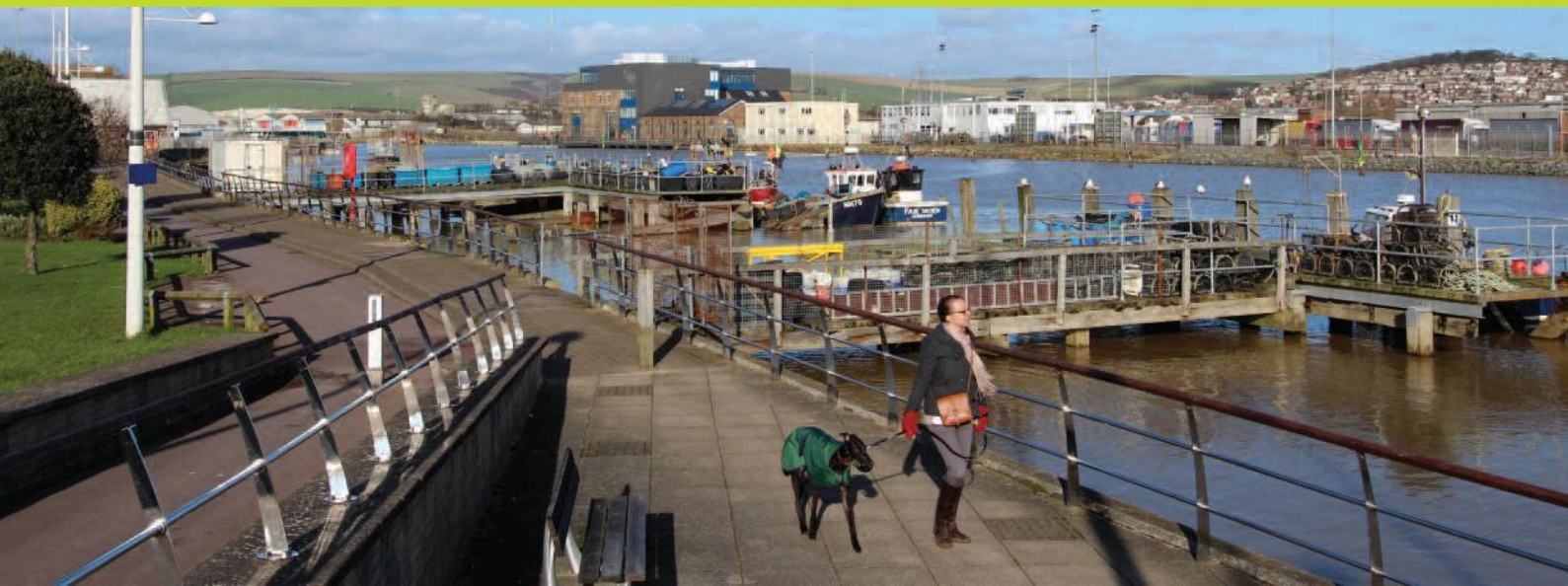




Newhaven Air Quality



Newhaven Air Quality Action Plan June 2016



This report is based on work carried out by Dr Clare Beattie of Air Quality Consultants Ltd on behalf of Lewes District Council in the period June to September 2015. The final contents are the responsibility of Lewes District Council.



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Executive Summary

Following the declaration of an Air Quality Management Area for the centre of Newhaven, an Air Quality Action Plan has been prepared to address the high concentrations of nitrogen dioxide (NO₂) which people are exposed to alongside the busy roads in the centre of Newhaven. Road transport is the main source of emissions relating to NO₂, and particularly diesel vehicles in stop- start traffic which make the biggest contribution resulting in higher emissions.

Seven broad areas of Action have been established to help deliver better air quality, with specific measures then identified for each of these Actions areas. The categories of Action are as follows:

- **Action 1: Enable the use of sustainable travel choices through the delivery of transport infrastructure and initiatives**
- **Action 2: Actively promote low emission vehicles and supporting infrastructure.**
- **Action 3: Use the planning system to ensure that air quality is fully considered for new development.**
- **Action 4: Use traffic management to reduce emissions within the AQMA.**
- **Action 5: Work with Public Health colleagues to inform the public about health impacts of Air Pollution and how they can change behaviour to reduce emissions and reduce exposure.**
- **Action 6: Continue to monitor and assess air quality in line with Government guidance on Local Air Quality Management (LAQM).**
- **Action 7: Target point sources in Newhaven Town Centre**

These Actions are evaluated in terms of their impacts on:

- air quality;
- cost and feasibility; and
- timescale for implementation.

An implementation plan is outlined, which includes a time scale for each measure and funding source. Ultimately the delivery of this Action Plan is dependent on adequate levels of resourcing, both for capital costs and staffing. Currently, increases in traffic are likely around the Ring Road system, assuming that the planned development for Newhaven is taken forward. Any improvements resulting from this Action Plan, in terms of reducing vehicle movements, or in reducing emissions directly, will therefore be challenged by an increasing number of vehicles due to new developments. This Action Plan should be treated as a living document and as such will be updated as and when required.

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1 Introduction and Aims of the Plan

- 1.1 It is now well documented that air pollution adversely affects human health. In the UK, outdoor air pollution is estimated to kill up to 40,000 people every year¹. Poor air quality has both long and short-term health impacts, particularly for respiratory and cardiovascular health, including increased hospital admissions and premature death. The impacts are not distributed equally, with the effect on life expectancy being greatest for the elderly and those with pre-existing heart and lung conditions². The World Health Organisation estimates that some 80% of outdoor air pollution- related premature deaths worldwide are due to heart disease and strokes, while 14% of deaths are due to chronic obstructive pulmonary disease or acute lower respiratory infections and 6% of deaths are due to lung cancer. The majority of health evidence relates to particulate matter (PM) but evidence associating nitrogen dioxide (NO₂) with health effects has strengthened substantially in recent years³.
- 1.2 Within Lewes District air quality is generally good. However, there are locations where pollutant levels are high, with the highest levels of pollution being experienced along the narrow congested street canyons (i.e. roads with properties close to the road on either side of the street) in Lewes and Newhaven.
- 1.3 This Action Plan aims to reduce NO₂ concentrations, as this is the pollutant for which Lewes District Council is not currently achieving relevant air quality objectives. There is a growing body of evidence of the health effects arising from exposure to both NO₂ and particulate matter, and it is important that measures that reduce NO₂ do not inadvertently increase emissions of particulate matter, as there is no threshold for health effects of particulate matter.
- 1.4 At a national level, the Environmental Audit Committee published its third report on Air Quality in December 2014, which concluded that recommendations from its previous two reports had not been implemented. It concluded that the Government must act urgently to:
- Meet EU nitrogen dioxide targets as soon as possible;
 - Engage with local authorities to establish best practice in tackling air pollution across the UK
 - Adjust planning guidance to protect air quality in local planning and development; and
 - Examine fiscal and other measures to gradually encourage a move away from diesel vehicles towards low emission options.

¹ From the Royal College of Physicians 'Every Breathe we take: The Lifelong impact of air pollution' <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

² Within Lewes District it is estimated to account for up to 48 premature deaths per annum attributable to particulate matter PM_{2.5}
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CR_CE_010.pdf

³ Committee on the Medical Effects of Air Pollution, 2015

- 1.5 The Government has recently published updated guidance to improve air quality in the UK. The plans set out actions being planned or implemented at local, regional and national levels to meet the annual and hourly EU limit values for nitrogen dioxide in the shortest possible time. Subsequent implementation of the plans and progress towards compliance will be closely monitored nationally. The plans rely heavily on actions undertaken locally through the local air quality management process with *Plan UK0031 South East* which includes the district of Lewes. The actions set out in this document will therefore complement work being undertaken nationally.
- 1.6 Road transport is the main source of emissions in relation to NO₂, and to a lesser extent for particulate matter, with diesel cars making the biggest contribution within the AQMAs. In particular, stop-start traffic (i.e. acceleration and deceleration) results in higher emissions.
- 1.7 This Air Quality Action Plan aims to reduce air pollution within the Newhaven AQMA, in order to reduce the health impacts of current concentrations. It sets out how Lewes District Council and its partners will act to locally reduce emissions of relevant pollutants.

2 Context of Air Quality and Transport within Lewes District Council

Air Quality

- 2.1 Under Part IV of the Environment Act 1995, Local Authorities are required to review and assess air quality in their areas and to report against objectives for specified pollutants of concern, to the Department for Environment, Food and Rural Affairs (Defra). For each air quality objective in the Regulations, local authorities have to consider whether the objective is likely to be achieved. Where it appears likely that the air quality objectives are not being met, the authority must declare an AQMA. Following the declaration of an AQMA, the authority must then develop an Air Quality Action Plan which sets out the local measures to be implemented in pursuit of the air quality objectives. Prompted by the Review and Assessment process, AQMAs have been declared in Lewes and more recently in Newhaven. An Air Quality Action Plan was published for Lewes in 2009 outlining a number of measures to improve air quality within the AQMA. The current Action Plan relates specifically to the Newhaven AQMA.
- 2.2 Both AQMAs have been declared for NO₂, with the main source of emissions being from road traffic (particularly where congested), often exacerbated by a lack of dispersion due to surrounding buildings. In Newhaven, the AQMA is around the Ring Road, where its gradients increase engine load and hence emissions.

Figure 1: Air Quality Criteria for Nitrogen Dioxide

Pollutant	Time Period	Objective
Nitrogen Dioxide	1-hour Mean	200 µg/m ³ not to be exceeded more than 18 times a year
	Annual Mean	40 µg/m ³

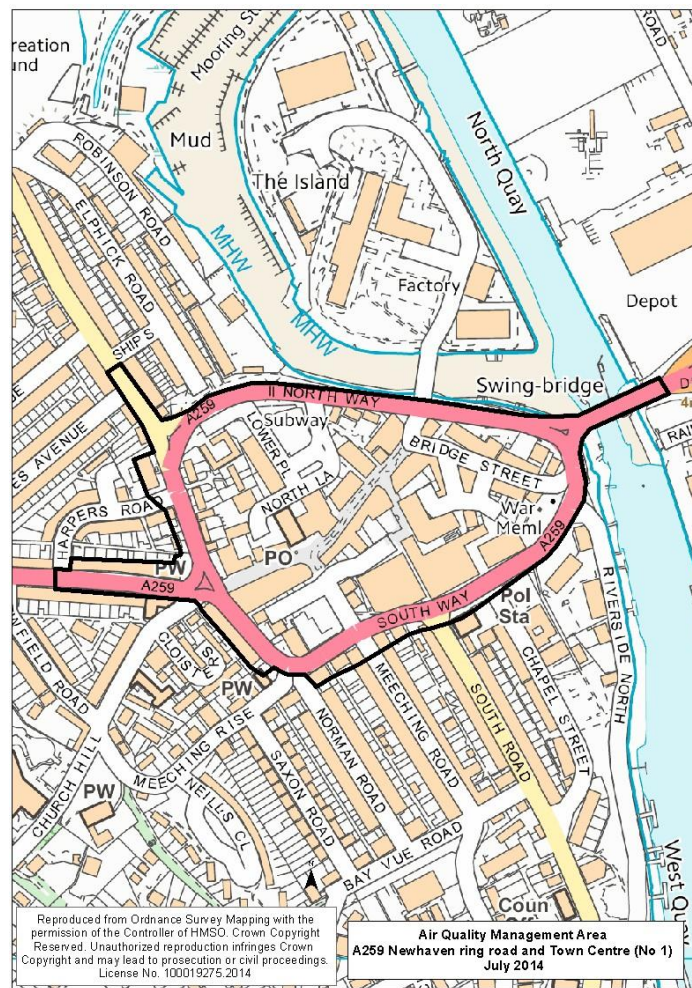


Figure 2: Newhaven AQMA

Source apportionment

- 2.3 The overall contribution made by emissions of nitrogen oxides from motor vehicles, which includes both nitric oxide and NO₂, to measured NO₂ concentrations depends on a number of factors, including how the emissions react in the atmosphere; in particular the reaction of nitric oxide with ozone, and the amount that is emitted directly as NO₂ (primary NO₂). Figure 2 shows the contribution from different vehicle types to NO₂ concentrations including background. Diesel cars and diesel light goods vehicles make the largest contribution from traffic.
- 2.4 At the 2011 Census the population of Newhaven was 12,232, made up of 4678 households, with 26% of these households not owning a car. However of those who work 62.5% travel to work by car, 13.6% use public transport, 13.4% walk or cycle and 10.5% work at home. There are

approximately 178 residential dwellings situated within the Air Quality Management Area with the majority of these being on or close to the Ring Road itself.

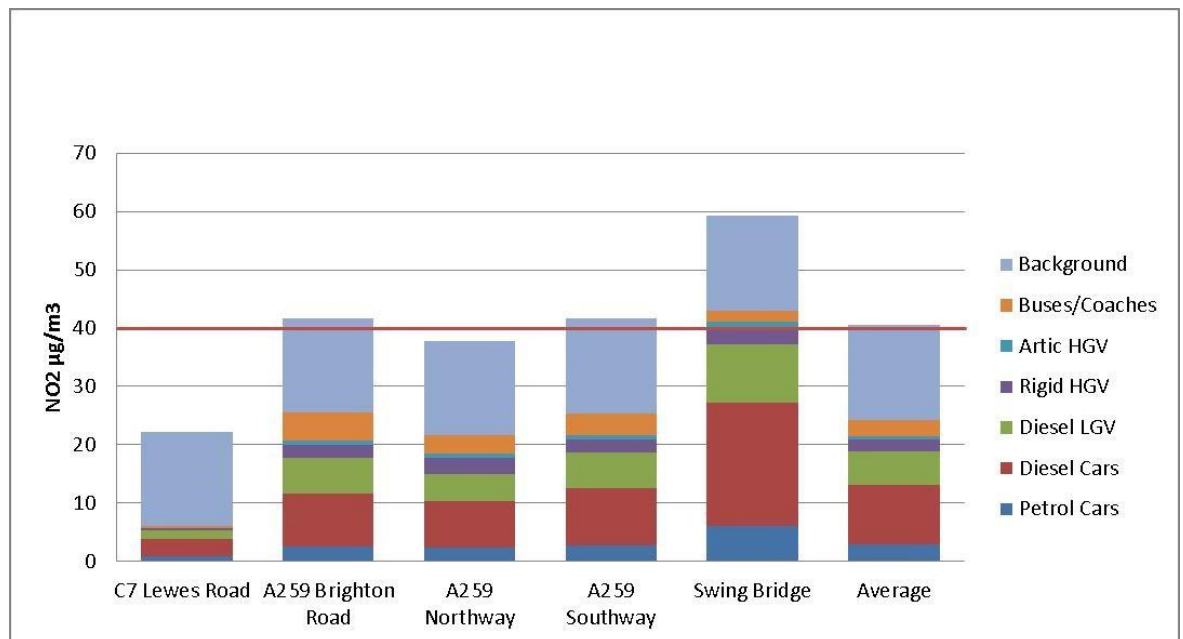


Figure 3: Apportionment NO₂ Concentrations by Source including Background within Newhaven AQMA

Newhaven AQMA NO₂ Concentrations

- 2.5 The Newhaven AQMA was declared in July 2014, the map of Newhaven in Figure 2 illustrates the size and location of the AQMA. This area was based upon evidence collected from our NO₂ diffusion tubes situated at strategic points around Newhaven. LDC has been monitoring in Newhaven for many years with a number of locations at or near the Ring Road currently exceeding the air quality limits for NO₂ when measured as an annual mean.

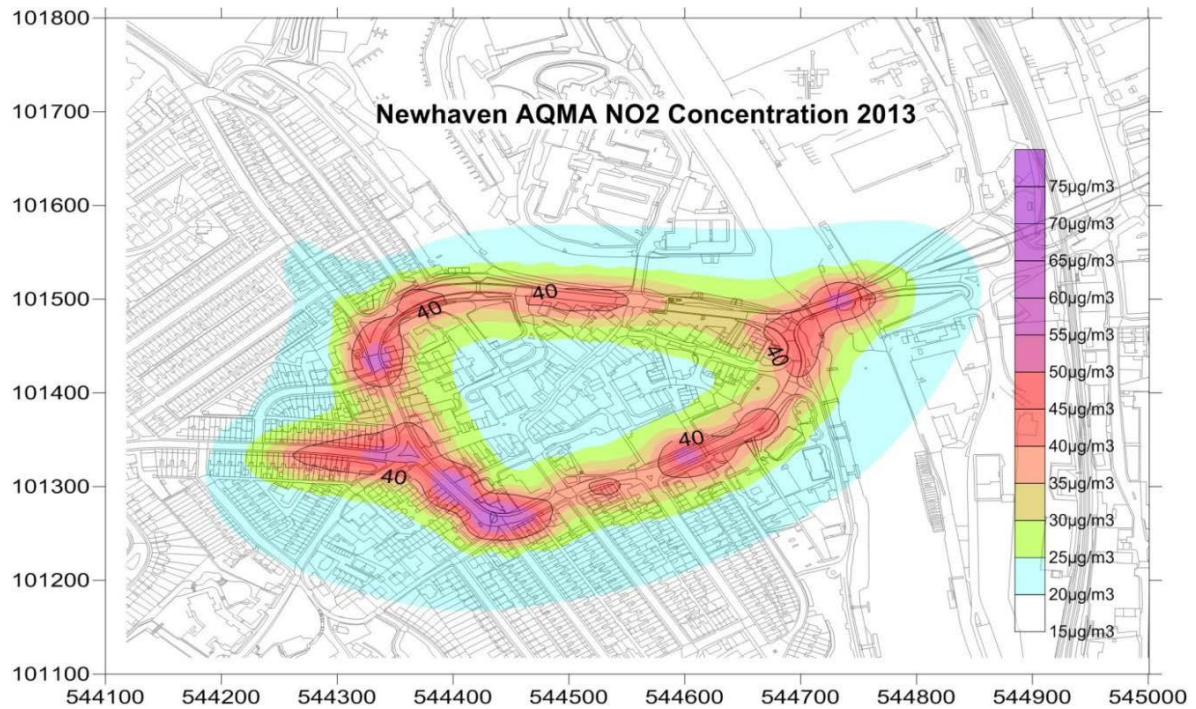


Figure 4: Newhaven AQMA NO₂ Concentration 2013

Annual Average Daily Traffic

- 2.6 Traffic flows and vehicle composition data have been provided by East Sussex County Council, who provided weekday counts used to derive Annual Average Daily Traffic (AADT) flows for the Newhaven Ring Road and its main tributaries.

Road Link	2014 AADT	HGV %
A259	28,582	3.3
Southway	16,960	4.4
Southway to Lewes Road Slip	7,793	3.8
Lewes Road	18,595	4.3
Lewes Road to Northway Slip	13,129	4.3
Northway	19,076	3.9
South Road	6,654	3.5

Southway to A259 Brighton Road	9,167	4.8
A259 Brighton Road to Lewes Road	10,802	4.7
A259 Brighton Road	19,970	4.7
Lewes Road to C7	5,236	2.7
C7 to Northway	5,947	3.0
C7	11,184	2.9

Figure 5: Annual Average Daily Traffic Summary 2014

Transport

- 2.7 Newhaven is one of the County's priority areas for economic growth, with significant investment being made in the area to achieve this particularly through Local Growth Fund monies being secured through the Local Enterprise Partnerships and the recently announced Enterprise Zone status for a number of key sites in the town. The 'Newhaven Clean Tech and Maritime Growth Area' is included in the South East & Coast 2 Capital Local Enterprise Partnership's Strategic Economic Plans and Growth Deals, along with the Greater Brighton City Region Growth Deal area. Funding has been secured through these mechanisms to deliver flood defence works and the Newhaven Port Access Road which will support future viability of new and existing employment sites within and around the port area.
- 2.8 Newhaven experiences a number of transport challenges, particularly around severance issues in relation to the High Street and congestion, both along the A259, which runs east-west through the town, and along the town centre Ring Road. As highlighted in paragraph 2.7 above, a key element of the economic life of the town is the port, which provides cross-channel ferries to Dieppe. A master plan has been developed for the port, which considers options for expansion of the port related activities. The five key strategic objectives are to maintain the ferry route; invest in infrastructure to enable a clean technology and renewable energy cluster; increase the volume of international trade through the port; invest in infrastructure for continued development of fishing and leisure marine sectors; and enhance the natural marine environment.
- 2.9 The town has two railway stations offering direct train services to Lewes, Seaford and Brighton. A significant number of people use rail to access employment, although there is the potential to increase the number of people using these stations. The town also has very good access to bus services with a high frequency route between Brighton – Newhaven – Seaford – Eastbourne; journey time reliability on

this service has been enhanced through the delivery of a bus corridor between Brighton and Peacehaven. In addition, the National Cycle Route NCN2 passes through Newhaven and forms part of the Avenue Verte London to Paris cycle route. There has been significant investment in the route towards Seaford in recent years, with investment in other routes serving the town including towards Peacehaven and this platform offers considerable potential to encourage more cycling within the town, for both utility purposes and leisure.

- 2.10 A commitment in ESCC Local Transport Plan (LTP) 2011 – 2026, outlined that the Ring Road in Newhaven would be reviewed, due to the impact it has on the town centre, particularly inhibiting access from the south. Consultants were commissioned to undertake modelling of options for improvements to the Ring Road; the modelling also included the transport demand generated by the planned housing and employment growth identified for Newhaven and Peacehaven in the emerging Lewes District Local Plan. These options included making the Ring Road two-way, but the results of the modelling demonstrated that this would cause major capacity issues at the junctions and beyond the Ring Road area, which would have further implications for air quality. Therefore consultants were commissioned to undertake a stage 2 study to look at improving traffic flow through junctions, potentially by linking the signals. The outcome of this study, completed in March 2016 will be made known once it has been reviewed by ESCC. Funding for these improvements may not be available in the short to medium term but if taken forward as part of a package of measures within the LTP Implementation Plan for the period 2016/17 to 2020/21; this will form a major element of the traffic management measures within this Action Plan.
- 2.11 ESCC is putting forward a Movement Access and Resilience Package for the A259 corridor focussed around Newhaven to both Coast to Capital and the South East Local Enterprise Partnerships for inclusion in their Local Growth Fund Round 3 submissions in July 2016. The package is seeking funding through both LEPS towards a number of elements including the Newhaven Ring Road improvements, public transport improvements on the A259 and a walking/cycling element for the Newhaven, Seaford and Peacehaven area.

New development

- 2.12 The LDC Joint Core Strategy (Local Plan Part 1) was adopted in May 2016 and nearly 20 sites have been identified as having potential for housing within the Strategic Housing Land Availability Assessment (SHLAA) for Newhaven, for which the traffic generated would need to enter the Air Quality Management Area. As at the 1st April 2015, 786 residential units were committed for delivery (in that they either had planning permission, or were an extant allocation), a further 400 units were proposed on a strategic housing allocation at Harbour Heights and a further 425

residential units were planned to be delivered on as yet allocated sites. Modelling of the effects of these increases in traffic on air quality within the AQMA has been undertaken to inform the planning process. This has shown that substantial increases in concentrations of NO₂ would occur around the Ring Road with these additional vehicle movements.

3 Existing Policies and Strategies

Local Enterprise Partnerships – Strategic Economic Plan – Local Growth Deals

- 3.1 As part of the Coast 2 Capital Local Enterprise Partnership Strategic Economic Plan, a Growth Deal was negotiated with government that allocated £10m to deliver Phase 1a of the Newhaven Port Access Road. This is subject to the approval of a robust business case by C2C and the Department of Transport. In addition £1.5m was allocated towards the Newhaven flood defence works scheme, through the C2C Growth Deal, which is being delivered by the Environment Agency, along with a further £1.5m allocated for this scheme through the South East Local Enterprise Partnerships' Growth Deal. This will capitalise on proposed investments including from E.ON on the Rampion Offshore Wind Farm and the new University Technical College (UTC) specialising in marine and environmental engineering. It will also assist in re-establishing Newhaven as an important gateway to mainland Europe.
- 3.2 The first phase of the Port Access Road has been completed and will unlock nearly 200 new homes and employment floor space as part of the Eastside development. The second phase, which will take the Port Access Road from the Parget Roundabout across the railway and Mill Creek closer to the harbour mouth, will enable the relocation of existing Port activities within the Port, and potentially unlock employment space to the north of the Port. There is also significant investment in the Port following planning approval to introduce a deep water berth at the harbour mouth, and ongoing support for the growing ferry service for both freight and passenger travel between Newhaven and Dieppe.
- 3.3 The plan also recognises the importance in supporting the need to support people's ability in accessing locations they need to get to for jobs and education. Therefore when opportunities arise, funding will be sought for delivering integrated transport packages that support high network resilience and local improvements in access to public transport and measures that support walking and cycling.

East Sussex Growth Strategy

- 3.4 The most significant recent policy document that demonstrates the commitment to driving economic development across the county is the East Sussex Growth Strategy. It aspires to easy movement around East Sussex, being well served by road and rail infrastructure and sustainable travel providing good access to all markets. In alignment with the Strategic Economic Plan it recognises the 'Newhaven Clean Tech and Maritime Corridor', stating that whilst investment has been undertaken, as with other growth corridors in the County further investment is required to sustain the momentum and ensure access is secured for key employment and housing areas.

- 3.5 ESCC Local Transport Plan (LTP) 2011 – 2026 sets out how local transport will be improved and how the roads will be maintained. The longer-term strategy document is supported by a series of short-term Implementation Plans showing how the strategy will be delivered. The vision for the LTP strategy is *‘to make East Sussex a prosperous county where an effective, well managed transport infrastructure and improved travel choices help businesses to thrive and deliver better access to jobs and services, safer, healthier, sustainable and inclusive communities and a high quality environment’*. Specific transport objectives include:

- Reduce congestion by improving the efficiency of the transport network and encouraging greater use of sustainable modes of transport;
- Reduce greenhouse gas emissions, local air pollution and noise from transport; and
- Improve personal health and well-being by encouraging and enabling increased physical activity through active travel (i.e. walking and cycling).

The transport approach for Newhaven identifies that the challenge for the area is to focus on improving the environment and conditions for sustainable modes of travel and for general traffic, to support and grow the economy of the town. To this end and specifically for Newhaven, the LTP aims to improve the area around Newhaven Town Station, with walking and cycling routes that link housing and employment locations, education facilities, health services and shops. Improving conditions for bus travel on the A259 between Newhaven, Seaford and Eastbourne in the east and Peacehaven in the west is also prioritised, in order that priority bus measures already established on the A259 out of Brighton are connected with Newhaven.

Lewes District Local Plan

- 3.6 Lewes District Council adopted the Joint Core Strategy (Local Plan Part 1) in May 2016. This sets out the current planning strategy for the District. The council has retained a number of saved policies including the Protection of Air and Land Quality (ST30) as follows:

ST30 When considering planning applications for potentially polluting development, the Council will need to be satisfied on the following matters:

- (a) that the location is appropriate in terms of land use in relation to the uses in the surrounding area
- (b) that the development will have an acceptable impact on the surrounding area in terms of its effect on health, the natural environment, or general amenity, resulting from releases to water land or air, or noise, dust, vibration, light or heat
- (c) that the development will not have an adverse effect on the use of other land
- (d) that, where relevant, the appropriate after-use of land can be secured
- (e) that the developer will comply with other relevant policies in the Plan

- 3.7 The Joint Core Strategy is the main document that guides development in the district until 2030. The policy on air quality has been strengthened in Core Policy 9 to reflect current legislation and guidance and the requirements of the current Air Quality Action Plan. Along with Policy ST30, Core Policy 9 is already being applied by the District Council for decision making purposes.

Core Policy 9: Air Quality The local planning authority will seek to improve air quality throughout the district, 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. 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.

As well as setting policies on issues such as air quality, the Core Strategy also identifies the level of housing and employment growth that is planned for Newhaven. Linked to this is the Council's Infrastructure Delivery Plan, which identifies the infrastructure needs associated with this development. Of relevance to this Action Plan is the need for junction improvements on the Ring Road and the junction with the A26 and improving demand management measures along the A259 to encourage greater use of public transport.

Strategic Housing Land Availability Assessment (SHLAA)

- 3.8 The SHLAA is being undertaken to show that the Council has a rolling five year supply of deliverable and developable land for housing. The findings are being used to inform planning policy work.
- 3.9 The purpose of the SHLAA is to assess potential housing land, within the district, to ensure a sufficient supply of housing sites. The conclusions of the SHLAA have informed the housing distribution, and strategic housing allocations, within the Core Strategy Proposed Submission document. It will also inform future housing sites within the Site Allocations Development Plan Document and Neighbourhood Plans. The SHLAA is an important technical piece of evidence. The study is not a statement of Council policy and does not in itself determine whether a site should be allocated for housing development.

Emerging Newhaven Neighbourhood Plan

- 3.10 Newhaven Town Council has begun the process of preparing a Neighbourhood Plan for the town. This will need to be in accordance with the strategic policies from the Local Plan and will identify the allocated housing sites that are required by the Lewes District Core Strategy. Further information on the Neighbourhood Plan can be found at: <http://www.newhaventowncouncil.gov.uk/neighbourhood-plan>

Sussex Air Quality Partnership

- 3.11 The Sussex Air Quality Partnership (Sussex-air) aims to drive improvements in air quality (and carbon reduction) for the benefit of the County's citizens and the environment. The partnership provides technical advice and support, and develops and implements projects that improve air quality and understanding of the health and environmental effects of poor air quality.

Air Quality and Emissions Mitigation Guidance for Sussex Authorities

- 3.12 This document (Sussex Air Quality Partnership, 2013) has been developed by the Sussex Air Quality Partnership to provide guidance on the assessment of air quality and the mitigation of potential impacts from proposed developments across Sussex. The guidance supports the principles of the partnership to improve air quality across Sussex and encourage emissions reductions to improve the environment and health of the population. The purpose of this guidance is to:

Provide a Sussex-wide approach for assessing potential air quality impacts from development and transport related emissions and provide a consistent approach to mitigating those impacts.

Provide technical advice to local planning authorities on how to deal with planning applications that could have an impact on air quality.

Air Alert Service

- 3.13 AirAlert is a service, provided by the Sussex Air Quality Partnership (SAQP) that sends alert messages to vulnerable people in Sussex informing them that poor air quality is predicted in their area. The alerts are sent to home phones via voice message, to mobile phones via text and via email.

Sussex LEZ Feasibility Study

- 3.14 A Low Emission Zone (LEZ) feasibility study has been undertaken in Sussex, with a wider remit to investigate measures for a low emission strategy. The aim of the project was to assess emission reduction options for Sussex AQMAs and develop implementation strategies, on a regional basis, with the ultimate aim being to develop a low emission strategy. A number of measures were looked at for each AQMA in Sussex including low emission buses, re-routing of HGVs, low emission local deliveries, car clubs and implementing the Ecostars scheme. Emissions modelling was undertaken of specific AQMAs, looking at specific measures in order to prioritise measures for a particular location. The Newhaven AQMA was not included in the study as it had not been declared at the time.

East Sussex Health and Wellbeing Strategy

- 3.15 The first Health and Wellbeing Strategy for East Sussex was published in October 2012 and identifies the health and wellbeing needs of East Sussex now and in the future. The strategy focuses on a small number of big issues where a more joined up approach will help improve outcomes and reduce inequalities. These issues include enabling people of all ages to live healthy lives and have healthy lifestyles, which complements the aims of this Action Plan in particular, with regard to active travel.
- 3.16 Sussex Community Development Association works across East Sussex developing community based initiatives aimed at addressing the needs of those most vulnerable in the community. The organisation has a healthy lifestyles team. The team delivers a range of programmes, some of which are funded by East Sussex County Council's Public Health department. The team is also involved in the Healthy Newhaven Network, which works alongside GP practices and aims to provide access to healthy activities. This may be a useful network to liaise with to ensure communication relating to behaviour change around active travel is implemented and well targeted.

Climate Change

- 3.17 'Your Energy Sussex' works with householders and businesses through investment in renewable energy, delivering a range of projects including large scale building refits, solar Photo Voltaic programmes and support to residents and communities. In addition, Lewes District Council is investing in Photo Voltaic panels on its own housing stock

Emerging ESCC Cycling and Walking Investment Strategy

- 3.18 The Infrastructure Bill became an Act in February 2015, and following considerable national lobbying, cycling and walking was included, alongside road infrastructure. Therefore the government is required to develop a National Cycling and Walking Investment Strategy (CWIS) to outline how any future funding associated with this will be allocated. As a result of the emerging national CWIS and to ensure that the County Council is prepared to bid for any funding associated with this, the County Council is developing a county wide Cycling & Walking Investment Strategy. This will include a cycling and walking investment plan for the Newhaven growth area, and the measures identified for inclusion will be reflected in the Newhaven Air Quality Action Plan.

Energise Network

- 3.19 The Energise Network was developed from Government grant funding from the Office of Low Emission Vehicles (OLEV) which has supported the installation of 18eV rapid electric vehicle chargers across sites in the South East, including one in Lewes and one in Newhaven. The Energise Network is a public and private sector partnership established to develop the electric vehicle network in the Southeast of England linking new and existing eV charge points. The network will link existing publicly accessible eV charge points across the Southeast to enable eV drivers' ease of access through Pay-As-You-Go systems or network RFID card operation. The Energise Network has been in operation since September 2015 and promotion of the sites to eV drivers is continuing through Sussex-air to increase usage of the new eV rapid chargers

Enterprise Zone

- 3.20 With the approval of the Secretary of State, Lewes District Council in partnership with Coast to Capital Local Enterprise Partnership (LEP) has been successful in bidding to establish an Enterprise Zone on eight key sites across Newhaven to facilitate inward investment, create new employment and sustain local economic growth, in line with the Government's key assessment criteria for new Enterprise Zones.
- 3.21 Newhaven's Enterprise Zone officially commences in April 2017. The primary benefit of Enterprise Zone (EZ) status is the ability to offer new businesses locating to the EZ a discount on their business rates of up to approximately £250,000 per business over a five-year period. An Implementation & Investment Plan will be completed by the end of 2016, which will set out key benefits in more detail.

- 3.22 The LEP has agreed that 100% of the uplift in business rates as a result of Enterprise Zone designation will be re-invested in the local Newhaven area to support delivery, including site-specific issues and wider infrastructure constraints.
- 3.23 This funding will emerge gradually as EZ sites are developed / occupied, with the primary objectives being to unlock the remaining sites and address existing barriers to development / redevelopment. Nonetheless, this funding could potentially assist businesses in sustainable practices and help develop transport plans for businesses to ensure they do not contribute to the incremental worsening of NOX depositions in already sensitive areas.
- 3.24 Commencing in April 2017, the Enterprise Zone is forecast to create around 55,000m² of new commercial floor space, refurbish a further 15,000m² of commercial floor space and create / sustain around 2,000 jobs over the zone's 25-year lifespan.
- 3.25 Currently there is a substantial net outflow of commuters due to paucity of employment opportunities with the majority of these travelling by car; the development of new business opportunities in the town, creating local jobs for local people, will have a positive effect on air quality.

4 Actions for Improving Air Quality

- 4.1 Some of the following actions are already underway, but this Action Plan will ensure they will continue to be improved upon. Others are in the early planning stages, or do not have funding associated with them yet. The actions therefore have different likely implementation times. There are 7 broad actions and for each of them, specific measures have been included. The actions are evaluated in relation to their expected impact on:

- Air quality (i.e. reduction in emissions or concentrations);
- Cost;
- Feasibility or practicability of option (including the wider non-air quality impacts); and
- Timescale for implementation.

Air Quality Impact

- 4.2 Air quality impacts have been classified on a scale of 'low' to 'high' impact. The higher the impact, the greater the improvement in air quality, i.e. the greater the reduction in NO₂ concentrations. For each Action, the expected reduction in annual mean NO₂ concentrations has been determined based on professional judgement, drawing, wherever possible, on experience gained from other studies. It should be noted that the impacts on air quality are judged in relation to the impacts within the AQMA(s). So, for example, an action may have wide reaching benefits, but only be slightly beneficial within the AQMA(s). The following classification scheme has been used:

Low: imperceptible (a step in the right direction). Improvements unlikely to be detected within the uncertainties of monitoring and modelling;

Medium: perceptible (a demonstrable improvement in air quality). An improvement of up to 2µg/m³ NO₂, which could be shown by a modelling scenario. Improvement is not likely to be shown by monitoring due to confounding factors of the weather; and

High: significant. Improvement of more than 2µg/m³ NO₂. Can be clearly demonstrated by modelling or monitoring (a significant improvement is likely to be delivered by a package of options rather than by a single intervention).

Cost

- 4.3 The implementation of the measures set out in this Action Plan are dependent on securing a sufficient and consistent level of funding both to support any additional staff that may be required, and to deliver the programme. In line with current Government guidance, it is not necessary to carry out a detailed cost-benefit analysis. Rather the aim is to provide a broad

indication of costs so that the proposed measures can be ranked according to the cost and the expected improvement to air quality. Costs are 'very high' to 'very low,' as follows:

'Very Low' cost is taken to be £10K and under;

'Low' cost is taken to be £10 - £50K;

'Medium' cost is £50 - 500K;

'High' cost is £500K - £2 million; and

'Very High' cost is over £2 million.

Further information on the types of funding that will be sought to deliver the proposed actions is outlined in section 6.

Feasibility

4.4 The feasibility of individual measures is not straightforward to quantify. The following factors have been taken into consideration:

- Alignment / synergies with Lewes District and other key partners' strategic documents, to support future bids for funding to deliver the measures in the action plan; these include the Lewes Local Plan, C2C and SE Local Enterprise Partnership Strategic Economic Plan, East Sussex Growth Strategy, ESCC Local Transport Plan 2011-2026, ESCC Health & Wellbeing Strategy and Newhaven Neighbourhood Plan
- Wider non-air quality impacts (social, environmental or economic)
- Stakeholder acceptance / "political" feasibility; and
- Source of funding available or possible.

The Feasibility has been classified as '**low**', '**medium**' and '**high**'.

Timescale

4.5 The timescale for the implementation of measures has also been considered, and will be largely dependent on the ability to secure future funding. The following classifications have been used: **Short-term** relates to those measures that can be implemented within the 2016/17 financial year; **Medium-term** relates to those implemented within 2-5 years; **Long-term** options are those which are 6+ years.

Action 1

Enable the use of sustainable travel choices through the delivery of transport infrastructure and initiatives

- 4.6 Many of the measures focussed on enabling people to choose sustainable travel choices are already being implemented through ESCC Local Sustainable Transport Funding Programme 2015-16. Some measures are identified in the ESCC Local Transport Plan (LTP) Implementation Plan 2016/17 to 2020/21 (this is the second LTP Implementation Plan) but the delivery of these measures will be subject to the prioritisation and the availability of funding either through ESCC Local Transport Capital Programme, development contributions or through specific bids for external funding. It is suggested that sustainable travel measures could be focussed at some locations (such as the University Technical College (UTC), Sainsbury's, the Retail Park in Newhaven, etc.), but further work to identify these will be undertaken through the development of the Cycling & Walking Investment Plan for the Newhaven growth area.
- 4.7 In order to enable more people to choose sustainable travel for everyday journeys, a complementary package of transport infrastructure and initiatives will be required. The specific measures will include:
- Further expansion of Real Time Passenger Information System ;
 - Promotion of Real Time Passenger Information System;
 - Bus waiting facilities improvements;
 - Pedestrian links to public transport and key trip attractors;
 - Cycle route and cycle parking infrastructure;
 - Consistent signing of walking and cycling routes from residential areas to employment and education sites;
 - New or upgraded pedestrian / cyclist crossing facilities;
 - Van club feasibility work (for SMEs);
 - Publicising CarShare;
 - Investigating the delivery of a car club scheme;
 - Sustainable travel engagement programmes with schools, organisations and businesses;
 - Smart ticketing systems on buses;
 - Lewes District Council Travel Plan;
 - Additional bus services on A259 and serving new development sites; and
 - Travel plans for industrial estates.

Table 1: Evaluation of Action 1

Action 1	Enable the use of sustainable travel choices through the delivery of transport infrastructure and initiatives
Air Quality Impact	Emissions from transport form the biggest single contributor to NO ₂ concentrations in Newhaven. Increasing the use of public transport and active travel, such as walking and cycling, as well as car sharing, should reduce single occupancy car use and hence improve air quality, as well as mitigate against climate change. It is judged that initially benefits to air quality would be Low , but should progressively increase over time depending on the level of investment and take up. Medium impact should be achievable.
Cost	The cost of implementing sustainable travel choices options as an overall package would be High to Very High , although the costs of individual options would be Low to Medium .
Feasibility	High feasibility as politically acceptable. Aligns with Lewes District Council and East Sussex County Council policies. Positive impacts for health, climate change gas emissions and potentially noise.
Ownership	Mainly implemented by East Sussex County Council, but subject to funding, and will require support from other key partners, LDC, SDNPA.
Partners	Public Health, Public Transport Operators, Employers, Co-wheels, Lewes Wanderers, Cycle Seahaven
Funding	Subject to funding – potential funding include ESCC LTP, Development Contributions, European Funding and Local Growth Funding.
Timescale	Short to Long term.

Action 2

Actively Promote Low Emission Vehicles and Supporting Infrastructure

- 4.8 Lewes District Council, in partnership with other local authorities in Sussex is already promoting Electric Vehicles², in part through the Air Quality and Emissions Mitigation Guidance for Sussex authorities, which sets out requirements for developers for electric vehicle recharging provision, but also through the installation of an electric charging point in Newhaven, where drivers can recharge at no cost. This Action Plan will enhance the promotion of Electric Vehicles in particular and Low Emission Vehicles more widely. There is currently one eV charger in Newhaven in Lower Place Car Park.

²<http://www.energisenetwork.co.uk/>

4.9 Specific Actions will include:

- Use of the planning system to ensure a more widespread infrastructure for low emission vehicles;
- Further electric charging points in Newhaven at key sites including supermarkets and retail parks;
- Ecostars;
- Encouraging lower emission buses within the AQMA;
- A larger proportion of Low Emission Vehicles in the Lewes District Council Fleet; and
- A parking strategy with differential charges based on emissions.

Table 2: Evaluation of Action 2

Action 2	Actively promote low emission vehicles and supporting infrastructure
Air Quality Impact	As the proportion of Ultra Low Emission Vehicles such as electric vehicles increases, emissions of NO _x and PM ₁₀ will decrease and concentrations will reduce. There will need to be a large swing towards electric vehicles before improvements are measurable. Therefore initially benefits to air quality would be Low , but should progressively increase over time depending on the level of investment.
Cost	Costs will largely be dependent on the level of investment gained. In order to make a difference to the vehicle park, it is considered that the overall investment would need to be High or Very High . As for the previous Action, the costs of individual options (such as Ecostars, improvements to the Lewes District Council Fleet) would be Low to Medium .
Feasibility	Medium feasibility. Some measures are very feasible (such as including infrastructure for electric vehicles within the planning system and inclusion of electric charging point in Newhaven), with others being less feasible and dependent on achieving funding (such as Ecostars and ensuring a larger proportion of Low Emission Vehicles in the Lewes District Council Fleet).
Ownership	Lewes District Council.
Partners	East Sussex County Council, developers, public transport operators.
Funding	Section 106, CIL, Air Quality Grants, OLEV Grants.
Timescale	Short to Long term.

Action 3

Using the planning system to ensure that air quality is fully considered for new development

- 4.10 Due to the large number of sites around Newhaven which have been identified for housing and the associated potential growth in traffic that this is likely to generate, this action is critical to ensure not only that air quality improvements come to fruition, but that the status quo is maintained. Modelling of air quality using relatively crude assumptions relating to traffic growth have shown a potentially significant worsening of air quality around the Ring Road in future years in relation to the baseline scenario of no growth. It is therefore imperative that the planning system is utilised to ensure that new development can support the Air Quality Action Plan, rather than hinder its implementation.
- 4.11 The Air Quality and Emissions Mitigation Guidance for Sussex Authorities will continue to be used to assess the impacts of specific developments and negotiate the levels of mitigation required. The issue which is more difficult to resolve is that of cumulative development within Newhaven. Each development assesses the impact of increased emissions associated with its own development, but the cumulative impact, in particular of increased traffic on the Ring Road system, will be more difficult to assess and mitigate.
- 4.12 Specific actions will include:
- Ensuring that the Sussex Mitigation Strategy Guidance for Developers is kept up to date, and implemented (particularly in relation to updates of national guidance etc.)
 - A review of East Sussex County Councils guidance on car parking provision
 - Ensuring that planning applications with potential air quality impacts are fully assessed for their impacts, at relevant locations using appropriate methodologies (as specified in the Air Quality and Emissions Mitigation Guidance for Sussex Authorities)
 - A strategy for ensuring that cumulative impacts are taken into account whereby appropriate mitigation is not only proposed but implemented where any relevant impacts are identified
 - Providing information re: sustainable transport for residents of new developments;
 - Integration of public transport at the planning stage and
 - Delivery of walking and cycling routes and measures that support access from new developments to key services.

Table 3: Evaluation of Action 3

Action 3	Using the planning system to ensure that air quality is fully considered for new development
Air Quality Impact	In the longer term, the air quality impact of siting new development in the locations which take air quality into consideration is likely to have a High impact on air quality, particularly where it takes place in locations that are particularly sensitive. In the shorter term, the impact will be Low .
Cost	Low cost for Lewes District Council.
Feasibility	High feasibility assuming political will.
Ownership	Lewes District Council.
Partners	East Sussex County Council, South Downs National Park Authority, developers.
Funding	Section 106 Agreements and Community Infrastructure Levy.
Timescale	Ongoing over the timescale of the Local Plan (and beyond).

Action 4

Traffic management to reduce emissions in locations within the AQMA

- 4.13 In 2014 Parsons Brinckerhoff was commissioned by East Sussex County Council to undertake a study to assess the future performance of the A259 through Newhaven to establish the potential impacts of further development planned in the town as identified in the emerging Lewes District Local Plan and to identify and test potential improvement options. The study focussed on two main highway options: a) capacity improvements to reduce existing congestion and accommodate the forecast demand; and b) to make North Way two-way (to improve town centre connectivity with the wider residential areas reducing the perceived severance issues). The study determined that forecast residential and employment growth up to 2030 could potentially be accommodated within the existing highway network; with improvement works however the modelling did indicate that increased congestion and traffic reassignment would inevitably be experienced. The study also assessed the impacts of a two-way A259 North Way option with a downgraded South Way. Modelling work indicated that this would result in significant capacity reductions making this option unviable.
- 4.14 A stage 2 study has recently been undertaken to produce preliminary designs for a number of highway improvements designed to improve existing conditions including upgrades to pedestrian crossings, linking existing traffic signals throughout the Ring Road to improve traffic flow, and modifications to the layout of a number of existing junctions to improve capacity. The benefits of these potential improvements have been tested using local

modelling. It is suggested that the outcomes of this work will be used to identify some of the specific traffic management measures that could be implemented should funding become available. It should also be noted that the impacts of some traffic management options may be negative for air quality. It should therefore be ensured that the impacts on air quality are fully considered.

4.15 Specific actions will include:

- LDC to support ESCC in bids for funding for Ring Road improvements.
- Improved signage on leaving Newhaven Port to aid HGVs in locating the A26.
- Anti-idling signage at key points in Newhaven; specifically on the A259 leading to the swing bridge and near local schools.

Table 4: Evaluation of Action 4

Action 4	Traffic management to reduce emissions in locations within AQMAs
Air Quality Impact	Medium to High impact.
Cost	Difficult to estimate at this stage, but a package of measures likely to be Medium to High .
Feasibility	Likely to be feasible as outcome of detailed study.
Ownership	East Sussex County Council.
Partners	Lewes District Council.
Funding	LTP, CIL and Section 106. DfT if any relevant funding streams.
Timescale	Medium to Long term.

Action 5

Work with Public Health colleagues to inform the public about health impacts of air pollution and how they can change behaviour to reduce emissions and reduce exposure

4.16 Air quality is a key issue for Public Health as exposure to high levels of air pollution can have adverse effects on the health of the population. This is because pollutants can exacerbate conditions such as asthma, and contribute to the risk of developing respiratory and cardiovascular disease, as well as lung cancer. These conditions are more likely to be present in people living in areas of deprivation, and nationally, evidence highlights linkages between the most deprived areas experiencing the worst air quality, thereby exacerbating health inequalities.

4.17 Active travel would lessen these health inequalities, as well as improve the health and wellbeing of people and achieve positive public health outcomes. For example, if people choose to walk and cycle more there would be a reduction in transport pollution, as well as an increase in physical activity. Not only will this increased activity lead to a reduction in obesity levels, and health conditions associated with obesity, evidence shows that exercise improves mental wellbeing, leading to greater feelings of revitalisation and a reduction in depression and anxiety.

4.18 Specific measures will include:

- Working closely with Public Health colleagues, through the Public Health Improvement Specialists
- Walking and Cycling Challenges (at key workplaces and schools in Newhaven)
- Adult Cycle Training (Bikeability)
- Installation of cycle parking at key services
- A cycle maintenance Initiative
- Promotion of Existing walking and cycling routes
- Working with Sussex Community Development Association to ensure that active travel is promoted for short journeys
- Continuation of the Air Alert Service
- Investigation of the feasibility of a real-time air quality monitoring station in Newhaven to use as a public information opportunity.

Table 5: Evaluation of Action 5

Action 5	Work with Public Health colleagues to inform the public about health impacts of Air Pollution and how they can change behaviour to reduce emissions and reduce exposure
Air Quality Impact	Low over the AQMAs as a whole, but required as a complimentary measure to traffic management, Smarter Travel and Low Emission Vehicles.
Cost	Low cost for each of the elements of this measure. As a whole the Action is likely to be Medium cost.
Feasibility	Highly feasible option as fits well with Lewes District Council policy and East Sussex Health and Wellbeing Strategy.
Ownership	Lewes District Council

Action 5	Work with Public Health colleagues to inform the public about health impacts of Air Pollution and how they can change behaviour to reduce emissions and reduce exposure
Partners	East Sussex County Council's Public Health department & ESCC Road Safety
Funding	Defra Air Quality Grants and Public Health funding.
Timescale	Short to Medium term.

Action 6

Continue to monitor and assess air quality in line with Government guidance on Local Air Quality Management

- 4.19 Lewes District Council currently monitors extensively for NO₂ and this Action Plan will retain this commitment. The existing air quality monitoring network should therefore be maintained, and a budget set aside for replacing real time analysers. The monitoring will assist in assessing the impacts of this Air Quality Action Plan, as well as ensuring that new development does not cause exceedances of the air quality objectives.
- 4.20 Specific measures will include:
- Continuation of monitoring within Lewes District Council, focussed on AQMAs, but also in other strategic locations
 - Regular assessment of air quality against air quality objectives, as specified by the LAQM process, with reports to Defra and the public; and
 - A review of measures set out in this Action Plan on a regular basis, to ensure they are up to date and being implemented

Table 6: Evaluation of Action 6

Action 6	Continue to monitor and assess air quality in line with Government guidance on Local Air Quality Management
Air Quality Impact	None directly in relation to LAQM, but acts as evidence base for measures
Cost	Low cost (per annum) to Lewes District Council
Feasibility	High Feasibility
Ownership	Lewes District Council
Partners	East Sussex County Council
Funding	Internal budget (LAQM) and LTP
Timescale	Ongoing

Action 7

Target Point Sources in Newhaven Town Centre

- 4.21 Gas boilers, combined heat and power plant, biomass plant all have associated emissions of NO_x, which will add to the emissions from the transport sources targeted in the actions set out above and increase NO₂ concentrations. This action will target any point sources which may have detrimental impacts locally and which also add to general background levels of pollutants in Newhaven.
- 4.22 Specific measures include:
- Undertaking a feasibility study for a Department for Energy and Climate Change (DECC) district-heating system (from an incinerator); and
 - Support for SMEs for innovative low NO_x heating systems (through Local Enterprise Partnership grant funding).

Table 7: Evaluation of Action 7

Action 7	Target Point Sources in Newhaven Town Centre
Air Quality Impact	Low
Cost	Low cost (per annum) to Lewes District Council depending on level of grants through LEP.
Feasibility	Medium to High Feasibility (to undertake study)
Ownership	Lewes District Council
Partners	Newhaven Town Council
Funding	Town Council currently funding feasibility study for a DECC District heating System. Potential for LEP funding for Small and Medium Enterprises
Timescale	Short to Medium term

5 Consultation

- 5.1 Under Schedule 11 of the Environment Act, local authorities are required to consult on their Air Quality Action Plan. It is important to have involvement of all local stakeholders to ensure the success of the Action Plan. This Action Plan has been drafted through a partnership approach in particular with East Sussex County Council (transport and public health), planners, Newhaven Town Council, Highways England and the Southdowns National Park.
- 5.2 The Newhaven AQAP is intended to be an evolving plan that will develop in time and, as a result will be subject to ongoing consultation. Effective action plans require consensus and co-operation of as many stakeholders as possible such as local communities and business organisations, as well as those bodies responsible for implementing solutions. Any action requires backing and support of stakeholders who need to take ownership of the action planning process and feel part of the overall decision making process.
- 5.3 External stakeholders include:
- The Secretary of State;
 - The Environment Agency;
 - Lewes District Council and East Sussex County Council councillors and officers;
 - Newhaven Port Authority;
 - Neighbouring local authorities;
 - Local residents within and bordering the AQMA;
 - Relevant local businesses, community groups and forums;
 - Network Rail, Public Transport Operators (bus and rail);
 - South Downs National Park Authority;
 - Highways England (A26 and A259); and
 - The Director of Public Health.
- 5.4 Internal consultation was carried out through:
- Meetings with Officers from Environmental Health and ESCC transport Team; and
 - Ad-hoc meetings between Officers and relevant Council Departments such as Taxi licensing, Regeneration, Planning Policy and Councillors.
- 5.5 External Consultation and engagement was carried out through:

- An article in 'Newhaven Matters', a newsletter that is distributed to every household in Newhaven;
- An online survey accessible through the LDC website; this ran from mid-February to 30th April 2016;
- Paper survey forms being available for collection and return at the local Newhaven community café;
- A press release to launch the consultation period. This was accompanied by an interview of the Lead Member to discuss air quality in Newhaven on local radio;
- A public event that included an exhibition of display boards on the AQMA and AQAP, distribution of leaflets and questionnaires and Officers from various Departments of the Council on hand to answer questions.

6 Implementation Plan

Partnership Working

- 6.1 To implement the Action Plan, Lewes District Council recognises the importance of working in partnership with all key stakeholders, to support the delivery of the identified measures, particularly District planners and transport planners and operators. To secure the necessary air quality improvements, all local stakeholders must be involved.
- 6.2 To support partnership working and the securing of future funding, LDC has established an Air Quality Action Plan Steering Group, which will meet biannually from September 2016.

Potential Funding Sources

- 6.3 Ultimately the delivery of this Action Plan is dependent on adequate levels of resourcing, both for capital costs and revenue costs for staff and initiatives. Funding sources have been highlighted in the evaluation tables, but the potential types of funding that will be sought by working in partnership with our key partners include:-
- Developer Contributions – either through Section 106 or through Community Infrastructure Levy (CIL). S106 will be secured for site specific requirements such as access. CIL is a planning charge placed on a development to help fund supporting infrastructure across the whole planning authority area. LDC will be responsible for deciding how CIL funds are spent;
 - ESCC Local Transport Plan (LTP) Capital Programme – There is the potential for measures identified in the action plan to be assessed and prioritised for inclusion in ESCC's Annual Local Transport Plan Capital Programme, which is approved by the ESCC Lead Member for Transport & Environment; and
 - External Funding – LDC will work with key partners to support them in securing external funding at both a strategic and local level.

Monitoring

- 6.4 The implementation and effectiveness of the Action Plan will be carefully monitored through the monitoring of NO₂ concentrations at relevant locations within Newhaven. In addition, other indicators such as traffic flow, proportions of different categories of vehicles, use of public transport and levels of cycling will be incorporated. There will be regular reviews of the action planning proposals by the Air Quality Action Plan Steering Group, which will be reported on an annual basis to Defra. These reviews will include both direct air quality monitoring information, as well as information on proxy measures for monitoring specific proposals. The following tables include a more refined timescale for implementation.

Table 8: Measures to be Included in the Air Quality Action Plan

Action 1	Enable the use of sustainable travel choices through the delivery of transport infrastructure and initiatives		
	Proposed Measure	Timescale	Potential Funding Sources
	Upgrade existing Real Time Passenger Information System;	Ongoing since Autumn/Winter 2015	Development contributions, LTP Capital Programme
	Promotion of Real Time Passenger Information System	Ongoing since Autumn/ Winter 2015.	LSTF
	Bus waiting facilities improvements	Ongoing.	Development contributions, LTP Capital Programme
	<p>Cycling – Develop and implement a cycling network for Newhaven and Seaford towns</p> <p>Walking – develop and implement measures to enable walking between key destinations, residential areas, town centre services, schools, employment</p> <p>Develop walking and cycling links to the South Downs National Park</p>	Cycling & Walking Investment Strategy is being developed by ESCC to be approved within 2016/17	Development contributions, LTP Capital Programme Other External Funding
	Consistent signing of walking and cycling routes from residential areas to employment and education sites	Initial design work has been undertaken for a signing strategy in Lewes	Development contributions, LTP Capital Programme DfT Other External Funding
	New or upgraded pedestrian / cyclist crossing facilities	Ongoing	Development contributions, LTP Capital Programme Other External Funding
	Van club feasibility work (for SMEs)	Short	
	Publicising CarShare	Ongoing	Internal budgets
	Sustainable travel engagement programme with schools and businesses	Ongoing	Other External Funding

	Smart ticketing systems on buses	TBC	TBC
Action 1	Enable the use of sustainable travel choices through the delivery of transport infrastructure and initiatives		
	Proposed Measure	Timescale	Potential Funding Sources
	LDC Travel Plan	Short	Internal LDC budgets
	Additional bus services on A259 and serving new development sites	Medium: Dependent on timing for delivery of major housing sites in Newhaven and Peacehaven	County Pot of Community Infrastructure Levy
	Travel Plans for industrial estates	Ongoing	Businesses Other External Funding
Action 2	Actively promote low emission vehicles and supporting infrastructure		
	Electric Charging Point in Newhaven Lower Place Car Park;	July 2015	OLEV
	Use of the planning system to ensure a more widespread infrastructure for low emission vehicles	Ongoing	n/a
	Ecostars	n/a	Funding needs to be sought, potentially from Defra Air Quality Grant
	Encouraging lower emission buses within AQMAs	TBC	ESCC / businesses
	Larger proportion of Low Emission Vehicles in the LDC Fleet	2017	LDC
Action 3	Use the planning system to ensure that air quality is fully considered for new development		
	Ensuring that the Sussex Mitigation Strategy Guidance for Developers is kept up to date, and implemented (particularly in relation to updates of national guidance etc);	Ongoing in partnership with other Sussex authorities	Internal budgets
	Working with planning policy colleagues to ensure that the forthcoming Core Strategy fully addresses air quality issues with appropriate policies included, including a review of East Sussex County Councils guidance on car parking	Ongoing to fit with Core Strategy timescales	n/a

	Ensuring that planning applications with potential air quality impacts are fully assessed for their impacts, at relevant locations using appropriate methodologies (as specified in the Air Quality and Emissions Mitigation Guidance for Sussex Authorities)	Ongoing	n/a
Action 3	Use the planning system to ensure that air quality is fully considered for new development		
	Proposed Measure	Timescale	Potential Funding sources
	Strategy for ensuring cumulative impacts of development materially affecting air quality are taken into account. Any consented developments materially impacting on the AQMA should be included within future air quality assessments for the area.	Ongoing	n/a
	Ensure appropriate mitigation is implemented where any relevant impacts are identified	Ongoing	n/a
	Information re: sustainable transport for residents of new developments	Short to medium	S106
	Integration of public transport at planning stage	Short to medium	S106
	Delivery of walking and cycling routes that support access from new developments to key services	Identified in ESCC Cycling & Walking Investment Strategy for LDC	S106
Action 4	Traffic management to reduce emissions in locations within AQMAs		
	Identification of traffic management options from the Stage 2 study of the A259 and lobbying for implementation of the outcomes	March 2016	Funding to be sought
	Improve signage on leaving Newhaven Port	Short	ESCC
	Introduce anti-idling signs at key locations	Short	ESCC
Action 5	Work with Public Health colleagues to inform the public about health impacts of Air Pollution and how they can change behaviour to reduce emissions and reduce exposure		
	Work closely with Public Health colleagues, through Public Health Specialist Advisors	Ongoing	
	Walking and Cycling Challenges (at key workplaces and schools in Newhaven)	Until March 2016 then dependent on future funding	Funding to be sought
	Adult Cycle Training (Bikeability)	Ongoing, but not specifically in Newhaven	DfT or other external funding

	Encourage the delivery of cycle parking at key services	Ongoing	Development contributions, LTP, Other External Funding Provided as part of development
Action 5	Work with Public Health colleagues to inform the public about health impacts of Air Pollution and how they can change behaviour to reduce emissions and reduce exposure		
	Proposed Measure	Timescale	Potential Funding sources
	Cycle maintenance initiative	Ongoing	Funding to be sought
	Promotion of Existing walking and cycling routes	Cycling leaflets will be updated and republished by March 2016, and made available	Other External Funding
	Work with Sussex Community Development Association to ensure that healthy travel modes are promoted for short journeys	Ongoing	ESCC Public Health
	Continue Air Alert Service	Ongoing	Sussex Air
	Investigate feasibility of a real time air quality monitoring station in Newhaven to use as public information opportunity	Short	LDC Internal Budgets
Action 6	Continue to monitor and assess air quality in line with Government guidance on Local air Quality Management		
	continuation of monitoring within Lewes District Council, focussed on AQMAs, but also in other strategic locations	Ongoing	LDC internal Budgets
	regular assessment of air quality against air quality objectives as specified by the LAQM process with reports to Defra and the public	Ongoing	LDC internal Budgets
	review of measures set out in this Air Quality Action Plan on a regular basis to ensure they are up to date and being implemented	Ongoing	LDC internal Budgets
Action 7	Target point sources in Newhaven town centre		
	Undertake a feasibility study for a Department for Energy and Climate Change (DECC) District heating System (from incinerator)	Short	Newhaven Town Council/ DECC
	Support for SMEs for innovative low NOx heating systems (through Local Enterprise Partnership grant funding)	November 2015	LEP

7 Summary of Responses to Online Survey

- 7.1 Our survey attracted 125 responses in total, of which 97% (121) were from residents. This was extremely positive as the Council would usually expect no more than around 20 or so responses to a survey of this type.
- 7.2 Overall, support for a 20mph zone on the swing bridge was relatively lukewarm with 44% of respondents being in favour, 43% against and 13% 'don't know'. However, 83% of respondents would be supportive of a Low Emission Zone around the Ring Road and 65% would like Lewes District Council to promote alternative modes of transport such as walking and cycling although it was noted that the majority of respondents already walked and cycled frequently.
- 7.3 57% of respondents would be more likely to walk or cycle around Newhaven if pedestrian and cycle access routes were to be improved whilst somewhat surprisingly, 62% said they would not join a car share scheme if the opportunity arose.
- 7.4 Only 24% of respondents would be supportive of making new developments car free with 55% saying no and the remaining 21% undecided. Comments made suggest that residents are quite understandably concerned that incomers to new developments will simply park their vehicles in the surrounding area potentially exacerbating parking problems there.
- 7.5 62% of respondents would like Lewes District Council to actively promote incentives for the purchase/lease of Ultra Low Emission Vehicles and the location of charging points.
- 7.6 The complete survey results are summarised at Appendix A below.

8 Actions Considered but Not Taken Forward

8.1 Actions considered but not taken forward include:

- Park and Ride facilities; the impact on local air quality would be minimal unless these facilities could be based at Newhaven Town train station;
- A feasibility study to investigate the impacts of car free developments in Newhaven; there is currently an insufficiently robust transport infrastructure to support these types of developments;
- Bus lanes on the A259 due to limited road space on the Ring Road;
- Investigation of a 20 mph zone around the Ring Road (with the aim to smooth traffic flow); at peak times the traffic generally travels at less than 20mph anyway and at other times, the cost of implementing the scheme would outweigh the debatable benefits to local air quality;
- Footbridges and subways instead of pedestrian crossings – because in accessibility terms they are not suitable and from a personal security perspective pedestrians prefer to cross at grade; and
- NOx-absorbing paint; as a whole there is little current evidence to suggest that the widespread use of photocatalytic surfaces will reduce ambient concentrations of nitrogen dioxide.

9 Actions Requiring Further Research

9.1 The following actions require further investigation and will be reviewed at the next Stakeholder meeting in September 2016:

- A Relief Road from the A26 north of Newhaven to the A259.
- A Low Emission Zone in Newhaven;
- The feasibility of capping of rail and/or bus fares for local travel;
- A reviewed parking strategy offering free parking for ULEVs and paid for parking based on vehicle engine size and emissions for long term parking along with free parking for all vehicles for up to one hour in the Town Centre car parks;
- Roadside Emissions Testing: This may be used by local authorities in England and Wales that have declared a traffic-related air quality management area under S.83 of the Environment Act 1995;
- Remote Sensing Technology: Following the Volkswagen emissions scandal, it is now well documented that the MOT does not reflect a vehicle's true emission performance in everyday use on the road. It is now possible to remotely detect vehicle emissions alongside number plate recognition without having to stop drivers;
- Enforcing idling vehicles legislation; it is an offence under Regulation 98 of the Road Vehicles (Construction and Use) Act 1986 to leave an engine running unnecessarily whilst the vehicle is stationary. Lewes DC intends to introduce 'anti-idling' signage at relevant hot spots such as the swing bridge and local schools. Should this not prove to be effective, the Council will consider enforcing the legislation by issuing fixed penalty notices under The Road Traffic (Vehicles Emissions) (Fixed Penalty) (England) Regulations 2002. It would however be preferable to raise public awareness of the impact of idling engines and to promote eco-driving;
- A re-allocation of bus stops on the A259 heading west out of Newhaven just off the Ring Road in order to reduce congestion and aid traffic flow; and
- A feasibility study into buses utilising the High Street rather than the Ring Road. This would reduce the need for members of the public to wait for buses in areas known to be of poor outdoor air quality.

10 Summary and Conclusions

- 10.1 This Air Quality Action Plan sets out 7 broad Actions as detailed below. For each action, specific measures have been included.
- Action 1: Enable the use of sustainable travel choices through the delivery of transport infrastructure and initiatives;
 - Action 2: Actively promote low emission vehicles and supporting infrastructure;
 - Action 3: Using the planning system to ensure that air quality is fully considered for new development;
 - Action 4: Traffic management to reduce emissions in locations within the AQMA;
 - Action 5: Work with Public Health colleagues to inform the public about health impacts of Air Pollution and how they can change behaviour to reduce emissions and reduce exposure;
 - Action 6: Continue to monitor and assess air quality in line with Government guidance on LAQM; and
 - Action 7: Target Point Sources in Newhaven Town Centre.
- 10.2 At this stage, it has not been possible to quantify emissions reductions for specific actions. It is considered that the measure with the greatest potential reduce NO₂ concentrations within the AQMA is Action 1, and in the longer term Actions 3 and 4.
- 10.3 Increases in traffic around the Ring Road system are very likely to rise given the planned development that is being taken forward. Any improvements resulting from this Action Plan in terms of reducing vehicle movements, or in reducing emissions directly, may therefore be counter to an increasing number of vehicles due to new developments although it recognised that new planned developments will need to make/contribute towards improvements in sustainable travel in the area.
- 10.4 The measures highlighted in this Air Quality Action Plan should reduce concentrations of NO₂ at the relevant sensitive receptors, although it is too early to say exactly what impacts they will have on improving air quality, especially against the increasing traffic levels on the Ring Road due to new developments coming on line. The Council is continuing to monitor air quality at several locations within the AQMAs. The results of the monitoring will be made available through the annual review and assessment reports along with proxy measures for quantifying improvements.
- 10.5 This Action Plan should be treated as a living document and as such will be updated as and when required. The Air Quality Action Plan supports the Draft Core Policy 9 of the Local Plan.

- 10.6 The Defra Draft Action Plan Appraisal Report recommended that the final Action Plan incorporate 'more accurate timescales for implementation of individual actions and sets clear and quantifiable indicators for tracking progress of the measures.' 'The likely availability and timeframes for securing funds should be considered and updated within the final Action Plan as this is likely to be one of the key factors in determining the overall effectiveness of the Action Plan.'
- 10.7 ESCC, the highway authority has identified possible transport measures and initiatives to improve air quality within the Newhaven AQMA however positive action on the ground is required if the County Council is to achieve its specific transport objective to reduce local air pollution through both its own Local Transport Plan and through collaborative working with Lewes District Council and other key stakeholders on the Newhaven Air Quality Action Plan.
- 10.8 Lewes District Council aims to maintain the current high profile of the Newhaven AQAP with residents and councillors; to this end the Council will hold biannual public stakeholder meetings reporting on the progress of the AQAP. Only with a unified and sustained approach can the Council lobby both ESCC and central government to prioritise action and funding in Newhaven.

11 References

Committee on the Medical Effects of Air Pollution (2015)

Statement on the Evidence of the Effects of Nitrogen Dioxide on Health. COMEAP

Sussex Air Quality Partnership. (2013).

Air Quality and Emissions Mitigation Guidance for Sussex Authorities. www.sussex-air.net

DEFRA Technical Guidance Note LAQM TG(16).

<http://laqm.defra.gov.uk>

eV South East Network Partnership

www.evsoutheast.net

12 Glossary

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
CIL	Community Infrastructure Levy
COMEAP	Committee On the Medical Effects of Air Pollution
DECC	Department for Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
ESCC	East Sussex County Council
Exceedance	A period of time when the concentration of a pollutant is greater than the appropriate air quality objective. This applies to specified locations with relevant exposure
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
LAQM	Local Air Quality Management
LEP	Local Enterprise Partnership
LEZ	Low Emission Zone
LSTF	Local Sustainable Transport Fund
LTP	Local Transport Plan
µg/m³	Microgrammes per cubic metre
NO	Nitric oxide
NO₂	Nitrogen dioxide
NO_x	Nitrogen oxides (taken to be NO ₂ + NO)
OLEV	Office for Low Emission Vehicles
Objectives	A nationally defined set of health-based concentrations for a number of pollutants setting out the extent to which the standards should be achieved by a defined date.
PM₁₀	Small airborne particles, more specifically particulate matter less than 10 micrometres in aerodynamic diameter
PM_{2.5}	Small airborne particles less than 2.5 micrometres in aerodynamic diameter

Section 106	Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended), commonly known as s106 agreements, are a mechanism which make a development proposal acceptable in planning terms, that would not otherwise be acceptable
SHLAA	Strategic Housing Land Availability Assessment
SME	Small and Medium Enterprise
Standards	A nationally defined set of concentrations for nine pollutants below which health effects do not occur or are minimal

13 Appendix A

Newhaven Air Quality Action Plan consultation survey results

Total respondents: 125

Survey opening date: 19 February 2016

Survey closing date: 30 April 2016

Q1. Are you responding as a resident or a member of the public?

A resident / member of the public: 97% (121)

On behalf of an organisation: 3% (4)

Q2. If responding on behalf of an organisation, please state which one

- Both a resident and as a Town Councillor
- The Woodland Trust
- Not stated: 2

Q3. Would you be supportive of a 20mph zone introduced on the Newhaven swing bridge?

Yes: 44% (55)

No: 43% (54)

Don't know: 13% (16)

Q4. Please tell us if you have any comments on this suggestion

Comment summary	Instances
Traffic is often too slow to reach 20mph	23
Slower speeds cause more congestion / pollution	24
Lights at pedestrian crossings slow the traffic down	9
20 mph limit It would need to be properly enforced	8
Would support if this reduces it actually pollution	3
20mph would help relieve congestion	2
Put the road back through the town to bring the centre of Newhaven back to life	2

Other comments

- Need an alternative route on the A259 to avoid the swing bridge.
- Don't slow us up ever more!
- I would support it but do not think it would have any effect.
- Ring road needs to be redesigned to let traffic flow.
- Install a speed camera to deter boy racers.
- Need needed - fast enough on the bridge.
- Should have 20mph in all towns in the district.
- The issues only started when the one way system was changed.
- This would encourage dangerous tailgating.
- This will not be successful in ensuring air quality is safe as a lone measure.

Q5. Would you be supportive of a Low Emission Zone around the Ring Road?
This would require us to ensure all commercial vehicles using this road meet vehicle emissions levels

Yes: 83% (104)

No: 14% (17)

Don't know: 3% (4)

Q6. Please tell us if you have any comments on this suggestion

Comment summary	Instances
Must be properly monitored / enforced	7
Large freight should be stopped from using the A259 / ring road and sent via the A 26/27	5
Too hard to enforce	4
Pedestrian crossings cause the congestion - they should change faster	3
Of course vehicles should meet the required standard	2
Unfair on owners of older vehicles	2

Other comments

- This could result in more commercial vehicles using the A259.
- This seems like a good idea, particularly for buses.
- It should stretch the whole length of the a259 from Brighton to Eastbourne.
- How and where would the testing be done?
- As long as it's only applied to commercial vehicles.
- The amount of large vehicles using the A 26 and coming into Newhaven is unacceptable - we need another alternative route.
- Need to clarify the zone you intend to include.
- The cause of the pollution is the constant holdups caused by pedestrian crossing ring road.
- Get vehicle drivers to switch off engines in the endless queues when the bridge is open.
- I would like to see far lower or zero emissions nationwide.
- Ridiculous as some vehicles would have to go via Lewes and Rottingdean to reach Peacehaven.
- Wouldn't make sufficient difference.
- Many measures are urgently required.

Q7. Would you like us to promote alternative modes of transport such as walking and cycling?

Yes: 65% (82)

No: 22% (27)

Don t know: 13% (16)

Q8. Please tell us if you have any comments on this idea

Comment summary	Instances
More cycle paths / infrastructure needed	12
Existing cycle paths are underused (e.g. A259)	6
Pollution makes walking/cycling dangerous	4
Most traffic not local	3
Better / cheaper public transport needed	3
More cycle lanes will cause more traffic congestion	3
This would be a waste of money	3
Improve links between cycle paths and signage	2
More shared paths / cycle paths	2

Other comments

- As a keen cyclist and member of cycle sea haven I would love to see this.
- Encourage public transport by reducing cost.
- Better public transport around town.
- Maintain park and ride in Peacehaven.
- Better to invest funds in another link road or improvement to the C6.
- Need a new road linking the C6 to the incinerator.
- Improve the Newhaven side of the walking/cycle path out of Peacehaven.
- Consider visually-impaired and disabled people in the planning of this to ensure their safety through accessibility.
- Need to consult cyclists before building cycle paths.
- I don't think this will be effective until the town centre becomes a thriving place.
- Alternative methods are already promoted.

Q9: Would you be more likely to walk or cycle if pedestrian and cycle access routes in and around Newhaven were improved

Yes: 57% (71)

No: 34% (43)

Don't know: 9% (11)

Q10: Please tell us if you have any comments on this idea

Comment summary	Instances
I already walk much of the time	10
I cycle already	5
I'd cycle more if there were more paths / they were better maintained	5
The poor air quality puts me off walking / cycling	4
Cycling is too dangerous currently	3
Good for those mobile enough to walk/cycle	2
I'd walk more if Newhaven offered more	2
Too many pedestrian crossings has caused congestion	2

Other comments

- Improvements needed to the crossing near the Job Centre.
- Need a pedestrian crossing on Lewes Road.
- Improvements to Peacehaven to Newhaven section needed.
- Paving over more land for cycle ways or taking already congested road.

space is a nonsense.

- Some pavements would benefit from being widened in certain areas as they are quite narrow.
- Mark them more clearly and maintain by keeping the cycling parts clear of litter and weeds.
- Not enough people doing it to warrant it.
- The new bus loop at the station requires cyclists to cross to many junctions
- There are already perfectly good pedestrian routes all around town.
- Not relevant to the issue of pollution.
- Lighting / cleaning up pavements would encourage walking.
- Cyclist don't use existing cycle paths.

Q11: Would you take join a car share scheme if this was promoted within the area

Yes: 22% (27)

No: 62% (78)

Don't know: 16% (20)

Q12: Please tell us if you have any comments on this suggestion

Comment summary	Instances
Care sharing not right for my needs / circumstances	16
I would be interested in this	3
I already car share	3
Difficult for people to match their journey times.	3
I use public transport	2
I wouldn't want to share with a stranger	2
This would have a negative effect on the pollution	2

Other comments

- Along the coast road towards Brighton in the mornings I see so many cars with only one person. I think this is a fantastic idea.
- A committee of trusted volunteer car-sharers could be established.
- The issue is traffic flow not traffic levels.
- I prefer to cycle.
- Agree but it but need to be well promoted.
- Only use my car when I have to.

- To make it work, employers need to encourage / offer incentives for employees to get involved.

Q13: Would you be supportive of making new residential developments car free

Yes: 24% (30)

No: 55% (69)

Don't know: 21% (26)

Q14: Please tell us if you have any comments on this suggestion

Comment summary	Instances
Don't see this as a good / practical idea. People need cars	21
People will simply park in surrounding area	16
Would need big investment in public transport	4
Would work for developments in town centre	3
This would be unfair on people with a physical disability	2

Other comments

- This will only exacerbate the existing parking problems.
- All new developments should have at least one parking space per property with a further 'visitor space' for each half a dozen properties.
- Only relevant for old people's developments
- Newhaven's infrastructure needs improving both any more housing is considered.
- The car has had its day and we should be preparing for forthcoming driverless technology where vehicles are pooled and parking demand will fall sharply.
- Promote door-to-door cycle routes, especially for kids to get to school.
- Nice idea but where do you put all the cars? They have to go somewhere.
- The carless development on London Road in Brighton has issues.
- If you want less congestion stop building houses.

Q15: Would you like us to promote grants toward the purchase of Ultra Low Emission Vehicles and location of charging points?

Yes: 62% (78)

No: 18% (22)

Don't know: 22% (25)

Q16: What improvements would you like to see made to the Newhaven industrial zone to improve air quality

Comment summary	Instances
Close / reduce emissions from the incinerator	22
Better monitoring of the emissions from these businesses	11
Better flowing traffic	9
Don't allow lorries on A259	3
Better public transport	2
Plant more trees	2
Encourage motorists to drive fuel-efficiently	2
Better access to parking	2

Other comments

- Redirect the traffic to go around Newhaven.
- Repair all the roads affected then drivers can keep to an even speed.
- Rethink the gyratory system that has killed Newhaven town centre.
- Build a bridge over the river and do away with the opening it.
- Improvements to the A26 are essential.
- Emissions control particularly at times when the town will be snarled up with traffic queuing for the railway bridge and the swing bridge.
- Encourage government to build a coastal motorway.
- Removal of scrap processing plant on North Quay.
- A new access road from the a26 with bridge over the railway line to the incinerator and waste plant.
- Encourage local businesses to invest in green technology.

Q17: If an alternative to the Ring Road could be implemented, where do you think this should be?

Comment summary	Instances
A fly-over Newhaven / the swing bridge	5
Crossing over the river north of Newhaven	5
Make the ring road two-way with better synced pedestrian lights.	3
Bridge over the river at Southease	2

Other comments

- Another route across the water.
- A relief road from Peacehaven linking directly to A26, so bypassing Newhaven.
- Up round South Highton and over to Piddinghoe.
- A by-pass to join near Kingston.
- Make the southern side access only to/from that part of the town, and the northern side two-way.
- Close southern portion of the Ring Road and reconnect the town centre to the areas to the south and West Quay.
- Build a northern relief road.
- Build a second swing bridge in Newhaven.
- Large traffic via A26/27.
- Reopen High Street and widen to facilitate traffic with parking options off-road.
- Roundabout on the A27 at Tarring Nevil linking across to the C7 and then another link to Peacehaven.
- At the back of Peacehaven, near the valley, north quay to A26.
- New motorway along coast.
- Would like to see South Way made 2 way with North Way acting to filter east and west bound traffic from the C7.
- There should be a proper set of lights at the top and bottom of the town that run on traffic density/timers to allow traffic to at least flow fairly.
- A lot of traffic comes onto the ring road from the C7 and circles the town before heading west to Peacehaven if a way could be found to remove that necessity that would reduce traffic at peak times.
- A by-pass somewhere North of the incinerator would be good. The Beddingham road should be dual carriageway in both directions right from Polegate through to the Lewes roundabout.
- Saltdean to Beddingham roundabout and Seaford to Beddingham.
- Open up the old straight through town centre road and keep the traffic constantly moving with no pedestrian crossings in the main street.
- I think that we need to make good what we have, and that will have to be radical in order to manage the current problems.

Q18: What other improvements would you like to see made to Newhaven town centre?

Comment summary	Instances
More / better shops	31
Free / cheaper parking	16
Encourage new shops e.g. lower rents	10
Re-open the high street	8
Re-develop town centre	8
More restaurants / cafes	8
Tidy up town centre	6

Relocate town centre	6
More flower beds / trees	5
Better access, security and facilities for cyclists	4
Reopen the central road to buses only	3
Remove / multi-story car park	2
Re-build the multi-story car-park	2
More for teenagers	2
More disabled parking spaces	2
Park and ride	2

Other comments

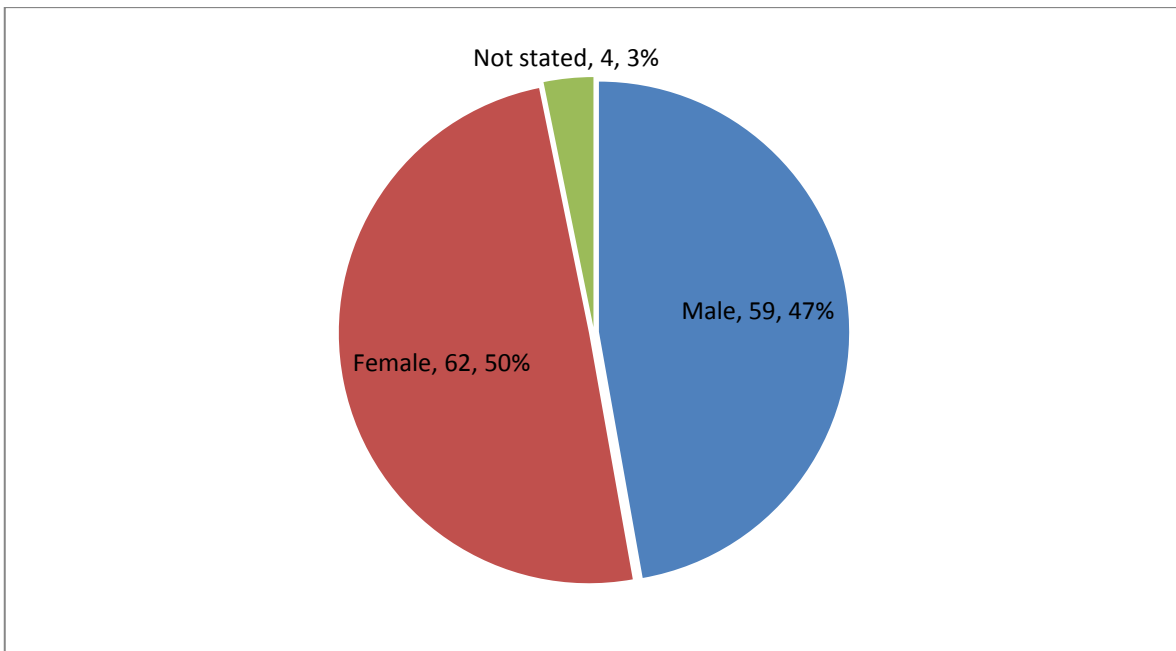
- Definition of the pavement kerbs for visually-impaired pedestrians to avoid unintentionally straying into the road.
- More housing, e.g on Lower Place car park.
- Widen roads and remove unnecessary grass verges.
- Remove swing bridge and provide alternative in order to avoid congestion when the bridge is opened.
- Fewer traffic lights.
- Keep passing/through traffic away from the ring road.
- Make accessible to vehicles.
- Invest in train station to encourage people to use the train.
- Close the high street and extend the pavement from post office to the Ship pub.
- The swing bridge should only be opened during night hours.
- Reopen the beach.
- Crack down on street drinking.
- New leisure facilities e.g. swimming pool, bowling, cinema.
- Improvement to public spaces.
- Remove some traffic lights.

Q19: Do you have any other comments about the draft Newhaven Air Quality Action Plan

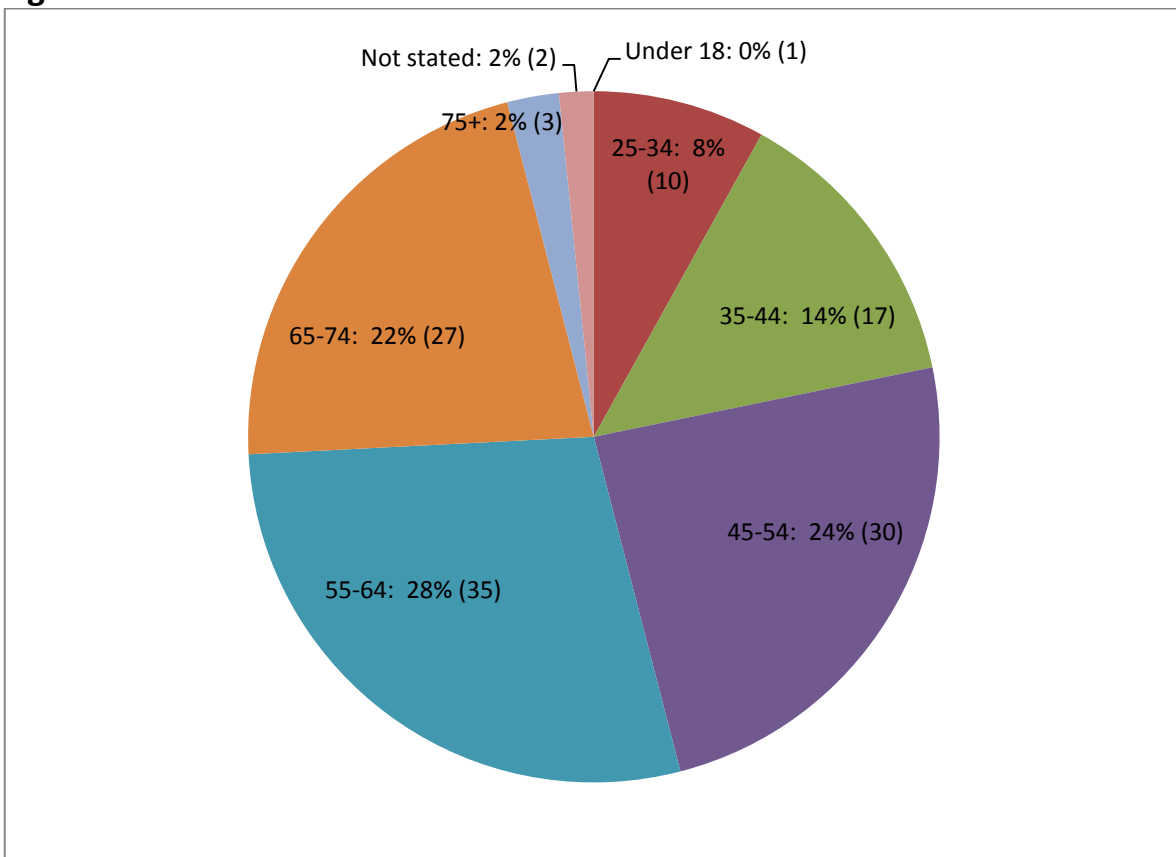
Comment summary	Instances
The incinerator adds to air pollution	7
Improve air quality and do it quickly	5
Traffic needs to be kept moving to minimise pollution	4
Monitor emissions from the ferry / incinerator	4
The plan is too complicated for many people and needs to be explained in more simple terms.	2
Remove / change the ring road	2
Need to improve public transport and park and ride	2

Equality data analysis

Sex



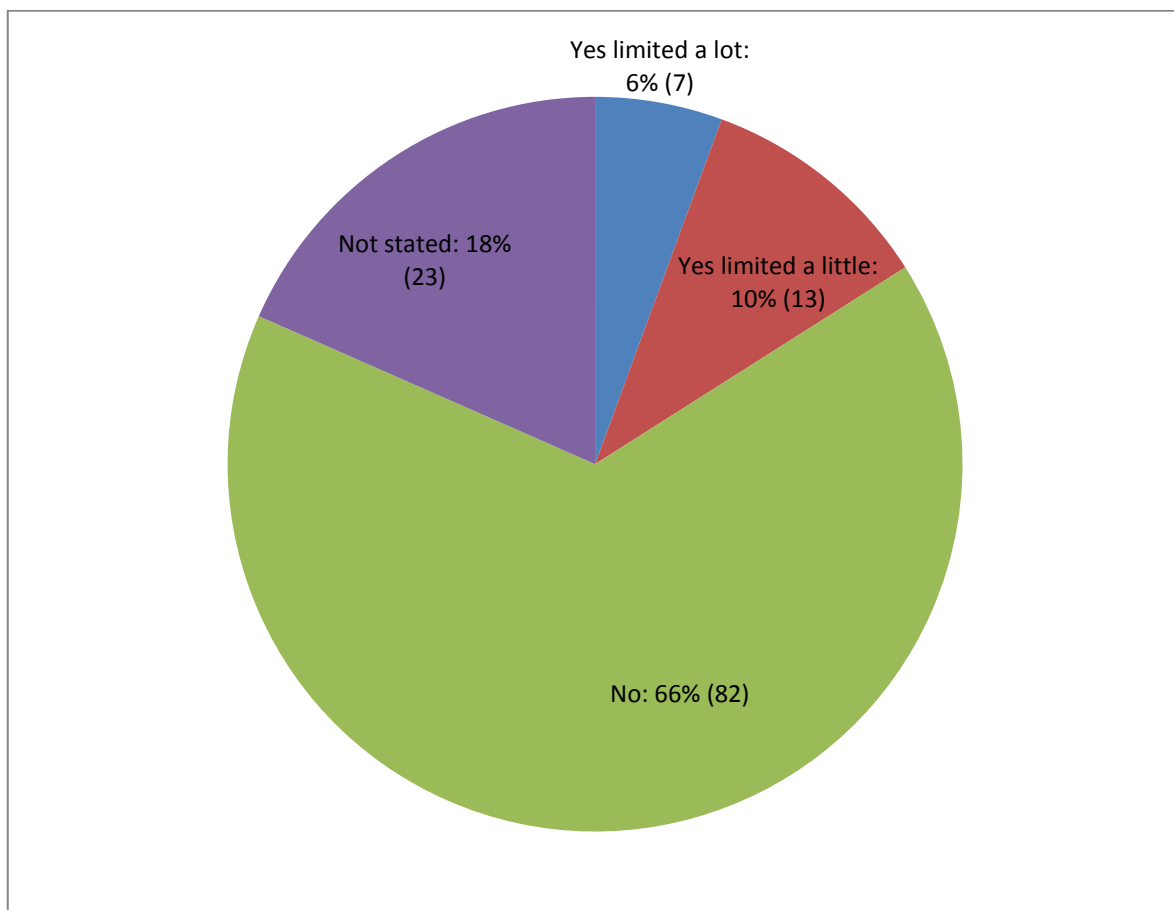
Age



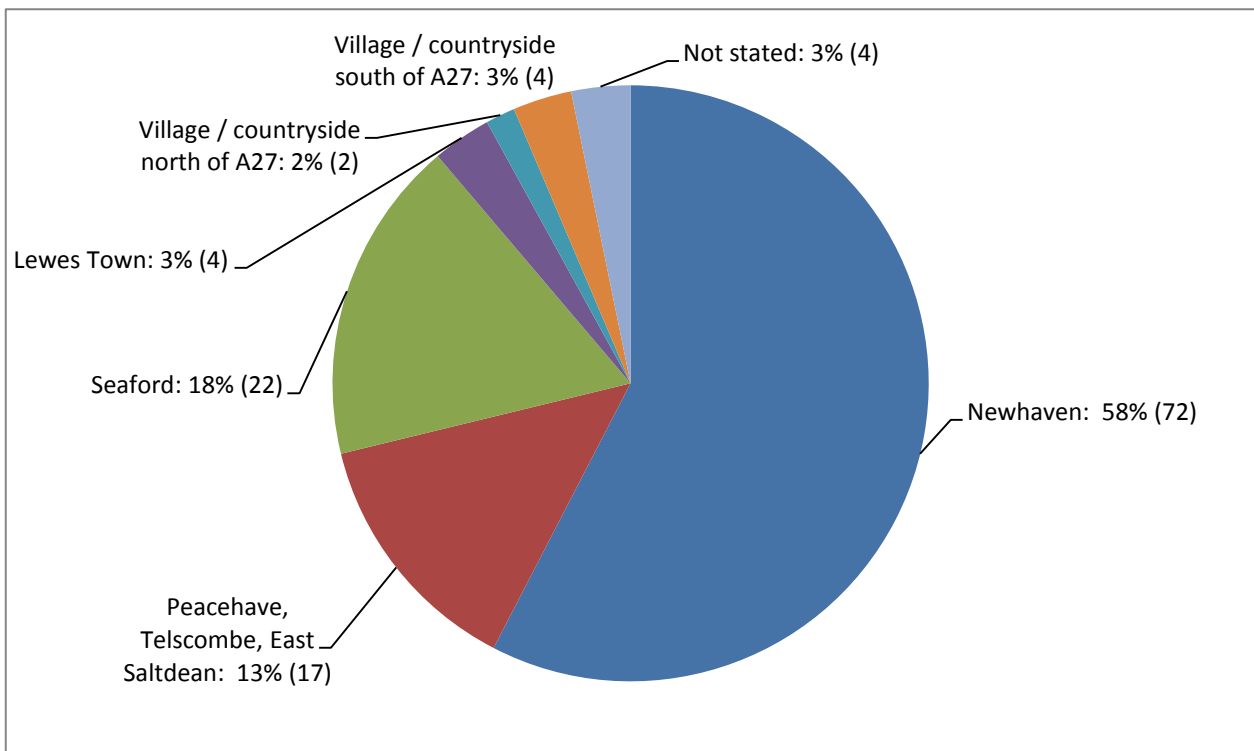
Ethnicity

- English, Welsh, Scottish, Northern Irish, British: 93% (117)
- White and Black Caribbean: 2% (2)
- Other Asian background: 1%
- Other white background: 1% (1)
- Not stated: 3% (4)

Are your day to day activities limited because of a health problem or disability which has lasted or is expected to last at least 12 months?



Where do you live in the district?



End of Survey



Newhaven Air Quality Action Plan June 2016

