

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):		[Chartered Institution of Highways and Transportation (CIHT)]		
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:		[Matthew Hughes]		
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.
1	Full?	General	General	<p>CIHT welcome this timely consultation and the much of the content/interventions contained within could help improve air quality. Quality of place, improvements to health and wellbeing and reducing congestion are all desired outcomes.</p> <p>However, most of the solutions in the guide whilst potentially easing the problem do not address the bigger picture. Cleaning up exhaust emissions and developing new vehicle technologies can help improve the quality of the air we breathe, but ultimately the most immediate way to tackle air pollution would be to achieve a much reduced number of vehicle kilometres travelled. This requires changes in planning and transport policy.</p>
2		4	L3	(following on from the comment above). This requires changes to planning policy and reducing our dependency on the motor vehicle in favour of more sustainable modes such as walking, cycling and low impact public transport. The guide should make some reference to this.
3		4 (section 1.1)	General	This section needs to recognise/highlight the differences between a local plans and land-use planning. At the moment it does not differentiate between the two.

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4		4	L11-17	<p>There is some contradiction within this section. 'Siting new building and estates so that the need for motorised travel is minimised' v 'ensuring facilities such as schools, nurseries and retirement homes are locate in areas where pollution will be low'. Areas that where pollution is low tend to not be easily accessed by non-motorised travel.</p>
5		5	L23-29	<p>CIHT received the following information when requesting feedback on the NICE guidance. The following, whilst not the views of the CIHT, may be of interest:</p> <p>"The document continually refers to Air Quality in a general way without being specific. Local Authorities and Central Government work towards the National Air Quality Objectives (NAQOs). These set levels for Annual, 24 hour, 8 hour, 1 hour and 15 minutes objectives. The majority of Air Quality Management Areas (AQMAs) in the UK are for NO₂, the primary Air Pollutant that is considered in assessments is NO₂ and PM₁₀. For these pollutants the only thresholds to be achieved are Annual, 24 hour and 1 hour. Annual objectives ONLY apply at Facades of buildings. 24 Hour objectives apply at facades and in gardens "where relevant public exposure to pollutants is likely, for example where there is seating or play areas". Therefore it is incorrect to simply state that Air Quality will be decreased as a result of trees and barriers between pollution sources and building facades (section 1.1.5), since the NAQOs generally apply to areas outside of these artificial and natural street canyons. The only NAQO that applies to areas that might fall within a canyon created with trees is the 1 hour and 15 minute objective. As a rule of thumb these only apply to locations that have Average Annual concentrations of over 60 µg/m³, which is a handful of the very worst sites in the country.</p> <p>I have undertaken modelling of buildings next to motorways which estimates significant decreases (approx. 33%) in NO₂ concentrations as a result of implementing a 10 metre high noise barrier. Trees on streets will have a similar effect on building facades and people's gardens (i.e. reductions in concentrations/improvements in air quality). In both cases pollutant concentrations would increase for motorway/road users, but no NAQOs exist for concentrations on roads themselves.</p> <p>If AQAs, Local Authorities and Central Government are measuring against the NAQOs, but NICE are simply referring to general Air Quality this will cause confusion."</p>
6		6	General	<p>CIHT has broadly welcomed the Clean Air zone Framework as it refocused attention on the desired outcome of 'clean air' rather than the issue of emissions which had been the focus of Low Emission Zones. The development of a consistent national framework of emission standards will help reduce uncertainty. Nevertheless for the measures to work they need to be;</p> <ul style="list-style-type: none"> • Consistent; • Achievable; • Affordable for local authorities or alternative additional central funding needs to be made;

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				<ul style="list-style-type: none"> It is important to ensure that it is understood that CAZ's on their own are not enough, and that other air quality measures outside of transport are necessary. Whilst local accountability is desirable, there is a requirement for proactive national leadership.
7		7	L4-13	<p>Whilst CIHT would encourage consideration of road user charging as a means to reducing congestion and improving air quality, there is a danger that installing congestion zones constricted by CAZ's could just result in the displacement of polluting traffic to another neighbouring area. This is not a solution. Ultimately reducing the number of kilometres driven is the most immediate solution.</p> <p>CAZ's will be challenging to implement without central government funding.</p>
8		8	L20	<p>Manual for Streets 1&2 advocates good street design and it should be considered and recommended. The House of Lords Select Committee on the Built Environment – recommendations was that MfS should be used more widely. MfS enshrines the principles of better design managing traffic speeds using good design. We understand that the Department for Transport is currently considering refreshing MfS and the importance of air quality should be recognised in this updated version.</p>
9		9	L1	<p>The document provides no guidance on walking</p>
10		9	L1-11	<p>Planning for cycle routes is an important section. NICE have to be careful with the wording in this section so it does not result in less cycling provision at the expense of motorised traffic. CIHT have produced guidance on 'Planning for Cycling' & 'Planning and Designing for Walking'</p>
11		9	L21-27	<p>An effective public education and publicity strategy is vital in achieving awareness and acceptance of the need to change behaviour to achieve better air quality. Engagement with the public is also key. Involving them at an early stage in any proposed changes is important. CIHT have produced 'Involving the Public and Other Stakeholders'.</p> <p>Advice to the general public and businesses could also include education on acceleration and deceleration which can be a greater source of exhaust and no-exhaust emissions than idling.</p>
12		10	L8-22	<p>This section makes some sensible suggestions for 'at-risk' groups. However as stated previously, ultimately reducing the number of kilometres driven would be the most immediate solution.</p>
13		13	L1-3	<p>Non-exhaust emission receive a brief mention and are estimated to account for only 21% of PM2.5 emissions. The National Atmospheric Emissions Inventory (NAEI) modelling estimates that the majority of PM10 and PM2.5 emissions (>50%) are from non-exhaust emissions, such as tyre, brake, engine and road wear. Ways to reduce these sources including reducing stops and starts, lighter vehicles, Kinetic Energy Recovery to reduce friction braking and solid wheel transportation such as trams and trains.</p>
14		17	L1-7	<p>Whilst agreeing that monitoring is very important to gather the evidence base to achieve planning, it should be noted that</p>

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				traffic data for most roads is currently ad-hoc, of low quality. Data on vehicle classifications and speeds is hard to obtain. Effective monitoring/measurement of traffic will be costly and require central funding.
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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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