

Air pollution - outdoor air quality and health

NICE National Institute for
Health and Care Excellence

**Consultation on draft guideline – deadline for comments 5pm on 25/01/17 email:
OutdoorAirPollution@nice.org.uk**

Please read the checklist for submitting comments at the end of this form. We cannot accept forms that are not filled in correctly.

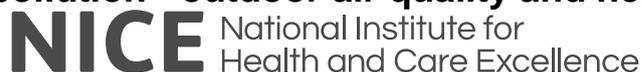
We would like to hear your views on the draft recommendations presented in the short version and any comments you may have on the evidence presented in the full version. We would also welcome views on the Equality Impact Assessment.

We would like to hear your views on these questions:

1. Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why.
2. Would implementation of any of the draft recommendations have significant cost implications?
3. What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.)
4. The guideline includes reference to the current draft proposals for clean air zones from DEFRA. Do stakeholders feel that this reference is helpful and will support implementation of actions locally?
5. The guideline includes reference to providing general advice on air quality. NICE is aware of information published after the completion of the reviews relating to the use of air alerts (Effects of an air pollution personal alert system on health service usage in a high-risk general population: a quasi-experimental study using linked data, doi:10.1136/jech-2016-207222). Are stakeholders aware of any further published evidence relevant to this recommendation that will inform the considerations of the committee after consultation?
6. Are there any grants / government schemes that are targeting traffic air pollution either now or in the future that could be referenced in any resource impact work?
7. Where you have implemented, or plan to implement any of these recommendations how would you prove or justify the benefit of the spend in business cases within your organisation?
8. Apart from broadening beyond the five cities, does recommendation 1.2 add anything to the DEFRA draft?
9. Does recommendation 1.2 from NICE act as a lever for local communities when considering clean air zones?

See section 3.9 of [Developing NICE guidance: how to get involved](#) for suggestions of general points to think about when commenting.

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Organisation name – Stakeholder or respondent (if you are responding as an individual rather than a registered stakeholder please leave blank):		Living Streets		
Disclosure Please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry.		None		
Name of commentator person completing form:		Rachel Lee		
Type		[office use only]		
Comment number	Document (full version, short version or the appendices)	Page number Or 'general' for comments on the whole document	Line number Or 'general' for comments on the whole document	Comments Insert each comment in a new row. Do not paste other tables into this table, because your comments could get lost – type directly into this table.
Example 1	Full	16	45	We are concerned that this recommendation may imply that
Example 2	Full	16	45	Question 1: This recommendation will be a challenging change in practice because
Example 3	Full	16	45	Question 3: Our trust has had experience of implementing this approach and would be willing to submit its experiences to the NICE shared learning database. Contact.....
	Full, all comments on the draft guideline out for consultation	General	General	We welcome this draft guidance on outdoor air quality and health. However, we would like to see greater emphasis on reducing the air pollution caused by road traffic at source rather than on mitigating its effects – in other words by promoting modal shift away motor vehicles. This is of course the most challenging element to implement. One avenue the Committee could investigate is whether or not the Road Traffic Reduction Act 1997 would be a useful lever for local authorities to reduce traffic volume.

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				The guidance should also reference the Local Cycling and Walking Infrastructure Plan (LCWIP) process, which English local authorities will be asked to follow as part of the Government's Cycling and Walking Investment Plan (CWIS).
		1	Box, paragraph 2	Why is driving style listed first? Driving appears to be seen as a given, when really we need to focus on changing behaviour – which means changing our environment so that walking and cycling (and using public transport for longer journeys) become the easy choice. This is in line with PH41 which says that cycling and walking should be the norm for short journeys.
		4	3	<p>Please note that there is a big difference between the preparation of local plans and strategies, and the everyday 'planning' the work done by land-use planners.</p> <p>Inclusion of air quality in Local Development Plans is a good idea. However, Plans may not be updated for several years making it difficult to enforce activities intended to reduce air pollution if these are not already adopted policies.</p> <p>Even if a Plan has the appropriate policies in place, it must also be acknowledged that planning departments are for the most part under staffed and overworked. This means that they are unlikely to have the resources to address air quality issues, even if they wanted to.</p>
		4	13-17	<p>This is dealing with the consequences of air pollution and not dealing with the problem – it expects vulnerable people to change their lifestyles. This could have negative unintended consequences e.g. a person with asthma having their opportunity for social interactions curtailed. Terraced streets offer views onto the street outside and help to reduce social isolation – removing roadside facades could increase social isolation as well as reducing natural surveillance. In other words there is the potential to create more problems by not tackling air pollution at source.</p> <p>Locating facilities such as schools “in areas where pollution levels will be low” may mean putting them in places where access will be easiest by motor vehicle. We suggest instead “take action to reduce motor traffic</p>

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				levels and pollution where facilities such as schools, nurseries and retirement homes are to be located”.
		5	1	This should be to support and ‘encourage’.
		5	5-6	Charging points for electric vehicles should not take space from pedestrians or cyclists. It is important that measures suggested in this guidance do not make it harder for people choosing to travel actively.
		6	1-3	The guidance should also acknowledge the shelter provided by trees and their aesthetic value.
		6	6-9	Clean air should be the norm. It should not be assumed that people will live in an unhealthy environment, where this is an avoidable situation. In the case of polluting motor traffic, it is avoidable. The Glossary to the Guideline should also explain what a Clean Air Zone is. The Department for Environment, Food and Rural Affairs’ use of the term implies a wider range of action including measures to promote behaviour change.
		7	5-6	While congestion charging does make a difference it is a bit of a blunt instrument. Would it not be possible to charge by use/mileage? The distance travelled would be a measure of how much you use the roads and pollute the environment. Once people pay to pollute the marginal cost of driving is so small that it does not change their behaviour (e.g. within a zone). The aim should be to reduce driving.
		7	12-13	Should car owners in the poorest communities (and the worst afflicted by air pollution) be given a licence to pollute? Instead of accepting the status quo, the aim of the guidance should be to promote realistic alternatives to driving (such as reinvesting any revenues into walking, cycling and public transport).
		8	1-4	Also consider the use of Intelligent Speed Adaptation, in other words speed limiters for fleet vehicles.
		8	21-27	We suggest broadening 20 mph beyond residential streets. Living Streets are actually calling for 20mph to be the new urban default speed limit. In answer to Question 2, the introduction of 20mph limits costs much less than 20mph zones because it is not necessary to include traffic calming measures.

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				20mph limits may help to change perceptions of acceptable traffic speeds and smooth traffic flows (less stopping and starting).
		9	2-3	Cycle routes and pedestrian networks must address travel need. Active travel routes should be convenient to use not moved away from vehicular traffic – the emphasis should be on removing the polluting vehicles.
		9	9-11	Consider reducing the time spent by pedestrians waiting to cross the road or waiting in the middle of the road on staggered crossings at busy junctions, for example, encouraging the use of diagonal crossings on tight junctions.
		9	17-19	Consider the content of messaging when pollution is high. For example “don’t drive unless you have to” as opposed to “stay indoors”. People in cars are more exposed to air pollution.
		9	23-24	It’s important to spell out that driving (as opposed to “travel choices”) is the main cause of air pollution and this affects other people’s ability to go out.
		10	6-7	Also consider walking and cycling between and within employment sites. For example, cargo bike deliveries have the co-benefits of reducing air pollution and road danger.
		10	12-22	See comment on page 9 lines 17-19. The key point here is that we need to drive less!
		12	21-27	It may be worth highlighting why road transport accounts for more than 64% of air pollution at urban monitoring sites (in other words industrial and other sources tend to be located away from urban centres). In relation to sources related to road transport, the guidance should also make clear that electric vehicles are not a panacea – in addition to the pollution at source (electricity generation), electric vehicles are heavier than their combustion engine counterparts and it has been suggested that there is positive relationship between vehicle weight and non-exhaust PM emission factors (see Victor R.J.H. Timmers, Peter A.J. Achten (2016). ‘Non-exhaust PM emissions from electric vehicles’, <i>Atmospheric Environment</i> , Volume 134, June 2016, Pages 10–17.

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		13	1-3	See above. Please specify what you mean by 'other sources' of non-exhaust emissions.
		14	4-6	Children and older people are the most vulnerable to air pollution – and the least likely to drive. This is even more reason to reduce pollution at source.
		14	7	This must be about encouraging and enabling people to walk and cycle. See recommendation 6 of Nice Guidance 16 https://www.nice.org.uk/guidance/ng16
		14	7-8	It's worth noting that in cities, such as London, people get most of their regular physical activity from walking and cycling for utility purposes – see Transport for London's 'Improving the Health of Londoners: Transport Action Plan' http://content.tfl.gov.uk/improving-the-health-of-londoners-transport-action-plan.pdf .
		18	7-10	Reductions in air pollution reduce health inequalities. Vulnerable groups are less likely to afford new vehicles with low emissions therefore it is important to offer meaningful alternatives to driving.
		22	1-3	The built environment can also influence the propensity to walk or cycle. Filtered permeability (for example the mini Holland in Waltham Forest http://www.standard.co.uk/news/london/mini-holland-scheme-in-walthamstow-hailed-as-major-success-as-traffic-falls-by-half-a3389936.html) reduces traffic and creates a better environment for active travel.
		23	13-14	How about levels of physical activity or user satisfaction (pedestrians, cyclists and public transport)?
		27	9-12	Question 8: no the recommendation 1.2 does not add much to Defra's draft proposals for Clean Air Zones (CAZ) in England. Our response to Defra is equally relevant to this draft guidance. We said that the CAZ Framework needs to recognise the health (and wider) inequalities generated by poor air quality in England's urban areas. In particular, the fact that people who walk or cycle do not contribute to poor air quality, but are unfairly exposed to it. The only way to address both air quality and create a fairer transport system is to promote a modal shift away from private motorised transport towards more walking, cycling and public transport. This will have the added benefit of reducing congestion.

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		31	18	Finally the guidance gets to the point and says that low emission zones have only slightly improved air quality "...partly because of ... the failure to address the overall volume of traffic". This should be nearer the front of the document.
		31	26-30	The guidance should mention 20mph limits here; there is less stop-go driving at slower speeds.
		37	1-6	Who would coordinate this national approach, for example, to charging schemes?
		37	27-28	Many local authorities outsource their services. Therefore, we suggest writing these conditions into new contracts.
		44	10-14	Actions could include the use of average speed cameras, radar speed signs and speed limiters in fleet vehicles.
		46	30	Major roads 'and junctions'
		47	4-5	Mention other measures such as 'filtered permeability' to reduce route options for vehicles.
		47	18-24	Why does the guidance not recommend reducing the number of vehicles and the pollution that they produce?
		48	20-21	Note that cycle ways and footways are much cheaper to maintain than roads.
		48	20-24	Planned street works also provide an ideal opportunity to look at how space is used by pedestrians and cyclists – to measure changes in behaviour and perhaps make changes in road configuration permanent.
		50	18-19	Concern about air quality can put people off walking too.
		52	26-28	We agree that better scheduling to avoid use of delivery vehicles when streets are congested may help to reduce pollution.
		54	22-25	The emphasis must be on the need to reduce outdoor air pollution. Shutting windows is not a good solution – in addition to potentially increasing the level of indoor pollutants it also interferes with the need to ventilate

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				homes (e.g. to reduce damp from drying laundry indoors).
		57	1-20	What incentives might be used? Is there evidence of the effectiveness of, for example, free bus travel in the first month of starting a new job or providing on street cycle storage?
		60	27	Include abrasion of the road surface as a source of PM ₁₀ and PM _{2.5} .

Insert extra rows as needed

Checklist for submitting comments

- Use this comment form and submit it as a Word document (not a PDF).
- Complete the disclosure about links with, or funding from, the tobacco industry.
- Include page and line number (not section number) of the text each comment is about.
- Combine all comments from your organisation into 1 response. We cannot accept more than 1 response from each organisation.
- Do not paste other tables into this table – type directly into the table.
- Underline and highlight any confidential information or other material that you do not wish to be made public.
- Do not include medical information about yourself or another person from which you or the person could be identified.
- Spell out any abbreviations you use
- For copyright reasons, comment forms do not include attachments such as research articles, letters or leaflets (for copyright reasons). We return comments forms that have attachments without reading them. The stakeholder may resubmit the form without attachments, but it must be received by the deadline.

You can see any guidance that we have produced on topics related to this guideline by checking [NICE Pathways](#).

Note: We reserve the right to summarise and edit comments received during consultations, or not to publish them at all, if we consider the comments are too long, or publication would be unlawful or otherwise inappropriate.

Comments received during our consultations are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the comments we received, and are not endorsed by NICE, its officers or advisory Committees.

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