivery of improvements to rail travel in East Sussex, specifically on passenger journeys. It focuses on:

- Priority Investment Area 1 – Accessibility of the rail network
- Priority Investment Area 2 – Integration with other modes
- Priority Investment Area 3 – Reliability and resilience
- Priority Investment Area 4 – Decarbonisation
- Priority Investment Area 5 – Journey time competitiveness
- Priority Investment Area 6 – Customer experience

[14] Rail Development Strategy. Available at: https://www.eastsussex.gov.uk/roads-transport/transport-planning/local-transport-plan/rail/rail-development-strategy

The improvement of the rail network and services helps encourage people to use public transport and therefore reduce car journeys and emissions and improve air quality.

3.2.9 Draft East Sussex Freight Strategy 2025 - 2050

The draft East Sussex Freight Strategy 2025 - 2050 sets out the future vision for the delivery of improvements to the movement of freight in East Sussex, as it is critical to people's everyday lives through the movement of goods to shops and businesses, our doors and local collection points. The strategy focuses on four priority investment areas:

- Priority Investment Area 1 – Strategic freight movements
- Priority Investment Area 2 – Decarbonisation
- Priority Investment Area 3 – Last mile logistics
- Priority Investment Area 4 – Planning & policy

The strategy references throughout the document the opportunities to support air quality especially through the use of vehicles using cleaner fuels and improvements to 'last mile' logistics, i.e. using consolidation centres and e-cargo bikes or other sustainable last mile options.

3.2.10 Lewes Neighbourhood Plan

A Neighbourhood Plan for Lewes was adopted as policy in April 2019, by the planning authority for Lewes Town – South Downs National Park Authority. This plan is based upon contributions of visitors to the exhibitions and workshops over four years, and the work done by the community representatives who formed the steering group during that period. Policies on themes such as transport and protection of the town's heritage; potential sites for new homes and ideas for design, with supporting arguments, were refined in light of the comments following various periods of consultation etc. The plan is also consulted with statutory bodies such as Lewes District Council; East Sussex County Council; South Downs National Park Authority; the Environment Agency; Natural England; Historic England and others.

The relevant policy which will help improve the air quality in the area is listed below:

Lewes Air Quality Action Plan 2026 - 2030

Policy AM3 Car Parking Strategy

New developments across the plan area will be supported where they have regard to and safeguard strategic car parking projects in the neighbourhood area.

This policy will particularly apply to:

- The rationalisation of surface car parks across the town to create an easy to understand system for residents and visitors.
- Improvements to air quality and reducing congestion.
- Supporting greater use of electric vehicles, more charging points of established regular standards for residents and visitors.
- Giving support to the Car Club network.

3.2.11 Lewes Integrated Movement Strategy

The Lewes Integrated Movement Strategy emerged from the Transport Season of the Lewes Climate Hub held in 2023. A 'movement strategy' is a plan that considers the needs of all transport users including pedestrians, wheelers, cyclists and bus and rail users and follows the transport hierarchy which places those road users most at risk in the event of a collision at the top of the hierarchy[15].

Lewes Town Council is leading this project and Lewes District Council is a member of the Task and Finish Group, with the following terms of reference:

"To develop and agree an 'integrated active travel strategy for Lewes as a supplementary document in our Neighbourhood Plan'."

East Sussex County Council and South Downs National Park Authority are consultees.

Outcomes from the phased implementation of the Strategy will include:

- Increased footfall and dwell-time in the town to benefit local businesses
- People-centred mobility services available to all
- Reduced need for private car ownership to save people money

[15] https://www.gov.uk/guidance/the-highway-code/introduction

- Improved air quality
- Reduced noise
- Improved public space and cultural heritage
- Links to green and blue space fit for an historic town in a national park

Funding secured by Cycle Lewes from Ouse Valley Climate Action has been utilised to procure specialist support for technical analysis and development of strategic design principles. Traffic volumes, key routes and pinch points have been identified in order to help identify opportunities and challenges as well as possible mitigations. This work is currently being assessed with a view to developing options and will be accompanied by a consultation later this year. This will support the opportunity to make the case for future funding to support the delivery of potential measures.

3.2.12 Newhaven Neighbourhood Development Plan

The Newhaven Neighbourhood Development Plan (NDP) was adopted on 14 November 2019 as a result of the South Downs National Park Authority (SDNPA) Planning Committee resolution.

The Newhaven Neighbourhood Plan (2017 – 2030) becomes part of the Statutory Development Plan along with the Lewes District Local Plan Part 1: Joint Core Strategy 2010 - 2030, Local Plan Part 2 and the South Downs Local Plan and will guide development in Newhaven up to 2030. This means that Lewes District Council and the South Downs National Park Authority (SDNPA) will consult the plan and use the planning policies within it, to determine whether to grant planning permission for planning applications made within the Neighbourhood Plan Area.

The relevant policy which will help improve the air quality in the area is listed below:

Policy T 1 – Congestion mitigation and sustainable movement

1. Planning applications will be supported which improve sustainable movement throughout the plan area to reduce traffic impacts and improve air quality.

2. Planning applications for new development which seek to minimise traffic impacts on the environment and improve air quality, including the provision of cycle storage, car sharing, and electric car charging points will be supported.

3. Where possible, new development should encourage walking and cycling by the inclusion of pedestrian and cycle links to existing access network and areas of public access.

4. New development should, where appropriate, contribute towards the provision or improvement of cycle and pedestrian routes throughout and connections with the town to include links to the South Downs National Park, railway stations, bus stops and subway enhancements to encourage their use and improve cross town links.

5. Proposals which will lead to significant increased traffic flows or congestion should take proportionate steps through legal agreements to mitigate traffic impacts. Mitigation may include a range of approaches such as a) Upgrading pedestrian crossing equipment including phasing b) Pedestrian and traffic signal enhancements (linking) c) Junction improvements.

6. To improve sustainable movement between the east and west sides of the town, a new moving pedestrian/cycle bridge over the River Ouse of exemplary design will be supported.

3.2.13 Re-Imagining Newhaven Programme

The Re-imagining Newhaven programme is being delivered with £37 million of capital grant funding to deliver 13 projects in Newhaven by March 2026 including:

- Refurbishment of the Newhaven Ferry Terminal to re-establish Newhaven as a key strategic gateway to the UK will incorporate new facilities and provide a better visual and more pleasant experience for passengers using the Newhaven Ferry service. It will increase the number of foot passengers using the cross-channel ferry service between Newhaven and Dieppe and new cycle stands will help encourage cyclists through the Port.
- A new pedestrian crossing in a key nodal point will link the train station, bus stop, and taxi rank to the Ferry Terminal.
- A new fish processing plant will enable fish landed in Newhaven to be processed, stored and distributed from the site.

- Improvements at Fort Road Recreation Ground will include the redesign of existing buildings, landscaping, including new trees, native hedging, pathways and the development of a new play area and outdoor fitness trail.
- Multiple projects to restore and enhance Newhaven Fort, which is a Scheduled Monument, so that it becomes a community asset and a key part of Newhaven's future as a popular visitor destination, encouraging local engagement and tourism, and potentially reducing the need for long-distance travel for recreation.
- Newhaven Square investment aims to transform empty underutilised properties in the heart of the town including a green wall which is proposed to the east elevation of the former Co-op and the north elevation of Dacre Road car park. The transformation will in turn will increase footfall, dwell time and spend, to create a thriving and sustainable town centre.
- Newhaven Wayfinding and Public Realm Improvements will connect key attractions, transport hubs and destinations within Newhaven by:
- Enlarging the scale of the public realm whether physically accessible or not to improve spatial definition and generosity for active travel users.
- Providing dignified pedestrian access to the major public institutions alongside the south of the site.
- Delineating a legible and engaging walking route between the train station and the river.
- Reducing the dominance of vehicular infrastructure, enhancing biodiversity and making space for people through relandscaping of the existing interchange and Railway Quay
- Planting (integrated with SUDS) to provide visual appeal, a buffer for vehicles and will break the pathway between emission source and receptor

3.3 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within Lewes District Council's area. Where road transport is identified as the principal source of emissions, the relative contributions from different vehicle types (e.g. cars, Heavy Good Vehicles (HGVs), Light Goods Vehicles (LGVs), and buses) can be determined to identify which vehicle type represents the most significant source of pollution.

A source apportionment exercise was carried out by Lewes District Council in 2022 using an air dispersion model to assess the overall emissions profile of vehicles moving through the AQMAs. Source apportionment was carried out for each AQMA separately.

Emission sources of NO_2 are dominated by a combination of direct NO_2 (f-NO_2) and oxides of nitrogen (NO_x), the latter of which is chemically unstable and rapidly oxidised upon release to form NO_2. Reducing levels of NO_x emissions therefore reduces levels of NO_2. As a consequence, the source apportionment study has considered the emissions of NO_x which are assumed to be representative of the main sources of NO_2. Both the source apportionment of NO_x and the source apportionment of the equivalent NO_2 are presented for reference

The methodology to achieve this involves dispersion modelling of road traffic emissions. Traffic data inputs were supplied by the appointed transport consultants and supplemented by DfT road traffic statistics. The Emissions Factors Toolkit (EFT) version 12.0.1 developed by Defra[16] was used. Road-NO_x contributions for each source type at receptor locations were then modelled using Cambridge Environmental Research Consultants ADMS-Roads™ dispersion model (version 5.0.0.1).

Background pollutant concentrations, as derived for the area from UK-Air, have been added to the ADMS-Roads modelled road source output to calculate predicted total

[16] Defra, Emissions Factors Toolkit (2023). https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/

annual mean concentrations of NO_x and NO_2. For each location the total NO_x from all vehicle classes as well as the percentage attributable to background sources has been predicted. Figure 3.1 and Figure 3.2 illustrates the general breakdown of NO_x concentrations averaged across all modelled locations within each AQMA respectively, providing information regarding:

- The regional background, which the Council is unable to influence
- The local background, which the Council should have some influence over
- Other local sources (explicitly modelled), which the Council should be able to directly influence with policy intervention

Figure 3.1 Average NO_x Contribution Across All Modelled Receptors – General Breakdown – Lewes Town Centre AQMA

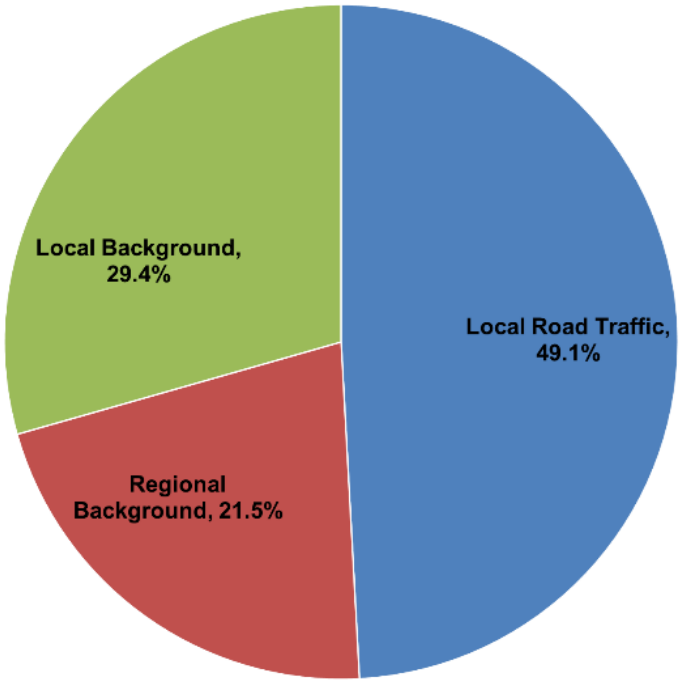

Figure 3.2 Average NO_x Contribution Across All Modelled Receptors – General Breakdown – A259 Newhaven Ring Road AQMA

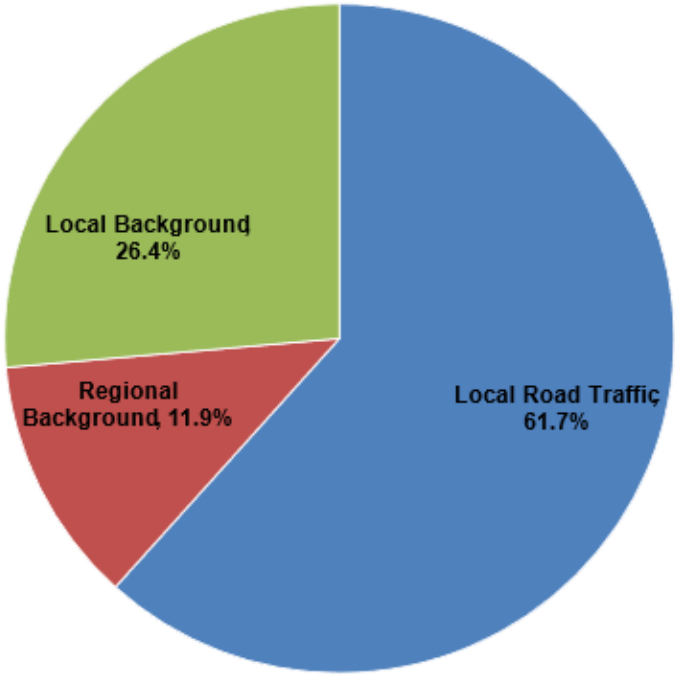

Figure 3.3, Figure 3.4, Figure 3.5 and Figure 3.6 provide detailed breakdowns of the local source contributions to NO_x concentrations, based on:

- The average across all modelled receptors (Figure 3.3 and Figure 3.4). This provides useful information when considering possible action measures to test and adopt. It will however understate road NO_x concentrations in problem areas;
- The receptor where the maximum road NO_x concentration has been predicted within the AQMAs (Figure 3.5 and Figure 3.6). This is to identify the area of most concern and so a good place to test and adopt action plan measures.

Figure 3.3 Source Apportionment of NO_x Averaged Across All Modelled Receptors – Lewes Town Centre AQMA

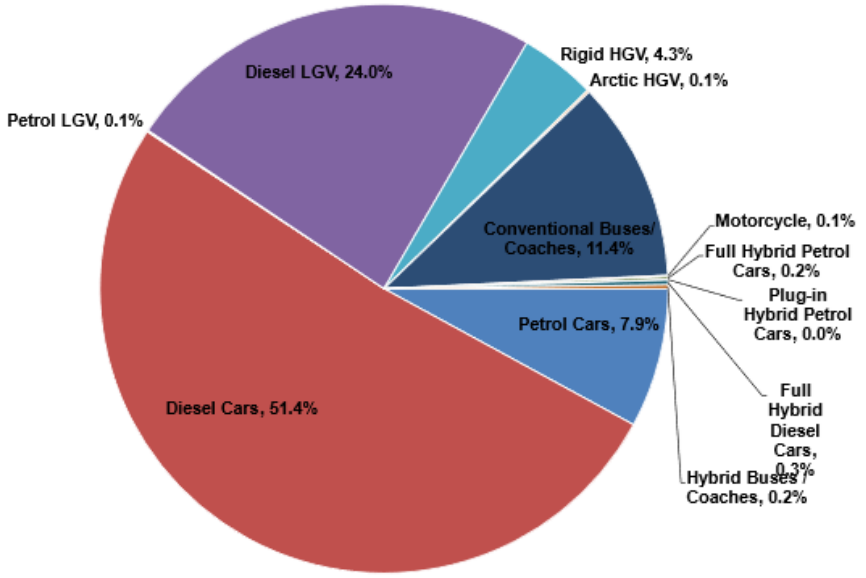

Figure 3.4 Source Apportionment of NO_x Averaged Across All Modelled Receptors – A259 Newhaven Ring Road AQMA

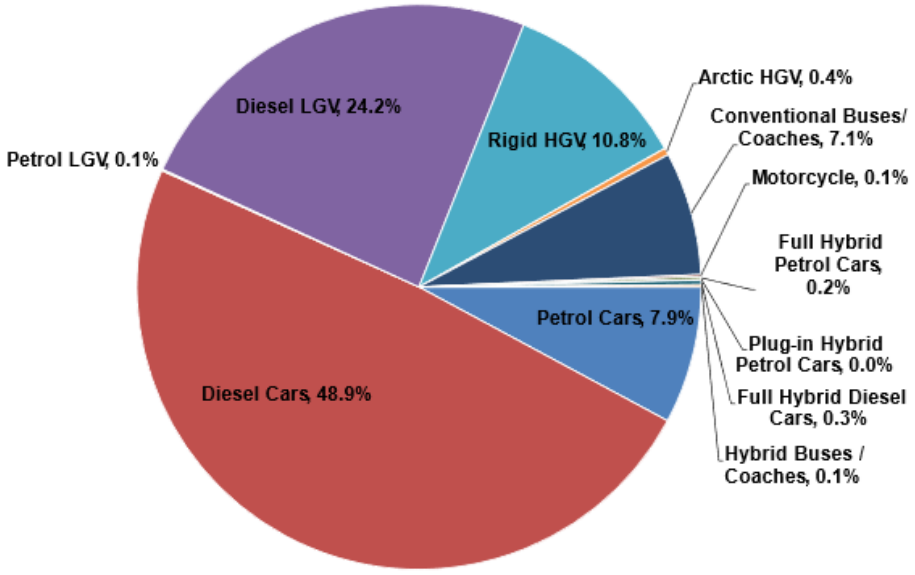

Figure 3.5 Source Apportionment of NO_x at Receptor with the Maximum Road NO_x Concentration (R51) within the Lewes Town Centre AQMA

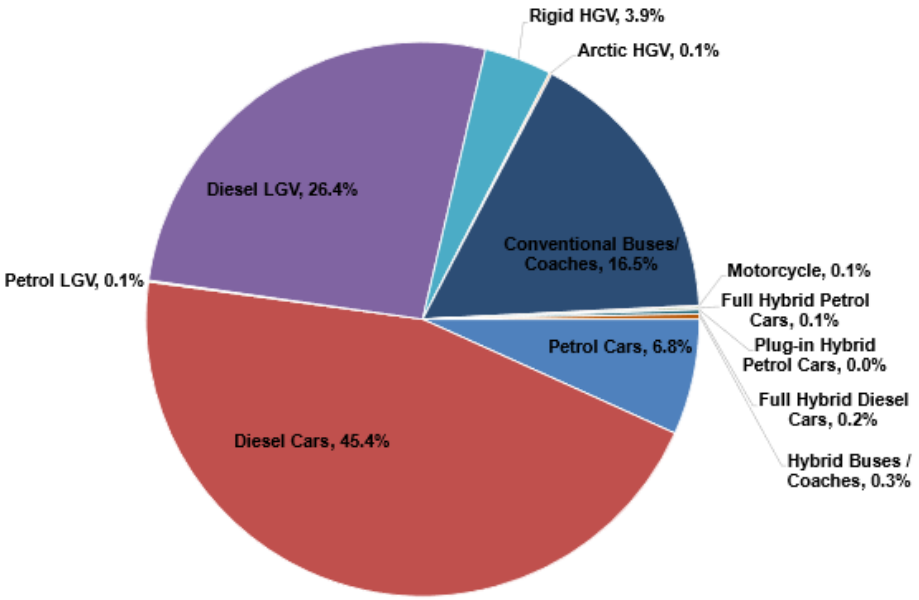

Figure 3.6 Source Apportionment of NO_x at Receptor with the Maximum Road NO_x Concentration (R22) within the A259 Newhaven Ring Road AQMA

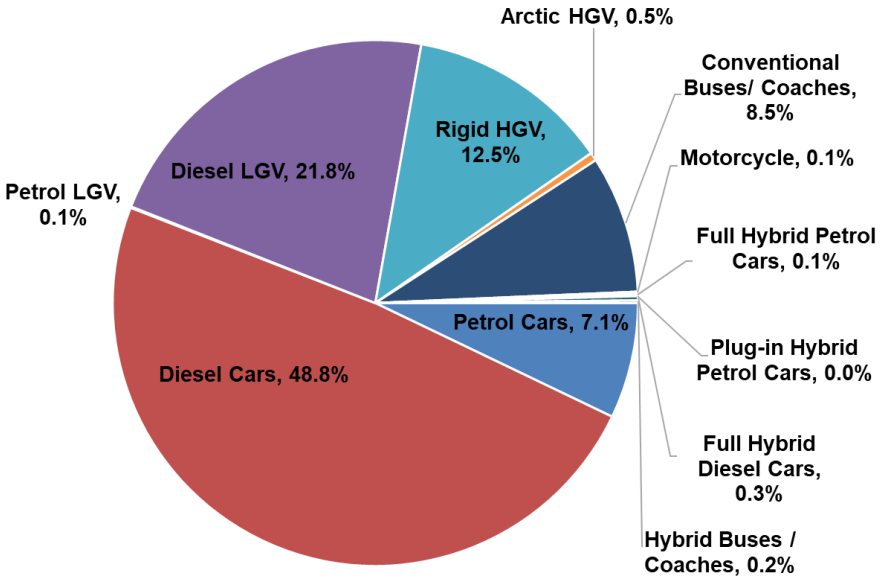

Table 3.2, Table 3.3 and Table 3.4 provide more detailed breakdowns of source apportionment in relation to NO_x concentrations and NO_2 concentrations for the following criteria:

- Contributions based on average NO_x and NO_2 levels across all modelled locations within each AQMA respectively
- Contributions based on NO_x and NO_2 levels at the highest NO_2 concentration in the Lewes Town Centre AQMA
- Contributions based on NO_x and NO_2 levels at the highest NO_2 concentration in the A259 Newhaven Ring Road AQMA

Table 3.1 Source Apportionment of NO_x - Lewes Town Centre AQMA

Results	All Vehicles	Petrol Cars	Diesel Cars	Petrol LGV	Diesel LGV	Rigid HGV	Artic HGV	Conventional Buses/ Coaches	Motorcycle	Full Hybrid Petrol Cars	Plug-in Hybrid Petrol Cars	Full Hybrid Diesel Cars	Hybrid Buses / Coaches	Background
Average Across all Receptors within AQMA														
NO_x Concentration ($\mu g/m^3$)	13.6	1.1	7.0	0.0	3.3	0.6	0.0	1.5	0.0	0.0	0.0	0.0	0.0	14.1
Percentage of total NO_x	49.1%	3.9%	25.2%	0.0%	11.8%	2.1%	0.1%	5.6%	0.0%	0.1%	0.0%	0.1%	0.1%	50.9%
Percentage of Road Contribution to total NO_x	100.0%	7.9%	51.4%	0.1%	24.0%	4.3%	0.1%	11.4%	0.1%	0.2%	0.0%	0.3%	0.2%	-
At Receptor with Maximum Road NO_x Concentration – R51														
NO_x Concentration ($\mu g/m^3$)	39.2	2.6	17.8	0.0	10.4	1.5	0.1	6.5	0.0	0.1	0.0	0.1	0.1	14.0
Percentage of total NO_x	73.6%	5.0%	33.4%	0.1%	19.4%	2.9%	0.1%	12.1%	0.1%	0.1%	0.0%	0.2%	0.2%	26.4%
Percentage of Road Contribution to total NO_x	100.0%	6.8%	45.4%	0.1%	26.4%	3.9%	0.1%	16.5%	0.1%	0.1%	0.0%	0.2%	0.3%	-

Table 3.2 Source Apportionment of NO_x - A259 Newhaven Ring Road AQMA

Results	All Vehicles	Petrol Cars	Diesel Cars	Petrol LGV	Diesel LGV	Rigid HGV	Artic HGV	Conventional Buses/ Coaches	Motorcycle	Full Hybrid Petrol Cars	Plug-in Hybrid Petrol Cars	Full Hybrid Diesel Cars	Hybrid Buses / Coaches	Background
Average Across all Receptors within AQMA														
NO_x Concentration ($\mu g/m^3$)	30.3	2.4	14.8	0.0	7.3	3.3	0.1	2.1	0.0	0.0	0.0	0.1	0.0	18.8
Percentage of total NO_x	61.7%	4.8%	30.2%	0.1%	14.9%	6.6%	0.2%	4.4%	0.1%	0.1%	0.0%	0.2%	0.1%	38.3%
Percentage of Road Contribution to total NO_x	100.0%	7.9%	48.9%	0.1%	24.2%	10.8%	0.4%	7.1%	0.1%	0.2%	0.0%	0.3%	0.1%	-
At Receptor with Maximum Road NO_x Concentration – R22														
NO_x Concentration ($\mu g/m^3$)	53.3	3.8	26.0	0.0	11.6	6.7	0.3	4.5	0.1	0.1	0.0	0.1	0.1	18.8
Percentage of total NO_x ($\mu g/m^3$)	73.9%	5.3%	36.1%	0.1%	16.1%	9.3%	0.4%	6.3%	0.1%	0.1%	0.0%	0.2%	0.1%	26.1%
Percentage of Road Contribution to total NO_x ($\mu g/m^3$)	100.0%	7.1%	48.8%	0.1%	21.8%	12.5%	0.5%	8.5%	0.1%	0.1%	0.0%	0.3%	0.2%	-

Table 3.3 Source Apportionment of NO_2 - Lewes Town Centre AQMA

Results	All Vehicles	Petrol Cars	Diesel Cars	Petrol LGV	Diesel LGV	Rigid HGV	Artic HGV	Conventional Buses/ Coaches	Motorcycle	Full Hybrid Petrol Cars	Plug-in Hybrid Petrol Cars	Full Hybrid Diesel Cars	Hybrid Buses / Coaches	Background
Average Across all Receptors within AQMA														
NO_2 Concentration ($\mu g/m^3$)	7.2	0.6	3.7	0.0	1.7	0.3	0.0	0.8	0.0	0.0	0.0	0.0	0.0	10.1
Percentage of total NO_2	41.7%	3.3%	21.4%	0.0%	10.0%	1.8%	0.1%	4.7%	0.0%	0.1%	0.0%	0.1%	0.1%	58.3%
Percentage of Road Contribution to total NO_2	100.0%	8.0%	51.4%	0.1%	24.0%	4.3%	0.1%	11.3%	0.1%	0.2%	0.0%	0.3%	0.2%	-
At Receptor with Maximum Road NO_2 Concentration – R51														
NO_2 Concentration ($\mu g/m^3$)	20.0	1.4	9.1	0.0	5.3	0.8	0.0	3.3	0.0	0.0	0.0	0.0	0.1	10.0
Percentage of total NO_2	66.6%	4.5%	30.3%	0.1%	17.6%	2.6%	0.1%	11.0%	0.1%	0.1%	0.0%	0.2%	0.2%	33.4%
Percentage of Road Contribution to total NO_2	100.0%	6.8%	45.4%	0.1%	26.4%	3.9%	0.1%	16.5%	0.1%	0.1%	0.0%	0.2%	0.3%	-

Table 3.4 Source Apportionment of NO_2 - A259 Newhaven Ring Road AQMA

Results	All Vehicles	Petrol Cars	Diesel Cars	Petrol LGV	Diesel LGV	Rigid HGV	Artic HGV	Conventional Buses/ Coaches	Motorcycle	Full Hybrid Petrol Cars	Plug-in Hybrid Petrol Cars	Full Hybrid Diesel Cars	Hybrid Buses / Coaches	Background
Average Across all Receptors within AQMA														
NO_2 Concentration ($\mu g/m^3$)	15.3	1.2	7.5	0.0	3.7	1.6	0.1	1.1	0.0	0.0	0.0	0.0	0.0	12.8
Percentage of total NO_2	54.4%	4.3%	26.6%	0.0%	13.2%	5.9%	0.2%	3.8%	0.1%	0.1%	0.0%	0.1%	0.1%	45.6%
Percentage of Road Contribution to total NO_2	100.0%	7.9%	48.9%	0.1%	24.2%	10.8%	0.4%	7.0%	0.1%	0.2%	0.0%	0.3%	0.1%	-
At Receptor with Maximum Road NO_2 Concentration – R22														
NO_2 Concentration ($\mu g/m^3$)	26.0	1.9	12.7	0.0	5.7	3.3	0.1	2.2	0.0	0.0	0.0	0.1	0.0	12.8
Percentage of total NO_2 ($\mu g/m^3$)	67.0%	4.8%	32.7%	0.0%	14.6%	8.4%	0.3%	5.7%	0.1%	0.1%	0.0%	0.2%	0.1%	33.0%
Percentage of Road Contribution to total NO_2 ($\mu g/m^3$)	100.0%	7.1%	48.8%	0.1%	21.8%	12.5%	0.5%	8.5%	0.1%	0.1%	0.0%	0.3%	0.2%	-

Lewes Town Centre AQMA

Of the contributors to total NO_x concentrations, local road traffic is the largest at 49.1% (13.6 µg/m^3), followed by local background at 29.4% (8.1 µg/m^3), then regional background at 21.5% (5.9 µg/m^3). This means that the Council should be able to influence 78.5% of total NO_x concentrations with intervention policies.

When considering the average breakdown of NO_x concentration across all modelled receptors in more detail, Diesel Cars are the highest contributing vehicle class accounting for 51.4% (7.0 µg/m^3) of any of the vehicle types on average, followed by Diesel LGVs accounting for 24.0% (3.3 µg/m^3) and Conventional Buses / Coaches accounting for 11.4% (1.5 µg/m^3).

When considering the modelled receptor location at which the maximum road NO_x concentration has been predicted, Diesel Cars are found to be the highest contributing vehicle class accounting for 45.4% (10.4 µg/m^3), followed by Diesel LGVs accounting for 26.4% (18.2 µg/m^3) and Conventional Buses / Coaches accounting for 16.5% (6.5 µg/m^3). This is similar to the contribution observed across the whole AQMA.

When considering the average breakdown of NO_2 concentration across all modelled receptors in more detail, Diesel Cars are the highest contributing vehicle class accounting for 51.4% (3.7 µg/m^3) of any of the vehicle types on average, followed by Diesel LGVs accounting for 24.0% (1.7 µg/m^3) and Conventional Buses / Coaches accounting for 11.4% (0.8 µg/m^3).

When considering the modelled receptor location at which the maximum road NO_2 concentration has been predicted, Diesel Cars are found to be the highest contributing vehicle class accounting for 45.4% (9.1 µg/m^3), followed by Diesel LGVs accounting for 26.4% (5.3 µg/m^3) and Conventional Buses / Coaches accounting for 16.5% (3.3 µg/m^3). This is similar to the contribution observed across the whole AQMA.

This indicates that **Diesel Cars, Diesel LGVs and to a lesser degree, Conventional Buses / Coaches are largely responsible for the high concentrations in the Lewes Town Centre AQMA**.

A259 Newhaven Ring Road AQMA

Of the contributors to total NO_x concentrations, local road traffic is the largest at 61.7% (30.3 µg/m^3), followed by local background at 26.4% (12.9 µg/m^3), then regional background at 11.9% (5.9 µg/m^3). This means that the Council should be able to influence 88.1% of total NO_x concentrations with intervention policies.

When considering the average breakdown of NO_x concentration across all modelled receptors in more detail, Diesel Cars are the highest contributing vehicle class accounting for 48.9% (14.8 µg/m^3) of any of the vehicle types on average, followed by Diesel LGVs of 24.2% (7.3 µg/m^3) and Rigid HGVs of 10.8% (3.3 µg/m^3).

When considering the modelled receptor location at which the maximum road NO_x concentration has been predicted, Diesel Cars are found to be the highest contributing vehicle class accounting for 48.8% (26.0 µg/m^3), followed by Diesel LGVs of 21.8% (11.6 µg/m^3) and Rigid HGVs of 12.5% (6.7 µg/m^3). This is similar to the contribution observed across the whole AQMA.

When considering the average breakdown of NO_2 concentration across all modelled receptors in more detail, Diesel Cars are the highest contributing vehicle class accounting for 48.9% (7.5 µg/m^3) of any of the vehicle types on average, followed by Diesel LGVs of 24.2% (3.7 µg/m^3) and Rigid HGVs of 10.8% (1.6 µg/m^3).

When considering the modelled receptor location at which the maximum road NO_2 concentration has been predicted, Diesel Cars are found to be the highest contributing vehicle class accounting for 48.8% (12.7 µg/m^3), followed by Diesel LGVs of 21.8% (5.7 µg/m^3) and Rigid HGVs of 12.5% (3.3 µg/m^3). This is similar to the contribution observed across the whole AQMA.

This indicates that **Diesel Cars, Diesel LGVs and Rigid HGVs are largely responsible for the high concentrations in the A259 Newhaven Ring Road AQMA**.

Limitations

It's worth noting that the source apportionment is likely to overestimate the emission contribution from conventional buses and coaches within both AQMAs, especially Lewes Town Centre AQMA. Most of the regional buses and coaches have been upgraded to low / zero emission engines since 2021 and 2022 and conventional vehicles now only account for a relatively small proportion of all buses and coaches. This upgrading was not factored into the modelling due to the lack of traffic manual count survey data. The default England (non-London) traffic composition was used for bus and coach source apportionment. The percentage of conventional buses and coaches is expected to be much lower than that from the modelled results so in turn, the emissions contribution in the region is expected to be much lower than those portrayed in the modelled results.

Targeted Measures

Given that diesel cars contribute the highest levels of NO_x and NO_2 within both AQMAs, LDC aims to continue to support a reduction in car travel by promoting sustainable travel through encouraging the implementation of Travel Plans and walking, wheeling and cycling, and use of public transport.

A large proportion of cars, LGVs and HGVs make up through traffic on the A259 Newhaven Ring Road AQMA, which is outside the remit of Lewes District Council. The growth in residential development within the district and in neighbouring authorities will add to traffic volume through the AQMAs and therefore the risk of contributing to higher pollutant concentrations. The LDC environmental team is planning to work more closely with the planning team to make sure the new residential developments introduced in Lewes are not exposed to high air pollution and the joint impact from new planning applications will not adversely impact on the AQMA.

3.4 Required Reduction in Emissions

In line with the methodology presented in Box 7-6 of LAQM.TG (22), the necessary reduction in Road NO_x emissions required to bring the Lewes Town Centre AQMA and A259 Newhaven Ring Road AQMA into compliance is calculated below.

As the modelled NO_2 concentrations are all below the annual mean AQS objective, the required reduction in emissions has been completed using the monitored NO_2 concentrations which exceeded the AQS objective in 2023 adjacent to Lewes AQMA and in 2022 within Newhaven AQMA.

The maximum modelled or monitored concentration in the Lewes Town Centre AQMA in 2023 was 23.7µg/m³. It has therefore met the required reduction in order to fall below the Air Quality objective. Table 3.5 provides the details on the calculations of the NO_x emission reduction at the worst-case exposure location, Diffusion Tube Monitoring Site ID 21 on School Hill adjacent to the Lewes Town Centre AQMA. This is taken as the worst case scenario to indicate the potential reduction required. There have been no exceedances within the current Lewes Town Centre AQMA since 2020 so this AQMA could be revoked following three years' compliance (2020 and 2021 do not count towards compliance due to the impact of Covid) however the Council is reviewing data for the current AQMA and School Hill in order to determine whether the current AQMA should be revoked with a new AQMA declared just for School Hill or whether it should be extended to include School Hill. The reduction in NO_x required to achieve compliance with the annual mean NO_2 objective of 40 µg/m^3 at the worst-case location of Site ID 21 is **18.6%**. This reduction would achieve the compliance needed at the worst-case location, adjacent to the current Lewes Town Centre AQMA.

Note: The percentage reduction necessary for compliance is based on 2023 data although 2024 data shows that a greater reduction is required. This section has not been updated to include calculations based on 2024 data due to the financial

implications of the further modelling work this would entail however the relevant current monitored data can be found in the latest Annual Status Report[17].

Table 3.5 Required NO_x emission reduction at the worst-case receptor location: Adjacent to Current Lewes Town Centre AQMA

Metric	Value (Concentrations as µg/m³)
Worst-Case Relevant Exposure NO_2 Concentration	45.7 (2023)
Equivalent NO_x Concentration	88.5
Background NO_x	13.1
Background NO_2	10.0
Road NO_x - Current	75.4
Road NO_x - Required (to achieve NO_2 concentration of 39.9µg/m³)	61.4
Required Road NO_x Reduction	14.0
Required % Reduction	18.6%

Table 3.6 provides the details on the calculations of the NO_x emission reduction at the worst-case exposure location, Diffusion Tube Monitoring Site ID 3 in the A259 Newhaven Ring Road AQMA. The reduction in NO_x required to achieve compliance with the annual mean NO_2 objective of 40 µg/m³ at the worst-case location of Site ID 3 is **5.6%**. This reduction would achieve the compliance needed at the worst-case location, within the A259 Newhaven Ring Road AQMA.

Table 3.6 Required NO_x emission reduction at the worst-case receptor location: A259 Newhaven Ring Road AQMA

Metric	Value (Concentrations as µg/m³)
Worst-Case Relevant Exposure NO_2 Concentration	41.3 (2022)
Equivalent NO_x Concentration	76.3
Background NO_x	17.5
Background NO_2	12.8
Road NO_x - Current	58.8

[17] https://sussex-air.net/air-quality-near-me/air-quality-reports/

Metric	Value (Concentrations as µg/m^3)
Road NO_x - Required (to achieve NO_2 concentration of 39.9µg/m^3)	55.5
Required Road NO_x Reduction	3.3
Required % Reduction	5.6%

3.5 Key Priorities

Based on the above source apportionment information, the AQAP measures should focus on the below, priority target areas to bring about and maintain compliance with the AQS objectives. There is often some overlap between some of the priorities. Please note that the below is not listed in a prioritised order, as all priorities collectively and jointly contribute to improving air quality in the local area with each playing an essential role in achieving this goal.

Priority 1 – Transport

The main source of air pollution leading to the declaration of both AQMAs is road transport emissions. Therefore, reducing transport emissions is the key priority for LDC. The approach focuses on areas where LDC has direct control (e.g. planning and procurement of outsourced functions) and areas where measures can be implemented via a partnership with East Sussex County Council or others.

As presented above, the main sources of pollution by vehicle type are Diesel Cars, Diesel LGVs and Conventional Buses / Coaches within the Lewes Town Centre AQMA and Diesel Cars, Diesel LGVs and Rigid HGVs within the A259 Newhaven Ring Road AQMA. Therefore Lewes DC will continue to prioritise reducing general car travel and reducing emissions from freight / delivery vehicles (especially HGVs).

Priority 2 – Planning and Infrastructure

There are emerging developments within and around Lewes District. These developments are likely to contribute to increasing traffic through both AQMAs in the district therefore it is essential to mitigate potential air quality impacts effectively by being involved in decision making at an early stage for current and future developments.

Priority 3 – Public Information and Behavioural Change

As discussed in further detail in Section 3.1 the impact of air pollution on public health via behavioural change is a major driver for improving air quality. Within Lewes a key priority is to ensure the health and wellbeing of the community is maintained. To achieve this, the intervention with highest potential to improve air quality is associated with combining behavioural interventions with other policy or infrastructure-based interventions. The Council is responsible for encouraging and facilitating these changes through education and awareness as well as through providing public information. Improving air pollution for the benefit of public requires a wide-reaching perspective and will therefore not be specific to the AQMAs but will instead be aimed at the whole district.

Priority 4 - Strategies and Policy Guidance

The Local Plans and Neighbourhood Plans set out the considerations that will be applied by LDC for all development proposals. The Council will work with developers and partner organisations to ensure the delivery of infrastructure, services and community facilities necessary to develop and maintain sustainable communities. This will not only apply to air quality but all relevant environmental aspects.

The Local Transport Plan and its supporting modal strategies set out the measures and considerations to improve the local air quality via transportation.

Priority 5 – Air Quality Monitoring (Evidence for Improvement)

This priority is to ensure satisfactory air quality monitoring data is available to track outcomes of the implemented AQAP measures.

LDC is also part of the Sussex Air Quality Partnership. The aim of the partnership is to assist partners in complying with their statutory Local Air Quality Management (LAQM) duties and to contribute to improving air quality and health in Sussex.

The objectives of the partnership are to pool limited resources to provide:

- A coordinated and high standard air quality evidence base.
- Information and advice to the public.
- The data management of the numerous continuous monitoring sites across Sussex.

- Coordination and delivery of strategic work and projects to improve air quality in Sussex.

4 Development and Implementation of Lewes District Council AQAP

4.1 Consultation and Stakeholder Engagement

In developing/updating this AQAP, we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995, as amended by the Environment Act (2021), requires local authorities to consult the bodies listed in Table 4.1. In addition, we have undertaken the following stakeholder engagement:

- Public consultation from 21st March - 16th May 2025 available via the Lewes DC website[18]

The response to our consultation stakeholder engagement is given in Appendix A: Response to Consultation.

Table 4.1 Consultation Undertaken

Consultee	Consultation Undertaken
The Secretary of State	Yes
The Environment Agency	Yes
National Highways	Yes
All neighbouring local authorities	Yes
South Downs National Park Authority	Yes
East Sussex County Council	Yes

[18] https://www.lewes-eastbourne.gov.uk/article/3207/Closed-Consultation-on-Lewes-District-Air-Quality-Action-Plan

Consultee	Consultation Undertaken
Other public authorities as appropriate, such as Public Health officials	Yes
Bodies representing local business interests and other organisations as appropriate	Yes

4.2 Steering Group

A steering group was established during the update process to drive forward the development of the new AQAP. The core aim of the steering group was to identify measures for inclusion within the AQAP that would be effective both in terms of reducing NO_2 concentrations and feasible in terms of implementation and delivery.

The AQAP steering group meeting was held on 18th December 2024 and a public consultation was held from 21st March to 16th May 2025. Measures identified in Table 5.1 (AQAP Measures) will be discussed and examined.

At the initial AQAP steering group meeting, representatives from various departments (including Planning, Transport, and Sustainability), East Sussex County Council and local groups provided valuable input and comments. The steering group agreed to review and update the proposed measures in the final version of the plan, incorporating additional measures identified during the discussion.

5 AQAP Measures

Table 5.1 shows the Lewes District Council AQAP measures. It contains:

- A list of the actions that form part of the plan
- A Defra prescribed category and classification for each action
- The departments/organisations responsible for delivering this action
- Estimated cost of implementing each action
- Expected benefit in terms of pollutant emission and/or concentration reduction
- The timescale for implementation
- Detail on how progress will be monitored

NB: Please see future Annual Status Reports (ASRs) for regular annual updates on implementation of these measures.

Table 5.1 Air Quality Action Plan Measures

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
1	Lewes – Cycle Route 90	Transport Planning and Infrastructure	Cycle network	2019	2029	ESCC, SDNPA Sustrans Cycle Lewes LTC LDC	Development Contributions and ESCC	NO	Not Funded	£1m - £10m	Planning	Reduction of NO_2 and PM emissions	Increased use of sustainable transport modes	Design and stakeholder consultation for cycle route and speed limit reduction completed for eastern section	Implementation of eastern section subject to securing full funding. The town centre/western section will require design work and consultation in a future programme when funding available
2	Coordination of building and road works in the Lewes and Newhaven town areas and across the district	Traffic Management	Other	Ongoing	Ongoing	ESCC Network Management	ESCC	NO	Funded	£10k - £50k	Implementation	Reduction of NO_2 and PM emissions	Number of agreements and s.61 agreements	East Sussex Highways with Balfour Beatty (ESCC Network Management); includes coordinating all works undertaken on the public highway, issuing the appropriate permits and licences for activities that impact the network and enforcing regulations	Ongoing
3	Target long-distance freight management & heavy traffic through town	Transport Planning and Infrastructure	Other	Ongoing	Ongoing	ESCC, LDC	ESCC	NO	Funded	>£10m	Implementation	Reduction of NO_2 and PM emissions	Traffic counts	Supports sustainable economic growth through facilitating the efficient movement of goods and people through implementation of the Local Transport Plan 4	Ongoing
4	Reduce emissions from idling vehicles - raise awareness through campaigns	Public Information	Other	Ongoing	Ongoing	LDC	Subject to successful funding bids	NO	Funded	£50k - £100k	Implementation	Reduction of NO_2 and PM emissions	Reduction in number of complaints received by LDC	Campaigns will continue to be carried out as part of active travel programmes	Currently ongoing but only as funding is available

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
5	Lewes Town Parking Management – programmes for extension of parking-controlled area, re-allocation of parking/loading spaces, higher charges for long stay parking, variable price parking permits, car spaces for low-emission vehicles, car-clubs and car share, increase provision of two-wheelers parking	Traffic Management	Other	Ongoing	Ongoing	ESCC, LDC, Lewes Town Council, Business Community, Network Rail/Southern (Lewes Rail Station), private operators	ESCC, LDC, Lewes TC	NO	Partially Funded	£100k-£500k	Planning	Reduction of NO_2 and PM emissions	Participation	Ongoing effective parking management is necessary in Lewes town and this measure has a phased approach with higher charges for residents' second parking permits and discounted permits for lower emission vehicles having been introduced in 2020	
6	Partnership work with bus & train operators (LTP4) Increase bus and train patronage through supporting marketing campaign, extend use of subsidised/ discounted fares, improve bus stop facilities, bus information	Transport Planning and Infrastructure	Other	Ongoing	Ongoing	ESCC/ Bus Operators Train Operating Companies	DfT for BSIP	NO	Funded	>£10M	Implementation	Reduction of NO2 and PM emissions	Increase in number of bus/train service users year on year	The ESCC Bus Service Improvement Plan delivers a fully integrated service with simple, multi-modal tickets, more bus priority measures, high-quality information for all passengers in more places and better turn-up-and-go frequencies that keep running into the evenings and at weekends. The maximum single bus fare is £3 with participating operators with short and medium trips in East Sussex being capped at £1 and £2.	As funding is available.
7	Address traffic flow & congestion on	Traffic Management	Urban Traffic Control, Congestion	Ongoing	Ongoing	ESCC	ESCC	NO	Partially Funded	>10m	Implementation	Reduction of NO_2 and PM emission	Improvement in traffic flow	Feasibility	Acknowledged as a priority, this measure is subject to funding

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
	Newhaven Ring Road		management, traffic reduction												accessibility. Currently at feasibility stage.
8	A259 South Coast Corridor Package – A259 Corridor Package	Transport Planning and Infrastructure	UTC, Congestion management, traffic reduction/ Other	Ongoing	Ongoing	ESCC	ESCC	NO	Partially Funded	>10m	Implementation	Reduction of NO_2 and PM emission	Improvement in traffic flow	Improvements to crossings completed summer 2021 has helped to address flow and congestion	Ongoing
9	New pipeline schemes - cycling infrastructure (Local Cycling & Walking Infrastructure Plan)	Transport Planning and Infrastructure	Cycle network/Other	Ongoing	Ongoing	ESCC	ESCC Local Transport Capital Programme	NO	Partially Funded	>10m	Implementation	Reduction of NO2 and PM emission	Reduced traffic and congestion at peak time, reduced re-circulation, reduced emissions; and modal shift and sustainable travel behaviour	Lewes station cycle parking is complete, other measures planned as per LCWIP	As funding is available
10	Cycle Parking	Promoting Travel Alternatives	Promotion of cycling	Ongoing	Ongoing	Cycle Lewes, Lewes Town Council, Foundry Healthcare, LDC	Various	NO	Partially Funded	£50k - £100k	Implementation	Reduction of NO2 and PM emission	Noticeable increase in modal shift and sustainable travel behaviour	Cycle Lewes has installed new bike parking facilities at two of Foundry Healthcare Lewes' GP sites; River Lodge and St Andrew's. Provision of additional undercover cycle parking at Lewes station is in the pipeline. In Newhaven, cycle stands are being installed around the former Co-op and existing Wave Active building	As funding is available
11	Walking events/groups	Promoting Travel Alternatives	Promotion of walking	Ongoing	Ongoing	Local Community Groups	Community Funding	NO	Funded	£50k - £100k	Implementation	Reduction of NO_2 and PM emissions	Increased active travel and sustainable transport modes	https://www.southdowns.gov.uk/get-active/on-foot/walk-with-a-group/ https://www.escis.org.uk/event/lewes-health-walk-every-friday/ https://lewesfootpathsgroup.org.uk/ https://www.ournewhaven.org.uk/people/societies-clubs-organisations/newhaven_ramblers https://sussexcommunity.org.uk/our-services/environmmentclimatechange/newhaven-heritage-routes/	Other walking groups can be found via the internet

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
12	Support Active Travel	Promoting Travel Alternatives	Promotion of cycling and walking	Ongoing	Ongoing	Sussex Community Development Association & Ouse Valley Climate Action (National Lottery) Cycle Seahaven	Community Funding	NO	Funded	£50k - £100k	Implementation	Reduction of NO_2 and PM emissions	Increased use of sustainable transport modes	https://sussexcommunity.org.uk/ Aims of the project include encouraging behaviour change to help the environment and supporting new greener travel initiatives around walking, cycling and e-bikes. Dr Bike is a group of cycle enthusiasts from Cycle Seahaven who help local people to use their bikes more. Dr Bike surgeries repair damaged and worn bicycles.	
13	Promoting sustainable travel to school	Promoting Travel Alternatives	School Travel Plans	Ongoing	Ongoing	LDC (as a member of the Sussex Air Quality Partnership) Cycle Seahaven ESCC Green United	Active Travel England and other Funding Bids, Community Funding	Partially	Funded	£100k - £500k	Planning	Reduction of NO_2 and PM emissions	Increased use of sustainable transport modes	Surveys have demonstrated an increase in walking and cycling to school, as well as a decrease in students being driven to school further to engagement with Sustrans air quality staff visiting the schools. Air Quality sessions are delivered often alongside complimentary sessions such as Bike Skills and Dr Bikes. These events reinforce the connection between air quality and active travel. East Sussex County Council has introduced a temporary School Street at Southover C of E Primary School in Lewes. This restricts vehicle access during peak school hours to make the pick-up and drop-off safer and more enjoyable, and to make it easier for people to walk, wheel and cycle to school. It is hoped this measure will become permanent. Green United is a group set up for young people in Lewes town and supports a sustainable lifestyle including school travel options.	As funding is available

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
14	Cargo Bikes/Last Mile Delivery	Freight and Delivery Management	Other	2024	Ongoing	GetBikery/ OVESCo/LDC	Funding Bids	NO	Funded	£50k - £100k	Implementation	Reduction of NO_2 and PM emissions	Increased use of sustainable transport modes and progress of project expansion to Newhaven	LDC obtained grants for e-cargo bikes and worked closely with OVESCo to set up the Get Bikery initiative, an eCargo Bike project based in Lewes that aims to provide a zero-carbon alternative to short journeys ordinarily made by cars and vans. Bikes are available to rent for households wanting to give up the car, for local tradespeople wishing to replace the van on some days, for fixed regular deliveries or for community events.	Further funding necessary for project expansion
15	Lewes Integrated Movement Strategy	Promoting Travel Alternatives/ Transport Planning & Infrastructure	Traffic reduction, promotion of cycling and walking, other	2024	Ongoing	Lewes Town Council, LDC, ESCC, Lewes Climate Hub, Lewes Living Streets, Cycle Lewes	TBC	NO	Partially Funded	£1m - £10m	Planning	Reduction of NO_2 and PM emissions	Increased use of sustainable transport modes, improvement in traffic flow	A movement strategy is a plan that considers the needs of all transport users including pedestrians, cyclists and other wheelers, bus and rail users and other vehicle users – resident or visitor. Lewes Town Council is leading on this project and has established a Project Board which has agreed a vision to develop people-centred mobility services available to all.	As funding is available
16	Re-imagining Newhaven Programme	Transport Planning and Infrastructure	Public transport improvements - interchanges stations and services / cycle network / other	2022	2025	LDC	LDC with capital grant funding: Future High Streets Fund, Town Deal and Levelling Up Fund (Round 1)	NO	Funded	£1m - £10m	Implementation	Reduction of NO_2 and PM emissions	Progression towards completion /increase in active travel/foot passengers using ferry	The project will connect key attractions, transport hubs and destinations within Newhaven. A new pedestrian crossing will link the station, bus stop, and taxi rank to the Newhaven Ferry Terminal. An engaging walking route between the train station and the river is proposed. Dominance of vehicular infrastructure will be reduced, enhancing biodiversity and making space for people through relandscaping of the existing interchange and Railway Quay. For the town centre, safety after dark for pedestrians and active travel users will be improved, and gateways and wayfinding into the town centre for pedestrians and cyclists will be upgraded.	Nearing completion

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
														The number of foot passengers using the cross-channel ferry service between Newhaven and Dieppe will increase and foot passengers' travel experience at the Newhaven end of the journey will improve.	
17	Newhaven MoveAbility Scheme	Promoting Travel Alternatives	Promotion of cycling and wheeling	2024	2027	Sussex Community Development Association/ Sustrans	Motability	NO	Funded	£100k - £500k	Implementation	Reduction of NO_2 and PM emissions	Increased use of sustainable transport modes	The MoveAbility project in Newhaven is a new inclusive cycle and wheeling programme for disabled people. As part of this three-year funding, disabled people will be able to trial, hire and loan bicycles within the Lewes district of Sussex and surrounding areas.	
18	Develop a pathway to a Sussex wide low carbon taxi fleet	Promoting Low Emission Transport	Taxi emission incentives	Ongoing	Ongoing	LDC/East Sussex Local Authorities	LDC	Partially	Partially Funded	£500k - £1m	Planning	Reduction of NO_2 and PM emissions	Number of black cab/hackney drivers making transition to EVs	East Sussex taxi survey undertaken in 2024. Liaising with East Sussex Licencing Group to seek viable methods of supporting transition to EVs	As funding is available
19	Decarbonise the LDC waste fleet (go all electric) by 2028	Vehicle Fleet Efficiency	Vehicle Retrofitting programme/ Other	Ongoing	2028	LDC	LDC	NO	Funded	>£10m	Implementation	Reduction of NO_2 and PM emissions	Progression towards target	The Council is currently in the process of electrifying its fleet as per the 2022 Fleet strategy. New EVs will arrive in April 2025 and the existing fleet is being re-powered. Fuel for the combustion engine vehicles has been 100% hydrotreated vegetable oil (HVO) diesel since early 2024. (Whilst HVO does not reduce particulate or NOx emissions, it does reduce carbon emissions.)	Co-benefits for LDC Net Zero Strategy
20	Lewes District Council Workplace travel planning/car sharing	Promoting Travel Alternatives	Workplace Travel Planning	Ongoing	Ongoing	ESCC/LDC	Funded	NO	Funded	£10k - £50k	Implementation	Reduction of NO_2 and PM emissions	Reduced traffic and congestion at peak time, reduced emissions, increased use of sustainable transport modes	LDC is a member of the easitNETWORK group through which we hope to influence travel behaviour in the area by providing a full range of transport options to encourage staff to adopt more sustainable commuting habits. EasitNETWORK is a social enterprise, not for profit	

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
														organisation that is all about sustainable travel. LDC also supports membership of the East Sussex Car Share Scheme.	
21	Funding mechanisms e.g. workplace parking levy	Traffic Management	Workplace Travel Planning	2025	TBC	LDC	LDC	NO	Not Funded	TBC	Planning	Reduction of NO_2 and PM emissions		Feasibility study to be undertaken	As funding available
22	Car Club and EV Programme	Promoting Low Emission Transport	Other	2023	2024	LDC	Funding Bid	NO	Funded	£500k - £1m	Complete	Reduction of NO_2 and PM emissions	Uptake in low emission vehicles	Installation of 67 public electric vehicle charge points (including three for car club cars) which supported the conversion of two car club cars from petrol to electric.	
23	Enshrine AQ measures and Lewes DC proposed objective of 30 $\mu g/m^3$ NO_2 Annual Mean into Planning through adoption via emerging Lewes District Local Plan	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	Ongoing	2026	LDC/SDNPA	LDC	NO	Funded	<£10k	Planning	Reduction of NO_2 and PM emissions through sustainable develop ment	Robust air quality mitigation measures included in Lewes DC Local Plan	The Environment Act 2021 sets legally binding targets to protect the environment and clean the air. LDC's emerging corporate plan puts sustainability at the heart of local planning. Goals include providing a well-managed and protected local environment and cleaner air across the district. Whilst control of pollution is highly regulated by government there is a role for local government in ensuring that planning proposals support sustainability and minimise pollution both during construction and for future occupiers.	Will require collaborative working with LDC and SDNPA Planners
24	Adoption of the Air Quality and Emissions Mitigation Guidance for Sussex through the emerging local plan or SPD	Policy Guidance and Development Control	Regional Groups Co-ordinating Programmes to develop Area wide Strategies to reduce emissions and improve air quality	Ongoing	2025	LDC (as a member of the Sussex Air Quality Partnership)/ SDNPA	LDC	NO	Funded	<£10k	Planning	Reduction of NO_2 and PM emissions through sustainable develop ment	Adoption of the Sussex-air Guidance	The planning system plays an important role in reducing air pollution as well as minimising exposure to poor air quality through good design. The Sussex Air Quality Partnership, a partnership of 15 local authorities across Sussex and Public Health bodies, is dedicated to enhancing the air quality throughout Sussex. This document sets out the partnership's latest guidance relating to planning applications made in Sussex and in the area	Will require support and agreement from SDNPA

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
														administered by the South Downs National Park Authority (SDNPA).	
25	Non-Road Mobile Machinery Emissions Standards	Promoting Low Emission Plant	-	2025	Ongoing	LDC (as a member of the Sussex Air Quality Partnership)/ SDNPA	LDC	NO	Funded	<£10k	Planning	Reduction of NO_2 and PM emissions from develop ment	Adoption of the Sussex-air Guidance	All non-road mobile machinery (NRMM) in London with engines with a 37 kW - 560 kW power rating is required to meet emission standards based on engine emission 'stages.' LDC will require that EU stage IIIB as a minimum and stage IV in urban areas and AQMAs be met on construction sites through securing conditions via planning, in construction environmental management plans (CEMPs)	The Council has support and agreement from SDNPA
26	Permit all industrial processes falling under Environmental Permitting Regulations 2016	Environment al Permits	Other	Ongoing	Ongoing	LDC /Environment Agency	LDC/Environ ment Agency	NO	Funded	£10k - £50k	Implemen tation	Reduction of NO_2 and PM emissions	Cleaner industry	Ensure all relevant industrial sites are permitted	Will require some collaboration with EA regulatory officers
27	Align air quality measures with net zero measures to support co-benefits for both strategies	Policy Guidance and Development Control	Other Policy	2025	Ongoing	LDC	LDC	NO	Funded	<£10k	Planning	Reduction of NO_2, PM and CO_2 emissions through strategic policy alignment	Alignment of Annual Sustainability Report and Annual Air Quality Report, collaborative working between sustainability and AQ officers	Policies to reduce air pollution often provide win-win strategies for both health and the climate. Addressing short-lived climate pollutants not only improves air quality and human health but is also an effective way to mitigate some of the effects of climate change, lowering the risk of breaching irreversible climate tipping points. Tackling air quality and climate change reduces health inequalities and social injustice and this integrated action helps to justify many of the measures taken to reduce greenhouse gases by improving air quality at the same time. https://www.the-ies.org/resources/integrating-action-air-quality	

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
28	Raising awareness of air quality issues	Public Information	Via the internet/via other mechanisms	Ongoing	Ongoing	LDC (as a member of the Sussex Air Quality Partnership)	LDC	Partially	Funded	£100k - £500k	Implementation	Reduction of NO_2 and PM emissions	Awareness/ feedback	The partnership exists to assist partners in complying with their statutory Local Air Quality Management (LAQM) duties and to contribute to improving air quality and health in Sussex. The Sussex-air website provides information on all the air quality monitoring sites across Sussex, air quality reports and provides valuable resources on air pollution, health impacts and how to make a difference locally.	As funding is available
29	Social media based campaigns	Public Information	Via the Internet	Ongoing	Ongoing	LDC (as a member of the Sussex Air Quality Partnership)	LDC	NO	Funded	<£10k	Implementation	Reduction of NO_2 and PM emission	Awareness/ feedback	Supporting ongoing campaigns including anti-idling and Global Action Plan's Clean Air Day.	
30	Green Infrastructure	Other	Other	2025	2027	LDC	LDC with capital grant funding	NO	Funded	£100k - £500k	Planning	PM emission capture	Progression towards installation	In Newhaven, a green wall is proposed to the east elevation of the former Co-op and the north elevation of Dacre Road car park in the Newhaven Square development and the new West Beach restaurant and Changing Places unit will have living green roofs	Core Policy 11 (*Green Infrastructure*) of the Local Plan Part 1 sets out the overall strategic framework for managing and enhancing the green infrastructure network across the district and in Part 2, Policy DM14: Multi-functional Green Infrastructure details requirements for development
31	Air Monitoring	Other	Other	Ongoing	Ongoing	LDC (as a member of the Sussex Air Quality Partnership)	LDC	Partially	Funded	£50k - £100k	Implementation	Scrutiny and awareness raising of NO_2 and PM emissions	Air Quality Annual Status Reports to be approved by Defra	Under the Local Air Quality Management regime (LAQM) LDC has a duty to monitor air quality across the district. The council will continue to monitor air quality through its substantial network of diffusion tubes alongside the automatic monitoring station in Lewes and a new monitoring station in Newhaven.	
32	Membership of Sussex-air Partnership	Other	Other	Ongoing	Ongoing	LDC and all other Sussex Local Authorities	LDC	NO	Funded	<£10k	Implementation	Reduction of NO_2 and PM emissions through strategic	Continued membership of Partnership	The Sussex-air Partnership is comprised of officers from all the Local Authorities in Sussex. Objectives of the partnership are to provide a coordinated and	

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments/Potential Barriers to Implementation
												policy alignment		high standard air quality evidence base, information and advice to the public, data management of the numerous continuous air monitoring sites across Sussex, and coordination and delivery of strategic work and projects to improve air quality in Sussex. Partners meet quarterly to discuss air quality policy and practice, decide on budget allocations, review existing contract performance and work on joint bids and project delivery.	

5.1 Timescales of the AQAP Measures

Several measures outlined in Table 5.1 have been implemented and are currently ongoing. One measure was successfully completed by 2024. The target for the first stage of measure completion is 2026. For the measures which remain incomplete by this date, examination of implementation barriers will be conducted, and necessary resolutions will be undertaken to ensure most measures are successfully completed by 2028 however, the delivery of measures will be subject to Lewes District Council and its key partners securing the appropriate levels of funding.

It is also important to note the emerging changes in local government with the establishment of a mayoral combined county authority (MCCA) for Sussex and Brighton from May 2026. This is alongside the creation of new unitary authorities across the West Sussex, Brighton & Hove and East Sussex geography. In East Sussex, this could mean moving away from the two-tier model of county council (East Sussex County Council) and borough or district councils (Eastbourne, Hastings, Lewes, Rother and Wealden). The establishment of this is likely to be during 2027.

5.2 Air Quality Partners

LDC is collaborating with ESCC on the below actions:

- Coordination of building and road works in the Lewes town area (LTP)
- Target long-distance freight management & heavy traffic through town (LTP)
- Lewes Parking Management (LTP)
- Partnership work with bus & train operators (LTP) (and emerging Great British Railways)
- New pipeline schemes – infrastructure to support walking, wheeling and cycling

LDC is collaborating with ESCC, SDNP and/or local community groups on the below actions:

- Lewes – Cycle Route 90

- Cycle parking
- Supporting active travel
- Promoting sustainable travel to school
- Cargo bikes/last mile delivery
- Lewes integrated movement strategy
- Re-imagining Newhaven

5.3 Maintaining Safe Air Quality

LDC will continue monitoring local air quality and providing analysis within the ASRs to ensure the objectives are maintained in the future. An Air Quality Strategy (AQS) will be produced and implemented upon the revocation of both AQMAs within Lewes in the future. Collaboration with air quality partners on the long-term projects, particularly those focused on public information and regional policies, will continue to be integral to the local Air Quality Strategy, ensuring sustained success after the objectives have been achieved.

LDC confirms that monitoring will continue within the district to ensure any substantial uplift in traffic numbers generated by new developments which may increase NO_2 levels will be captured in monitoring results. Furthermore, any AQS put in place will be regularly reviewed and updated as necessary.

Air Quality Standards are concentrations recorded over a given time period, which are considered to be acceptable in terms of what is scientifically known about the effects of each pollutant on health and the environment. They can be used as a benchmark to indicate whether air pollution is getting better or worse. However, there is no safe level of air pollution. With a more stringent air pollution guidelines value published by the World Health Organisation (WHO), EU Directive 2024 and lower objective values pursued by many other local authorities (e.g. Brighton and Hove), Lewes District Council aims to achieve a lower annual NO_2 objective of 30 $\mu g/m^3$. Upon the achievement of compliance within both AQMAs, LDC will continue to work toward better local air quality with the new proposed local NO_2 objective of 30 $\mu g/m^3$. This is 25% lower than the UK legal requirement of 40 $\mu g/m^3$ and is indicative of our

commitment within this plan to improve local air quality beyond UK standards in order to provide better health protection across the district.

The table below shows the main sets of Standards and Guidelines for NO_2 annual mean concentration in outdoor air from the UK Government, EU Directives, WHO guidelines, neighbouring local authorities and proposed local objectives.

Table 5.2 Comparison of NO_2 Annual Mean objectives

Standards and Guidelines	NO_2 Annual Mean Objectives
EU & English Limits set 2010 (current LAQM objectives)	40 µg/m^3
EU Directive 2024	20 µg/m^3
WHO 2021 Guidelines	10 µg/m^3
Brighton and Hove AQAP Objective	30 µg/m^3
Lewes District AQAP Objective	30 µg/m^3

6 Quantification of Measures

6.1 Assumptions

Most of the action plan measures set out in Table 5.1 are very difficult to quantify. No detailed studies have been completed for any measure to reliably inform the likely effect in terms of change in traffic or fleet composition as a result of the measures. Having said that, some measures allow for a high-level analysis of reductions in emissions. A summary consideration of the measures and whether they can be quantified is contained in below Table 6.1. The table also details the AQMA most affected by the measures.

Table 6.1 Quantification of Measures

Measure No.	Measure	Assumptions for Quantification	Assumed Reduction in AQMA	
			Lewes Town Centre AQMA	A259 Newhaven Ring Road AQMA
1	Lewes – Cycle Route 90	See Table 6.2 below for quantification	2.1µg/m³	2.3µg/m³
2	Coordination of building and road works in the Lewes town area (LTP)	This is a measure from Local Transport Plan. Reduction based on literature review and professional judgement	<0.5µg/m³	<0.5µg/m³
3	Target long-distance freight management & heavy traffic through town (LTP)	This is a measure from Local Transport Plan. Reduction based on professional judgement	<0.5µg/m³	<0.5µg/m³
4	Reduce emissions from idling vehicles - raise awareness as part of broader AQ campaigns	Reduction based on literature review and professional judgement	<0.5µg/m³	<0.5µg/m³
5	Lewes Parking Management (LTP)	This is a measure from Local Transport Plan. Reduction based on professional judgement	<0.5µg/m³	<0.5µg/m³
6	Partnership work with bus & train operators (LTP)	See Table 6.3 below for quantification	2.4µg/m³	2.3µg/m³
7	Address traffic flow & congestion on Newhaven Ring Road	Reduction based on professional judgement	<0.5µg/m³	<0.5-1µg/m³
8	A259 South Coast Corridor Package – A259 Corridor Package	See Table 6.4 below for quantification	<0.5µg/m³	3.4µg/m³
9	New pipeline schemes - cycling infrastructure (Local Cycling & Walking Infrastructure Plan)	Reduction based on literature review and professional judgement.	<0.5µg/m³	<0.5µg/m³
10	Cycle parking	Reduction based on professional judgement	<0.5µg/m³	<0.5 µg/m³
11	Walking events/groups	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
12	Active travel	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
13	Promoting sustainable travel to school	Reduction based on literature review and professional judgement. According to a literature review on travel plans, a reduction of around 0.5-1 µg/m³ is estimated.	<0.5-1 µg/m³	<0.5-1 µg/m³
14	Cargo Bikes	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
15	Lewes Integrated Movement Strategy	Reduction based on professional judgement	0.5-1 µg/m³	<0.5 µg/m³
16	Re-imagining Newhaven	Reduction based on literature review and professional judgement	<0.5 µg/m³	<0.5-1 µg/m³

Measure No.	Measure	Assumptions for Quantification	Assumed Reduction in AQMA	
			Lewes Town Centre AQMA	A259 Newhaven Ring Road AQMA
17	MoveAbility	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
18	Low Emission Taxi Fleet	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
19	Low Emission Waste Fleet	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
20	Lewes District Council Workplace travel planning/car sharing	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
21	Funding mechanisms e.g. workplace parking levy	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
22	Car Club and EV Programme	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
23	Enshrine AQ measures and Lewes DC proposed objective of 30 µg/m3 NO2 Annual Mean into Planning	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
24	Adoption of the Air Quality and Emissions Mitigation Guidance for Sussex	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
25	Non-Road Mobile Machinery Emissions Standards	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
26	Permit all industrial processes falling under Environmental Permitting Regulations 2016	Reduction based on professional judgement	<0.5 µg/m³	0.5-1 µg/m³
27	Align air quality measures with net zero measures	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
28	Raising awareness of air quality issues	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
29	Social media based campaigns	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
30	Green Infrastructure	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
31	Air Monitoring	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³
32	Membership of Sussex-air Partnership	Reduction based on professional judgement	<0.5 µg/m³	<0.5 µg/m³

6.1.1 Detailed Quantitative Calculation

The below three measures are reported as top three measures within Lewes which are the three key air quality improvement measures that the LDC would like to raise awareness of amongst local community. These top three measures are quantified by using the latest version of Emission Factors Toolkits (EFT)[19] to estimate the reduction in Road NO_x emission. While the NO_2 concentrations are not directly predicted, the reduction in Road NO_x emission can help indicate the impact of the top three measures.

Measure 1: Lewes – Cycle Route 90

Brighton & Hove / East Sussex Regional Route 90 (RR90) is a cycling route running from Brighton through Lewes and towards Eastbourne, connecting the coast and the South Downs National Park. It forms part of the National Cycle Network's regional routes and offers a mix of coastal and countryside cycling, with sections suitable for various abilities.

This measure focuses on the traffic modal shift from cars to cycling. According to cycling infrastructure studies[20,21], well-designed cycle routes can achieve 2-8% modal shift from cars to cycling for local trips. The second cycling and walking investment strategy (CWIS2)[22] set targets to increase the percentage of short journeys in towns and cities that are walked or cycled from 41% in 2018 to 2019 to 46% in 2025 (an 5% increase in non-car journeys).

Therefore, it has been assumed that this measure will result in 3%-5% reduction in car trips travelling into Lewes Town Centre AQMA and Newhaven AQMA. The table

[19] Emission Factor Toolkit v13.1, published March 2025. Available at: https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/

[20] Song Y, Preston J, Ogilvie D; iConnect consortium. New walking and cycling infrastructure and modal shift in the UK: A quasi-experimental panel study. Transp Res Part A Policy Pract. 2017 Jan;95:320-333. doi: 10.1016/j.tra.2016.11.017. PMID: 28163399; PMCID: PMC5270770.

[21] Panter, J., Griffin, S., Jones, A. et al. Correlates of time spent walking and cycling to and from work: baseline results from the commuting and health in Cambridge study. Int J Behav Nutr Phys Act 8, 124 (2011). https://doi.org/10.1186/1479-5868-8-124

[22] The second cycling and walking investment strategy (CWIS2), updated 10 March 2023. Available at: https://www.gov.uk/government/publications/the-second-cycling-and-walking-investment-strategy/the-second-cycling-and-walking-investment-strategy-cwis2

below shows the calculations undertaken and potential reductions in both AQMAs respectively.

Table 6.2 Detailed Quantitative Calculations – Lewes Cycle Route 90

Lewes Town Centre AQMA	
Annual Link NO_x Emissions – A275 and A27 without measure (kg/year)	553
Annual Link NO_x Emissions – A275 and A27 with measure (kg/year)	541
Reduction in Road NO_x (%)	2.1%
A259 Newhaven Ring Road AQMA	
Annual Link NO_x Emissions – A259 without measure (kg/year)	1,602
Annual Link NO_x Emissions – A259 with measure (kg/year)	1,566
Reduction in Road NO_x (%)	2.3%

Table 6.2 shows that this measure can result in a NO_x emission reduction within the Lewes Town Centre AQMA of 2.1% and a NO_x emission reduction within the A259 Newhaven Ring Road AQMA of 2.3%.

Measure 6: Partnership work with bus & train operators (LTP)

This measure aims to increase number of bus/train service users and therefore reduce car travel. The measure is a "soft measure" through supporting marketing campaigns, extending use of subsidised/discounted fares, improving bus stop facilities and bus information, as well as provision of additional undercover cycle parking at Lewes station. There is no direct literature for the impact of increasing bus and train patronage. Therefore, the impact of this measure is estimated based on similar behaviour change measures like the use of a travel plan. It is estimated that around a 3% reduction in car trips into Lewes town centre and Newhaven may be achieved. The table below shows the calculations undertaken and potential reductions in both AQMAs respectively.

Table 6.3 Detailed Quantitative Calculations – Partnership work with bus & train operators (LTP)

Lewes Town Centre AQMA	
Annual Link NO_x Emissions – AQMA without measure (kg/year)	483
Annual Link NO_x Emissions – AQMA with measure (kg/year)	471
Reduction in Road NO_x (%)	2.4%
A259 Newhaven Ring Road AQMA	
Annual Link NO_x Emissions – AQMA without measure (kg/year)	1,923
Annual Link NO_x Emissions – AQMA with measure (kg/year)	1,879
Reduction in Road NO_x (%)	2.3%

Table 6.3 shows that this measure can result in a NO_x emission reduction within the Lewes Town Centre AQMA of 2.4% and a NO_x emission reduction within the A259 Newhaven Ring Road AQMA of 2.3%.

Measure 8: A259 South Coast Corridor Package

A259 South Coast Corridor Package is an infrastructure improvement measure targeting congestion reduction. This will improve the A259 Brighton-Eastbourne-Pevensey (South Coast) MRN corridor and mainly impact the Newhaven AQMA.

The estimation of the measure impact focuses on the improvement of traffic congestion around the A259 at junctions / corridor. On the A259 road section within Newhaven AQMA, the speed is estimated to improve from an average of 5-10 mph with congestion area to 20 mph during peak hours.

Table 6.4 Detailed Quantitative Calculations – A259 South Coast Corridor Package

A259 Newhaven Ring Road AQMA	
Annual Link NO_x Emissions – AQMA without measure (kg/year)	1,658
Annual Link NO_x Emissions – AQMA with measure (kg/year)	1,602
Reduction in Road NO_x (%)	3.4%

Table 6.4 shows that this measure can result in a NO_x emission reduction within the A259 Newhaven Ring Road AQMA of 3.4%.

6.2 Cost Benefit Analysis of Measures

6.2.1 Methodology

Using the above assumptions around the quantitative pollution reduction and assumed costs, each measure was given a score as set out below.

Table 6.5 Cost Score

Estimated Cost of Measure	Score
< £10k	7
£10k - £50k	6
£50k - £100k	5
£100k - £500k	4
£500k - £1m	3

£1m - £10m	2
> £10m	1

Table 6.6 Benefit Score

Estimated Reduction in Pollutant Concentrations	Score
<0.5 µg/m³	1
0.5-1 µg/m³	2
1-2 µg/m³	3
2-3 µg/m³	4
3-4 µg/m³	5
4-5 µg/m³	6
>5 µg/m³	7

Using the scores above, the below matrix was implemented to work out the cost-benefit. Higher scores are awarded for those measures which are cheapest and have the greatest effect on pollution reduction, and the lowest scores awarded for costly measures with limited impact on reduction in pollution.

Table 6.7 Cost Benefit Scoring Matrix

		Estimated Reduction in Pollutant Concentrations						
		>0.5 µg/m³	0.5-1 µg/m³	1-2 µg/m³	1-2 µg/m³	2-3 µg/m³	3-4 µg/m³	>4 µg/m³
Cost of Measure	< £10k	7	14	21	28	35	42	49
	£10k - £50k	6	12	18	24	30	36	42
	£50k - £100k	5	10	15	20	25	30	35
	£100k - £500k	4	8	12	16	20	24	28
	£500k - £1m	3	6	9	12	15	18	21
	£1m - £10m	2	4	6	8	10	12	14
	> £10m	1	2	3	4	5	6	7

The analysis should also account for the feasibility of implementing the measures, with those likely to progress given a higher priority than those which are acknowledged to be a challenge to implement. The feasibility score factors in local influences such as political backing, accessibility to funding options and resources available. As such, each measure was assigned a ‘Feasibility score’ based on the table below. The score from the matrix was multiplied by this score.

Table 6.8 Feasibility Scores

Feasibility Score	Score
Measure has already been started and just requires progressing	7
Very easy to implement, and political good will towards this, sufficient resources	6
Relatively easy to implement, resources available	5
Possible to implement but may require some learning/campaigning, moderately time intensive	4
Challenging but still feasible, may require additional support and resources	3
Difficult to implement, no political appetite, time and resource intensive	2
Very difficult to implement, no political appetite, time and resource intensive	1

6.2.2 Cost-Benefit Analysis

Following the above assessment, it has been possible to rank the measures by cost, benefit and feasibility, this is shown in Table 6.9 below. With the feasibility weighting meaning that measures which are the easiest to progress are scored higher, these are prioritised. The feasibility is accessed by referencing the cost of each measure and using the local knowledge of Lewes DC staff.

Table 6.9 Cost Benefit Analysis of Measures

Measure No.	Measure	Cost Score	Air Quality Effect Score	Feasibility Score	Overall Score
26	Permitting	6	2	6	**72**
12	Active travel	7	1	7	**49**
28	Air quality websites	7	1	7	**49**
29	Social media campaigns	7	1	7	**49**
29	Social media based campaigns	7	1	7	**49**
11	Walking events/groups	7	1	7	**49**
27	Align AQ and net zero	7	1	7	**49**
32	Sussex Air Partnership	7	1	7	**49**
24	Sussex Air Planning Guidance	7	1	6	**42**
25	NRMM	7	1	6	**42**
13	Promoting sustainable travel to school	4	2	5	**40**
2	Coordination of building and road works in the Lewes town area (LTP)	6	1	6	**36**
4	Reduce emissions from idling vehicles - raise awareness as part of broader AQ campaigns	5	1	7	**35**
20	LDC Workplace travel planning	7	1	5	**35**
23	AQ measures and NO_2 30µg/m^3 objective	7	1	5	**35**
31	Air monitoring	5	1	7	**35**
1	Lewes – Cycle Route 90	2	2	7	**28**
15	Lewes IMS	2	2	7	**28**

Measure No.	Measure	Cost Score	Air Quality Effect Score	Feasibility Score	Overall Score
16	Re-imagining Newhaven Programme	2	2	7	**28**
17	Newhaven MoveAbility	4	1	7	**28**
30	Green infrastructure	4	1	7	**28**
10	Cycle parking	5	1	5	**25**
14	Cargo bikes/LMD	5	1	5	**25**
7	Address traffic flow & congestion on Newhaven Ring Road	4	2	3	**24**
5	Lewes Parking Management (LTP) -	4	1	5	**20**
22	Car club and EV programme	3	1	5	**15**
6	Partnership work with bus & train operators (LTP)	1	2	7	**14**
21	Workplace parking levy	6	1	2	**12**
18	Low Carbon Taxi Fleet	3	1	3	**9**
8	A259 South Coast Corridor Package – A259 Corridor Package	1	3	3	**9**
19	LDC Waste Fleet	1	1	6	**6**
9	New pipeline schemes - cycling infrastructure (LCWIP)	1	1	5	**5**
3	Target long-distance freight management & heavy traffic through town (LTP)	1	1	3	**3**

6.3 Year of Objective Compliance

For Lewes Town Centre AQMA, the modelling results show that all receptors within the AQMA had modelled NO_2 annual mean concentrations below 36 µg/m^3 in 2023 (below and not within 10% of AQS objectives). However, one monitoring location (Site ID 21) which is on the High Street (School Hill) and not within the Lewes Town Centre AQMA, recorded an exceedance with levels of 45.7 µg/m^3 in 2023 and 50.7 µg/m^3 in 2024. This site had exceeded the AQS of 40 µg/m^3 prior to Covid but in recent years, questions were raised as to the possible impact of a nearby boiler outlet pipe however the tube has been relocated and current data continues to show an exceedance. Lewes DC considers that further analysis is necessary to determine whether the AQMA needs to be extended to cover this area of School Hill.

All monitoring locations within the Lewes Town Centre AQMA have achieved compliance annually since 2020.

Diffusion tube site ID 20, also on School Hill is recording increasing levels and is now just below 36 µg/m^3 as an annual average. This site is located approximately 90m distant from site ID 21.

Comprehensive detail including progression of planned monitoring and modelling studies for School Hill in order to determine potential sources and mitigation measures for these emissions will be published in future ASRs.

With regard to the A259 Newhaven Ring Road AQMA, the modelled receptor with the highest concentration within the AQMA reported an annual mean NO_2 result of 41.3 $\mu g/m^3$ in 2022, reduced to 38.2 $\mu g/m^3$ in 2023 and still within 10% of the AQS objective, then 33.2 $\mu g/m^3$ in 2024. Continued monitoring and review is necessary for this AQMA.

Lewes District Council's aim is that implementation of the outlined measures will result in the relevant objective(s) being attained by:

- 2030 within and in close proximity to the Lewes Town Centre AQMA;
- 2027 within the A259 Newhaven Ring Road AQMA (dependent on level of through traffic and predicted tail pipe emission reduction)

Appendix A: Response to Consultation

Table A.1 Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

Consultee	Measures/Concerns identified	Lewes District Council Response
Defra	AQMA should be declared without delay for School Hill in Lewes Town	See Table B.1 below for full details and Lewes DC response.
Public	A summary of responses received during the public consultation	This table A.1 should be read in conjunction with the full draft AQAP consultation report
East Sussex County Council	Table 6.5 – Cost Benefit Analysis of Measures	A detailed response was received from ESCC addressing various policies and wording relating to these in the draft version. All matters have been addressed in this final document. With respect to Table 6.5, the supporting text in the body of the AQAP has been updated to address the lack of funding for some measures.
Public Health East Sussex	A very comprehensive, holistic and detailed plan with clear priorities and measures. It is good that it draws on key supportive policy levers and makes strong links to public	Lewes District Council welcomes these comments.

Consultee	Measures/Concerns identified	Lewes District Council Response
	health considerations. The strong considerations given to planning and the 'planning for health' work (including the HIA Toolkit, working group etc) as well as the details in relation to the LTP, LCWIP and BSIP are welcomed. It incorporates considerations for behaviour change and looks to understand the health inequalities related to AQ. Therefore the AQAP is supported from a 'Healthy and Sustainable Places' perspective.	
Brighton & Hove City Council	Key Areas: Active Travel, Bus, Train, Planning, Partnerships, NRMM, CEMP, Awareness Raising	The suggested amendments have been incorporated into the final AQAP.
Public	Public Realm: Needs to be more on the public realm and shared space with actions aimed at limiting the impact of LGVs and car traffic and deliveries on pedestrian and outside eating areas.	The AQAP details the work being undertaken both in Newhaven and Lewes Town to improve the public realm and the Council will continue to work with relevant stakeholders to progress this work and to incorporate into

Consultee	Measures/Concerns identified	Lewes District Council Response
		the AQAP relevant measures where this impacts air quality.
Public	Smoke Control Areas: Can the centre of Lewes be designated a smoke control zone?	Whilst this AQAP specifically addresses the NO_2 exceedances within the AQMAs, it is acknowledged that domestic fires can add to the NO_2 burden although particulate matter is the pollutant of primary concern from these activities. The Council, through its membership of the Sussex-air partnership will evaluate the feasibility of implementing a SCA. This will be discussed in detail in the next Annual Status Report.
Public	Wood Burning: The air quality action plan should include smoke and fumes emitted from wood burning stoves and explain how these emissions will be mitigated. The AQAP should address to the domestic burning of solid fuels, and in particular wood as it is a serious source of air pollution for those living in the centre of Lewes town.	Whilst this AQAP specifically addresses the traffic related NO_2 exceedances within the AQMAs, it is acknowledged that the use of solid fuels adds to the NO_2 burden. Emerging evidence supports the need for greater public awareness of the health impact of wood burning and the Council aims to address this issue alongside partner authorities during the winter months ahead. Information on wood burning can be found on the Sussex-air website

Consultee	Measures/Concerns identified	Lewes District Council Response
		and this will be discussed in next year's Annual Status Report.
Public	Parking charges: These are purely revenue-raising matters.	Car parking charges will be considered by Lewes Town Council, East Sussex County Council and Lewes District Council as part of the budget setting processes.
Public	Cycling: encourage cycling by strictly enforcing the Highway Code so one-way systems and traffic lights are observed. Consider contra-flow cycle lanes where feasible. Make cycle parking and bike use more integrated with public places, more bike parklets etc.	The Council has no powers to enforce the Highway Code however as detailed in the AQAP, there are a number of measures designed to support shared spaces and prioritisation of public transport and active travel modes.
Public	Sources of air pollution: how are diesel cars considered to be the biggest source, as apart from taxis there do not seem to be many? How will the loss of the old bus station and requisition of street-side places for bus stops improve air quality? In Lewes, much recent congestion appears to be due to road and	Diesel vehicles emit higher proportions of pollutants than their petrol, hybrid or electric counterparts. Most delivery vehicles (large and small) are diesel and the numbers of these vehicles have increased substantially since Covid. The cost of living crisis has seen a slower uptake of newer and less polluting vehicles than had been expected prior to Covid and Brexit.

Consultee	Measures/Concerns identified	Lewes District Council Response
	infrastructure maintenance. This should be coordinated.	Lewes DC alongside ESCC will be undertaking modelling and monitoring to determine the specific traffic sources of air pollution in Lewes Town over the next year and actions to improve air quality will be based on the results of this exercise. One of the measures of the AQAP is to better coordinate road and infrastructure maintenance.
Public	Sources of Air Pollution: In Newhaven, the main problem seems to be large diesel-engine vehicles coming off or going to the ferries.	Lewes DC is committed to undertaking more detailed air quality modelling and monitoring in Newhaven in order to better understand the various sources of pollution in the town. Any actions necessary to minimise these emissions will be taken in partnership with local businesses and authorities following the monitoring exercise.
Public	Pollution from industrial activities in Newhaven	Potentially polluting industrial activities are regulated either by Lewes DC or the Environment Agency and the relevant environmental permits should ensure these activities do not cause harm to residents or the environment. The proposed modelling and monitoring alongside partnership working with relevant authorities

Consultee	Measures/Concerns identified	Lewes District Council Response
		and businesses will support a more detailed understanding of the primary emission sources in Newhaven.
Public	Table 6.1 Quantification of Measures: The AQAP should set out how they will be monitored over the period of the AQAP. The cost-benefit & feasibility sections do not do this, well thought out though they may be.	The cost benefit and feasibility sections are included to give a general overview of all aspects of the measures. The Council has a duty to report annually on the progress of measures in the AQAP and this is undertaken via publication of an Annual Status Report (ASR). These reports can be found here
Public	Presentation: Tables 6.4 and 6.6: Please recast these tables in the interest of visual accessibility.	These tables have now been updated.
Public	Improve and promote public transport	Measures to support public transport use are included in the AQAP; see Measure 6.
Public	More public information	The Council will seek to expand its current methods for sharing information on air quality/pollution and associated activities.

Consultee	Measures/Concerns identified	Lewes District Council Response
Public	Newhaven Ring Road	East Sussex CC is the lead transport authority for the A259 in Newhaven and has been successful in obtaining funding to support initiatives on this section of road to improve traffic movement and reduce congestion. This is an ongoing scheme and further improvements will be implemented subject to receipt of additional funding.

Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision

Consultee comment	Action description	Reason action is not being pursued
It is recommended that the local authority either a) amends the existing AQMA immediately to incorporate DT 21 as a minimum due to its exceedances, or b) declares a new AQMA for DT 21 as a minimum if the original AQMA is revoked by the local authority due to three consecutive years of compliant monitoring data. The full extent of the exceedances (and the revised AQMA boundary) should be identified, this may be using a detailed modelling assessment. As a precaution, DT 20 could also be included in the amended / newly declared AQMA due to the increasing concentrations between 2022-2024 and	Declaration of Air Quality Management Area for School Hill, Lewes Town	The council accepts that School Hill in Lewes has shown elevated levels of nitrogen dioxide for many years and this was discussed in the last AQAP published in 2009. At that time, the rationale for exclusion of a greater area of School Hill from the AQMA was that measures intended to reduce air pollution due to traffic within the AQMA boundary would also reduce NO2 levels on School Hill. Unfortunately, this has not been the case but Lewes DC is committed to undertaking modelling and further monitoring in this area to determine the cause of the more recent elevated levels of NO2. It should be noted that levels dropped

its proximity to DT 21 which has been exceeding the annual mean AQO. However, there is no exceedance of the annual mean AQO (40ug/m3) at DT 20 nor is it within 10% of the annual mean AQO (36ug/m3). Therefore, it is not a necessity to include it in the amended / newly declared AQMA at the current levels. The intention to amend/ revoke and/or declare a new AQMA should be included within the upcoming AQAP submission and action to amend/ revoke and/or declare a new AQMA boundary should not delay submission of the AQAP. If Lewes District Council does not wish to extend the AQMA, instead revoking it following monitoring evidence of 3-consecutive compliant years, such intentions must be declared in the AQAP and the local authority must declare a new AQMA for DT 21 as a minimum (see comments RE: DT 20 above) due to its consecutive exceedances of the annual mean AQO (40ug/m3).		considerably around mid-2025 but it is acknowledged that this may not continue and to date, there is no obvious cause for either elevated levels or a sudden decrease. The council's air quality officer has commenced collating traffic data and will be working with East Sussex County Council to undertake a six month traffic count on School Hill to include two separate weeks of ANPR fleet modelling data. This will determine the fleet make up and highlight any components that may impact NO2 levels here. Consideration will also be given to any change in bus frequency and fleet engine standards since 2019, and non-traffic issues including the prevalence of domestic open fires and wood burners alongside commercial cooking due to the impact these activities can have on localised NO2 levels. Additional diffusion tubes will be located on School Hill and with the lo-cost sensor located at

Failure to explain in the AQAP intentions regarding AQMA action could lead to Defra rejecting the AQAP submission. However, AQMA action and subsequent processes should not delay the submission of the AQAP to Defra. **Note:** (April 2026) Lewes DC has consulted Defra on the 2025 results for the School Hill area and it has been agreed that the AQMA does not need to be extended but the area will be kept under close review with monitoring and traffic analysis data to be published in the Annual Status Reports.		Lewes House, this will enhance the monitoring already in situ. It is envisaged that confirming bus and other transport movements for a period of time dating back to immediately before Covid will allow for a sufficiently detailed study to enable a conclusion on the reasons for the anomalies in air quality on School Hill and if necessary, will support any mitigation measures required to reduce NO2 levels.

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air Quality Annual Status Report
BSIP	Bus Service Improvement Plan
COMEAP	Committee on the Medical Effects of Air Pollutants
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
ESCC	East Sussex County Council
EFT	Emissions Factors Toolkit
EU	European Union
HGV	Heavy Goods Vehicle
IMD	Indices of Multiple Deprivation
LAQM	Local Air Quality Management

LDC	Lewes District Council
LGV	Light Goods Vehicle
LCWIP	Local Cycling and Walking Infrastructure Plan
LSOA	Lower Super Output Area
LTP	Local Transport Plan
NDP	Neighbourhood Development Plan
NHS	National Health Service
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
PM_{10}	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
$PM_{2.5}$	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
SDNPA	South Downs National Park Authority
WHO	World Health Organization

References

- Environment Act 1995, as amended by the Environment Act 2021
- South Downs Local Plan. South Downs National Park Authority. (2019). South Downs Local Plan 2014-2033. Adopted 2 July 2019.
- Lewes District Local Plan Part 1: Joint Core Strategy 2010-2030. Lewes District Council. (2016). Adopted 11 May 2016.
- Towards a Lewes Local Plan: Spatial Strategy and Policy Directions. Lewes District Council. (2023). In process to be adopted.
- Fourth East Sussex Local Transport Plan 2024 – 2050 (LTP4). East Sussex County Council. (2024).
- East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP). East Sussex County Council. (2020).
- East Sussex Bus Service Improvement Plan (BSIP) East Sussex County Council. (2021).
- East Sussex Rail Development Strategy. East Sussex County Council. (2013). Approved November 2013.
- Lewes Neighbourhood Plan. Lewes Town Council. (2019). Adopted April 2019.
- Newhaven Neighbourhood Development Plan. Newhaven Town Council. (2019). Adopted 14 November 2019.
- Department of Health's Committee on the Medical Effects of Air Pollutants (COMEAP) Report 2010. Committee on the Medical Effects of Air Pollutants. (2010). The Mortality Effects of Long-Term Exposure to Particulate Air Pollution in the United Kingdom. Department of Health.
- Every breath we take: the lifelong impact of air pollution. Report of a working party. London: RCP. Royal College of Physicians. (2016).
- Office for Health Improvement and Disparities Guidance. Office for Health Improvement & Disparities. (2024)
- Public Health Outcomes Framework (England). Office for Health Improvement & Disparities. (2024)
- "Air Quality – A Briefing for Directors of Public Health". Defra, Public Health England, Local Government Association. (2017).

- Guidance on improving outdoor air pollution and health: review of interventions. Public Health England. (2019).
- LAQM.TG (22) - Local Air Quality Management Technical Guidance. Department for Environment, Food and Rural Affairs. (2022).
- WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide. Geneva: World Health Organization. (2021).
- Directive (EU) 2024/2881 of the European Parliament and of the Council of 23 October 2024 on ambient air quality and cleaner air for Europe
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. Department for Environment, Food and Rural Affairs. (2007).