

Air pollution: outdoor air quality and health

Consultation on draft guideline Stakeholder comments table

01/12/16 to 25/01/17

Comments forms with attachments such as research articles, letters or leaflets cannot be accepted.

ID	Type	Organisation name	Document	Page No	Line No	Comments Please insert each new comment in a new row	Developer's response Please respond to each comment
1	[office use only]	20's Plenty for Us	Full	8	23	<p>Say implement not consider – We ask NICE to reword the recommendation to the stronger word 'Implement' 20mph limits, not just 'consider'. 20mph limits are acknowledged best practice by NICE for preventing unintended child injuries, for reducing obesity and for preventing early deaths. Likewise, the Royal College of Paediatrics & Child Health & National Children's Bureau support wide 20mph. Their <i>Why Children Die</i> research, led by Dr Ingrid Wolfe</p> <p>www.rcpch.ac.uk/system/files/protected/page/WhyChildrenDieFINAL.pdf May 2014, recommends reducing the National speed limit to 20mph in built up areas.</p> <p>The Department for Transport (Setting Local Speed limits 01/2013 guidance) recommends 20mph limits.</p> <p>https://www.gov.uk/government/publications/setting-local-speed-limits - "Traffic authorities can, over time, introduce 20mph speed limits or zones on: Major streets where there are – or could be - significant numbers of journeys on foot, and/or where pedal cycle movements are an important consideration". All Take Action on Active Travel report partners including the Association of Directors of Public Health, Faculty of Public Health & UK Public Health Association support 20mph speed limits in towns & villages. <i>"Make 20mph or lower speed limits the norm for residential streets & those used by shoppers, tourists & others, close to schools or public buildings, or important for walking & cycling or children's play. In urban areas only the busiest strategic traffic routes should now qualify for higher speed limits."</i></p>	Thank you for this comment. Please note that this guideline addresses air pollution. The use of 20mph zones and limits for prevention of injuries are considered in the NICE guideline you reference.
2	[office use only]	20's Plenty for Us	Full	8	23	<p>Limits not zones. NICE draft guidance says "20-mph zones" We ask that this be reworded to limits. Though the distinction is less clear than in the past (as only one traffic calming feature is now needed for a zone), the distinction in definitions is that limits don't have traffic calming whereas zones include traffic calming physical</p>	Thank you for this comment. The recommendation on smooth driving and speed reduction (now section 1.5) has been amended to clarify the difference between 20mph limits and 20mph zones.

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						measures. Traffic calming increases air pollution. We do not campaign for traffic calming. Instead we ask for signs and lines implementation of wide area 20mph with driver education to maximise compliance. Our suggested rewording is "20mph limits"	
3	[office use only]	20's Plenty for Us	Full	8	23-24	Extent of limits – Built up Areas not just residential areas. It is best practice to implement wide area default 20mph limits across a community, with exceptions determined by the traffic authority for situations where the safety needs of vulnerable road users have been met by other means. We ask that the wording of residential areas is changed to built up areas. DfT guidance says that "Major streets" can be included. The National Cycle Campaigner organisation CycleNation for instance say "A default 20 mph speed limit in the centre and in residential districts" at http://www.cyclenation.org.uk/campaigns See above in comment 1 other organisations wording for the extent of limits.	Thank you for this comment. The wording in recommendation 1.5.1 of the final guideline (1.4.2 in the consultation version) has been amended to 'urban areas'.
4	[office use only]	20's Plenty for Us	Full	8	23-24	Default limits not small or isolated 20mph areas We ask for wide area default 20mph limits which means that traffic authorities make 20mph normal and decide where to exempt those areas that remain 30mph or above because the needs of vulnerable road users have been taken into account.	Thank you for this comment. The wording in recommendation 1.5.1 of the final guideline (1.4.2 in the consultation version) has been amended to 'urban areas'.
5	[office use only]	20's Plenty for Us	Full	8	general	Diesel emissions in particular are reduced by wide area default 20mph limits and since diesel fumes dominate the health effects, this is equivalent to taking half the petrol cars off the road. http://www.20splenty.org/emission_reductions We are surprised that there is no recommendation pertaining to greatly reducing the amount of diesel pollution urban areas and to mentioning that 20mph limits are effective at this.	Thank you for this comment. The guideline is limited to interventions that can be implemented locally, the decision regarding how widely 20mph limits are implemented for consideration at a local level and with neighbouring areas as recommended (please see recommendation 1.3.3). Other limits, for example on vehicle fuel types would need to be considered at a national level. NICE does not have a remit to make recommendations on national policy.
6	[office use only]	20's Plenty for Us	Full	46	13	Delete the word may. Change to "Reduced speeds in urban areas supports modal shift to walking and cycling" Evidence for this was found in the Edinburgh South Central trial of 20mph limits (5% traffic reduction and a doubling of cycling to school) and in Bristol.	Thank you for this comment. The wording in the committee's discussion section has been amended accordingly.
7	[office use only]	20's Plenty for Us	Full	46	15	Delete the word may and change to "Reduced speeds reduces the number and severity of road injuries". It is proven that reducing speeds reduces both the number and severity of crashes. Every 1mph less reduces injuries by 6% according to TRL research	Thank you for this comment. The wording in the committee's discussion section has been amended accordingly.

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8	[office use only]	[Aeris Europe Limited]	Draft-guideline	General	General	At the time of writing "Clean Air Zones" and the Government's National Air Quality Plan have yet to be finalised: The results of the recent Clean Air Zone Consultation have not yet been published and The High Court quashed the National Air Quality Plans 2 November 2016. We believe consulting and issuing guidance on these items is premature.	Thank you for this comment. Implementation of the recommendations at a local level will need to take account of the final national plan. It is not possible to alter the timeline for this guideline however there is a surveillance process for future updates.
9	[office use only]	[Aeris Europe Limited]	Economic-report	General	General	The economic report and associated Excel model are comprehensive. However the methodology includes evaluation of NO2 mortality impacts and there is currently only an Interim Guidance note of December 2015 issued by COMEAP: "INTERIM STATEMENT ON QUANTIFYING THE ASSOCIATION OF LONG-TERM AVERAGE CONCENTRATIONS OF NITROGEN DIOXIDE AND MORTALITY". The highlights the uncertainties over NO2 relationship to mortality and the difficulties in reducing them. We believe that evaluating NO2 mortality impacts based on the Interim Statement is premature.	Thank you for this comment. The committee (which included the secretariat from COMEAP) was aware that the methodology was based on interim data and sensitivity analysis of the relative risk coefficients did not change the decision as to whether the specific intervention was cost effective. The committee felt it was important to evaluate these impacts and therefore supported the use of these figures. The economic report acknowledges these uncertainties. There is a surveillance process for future update of the guideline.
10	[office use only]	[Aeris Europe Limited]	Economic-report	General	General	Consideration of incremental benefits and marginal cost effectiveness of measures appears to be absent. This is especially relevant when evaluating interventions such as LEZ to tackle lack of compliance at hotspots.	Thank you for this comment. This could not be undertaken due to lack of baseline data (i.e., estimation of impacts without the intervention) on effectiveness in the source literature. This has been acknowledged as a limitation of the model in the final report.
11	[office use only]	[Aeris Europe Limited]	Draft-guideline	55	13	Due to time constraints we are not submitting detailed comments but urge the Committee to investigate the work of (for example) TfL and Wandsworth Borough Council with respect to bus emissions.	Thank you for this comment. The evidence identified for bus operations (review question 2) was based on a systematic search of the literature including grey literature, we also undertook 2 calls for evidence with stakeholders in accordance with the NICE manual .
12	[office use only]	[Aeris Europe Limited]				The consultation is premature in the context of the current lack of final COMEAP health guidance on NO2 impacts and the recent High Court decision quashing the Government's National Air Quality plans. Should NICE delay and re-consult when these items are finalised, I would welcome the opportunity to submit more detailed comments.	Thank you for this comment. This guideline has been developed in accordance with the NICE manual and a second consultation is not planned. There is a surveillance process for future update.
13	[office	Arun District	Full	5	7	Following on from above comment – provision of a national standard	Thank you for this comment. Please note that

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	use only]	Council				supplementary planning doc would be much better than all LAs creating their own, for same / similar reasons. Would help to ensure action is taken and taken soon rather than time and resources wasted on looking into what's needed.	recommendations on national policy are beyond the remit of NICE.
14	[office use only]	Arun District Council	Full	general		<p>NICE could be missing a chance here. The ideas mentioned in the recommendations have been tried, in differing ways and with different emphasis, for decades yet air pollution hasn't gone away. For the espoused cumulative benefits approach to work then sign up is needed everywhere and not just from time to time in place to place. This would be achieved much more easily if those responsible could merely add items to a shopping basket instead of creating the product from scratch.</p> <p>Lead target achieved because national standard and requirements were set and enforced – imagine what would have happened if the approach had been to introduce catalytic converters only in the areas where pollution was worse and on by each local authority making its own decision on what standards or approach to take.</p>	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
15	[office use only]	Arun District Council	Full	6	6	<p>Consider introducing clean air zones... to be successful a CAZ would operate on ANPR basis, probably using penalties for the most polluting vehicles, or banning them, or encouraging low emission vehicles by a benefit of some sort (allowed to use bus lanes?). If bans then re-routing of traffic required, may lead to other areas becoming impacted. Equipment and signage costs alone are £hundreds of k and local authorities cannot afford same without funding. Project work to show same would be locally effective also required in order to defend decisions and show CAZ would be effective.</p> <p>Would probably help the large number of AQMAs that are traffic related but why leave each area to come up with own concept of what would work, how to implement, who to charge / ban / benefit and how? Again, if CAZ toolkit created with gov backing, that can just be signed up to instead of constantly re-inventing the wheel, then take-up should be maximised and polluting vehicle owners (private as well as commercial) would be more encouraged to change due to national coverage instead of piecemeal.</p>	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
16	[office use only]	Arun District Council	Full	6	22	Better to develop the existing powers over no idling so that it is national practice. Every school should and other vulnerable place have a no idling zone around it – why leave it for fragmented	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a

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						approach?	remit to make recommendations on national policy.
17	[office use only]	Arun District Council	Full	7	4	Congestion zones –similar comments re CAZs really – time and costs spent ahead of introducing a zone of researching and monitoring and signage and proof of effectiveness are beyond most LA budgets for pollution reduction. LAs have the local knowledge to know where such zones would be a benefit, but proving the same in each individual place is prohibitive. Provision of a national model to follow for congestion charging would cut out wasted research, be quicker to implement and be more acceptable to road users / more readily understood	Thank you for this comment. Local action will need to be developed based on specific local conditions.
18	[office use only]	Arun District Council	Full	8	11	<p>LAs shouldn't 'consider' procuring low emission vehicles for their fleets – a straightforward, compulsory requirement to only buy low emission vehicles should be in place. LAs are public health bodies that should lead by example – too much emphasis has been placed on cost reductions and rationalising resources – every procurement decision around the country is scrutinised to such a degree that time and money spent could be saved if LEVs became a requirement – no need to do the calculations and occasionally find them cheaper. Impact on market would improve cost benefits in any case.</p> <p>This would lead to private / commercial fleets benefitting too as they would see reduced LEV costs and then be more likely to switch. The same principle should be applied to solar power – all LA owned premises should be retro-fitted with such and planning requirement for all new dwellings to be fitted should be in place; this would reduce capital and installation costs substantially as well as impacting on pollution created via domestic energy use</p>	Thank you for this comment. The use of 'consider' is standard NICE wording based on the strength of the evidence considered. A compulsory decision about procurement would be a central government decision. It is not within the remit of NICE to make recommendations for central Government.
19	[office use only]	Arun District Council	Full	General		<p>The focus of the document's recommendations seems to remain on local measures being put in place (bylaws, supplementary planning guidance, changes to local plans, local clean air zones, etc.) rather than providing national standards that can be used across the board.</p> <p>For example, if bylaws would work then create a model bylaw for LAs to easily adopt. The success of the skin piercing bylaws is a good example of how this worked – and if they're needed in the majority of areas to succeed in having the cumulative impact, then recommend to make it national law instead.</p>	Thank you for this comment. It is not within the remit of NICE to make recommendations for central Government. NICE has worked with Public Health England (PHE) to develop this guideline. PHE advise central Government on National policies.

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						<p>In effect the guidance is perpetuating the fragmented approach of the last 20+ years by encouraging lots of local bodies to spend time, money and resources in silos – expecting funding to appear from nowhere (CIL mentioned though) and ending up with inconsistencies that businesses and developers (rightly) use to criticise Local Authorities.</p> <p>LAQM hasn't worked well over the last 20 years as it is underfunded and requires someone to set specific standards and tools for tackling the issues, not making generalised comments about things that should be 'considered'.</p>	
20	[office use only]	Ashwoods Lightfoot Ltd	Full	31	16	The problem is not technology or vehicles – the biggest problem is drivers. Drivers need to change their driving style to be smoother and, therefore, significantly more efficient. You can give the ultimate cutting edge technology to a bad driver and it will still be inefficient.	Thank you for this comment. The guideline makes recommendations on smooth driving (section 1.5).
21	[office use only]	Ashwoods Lightfoot Ltd	Full	39	22	Training is not the answer. Training is proven to only provide temporary improvements to driving style before old habits creep back in. Lightfoot technology deals with bad/inefficient/unsafe driving in real-time in-cab and sustains this improved driving style permanently. This is backed up with data from thousands of UK commercial fleet drivers.	Thank you for this comment. The statement in the committee's discussion section is based on expert testimony on influencing driving behaviours for fleet drivers and others. In addition, evidence from published studies and the committee's expertise were taken into consideration when developing the recommendations on driver training (1.4.1-1.4.5 of the final guideline).
22	[office use only]	Ashwoods Lightfoot Ltd	Full	43	7	This is absolutely the BEST way to educate drivers. Providing real-time information, live, in-cab to the driver to help them improve their driving style, significantly reducing harmful emissions. We have proven this in trials with thousands of UK commercial fleet drivers.	Thank you for this comment.
23	[office use only]	Ashwoods Lightfoot Ltd	Full	9	14	Community engagement is best achieved over Social Media with a supporting Connected Car technology, linking the vehicle to the internet. To achieve this engagement you have to encourage drivers to compete against each other to show who the best drivers are. This works much in the same way as the Fitbit – making people healthier by encouraging them to compete.	Thank you for this comment. The guideline includes a research recommendation to examine how best to achieve positive change in this area.
24	[office use only]	Ashwoods Lightfoot Ltd	Full	51	22	Absolutely. And this cannot be achieved via training or via traditional telematics. This is a perfect opportunity for a cutting-edge technology,	Thank you for this comment.

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25	[office use only]	Asthma UK	Full	General	General	<p>Question 4</p> <p>Asthma UK believes that referencing the current draft proposals for clean air zones is helpful. The inclusion of the draft proposals highlights that clean air zones are an effective public health policy as well as being useful environmental and anti-congestion measure. Asthma UK strongly supports action on air quality at a local level.</p>	Thank you for this comment
26	[office use only]	Asthma UK	Full	General	General	<p>Question 5</p> <p>Asthma UK's Connected Asthma Report has the potential to add to the considerations of the committee after consultation. The section entitled <i>health apps to track and avoid triggers</i> is highly relevant to the study mentioned in question 5. Given the speed at which technology develops it would be helpful to consider a broader range of evidence as well as published evidence due to the time lag and disparity between technological developments and published papers.</p>	Thank you for this comment. We will pass this information to our resource endorsement team. More information on endorsement can be found here .
27	[office use only]	Asthma UK	Full	General	General	<p>Question 8</p> <p>Yes, recommendation 1.2 defines and refers to at risk groups. At risk groups are not mentioned in the DEFRA consultation.</p>	Thank you for this comment. Please note it has been agreed to remove the reference to the DEFRA clean air zones draft proposals and the recommendation (now 1.3.1) suggests aiming to meet WHO air quality guideline levels.
28	[office use only]	Asthma UK	Full	10	8-22	Asthma UK strongly supports the measure set out in the at risk group section of the recommendations.	Thank you for this comment.
29	[office use only]	Asthma UK	Full	14	4-6	<p>Lines 4-6 state that children and older people are amongst the most vulnerable to air pollution. It should be noted that people with Asthma are also highly vulnerable to air pollution.</p> <p>A survey of 1000 people with asthma found that traffic fumes trigger symptoms in two thirds (66%) of people with asthma (Asthma UK 2014). Repeated exacerbations have a very detrimental effect on quality of life, 42% of those surveyed stated that traffic fumes discourage them from walking or shopping in congested areas. People with asthma should be mentioned in this section.</p>	Thank you for this comment. The context section of the guideline has not been amended. However, please note that the definition of 'vulnerable groups' included in the 'Terms used in this guideline' section includes 'people with chronic conditions'.

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30	[office use only]	Bradford Metropolitan District Council	Full	5	14	Highlight that current travel planning arrangements encourage modal shift but do not look at the remaining vehicle stock and miss opportunities for low emission vehicles (LEVs). Travel plans could incentivise uptake (eg through advantageous parking, free/reduced charging, and salary sacrifice arrangements) e-bikes could also be encouraged where terrain makes traditional bikes more difficult.	Thank you for this comment. The recommendation relating to travel plans has been amended. It is now included in recommendation 1.2.1. It focuses on including air pollution outcomes.
31	[office use only]	Bradford Metropolitan District Council	Full	5	17 & 18	The evidence is <u>very</u> patchy around vegetation type measures as an intervention as part of schemes (to the point where Highways England have discounted them). This is acknowledged in the committees discussion section, and that vegetation can actually make air quality worse so this could be counter productive even. We felt that uncertainty is to such an extent that a note should be inserted into the guideline (when compared with other interventions to 'consider'). The reason for highlighting this is that whilst we appreciate the wider health benefits of green space and vegetation, this is a relatively easy intervention as part of the landscaping for a road scheme (that would be happening anyway for other reasons) and if the guideline indicates this as an effective air quality improvement intervention to consider (without mention of potential for negative effects cf page 8 22-23 for reduced speeds), this could be the 'only' air quality mitigation offered and in situation where the insertion of vegetation could actually make things worse, that is undesirable as an outcome for the application of this guideline.	Thank you for this comment. The discussion section includes further examination of the benefits and harms of vegetation as you note. Vegetation can have a positive effect and is recommended in 1.1.2 where this will not reduce ventilation. The guideline notes that positive change will come from the combination of the range of measures outlined not from single actions.
32	[office use only]	Bradford Metropolitan District Council	Full	5	22	CIL measures examples would be useful to insert here, such as low emission refuse collection infrastructure (cng station), or on-street lev infrastructure (such as charging points).	Thank you for this comment. The recommendation (1.2.2 in the final guideline) has been amended to include measures to reduce emissions.
33	[office use only]	Bradford Metropolitan District Council	Full	6	10	The word 'consider' is used in relation to reducing pollutant levels below EU limits. The guideline defines that 'consider' is used where there is less certainty in the strength of the evidence. Two points in relation to this, i) EU may soon become redundant so could the guideline should reference WHO limits here? (which are more conservative) and ii) The evidence for progressive targets is very strong (6 cities study etc) with countless studies showing straight line graphs for health improvement well below the current EU limits. To question whether or not air quality improvement should be progressive is like saying the evidence is not strong enough to warrant the guideline in the first place and questions whether health and air quality are linked at all. It would be better to remove the word	Thank you for this comment. The amended guideline includes aiming for WHO levels (recommendation 1.3.1).

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						'consider' from this line.	
34	[office use only]	Bradford Metropolitan District Council	Full	7	1	The word consider should be removed from this line – in what circumstances would joint working <u>not</u> be a positive recommendation?	Thank you for this comment. This word has been removed.
35	[office use only]	Bradford Metropolitan District Council	Full	8	17	This recommendation (and others in the guideline) would be useful Highways England and DfT, what is the reasoning for it is it only for 'non-governmental organisations'?	Thank you for this comment. The wording of the intended audience ('who is it for' in the overview text) of the final guideline has been amended to include 'staff working in transport and highways authorities'.
36	[office use only]	Bradford Metropolitan District Council	Full	8	22-23	Like vegetation, the evidence is patchy for the air quality impact of reducing speeds, and there is evidence for <u>both</u> positive and negative impacts (lower speeds can give less emissions in stop start driving conditions and it depends on the vehicle type too). This should be mentioned rather than just the potential 'adverse' impacts, it should say 'potential adverse and positive impacts' to make the guideline more balanced in relation to the evidence currently available.	Thank you for this comment. This is addressed in the discussion section.
37	[office use only]	Bradford Metropolitan District Council	Full	9	21	The word 'consider' for this section is not appropriate, even if there is little evidence for direct air quality improvement from providing the public with information about air quality and health, and how they can help improve it and reduce their own exposure, it would still be a good thing to do, this should be acknowledged by the guideline.	Thank you for this comment. The committee's discussion section has been clarified to state that it is important to give the public information on how road-traffic related air pollution affects their health and how their transport choices contribute to this. However, the evidence was weak therefore the strength of the recommendation remains 'consider'. The strength of a recommendation is determined by the level of evidence identified. The committee's discussion section on this recommendation 1.7.4 in the final guideline now includes additional rationale on why a recommendation is needed on this topic.
38	[office use only]	Bradford Metropolitan District Council	Full	10	1	This section (advice for businesses) should include reference to their procurement practices, in relation to the buying of general goods (anything that is transported) and vehicle selection for the company itself. Changes to procurement policy could achieve widespread LEV uptake. It could also include LEV incentivisation in the workforce through LEV travel planning and staff incentives (free parking, charging and salary sacrifice) and LEV infrastructure for	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.

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						businesses, including shared facilities and partnership arrangements with other businesses and or local authorities.	
39	[office use only]	Bristol City Council	full		General	<p>Bristol City Council (BCC) welcomes this draft guidance especially as it is targeted at people like us who are working in local authorities with communities.</p> <p>The emphasis on cars and transport is welcome. It would be helpful to acknowledge the areas that were out of scope of this guidance that have a significant impact on air quality such as planning policy and energy security. For example introducing caution for introducing any new diesel generators and encouraging the use of solar panels instead.</p>	<p>Thank you for this comment. The full scope for the guideline is available here. The committee's discussion section highlights some of the issues that were out of scope of the current guideline.</p> <p>Recommendations on planning are included in section 1.1 of the final guideline.</p>
40	[office use only]	Bristol City Council	full			<p>Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why.</p> <p>The majority of the recommendations are practical and timely. BCC has made tackling air quality a priority and this guidance when published will shape the direction we take.</p> <p>Making the link between the suggested actions, air pollution and health is vital to ensure that planning policy can be updated accordingly to give air pollution the weight that it requires.</p>	<p>Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned.</p>
41	[office use only]	Bristol City Council				<p>Would implementation of any of the draft recommendations have significant cost implications?</p> <p>Very few, if any of the suggested measures are cost neutral, In the current financial climate faced by Local Government the challenge that this presents is very significant.</p> <p>Implementation of a CAZ or congestion charging will have significant cost implications not only for implementation but also at the feasibility study phase which will need to be carried out. At BCC, funding for this type of work in not available.</p> <p>Keeping cycle routes fully segregated or away from main transport routes could have additional cost implications. Separation with trees can also add costs along with ongoing revenue cost for upkeep.</p>	<p>Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.</p>

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						<p>A public awareness campaign will also be costly to implement. Considerable time and resource will need to be made available to develop and circulate material and to engage effectively with residents, businesses and other local groups. BCC has applied for an air quality grant from government to start a public awareness and engagement campaign.</p> <p>Procurement changes, to ensure the cleanest vehicles are used are again likely to have cost implications. For example, bus services procured by BCC for transporting school children often end up with some of the oldest and most polluting buses being used for these contracts as they provide the cheapest option.</p> <p>Significant interventions such as CAZs and congestion charging cannot be absorbed by doing things differently.</p>	
42	[office use only]	Bristol City Council	full			<p>What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.)</p> <p>The Joaquin Decision Tool is a structured step by step tool to help local areas http://joaquin.production.cloud.kanooh.be/en</p> <p>In the current financial climate that local authorities are working in, even small increases in costs are difficult to get approved. It is vital that the link is made between these additional costs and the longer terms health benefits. Guidance on how to make these links so that ongoing revenue costs, or increased procurement costs for example can be more than offset by reduced health costs would help public health deal with the inevitable push back that will occur due to additional costs of some of these measures.</p> <p>It is considered vital that national policy matches the local aspirations to improve air quality. Two examples where national policy undermine measures outlined in this consultation document are:</p> <ul style="list-style-type: none"> • The continued financial incentives offered by The Treasury for diesel vehicles and continued reluctance to change this or consider the need to include cars in any CAZ plans. • The recent changes to the planning process and in 	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .

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						particular the prior approval process which allows changes of use without consideration of air quality and its impacts being required. As a result, offices can be converted to residential use without assessment of impacts of existing air pollution on new residents of these buildings.	
43	[office use only]	Bristol City Council	full			<p>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?</p> <p>It will be very difficult to implement a clean air zone without being part of a formal national programme because it is difficult to get political support for measures that are likely to be seen as unpopular. Bristol has full council support for the introduction of CAZs so has cleared this issue; however, funding of feasibility studies and the cost of implementation is a considerable barrier. More detail about how a non-charging CAZ can be linked to the other measures outlined in the consultation document may help adoption of a CAZ and help local authorities implement measures outlined in the consultation document in a coordinated manner. CAZs may help trigger effective action in a way that air quality management areas have failed to nationally. The ongoing operational costs of a CAZ and the air quality improvements need to be spelt out in order to demonstrate cost effectiveness. Advice on what the cordon area should be would help. Explicit comparisons with other tools for managing congestion, which impacts air pollution, would be helpful.</p>	Thank you for this comment. Please note it has been agreed to remove the reference to the DEFRA clean air zones draft proposals and the recommendation (now 1.3.1) suggests aiming to meet WHO air quality guideline levels.
44	[office use only]	Bristol City Council	full			<p>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?</p> <p>The figures quoted here only refer to PM2.5 deaths and does not reflect the latest evidence on NO2 which does not match the rest of the document which refers correctly to the significant health impacts associated with NO2 pollution.</p>	Thank you for this comment. The information about the extent of the health impact of NO ₂ has been updated in line with the recent COMEAP report.

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45	[office use only]	Bristol City Council	full			<p>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?</p> <p>Air quality grant fund https://www.gov.uk/government/collections/air-quality-grant-programme</p> <p>OLEV Funding, Cycling ambition, clean bus technology fund etc. are all aimed at air quality improvement measures. The problem with all of these is that they are ad-hoc grants for which local authorities have to compete against each other. The way funding is currently provided for air quality schemes means that it cannot effectively be used to fund a strategic air quality action plan.</p> <p>Another issue with grant funding in its current form is that it does not generally provide revenue funding. Without revenue funding the current financial constraints make it increasingly difficult for local authorities to resource the implementation of measures funded by these grants.</p>	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
46	[office use only]	Bristol City Council	full			<p>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?</p> <p>There are no monies for new business cases so this would hamper efforts to introduce new interventions, hence the difficulty with implementing clean air zones without any extra government resources to do so. Even when resource is allocated for air quality improvement measures difficulties are being encountered when making the business case for initiatives due to concerns over ongoing revenue cost. As an example, the West of England region was recently successful in bidding for £7m to encourage low emission vehicle uptake. Charging infrastructure will have some element of ongoing costs and evidence and a methodology that can be followed to ensure health benefits are costed and accounted for in these business cases will assist with implementation of measures.</p> <p>In 2004 Bristol City Council and Bath & North Somerset Council set up the Bristol/Bath freight consolidation scheme with the aim of helping to reduce pollution and congestion in central Bristol and Bath, and overall carbon emissions from freight transport. The</p>	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.

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						scheme has been successful in achieving a 78% reduction in trips (1800 trips saved), a reduction of 157 tonnes of CO2 and 5 tonnes of NOX since 2011. We need approximately 140 businesses in order to make this scheme cost effective.	
47	[office use only]	Bristol City Council	full			<p>Apart from broadening beyond the five cities, does recommendation 1.2 add anything to the DEFRA draft?</p> <p>Bristol City Council responded to the Defra consultations on National Air Quality Action plans and Clean Air Zones.</p> <p>The wording 'could include restrictions' is contrary to the CAZ framework which does not propose to include restrictions, only charging aimed at cleaning the vehicle fleet in areas of poor air quality.</p> <p>Additional recommendations in NICE guidance which back up the ideas outlined in the National Air Quality Action Plan will help to add weight to arguments for them to be introduced.</p>	Thank you for this comment
48	[office use only]	Bristol City Council	full			<p>Does recommendation 1.2 from NICE act as a lever for local communities when considering clean air zones?</p> <p>Inclusion of recommendation 1.2 adds weight to the argument for CAZs by making a clear link between Clean Air Zones, air pollution and health impacts.</p>	Thank you for this comment
49	[office use only]	Bristol City Council	full	7	1.3.1	Driver training initiatives are welcome.	Thank you for this comment
50	[office use only]	Bristol City Council	full	8	1.4.3	Introducing a 20 mph for air quality and accident reduction reasons is a great idea - a win win	Thank you for this comment
51	[office use only]	Bristol City Council	full	9	1.5.2	<p>Using dense foliage to screen cyclists sounds interesting but confusing; a visual illustration might be helpful.</p> <p>Reducing the time cyclists spend at busy sites - do you have any specific examples of how this can be achieved?</p> <p>There is a potential conflict between the messages short-term warnings have. There are a limited number of days each year where</p>	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.

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						a warning would be issued for moderate or above air pollution and therefore the link/training on long term air pollution is needed to ensure warnings do not lead to complacency and the feeling from the general public that on all other days the level of air pollution is not a problem	
52	[office use only]	Bristol City Council	full	10	1.6.6	We welcome the list of practical advice for at risk groups. More explicit advice about how we should use the daily air quality index and data from real time air quality monitors for communications to the public about air quality would be helpful.	Thank you for this comment. There was limited evidence on the effectiveness of air alerts interventions. Activities to raise awareness of air pollution, including air pollution alerts and the ability of health services to respond to concerns raised by issuing alerts has been identified as an area for research (research recommendation 5).
53	[office use only]	Bristol City Council	full	12	24	This figure of 64% is less than other values for NO2 at road-side locations quoted in other documents such as the National Air Quality Action Plan which quotes a figure of up to 80% of NOx being from transport sources at roadside locations where we need to take action	Thank you for this comment. This figure relates to air pollution at urban monitoring sites.
54	[office use only]	Bristol City Council	full	15	28	As nitrogen dioxide pollution is made up of more local sources of pollution compared to PM2.5 is there an opportunity to update the public health outcomes indicator to reflect the latest health evidence for nitrogen dioxide and to help drive more local action on air quality?	Thank you for this comment. The public health outcomes indicator stated in the guideline is as per the current information (June 2017) available on the Public Health England website. The decision to recommend changes to this is not within NICE's remit.
55	[office use only]	Bristol City Council	full	26	12	Disagree with the statement that planning and local transport officers are best placed to ensure trees and barriers are used effectively. Air pollution experts need to lead on this work if it is aimed at reducing exposure and ensuring that air pollution is not worsened. Suggest that this is changed to ensure air quality officers/pollution control officers are considered best placed-in consultation with planning and transport.	Thank you for this comment. This sentence in the committee's discussion section in the final guideline has been amended to '...local planning and transport officers in consultation with air quality or pollution control officers, are best placed to ensure that trees and barriers are used effectively in urban areas'.
56	[office use only]	British Lung Foundation	Full	General	General	Qu.1: Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why. In our experience, the ability and capacity to implement NICE guidance considerably varies across the UK. Some LAs are likely to face significant challenges in embedding a joined-up working culture between health and transport. We recommend that bodies such as the Local Government Association and London Councils work to support and disseminate best practice and advice for doing so.	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned.

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						Challenges are likely to be compounded in LAs where budget cuts have been extensive and where there is less expertise and lower public awareness.	
57	[office use only]	British Lung Foundation	Full	Pg.4 Pg.5	Line: 5-20 Line 1-29	<p>Qu.1: Joined-up local planning</p> <p>We welcome the focus on planning and air pollution in this draft guidance. This is particularly pertinent for areas where at risk populations frequent. We agree that applications for new schools should not be considered in high pollution areas and if they are built, then information, funding and resources need to be given to that school to enable them to take steps to protect children. The guidance should emphasise the importance of careful planning for new schools, care homes and hospitals.</p> <p>We are concerned that the guidance doesn't outline how any of the recommendations will be implemented - which is likely to be make transparency and evaluation difficult. Many LA professionals we have spoken to are already struggling to champion air quality within their departments. Particularly when competing against high-profile issues such as infrastructure and congestion. The guidance should be more explicit about existing legislation, policies or indicators that LAs can use to take action on air pollution. For instance: the guidance could recommend that LAs assess if funds can be obtained from new developments in high air pollution areas through the community infrastructure levy.</p> <p>As the guidance states, there is already an indicator on air pollution in the public health outcomes framework (PHOF) and in the transport analysis guidance (TAG). These indicators exist, but have failed to deliver change on the ground. This shows that this guidance will need to be supported by further national measures to achieve the wide-scale change that is required.</p> <p>Local public health teams across the UK have experienced budget cuts which make any extension of their prevention work challenging. In November 2015, it was announced that public health funding will be cut by 9.7% by 2020/21 in cash terms of £331 million, on top of the £200 million cut in year for 2015/16ⁱ. These stretched teams require clear advice, training and resources to be able to add or integrate air pollution to their portfolios.</p>	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned.

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						<p>LAs need clear targets, training and incentives to be able promote air quality within their teams. Particular attention should be paid to the presentation and availability of local data. Currently data can be difficult for members of the public to understand, not easy to access and often written by transport teams. The guidance should recommend that LAs improve the access and quality of data for the general public and for professionals.</p> <p>Additionally, LAs should signpost professionals to organisations that are already working in this sector. As a patient organisation, the British Lung Foundation is able to provide expertise on respiratory outcomes, patient services and health advice. Signposting to organisations will save LAs resources and time, as well as improve their reach into vulnerable communities. The guidance should be more specific about the LA leads who should be involved in air quality planning – namely planning, transport and public health.</p>	
58	[office use only]	British Lung Foundation		Pg.4 Pg.5	Line: 5-20 Line 1-29	<p>Qu.1 Joint outcomes across LAs</p> <p>The BLF works with health care professionals across the UK. In our experience, it's rare that these professionals have been involved in air quality planning and it's rare to find air quality plans with respiratory outcomes attached to them.</p> <p>Every year, the Department for Environment, Food and Rural Affairs (DEFRA) estimates that air pollution costs the treasury up to £27.5 billionⁱⁱ. The British Lung Foundation's <i>Battle for Breath report</i>,ⁱⁱⁱ found that lung disease places a huge burden on health care services. It accounts for 700,000 hospital admissions and over 6.1 million hospital bed days a year in the UK. Many of these hospitalisation days can be linked to air pollution episodes. Both air pollution and lung disease prevalence increase in areas of higher social deprivation.</p> <p>Therefore, improved respiratory mortality outcomes should be linked to air quality plans. This will not only improve health outcomes but help tackle embedded social inequalities. Cross-departmental targets and outcomes will ensure funding and resources are used more efficiently across LAs.</p>	Thank you for this comment. The guideline includes a recommendation (1.1.1) about including air pollution in strategic plan making locally, including health and wellbeing plans.
59	[office	British Lung	Full	General	General	Qu: 2: Would implementation of any of the draft recommendations	Thank you for your response. We have

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	use only]	Foundation				<p>have significant cost implications?</p> <p>Lowering air pollution levels to a safe level will require financial investment and resource; however the health benefits that could be achieved far outweigh these costs. Every year, DEFRA estimates that air pollution costs the treasury up to £27.5 billion. Tackling air pollution will help create cleaner and safer cities which are then more likely to be attractive places to invest.</p>	<p>passed it to the NICE resource impact assessment team to inform their support activities for this guideline.</p>
60	[office use only]	British Lung Foundation	Full	Pg.5	Line 3	<p>Qu: 3: What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.)</p> <p>Qu.3: Increase monitoring outside schools</p> <p>Information and data on air pollution outside schools often is not collected, and where it does exist it is not always accessible and easy to understand. Better pollution data would make the NICE recommendation on "safe travel routes," more effective and easier to implement around schools.</p> <p>Following a Freedom of Information (FOI) request to councils earlier this year we discovered huge discrepancies in the levels of pollution monitoring outside schools across the country. Nearly two-thirds (57%) of LAs don't have air quality monitors outside their local schools, yet many of them are located within the most harmfully polluted areas, according to the World Health Organisation. There was also a discrepancy in LA's understanding of the current local air quality monitoring guidance – with some stating that schools were a priority and others stating schools were not. Therefore the suggested NICE recommendations around schools need to be supported by updated local air quality monitoring guidance from DEFRA.</p> <p>Increasing monitoring outside schools will ensure that teachers and parents have the information they need to be able to make health decisions. This will also equip LAs with more data and information on pollution in areas where the most vulnerable people are. This will help ensure that NICE's recommendation on travel planning is more</p>	<p>Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here.</p>

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						<p>effective, as cleaner routes will be easier to identify. Safe travel routes should be communicated to parents through a variety of mediums in a clear manner, with straightforward explanations of what air pollution is, the impact that it has on children, and what they can do to limit their child's exposure.</p> <p>We have spoken to many LAs who are keen to carry out projects with schools but often lack the funding to do so. Where these projects have been carried out some interesting results have been achieved. For example, councils across London worked with the Cleaner Air 4 Schools project, where students measured air quality around their schools and then ran a campaign to encourage their parents to stop using cars on the school run. This saw car travel reduced by 35% with resultant improvement in air quality.</p> <p>These schemes should be encouraged and case studies should be shared in the guidance to encourage other LAs to adopt them. Organisations like the BLF are able to support with the delivery of these projects.</p>	
61	[office use only]	British Lung Foundation	Full	Pg.25 Pg.27	Line 4-6 Line: 15-23	<p>Qu.3: Increased active travel will have co-benefits across public health</p> <p>We welcome the focus on active travel measures in the guidance. Schemes that reduce car travel must be accompanied by investment in alternative transport methods. However, we feel the guidance should emphasise the co-benefits that active travel will bring to LAs. LAs should be required to ensure that policies on active travel are compliant with NICE guidelines on physical activity. Local authorities should also work with Public Health England and local public health teams so that these policies tackle other public health goals, including improving lung health, reducing obesity, increasing physical activity and addressing health inequalities. Subsequently, this will help lower pollution and create safer and more active communities.</p> <p>LAs should promote active travel amongst the most deprived communities, as this would yield outcomes in improving public health and reducing health inequalities – important government and</p>	<p>Thank you for this comment. The guideline notes the benefits of active travel and makes links to other NICE guidelines, such as 'physical activity: cycling and walking' (PH41). However please note that this current guideline focuses on air pollution.</p>

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						NHS priorities. Deprived communities are less likely to have access to alternative transport infrastructure and green spaces, yet are more likely to be exposed to toxic pollution levels and have a lung condition. For example, people in London's poorest boroughs are twice as likely to have COPD when compared to people living in London's richest boroughs. ^{iv} Moreover, children in more deprived areas are also likely to be at higher risk: 443 schools in London are located in areas that exceed legal levels of NO ₂ , with 83% of these schools considered deprived. ^v A similar situation exists nationwide, with Sir Michael Marmot's review of health inequalities finding that 66% of man-made carcinogens are emitted from the 10% most deprived English city wards. ^{vi} The guidance should be amended to reflect these broad public health benefits that could be achieved from active travel schemes.	
62	[office use only]	British Lung Foundation	Full	General	General	<p>Qu.3: Training and awareness-raising with professionals</p> <p>The UK government should fund a national public health awareness campaign for both LA professionals and the general public. This should include training for LAs. This will then equip practitioners with the knowledge they need to champion air quality locally. It would also have the potential to raise democratic pressure and public willingness to support more ambitious interventions.</p>	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
63	[office use only]	British Lung Foundation	Full	Pg.9	Line 12-27	<p>Qu.3: Tailored health information campaigns</p> <p>Campaigns must be targeted at all audiences, particularly vulnerable groups who may be harder to reach and/or less likely to engage. This includes people who have lung conditions, who may be also disproportionately affected due to reduced mobility. Efforts to engage with vulnerable people must consider those with an 'invisible' illness and those who might not consider themselves to be "disabled".</p> <p>Information shared as part of these campaigns must be written in simple and straightforward language, outlining how people with different conditions – including lung conditions – will be affected. This should include robust health advice on how people can protect themselves from air pollution.</p> <p>LAs should issue health alerts during episodes of high pollution,</p>	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned.
				Pg.10	Line 1-22		

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						through a variety of mechanisms – including social media, text messages, email alerts, local radio and television etc. – to reach the largest number of people possible. The Mayor of London has recently introduced these types of alerts, and other LAs should evaluate and learn from this programme.	
64	[office use only]	British Lung Foundation	Full	Pg.6	Line 4-28	<p>Qu. 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?</p> <p>The inclusion of clean air zones should be core to any LA guidance. This will help increase awareness about the role and impact Clean Air Zones could have on pollution levels. However, for these zones to be successful LAs must be supported by a wider ambitious national strategy. Until this strategy is in place, it's unclear how useful such references will be.</p> <p>For Clean Air Zones to sufficiently tackle local pollution hotspots and bring emissions down to safe levels, they must be based on robust modelling. This modelling should assess which vehicles contribute the most pollution. In the majority of towns and cities, it's likely that private cars, particularly diesel will be the largest emissions source. Therefore, the guidance should recommend that private cars are included in any charging scheme, unless modelling suggests otherwise.</p> <p>Evidence suggests that the inclusion of cars within a clean air zone can lead to excellent outcomes. For example, a clean air zone in Berlin which included cars led to PM and NO₂ emissions 50% and 20% lower than the predicted trend.^{vii} London's current Low Emission Zone has failed to provide positive health outcomes, largely because it does not go far enough and has failed to regulate private cars.^{viii} In the three years it has been operating, there has been no evidence of air quality improvement or improvement in children's lung health. Therefore, in order to achieve positive public health outcomes NICE should recommend that these clean air zones are ambitious in scope, size and design.</p> <p>We agree that LAs are well-placed to identify local problems and</p>	<p>Thank you for this comment. Please note that the guideline focuses on local actions. Recommendations on national policies are outside the remit of NICE.</p> <p>It has been agreed to remove the reference to DEFRA's current draft proposals for clean air zones and the recommendation (now 1.3.1) suggests aiming to meet WHO air quality guideline levels.</p>

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						<p>decide on the measures that should be put in place. However, they need to be given sufficient resources to make this decision. This could mean easy access to case studies of the impact of vehicle inclusion across different areas. It could also mean the provision of funding to carry out studies and assessments. This will ensure all policies are supported by robust modelling and evidence and will require support from a national air pollution framework.</p> <p>Currently, the DEFRA framework does not clarify the operational standards for vehicle detection in clean air zones. If vehicles identified through ANPR are being recorded as compliant with Euro 4 or diesel Euro 6/VI standards based on laboratory testing only, then the standards will be difficult to implement as intended. This is because many laboratory tests systematically understate true pollution levels, as highlighted in the Department for Transport's 2016 report on nitrogen dioxide emissions from cars sold in Britain.^{ix}</p> <p>These standards should be acceptable if DEFRA, the Department for Transport and the DVLA cross-reference cars identified through ANPR with data real world emissions, or use cameras or sensors to measure the real world emissions for each car entering the clean air zone. The framework should establish the minimum number and optimal location of cameras, including the need for mobile cameras. Alternatively, these government departments could work with industry partners to ensure that cars are required to have consumer labelling based on real world emissions that local authorities can monitor. These changes will ensure that only low polluting vehicles will be permitted to enter clean air zones.</p> <p>The guidance should signpost LAs to organisations that can support them with real-world emissions testing and monitoring. This will then help LAs take steps to clean up their procurement contracts, carry out random vehicle inspections on their fleet and create effective clean air zones.</p>	
65	[office use only]	British Lung Foundation	Full	Pg.6	Line: 4-28	<p>Qu.4: Clean air zones need to work for the most vulnerable people</p> <p>The NICE guidance should recommend that the boundaries of clean air zones are drawn up to include as many schools, hospitals and care homes as possible. Additionally, clean air zones should also</p>	<p>Thank you for this comment. Boundaries of a clean air zone would need to be developed based on local information.</p> <p>Local implementation will need to take</p>

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						<p>contain ample parking and stopping places to ensure that people with mobility issues are able to embark and disembark from their vehicle on journeys. This is because people with respiratory related mobility issues may be unable to walk even short distances without experiencing fatigue.</p> <p>These guidelines should recommend that LAs establish exemption frameworks that ensure people with reduced mobility from a lung condition are not negatively impacted. Blue badge holders should be automatically exempt from clean air zones as they are more likely to rely on their car to live and work. However, NICE should also recognise that many people who have "invisible conditions," such as COPD struggle to walk long distances and may not be able to use equipment like bikes or travel by public transport. If LAs fail to consider the impact on people with a respiratory condition, they may well then breach their Public Sector Equality Duty under the Equality Act 2010. LAs need to make sure that health practitioners are aware of these changes so that they can support vulnerable people get the correct support. A national exemption criterion should be written to prevent inconsistencies and confusion across the UK.</p> <p>LAs should also consider that alternatives to cars are not always feasible for people with lung-related mobility issues. Some modes of transport, such as buses, still require relatively significant amounts of exertion to get to and from stops. These journeys may be even more challenging during the peaks of summer or winter, when outdoor air quality may be diminished due to natural environmental factors. These barriers may be both physical and mental for some patients and may exclude some people from some of these policies.</p>	<p>account of vulnerable groups (see recommendation 1.3.8).</p> <p>Recommendations on national policy are outside the remit of NICE.</p>
66	[office use only]	British Lung Foundation	Full	Pg.59	Line: 14-28	<p>Qu: 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. Are stakeholders aware of any further published evidence relevant to this recommendation that will inform the considerations of the committee after consultation?</p> <p>We welcome the inclusion of health alerts and information provision in the draft guidance; it's essential that this information is timely, accessible and localised to enable people to make the right choices</p>	Thank you for this comment

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						<p>for their health. NICE should emphasise that all alerts need to be accompanied by robust health advice. LAs should work with organisations like the BLF to provide this advice.</p> <p>We are not aware of any new evidence on the efficacy of air quality alerts; however we have collated feedback on this from the people we support. In a survey with 83 lung patients and carers, 25% said that air pollution information needed to be presented more clearly, 32% said it should be easier to find, nearly 40% said it needed to be more localised, 31% wanted earlier warnings and 36% wanted air pollution alerts to be accompanied by clear health advice.</p>	
67	[office use only]	British Lung Foundation	Full	General	General	<p>Qu: 8: Apart from broadening beyond the five cities, does recommendation 1.2 add anything to the DEFRA draft?</p> <p>No, it is largely in line with the DEFRA draft. As outlined above, we think it needs to go further in ambition level, particularly in setting targets, timelines and implementation mechanisms.</p>	Thank you for this comment. It is beyond the remit of NICE to set national targets and timelines. However, the recommendations include setting of appropriate targets by local bodies
68	[office use only]	British Lung Foundation	Full	General	General	<p>Qu:9: Does recommendation 1.2 from NICE act as a lever for local communities when considering clean air zones?</p> <p>Yes, although the guidance will need to be supported by national government action as outlined in this consultation response.</p>	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
69	[office use only]	British Thoracic Society	General			<p>We agree that there is good evidence that air pollution causes acute exacerbations of airway disease, and that there are concerns about lung cancer from diesel exhaust.</p> <p>The British Thoracic Society supports measures that may reduce road traffic air pollution.</p>	Thank you for this comment.
70	[office use only]	British Thoracic Society	General			<p>The measures suggested seem to be very sensible and achievable, although the evidence that they will work appears to be very limited.</p>	Thank you for this comment. Weaknesses in the evidence base are noted in the committee's discussion section and recommendations for further research are included.
71	[office use only]	British Thoracic Society	General			<p>The main section relevant to healthcare professionals relates to educating physicians about the health effects of air pollution, and providing daily air quality guidance to patients.</p>	Thank you for this comment.

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						<p>The latter issue needs careful consideration, in terms of balancing potential benefits (avoiding exacerbations) versus negative impacts e.g. increasing worry and social isolation.</p> <p>We note that the Met Office has undertaken research on behaviour change and style of severe weather warnings – perhaps there may be lessons here?</p>	
72	[office use only]	British Thoracic Society	General			We note the discussion about using trees to reduce air pollution, but no mention that this might increase allergen levels	Thank you for this comment. The focus of this guideline is on traffic related air pollution. The evidence reviewed did not focus on capturing information on unintended consequences of interventions in relation to allergen levels. This is now noted in the committee's discussion section of the final guideline.
73	[office use only]	British Thoracic Society	General			No distinction is made between diesel and petrol engines - we suggest that reference is made to the need to reduce diesel engines.	Thank you for this comment. Decisions to restrict particular vehicle types (see recommendation 1.3.2) will depend on local circumstances and sources. This, and the contribution of diesel vehicles to air pollution, is noted in the discussion section.
74	[office use only]	Building Services Engineering Association BESA	Full	5	7	<p>The BESA believes that buildings have the potential to provide “safe havens” to mitigate many of the harmful impacts of air pollution. People spend over 80% of their time within buildings (87% National Human Activity Pattern Survey Klepeis et al 1995). 20 hours per day (Royal Institute of British Architects RIBA 2016). It therefore makes sense to protect them during these periods. This can be achieved by the design and installation of ventilation systems that filter incoming air. In order to design ventilation systems to mitigate air pollution, a base line of pollutants should be taken in much the same way as a noise impact assessment does to establish ambient noise levels. Typically planning approval sets a requirement to design at 10dB below ambient so that a new building does not contribute to additional noise pollution.</p> <p>Once installed it is vital that systems are correctly commissioned and maintained. Air pollution is not visible so unless there is a monitoring system installed, poor air quality is not detected Systems can therefore fail to deliver clean air to the building without the occupants becoming aware of this. At our own offices on the Hammersmith Road in London where the BESA are tenants, it was</p>	Thank you for this comment. The guideline focusses on outdoor air pollution. Please note that NICE is developing a guideline on indoor air pollution .

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						<p>only by installing air quality monitoring equipment that we detected spikes in poor air quality throughout the day. Investigation revealed the air intake for the ventilation system is sited at the entrance to the garage; cars sit at the gate idling waiting for it to open. The problem was compounded by the removal of the air filters from the ventilation system, as they were clogging frequently and impacting on the performance of the fan.</p> <p>In future a planning approval should include a requirement to install air quality monitoring equipment and to make the results public. This would alert occupants to the issue and provide an opportunity to raise general awareness of the wider air quality problem.</p>	
75	[office use only]	Cambridgeshire Combined Villages Heavy Commercial Vehicle Group	Short	General	General	<p>No mention is made of the effects on health of vehicle noise and vibration. Although these pollutants are not as insidious as the NOx and particulate matter in affecting health they have a significant direct effect on peoples health through sleep deprivation and daytime disturbance. We have carried out studies locally and shown that a significant number of residents living in properties near roads are having their sleep continuously disturbed by passing vehicles and their daytime activities reduced e.g. their safety whilst walking and cycling to improve their health is badly effected by the heavy traffic flows not just the pollution.</p>	Thank you for this comment. While noise and vibration may have health impacts these are outside the scope of the current guideline.
76	[office use only]	Cambridgeshire Combined Villages Heavy Commercial Vehicle Group	Short	General	General	<p>Other vehicle sourced pollutants SO₂, NH₃ and VOC's get no mention at all although these do all have a chronic effect on peoples health.</p>	Thank you for this comment. The discussion section notes that other pollutants are associated with road traffic. This guideline focuses on particulate matter and NO ₂ because these have the greatest impact on health at levels currently seen in the UK.
77	[office use only]	Cambridgeshire Combined Villages Heavy Commercial Vehicle Group	Short	General	General	<p>A list of approved methods for testing for these pollutants should also be included or source references for these tests.</p>	Thank you for this comment. This is outside the scope of the guideline.
78	[office use only]	Cambridgeshire Combined Villages	Short	General	General	<p>A long list of things that can be put into new planning is fine but most of us live in developed areas, what can be done locally to reduce vehicular pollution? Unless pollution reduction measures are</p>	Thank you for this comment. The guideline includes recommendations to reduce road traffic related pollution in other areas. It is

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		Heavy Commercial Vehicle Group				legally binding in new planning approvals then developers are just going to ignore them especially if there is a cost involved.	beyond the remit of NICE to make national policy recommendations for legally binding requirements.
79	[office use only]	Cambridgeshire Combined Villages Heavy Commercial Vehicle Group	Short	General	General	A long list of things that can be put into new planning is fine but most of us live in developed areas. So what can be done locally to reduce vehicular pollution?	Thank you for this comment. The guideline includes recommendations to reduce road traffic related pollution in other areas.
80	[office use only]	Chartered Institute of Environmental Health	Full	General	General	The guidance seems to take little account of some of the worldwide evidence regarding the negative impacts on health arising from air pollution which started with the 1993 seminal US study cited below: 'An Association between Air Pollution and Mortality in Six U.S. Cities' Douglas W. Dockery, C. Arden Pope, Xiping Xu, John D. Spengler, James H. Ware, Martha E. Fay, Benjamin G. Ferris, Jr., and Frank E. Speizer N Engl J Med 1993; 329:1753-1759 December 9, 1993 DOI: 10.1056/NEJM199312093292401	Thank you for this comment. Examination of the epidemiology around the health effects of air pollution is beyond the scope of this guideline. We have used assessments of this, such as those produced by COMEAP, as the basis for the cost effectiveness work.
81	[office use only]	Chartered Institute of Environmental Health	Full	General	General	The guidance appears to take no account of the fact that local authority environmental health officers have been gathering location specific air pollution monitoring data, both in terms of real time values and daily, weekly and monthly averages over many years. This data is freely available and has been used for many years as inputs into Local Plans. In the same vein, local authority environmental health officers have been acting as consultees and have given advice on air quality matters to their planning departments in respect of both individual planning applications and Local Plans for many years and have been advising on the measures contained in the Guidance over the same period; however, their guidance is not always acted upon or has been negated by the rapid growth in both urbanisation, vehicle use and the number of miles driven by individual vehicles.	Thank you for this comment. The committee is aware of the important work carried out by environmental health officers and the recommendations in this guideline aims to will support their actions to reduce air pollution.
82	[office use only]	Chartered Institute of Environmental Health	Full	4	5	In respect of planning new developments, the CIEH is of the view that the guidance should be stronger and should state that air quality issues MUST be taken into account in the local plan and that the guidance should also state that this should also apply to the	Thank you for this comment. The strength of the recommendation is determined by the level of evidence identified.

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						location and orientation of new homes which should, so far as is reasonably practicable, be afforded protection from all potential hazards prevailing in the local environment which should include pollution (including airborne noise, air pollution and radiation).	
83	[office use only]	Chartered Institute of Environmental Health	Full	4	18	Proposals to locate or increase capacity of roads close to housing and centres of population including vulnerable groups such as schools (where pupils will have several years of daily exposure), ensuring the direction of the prevailing wind and topography is taken into account with downwind alternatives being given priority. In the light of developing research the precautionary principle should apply as it will not possible to turn the clock back once respiratory or mental (dementia) damage has been caused.	Thank you for this comment. The guideline includes recommendations to avoid siting vulnerable groups where air pollution will be high.
84	[office use only]	Chartered Institute of Environmental Health	Full	5	7	This requirement would be negated if the guidance clearly stated that it MUST be taken into account in respect of new developments	Thank you for this comment. The wording of NICE recommendations are designed to reflect the strength of evidence underpinning them.
85	[office use only]	Chartered Institute of Environmental Health	Full	5	11	CIEH is of the view that the guidance to planning authorities in respect of traffic-related air pollution and the provision of mitigation measures is negatively focussed and implies that air pollution levels may have to be accepted and 'lived with' in certain circumstances. This is an unduly negative standpoint and we are of the view that it should be clear that this is a measure of 'last resort'.	Thank you for this comment. The recommendations have been amended to place greater emphasis on actions to reduce production of air pollution.
86	[office use only]	Chartered Institute of Environmental Health	Full	6	6	CIEH is of the view that the inclusion of guidance on the introduction of Clean Air Zones (CAZ) is welcomed but is premature. Local authorities will largely wait to see the outcomes and evaluation of the DEFRA sponsored 5 cities trials of CAZ before acting and information passed to CIEH already indicates that, for at least one of the cities, the CAZ proposals will be hard to implement and may merely have the effect of moving air pollution hotspots to previously lesser affected areas.	Thank you for this comment. The inclusion of these recommendations will encourage uptake of actions such as these to address air pollution in a timely fashion.
87	[office use only]	Chartered Institute of Environmental Health	Full	6	15	CIEH is of the view that measures to encourage the uptake of low and zero-emission vehicles should be a national, rather than a CAZ associated measure and should include the provision of 'scrappage' schemes embracing fiscal incentives for diesel powered private cars.	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
88	[office use only]	Chartered Institute of	Full	6	19	CIEH believes that that guidance in respect of emission standards for private hire and other licensed vehicles should follow the pattern	Thank you for this comment. This would need to be determined locally, based on emissions

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	only]	Environmental Health				set by London where, from 2018, no new taxis will be licensed unless they are low/zero-emission vehicles.	apportionment. See recommendation 1.3.2.
89	[office use only]	Chartered Institute of Environmental Health	Full	7	5	CIEH is concerned that the incorporation of congestion charging within CAZ will promote the movement of poor air quality hotspots to areas where air quality is currently good or where it is less of a problem	Thank you for this comment. The committee discussed the risk of movement of problems as a result. Recommendation 1.3.7 notes the need to monitor to see if problems are arising and address them if they are.
90	[office use only]	Chartered Institute of Environmental Health	Full	8	12	CIEH is concerned that the guideline here is too weak and should be strengthened. The suggestion that authorities merely 'consider' the procurement of low/zero emission vehicles should be changed and that Government fiscal support should be available to support this move.	Thank you for this comment. The use of 'consider' is standard NICE wording based on the strength of the evidence considered. Fiscal support from the government is beyond the remit of NICE.
91	[office use only]	Chartered Institute of Environmental Health	Full	8	25	CIEH is concerned that the guidance does not reference the conflict that many local authorities face when the provision of road safety measures appear to be incompatible with improving traffic-related air pollution. The provision of speed humps and bumps that are designed to slow traffic as a safety measure, actively results in encouraging sudden acceleration, deceleration and consequent elevated emissions and this incompatibility need to be addressed. If road safety considerations are to be allowed to 'trump' air quality objectives then this should be recognised.	Thank you for this comment. The recommendation (now 1.5) has been amended to clarify the difference between 20mph limits and 20mph zones.
92	[office use only]	Chartered Institute of Environmental Health	Full	10	12	CIEH welcomes the suggestion that healthcare professions (including Environmental Health Officers [EHOs]) raise awareness of poor air quality and advise on how to minimise exposure and impact. This is in line with the principle of Making Every Contact Count (MECC); however, in so advising groups, CIEH is concerned that EHOs will be party to a tacit acceptance of the enduring nature of poor air quality and that such a position is incongruous with their professional objectives of environmental health improvement.	Thank you for this comment. Recommendations in the guideline emphasise the importance of different agencies working across boundaries to ensure a consistent approach.
93	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		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.	Thank you for this comment. The guideline includes recommendations on including air pollution in local planning by supporting zero- and low- emission travel, including walking and cycling (see recommendation 1.1.1). Please note that recommendations on national policy are outside the remit of NICE.

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94	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		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.	Thank you for this comment. The recommendation (1.1) has been divided to clarify these differences.
95	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		4	L11-17	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.	Thank you for this comment. This has been amended to recommend avoiding siting facilities in areas where pollution is high.
96	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		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</p>	Thank you for this comment. Air quality is used in the guideline in its general sense. Your comments will be considered by NICE where relevant support activity is being planned.

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						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. 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."	
97	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		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; • 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. 	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
98	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		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>	<p>Thank you for this comment. The guideline notes the risk of displacement. Recommendations address the need to reduce unnecessary motor travel and to change mode.</p> <p>Central government funding is beyond the remit of NICE.</p>
99	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		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</p>	<p>Thank you for this comment. Recommendation 1.5.2 in the final guideline (1.4.2 in the consultation version) cross-refers to NICE's guideline on unintentional injuries on the road (PH31). The 'unintentional injuries</p>

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						understand that the Department for Transport is currently considering refreshing MfS and the importance of air quality should be recognised in this updated version.	on the road' guideline's recommendations on needs assessment and planning includes an action to ensure this is done in line with current good practice guidelines and case studies (such as Manual for streets),
100	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		9	L1	The document provides no guidance on walking	Thank you for this comment. No specific evidence relating to walking was identified in the evidence reviews. However, the guideline links to the NICE guideline on physical activity: walking and cycling (PH41) and so walking has been included in the title of recommendation 1.6.
101	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		9	L1-11	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	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline physical activity: walking and cycling (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added. We will pass this information to our resource endorsement team. More information on endorsement can be found here . Please note that NICE is currently updating the guideline on physical activity and the environment (PH8).
102	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		9	L21-27	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 . 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.	Thank you for this comment. We will pass this information to our resource endorsement team. More information on endorsement can be found here .
103	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		10	L8-22	This section makes some sensible suggestions for 'at-risk' groups. However as stated previously, ultimately reducing the number of	Thank you for this comment. The recommendations in section 1.7 in the final

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	only]	Highways and Transportation (CIHT)]				kilometres driven would be the most immediate solution.	guideline (section 1.6 in consultation version) on awareness raising have been amended to include actions to reduce the number of motor vehicle journeys, change in driving style and changing routes to avoid highly polluted area (recommendation 1.7.4). The guideline also includes recommendations supporting active travel, including walking and cycling (please see section 1.6 of the final guideline).
104	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		13	L1-3	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.	Thank you for this comment.
105	[office use only]	[Chartered Institution of Highways and Transportation (CIHT)]		17	L1-7	Whilst agreeing that monitoring is very important to gather the evidence base to achieve planning, it should be noted that 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.	. Thank you for this comment. The committee agreed with the point noted on traffic data and have clarified this in the committee discussion. Questions of the key vehicle classes which may need to be restricted in a particular location will need to be determined by examination of local factors.
106	[office use only]	City of York Council	Full	general	general	Major cost implications are likely to be: <ul style="list-style-type: none"> Investment in low emission public transport to support CAZ proposals (bus operators alone unlikely to provide this) Investment in low emission public sector vehicles (investment in these currently restricted by cost, timetables for replacements and lack of engagement from fleet operators) Investment in low emission vehicle infrastructure (could be met locally to some extent by developers but better overall management and more strategic planning at a national level needed to deliver a more useful and robust network) Ongoing resource costs within local authorities associated with routinely reviewing and commenting on planning 	Thank you for this comment. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.

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						<p>applications and cost of defending appeals etc (the time needed to do this properly equates on average to around 1-2 officer days per week in large cities)</p> <ul style="list-style-type: none"> • Set up and enforcement cost for anti-idling zones (finding resources within local authorities to take on this additional enforcement role is challenging) • Set up and enforcement costs for CAZs (costs depend on scope of CAZ and how it is enforced, local bus only option is much cheaper to implement than one which covers other vehicles, this is currently not an option under the Defra CAZ proposals) • Ongoing funding for fleet recognition schemes e.g. ECO-stars – ongoing funding is already a problem for LAs who have the schemes at present Infrastructure costs e.g. cycle lanes, gas refuelling depots, public sector recharging points etc • Marketing and communication costs / staff resourcing for public engagement activities 	
107	[office use only]	City of York Council	Full	General	general	<ul style="list-style-type: none"> • National low emission planning guidance (based around existing LEP work and York template) • There are many examples of planning good practice on the LEP hub http://www.lowemissionhub.org/. Funding needed to support this resource in the longer term. • National health and air quality publicity campaign with agreed health messages that can be readily and easily used at a local level • More flexibility around CAZ entry requirements and greater recognition of the role electric vehicles can take in developing these • Greater consideration of local air quality impacts during procurement of public sector vehicles (and other goods and services). To be achieved through improved guidance and training of those responsible for making the procurement decisions and more accountability for the air quality impact of such decisions at Chief Exec / DPH level. <p>There is already plenty of guidance with respect to all the suggested measures. What is really needed is the commitment to deliver air quality improvement from all</p>	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.

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						professionals and politicians who have an ability to influence it in any way and more accountability within public sector organisations for decisions which have the ability to impact on local air quality conditions. Greater public understanding is also needed so that the public themselves will start to demand and drive air quality improvements.	
108	[office use only]	City of York Council	full	general	general	<p>The reference is useful for bringing the matter to the attention of the wide audience to which the document is addressed, but past experience has shown that inclusion of measures to improve air quality in guidance does not necessarily add any weight to the ability to progress them at a local level.</p> <p>There is already a large amount of Defra guidance available on how the development and delivery of air quality action plans should be managed and delivered at a local level, with a clear emphasis on the need for the process to be driven by Directors of Public Health and supported corporately by Chief Executives, Heads of Transport, Heads of planning etc. The reality is that within many local authorities air quality remains a 'Cinderella' issue which despite occasionally being paid lip service at chief officer /DPH level is not given the level of corporate management and priority that it deserves. Failure to fully consider the health and economic costs of poor air quality when making key decisions at a local level often means that the issue is given less priority than other issues. Often there are opportunities to achieve win-win outcomes for air quality alongside other issues but these are frequently missed and the ability to implement the measures suggested in the NICE guidelines (and already included within the York AQAP) become eroded with time as other matters are given priority. Whilst we welcome the additional guidance from NICE we would have liked to have seen more emphasis on the need for DPHs / public health boards to push for more action at a local level and for DPHs to take a more active role in ensuring local delivery of AQAPs. Without this, the NICE guidelines become just another set of documents that will do little to drive real improvement on the ground.</p> <p>As detailed above we also have concerns about the current</p>	<p>Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned. We acknowledge the difficulty of implementing changes locally.</p> <p>The guideline aims to support the greater engagement of public health to give the issue greater priority. For example, inclusion of air pollution in strategic plan making (including health and wellbeing strategies) is addressed in section 1.1.</p> <p>The scope of the DEFRA CAZ guideline is outside the remit of NICE. It has been agreed to remove the reference to the DEFRA current draft proposals for clean air zones and the recommendation (now 1.3) suggests aiming to meet WHO air quality guideline levels.</p>

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						Please insert each new comment in a new row	Please respond to each comment
						scope of the Defra CAZ guidance and are struggling to deliver our own CAZ ambitions at a local level. To some extent this is a result of the overly prescriptive nature of the Defra CAZ guidelines and the focus on moving towards diesel Euro 6 emissions for buses / HGVs / LGVs and taxis. The inclusion of the reference to the CAZ within the NICE guidance is considered unlikely to assist with the resolution of these policy based issues at a local level.	
109	[office use only]	City of York Council	Full	general	general	No, we are not aware of any further evidence. We have not tried using any form of air alert system in York.	Thank you for this comment.
110	[office use only]	City of York Council	Full	general	general	<p>The sources of funding CYC has previously used to support AQAP delivery include:</p> <ul style="list-style-type: none"> • DfT Greener bus fund • DfT Cleaner Vehicle Technology Fund • Local Sustainable Transport Fund (LSTF) • Defra Air Quality Grant Fund • OLEV Go Ultra Low / Low Emission City grant • Low Emission Partnership funding (sourced from co-operative DEFRA air quality grant bids) <p>These are all increasingly limited funding opportunities which have been successfully accessed in the past via competitive bid processes. In a system which is increasingly short of staff resources the competitive bidding system is often tedious and time consuming, often with little reward at the end. In some cases the time taken to prepare and submit a bid has to be weighted against the likelihood of success or the likely value of the output. In some cases it is no longer considered cost effective to enter the bidding process.</p> <p>A more strategic approach to planning delivery of low emission vehicle infrastructure, new buses etc. undertaken at a national level (with funding targeted at the areas where it is most needed or likely to be successfully implemented) may offer scope for better outcomes in terms of the quality, interconnectivity and longer term monitoring of air quality improvement projects. Monitoring and reporting on outcomes</p>	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.

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						from funded projects is currently particularly poor which is reflected in the conclusions drawn by NICE on many of the issues considered.	
111	[office use only]	City of York Council	Full	general	general	<p>The measures within the current York AQAP are based on an evidence base made up of :</p> <ul style="list-style-type: none"> • long term monitoring of air quality conditions in the city to identify particular areas of concern and city wide trends. • Detailed traffic counts and characterisation of the fleet in terms of vehicle type, age , fuel type etc • Detailed source apportionment studies to identify the main sources of emissions (based on monitoring and traffic count data) • Use of detailed traffic models (SATURN and PARAMICS), emission models (PHEM, EFT, EMIT) and dispersion models (ADMS-Urban) to undertake scenario testing based on proposed measures <p>The authority has more recently identified a need to extend this evidence base to include;</p> <ul style="list-style-type: none"> • An economic impact assessment of the proposed measures (particularly in relation to the CAZ) based around the potential impact on local businesses, transport operators • A Health Impact Assessment of the proposed measures and economic analysis of the health cost savings related to implementation of the measures. <p>Whilst most local authorities are already familiar with the use of air pollution monitoring techniques, transport models, emission models and dispersion models there is less capability in the areas of economic appraisal and health impact assessment. These are the areas where more support, guidance and training is required to ensure all the impacts of air quality improvement measures are</p>	<p>Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned</p> <p>Please also refer to the 'Putting this guideline into practice' section of the final guideline. This provides links to tools and resources which can assist with areas such as health impact assessment to ensure the impacts of air quality improvement measures are fully assessed.</p>

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						<p>fully assessed and reported on during decision making processes.</p> <p>To justify spend on air quality improvement measures it is essential that the health improvement potential and the health cost savings associated with those improvements are fully communicated to decision makers. Likewise the health impacts of 'do-nothing' scenarios must also be assessed and communicated. At present these health costs / savings are too often overlooked with only more tangible costs such as the cost of a new bus or cost of infrastructure given any form of consideration. As these more tangible costs are usually very high schemes can be readily written off without the underlying health costs and savings ever being fully considered.</p> <p>In the future decision makers need to be better informed as to the true cost of air pollution on health and be willing and ready to challenge any decision taken which has the ability to impact on air quality but has not been subjected to a full HIA and associated costing.</p>	
112	[office use only]	City of York Council	Full	general	general	<p>No, we would have like liked to have seen a stronger recommendation in relation to measures to deal with diesel car emissions which is currently also missing from the Defra draft.</p> <p>Proactive LAs have already developed low emission strategies which contain many of the measures suggested by Defra for voluntary CAZs (excluding the need for on-street signage and specific vehicle emission controls). The role of low emission strategies should be more widely recognised by the NICE guidance as a valid step towards a Defra style CAZ.</p> <p>As detailed above Defra style CAZs are not compatible with the air quality improvement aspirations of some cities and a greater deal of flexibility may be required to enable some authorities to pursue CAZs in the future.</p>	Thank you for this comment. Decisions to restrict particular vehicle types (see recommendation 1.3.2) will depend on local circumstances and sources. This, and the contribution of diesel vehicles to air pollution, is noted in the discussion section.

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113	[office use only]	City of York Council	Full	General	General	This would depend on how well informed the local community are about the existence of the NICE guidance and how concerned they are about seeing it fully implemented (or not). The level of concern is directly linked to the other recommendations at 1.6 relating to awareness raising. It would perhaps be more appropriate to place awareness raising at the top of the list of NICE recommendations as ultimately it is increased awareness and public concern about local air quality which will drive local authorities to deliver all the other recommended measures within the NICE guidance. Awareness raising is the area which to date has received the least amount of consideration and investment and the area where public health practitioners are probably best qualified to lead the way. Polluting the air needs to become socially unacceptable in the same way drink driving, smoking, driving without a seatbelt and other health / safety issues have been dealt with in the past, only then will real action be taken to improve the situation. It also depends on what is meant by communities? It is easier to implement change in a local authority area if it is implemented across the authority, but this requires political backing and consensus. York is now delivering a number of services and projects at a small area/ ward level. Easily accessible material to help community champions to deliver very local air quality improvement schemes would also be welcomed. This could include non idling zones, tree planting, pedestrian zones, lower speed limit zones, localised traffic calming etc.	Thank you for this comment. The committee discussed the importance of awareness raising in achieving support for other activities recommended. Please see the committee's discussion section of the final guideline. Thank you for the suggestion to place the section on awareness raising (1.7 in the final guideline) at the top of the list. Please note all of the recommendations have equal priority. In this case the committee did not agree with the suggestion as the committee considered that the ordering should reflect the more strategic planning and decision making approaches first with progression to activities targeting people.
114	[office use only]	Community by Design	Full	general	general	https://www.gov.uk/government/publications/funding-competition-innovation-in-infrastructure-systems-round-2/competition-brief-innovation-in-infrastructure-systems-round-2 Link to current funding competition that may be suitable for green infrastructure proposals under the "urban living" criteria	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline
115	[office use only]	Cycling Embassy of Great Britain	Air pollution: outdoor air quality and health	5	2	Change 'could' for "should" or 'must', at least in reference to cycling and walking.	Thank you for this comment. The strength of the recommendation is determined by the evidence underpinning it.
116	[office use only]	Cycling Embassy of Great Britain		8	21	1.4.2 Attempting to tackle pollution on residential streets by tinkering with street features misses the most obvious and sensible way of dealing with the problem – by removing extraneous motor traffic.	Thank you for this comment. This recommendation (now 1.5) has been amended to clarify the difference between 20mph limits and 20mph zones. The guideline

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						<p>Crucially, 20mph zones should correspond to areas of low motor traffic (under 2000 vehicles per day), areas carefully designed to limit the motor traffic using the streets in those zones to access-only, by means of point closures, or a system of carefully arranged one-way streets.</p> <p>In other words, there should be no extraneous motor traffic in 20mph zones – no motor traffic that is travelling through them to go somewhere else. In and of itself, this should greatly reduce vehicular emissions on these kinds of street. There should be very little 'stop-go' traffic in these areas, altogether – only residents and other vehicular access.</p> <p>In addition, street features like humps will often be an integral element of safe design for walking and cycling in these 20mph zones – for instance, ensuring clearer priority for walking at side roads, as well as ensuring that vehicle speeds remain low. Problems of pollution in these areas should not be tackled by adapting or removing these features, but by tackling the problem at source – by removing extraneous motor traffic, and therefore creating safer, calmer and more attractive street environments.</p>	does not recommend removal of features used to reduce vehicle speed where these are needed.
117	[office use only]	Cycling Embassy of Great Britain		9	2	<p>1.5.1 Useful cycle networks will essentially have to cover every <i>single road and street in an urban area</i>. Failing to provide cycling infrastructure on main roads, even if they are polluted, will create gaps in that network that will make journeys by cycle difficult or impossible. (By analogy, imagine a walking network that did not include any footways on main roads, and how effective that might be at enabling people to make useful journeys on foot).</p> <p>Cycling infrastructure should not merely consist of 'routes' that can be sited on backstreets as an alternative to main roads; it <i>must</i> consist of a network that goes everywhere. Main roads will almost always form important parts of that network, as well as being destinations in their own right. Failing to include main roads in cycle networks will not enable modal shift to cycling, consequently maintaining the status quo of a large proportion of short urban trips made by the most polluting modes.</p>	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
118	[office use only]	Cycling Embassy of Great Britain		8	4	<p>1.5.2 Where busy roads are used consider -</p> <ul style="list-style-type: none"> • Providing as much space as possible between the cyclist and motorised vehicles. 	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of

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						<ul style="list-style-type: none"> Using dense foliage to screen cyclists from motor vehicles, without reducing street ventilation so that air pollution can disperse.' <p>While we agree in principle that cycling should, on grounds of comfort, safety and attractiveness, be separated from motor traffic as much as is reasonably possible, context is extremely important. Route directness should not be sacrificed; nor should cycleways or cyclepaths be designed in a way that isolates them from the social functions of the road they run along.</p> <p>Dense, screening foliage may also present safety issues, particularly at side road junctions. Safe cycling design requires good intervisibility between cyclists and drivers, with both parties able to see and predict the actions of the other. Hedges would remove that intervisibility, making collisions likely, especially at 'priority' junctions, where one party is required to yield to the other.</p> <p>In addition, safety for people cycling at junctions will often rely on ensuring that cycleways are sited at specific distances from the main road when the cycleway crosses a side road, again to ensure intervisibility between drivers and cyclists, and to ensure that the crossing point is at a location where speeds will be low. Safety-critical design should not be adjusted or adapted, even out of a well-meaning concern to reduce the effects of pollution.</p>	<p>routes and to link to the NICE guideline 'physical activity: walking and cycling' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.</p>
119	[office use only]	Cycling Embassy of Great Britain		General	General	<p>The focus on cycling in this document is largely framed around mitigating the effects of pollution on the relatively small proportion of people cycling in urban areas, and it suggests doing so in ways that, in some instances, might even reduce the amount of cycling in urban areas by making it less convenient, difficult, or even impossible.</p> <p>Clearly this would be counterproductive, if it means short urban trips continue to be made by motor vehicles, instead of by non-polluting modes. A more constructive approach would be to view cycling as a solution to the problem of pollution in urban areas, and to therefore focus policy around designing roads and streets that enable cycling for everyone.</p>	<p>Thank you for this comment. The committee note that supporting cycling and walking is important as a way of reducing pollution, as well as contributing to physical activity. This is emphasised in the final version, and additional links to NICE guidelines on promoting walking and cycling are provided.</p>
120	[office use]	Defra and DfT	Full	General	General	<p>Department for Transport (DfT) were encouraged to see mention of car clubs and travel plans alongside the cycling and walking</p>	<p>Thank you for this comment. E-bikes have been added to the definition of electric</p>

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	[office use only]					initiatives. However, is it also worth highlighting the potential of electric bikes too? By way of background In 2015 the DfT provided funding for an Electrically Assisted Pedal Cycle sharing pilot in England as a means of testing the appetite for such schemes. This money helped us fund eleven varied schemes throughout England. We are currently evaluating the outcomes of the pilot and this could lead to continuing work with our stakeholders to consider new and further initiatives that will encourage the uptake of electric bikes. We hope that the pilot will highlight the potential for e-bikes to enable new trips to be converted to cycling, as well as showing hillier and longer journeys can be more attractive on an e-bike.	vehicles in the 'Terms used in this guideline' section of the final guideline.
121	[office use only]	Defra and DfT	Full	General	General	<p>The guidance is thorough and provides scientifically robust policy advice on air quality action that could reduce exposure, concentrations and emissions.</p> <p>It might benefit from identifying which of these three classes of air quality outcome each action leads to e.g. siting cycle lanes away from busy roads will directly reduce exposure, but emissions and concentration benefits would be less direct or likely.</p>	Thank you for this comment. These classes are discussed in the scope, however the committee did not want to use this approach in organising recommendations.
122	[office use only]	Defra and DfT	Full	9	12	Section 1.6 might benefit from reflecting the findings of the AQ1010 project, which can be found here , such as information on the health effects of air pollution should be accompanied by advice on how to mitigate exposure to reduce the likelihood of the audience "turning off."	Thank you for this comment. The recommendation (now 1.7) has been amended to include actions that can be taken to avoid creating and being affected by air pollution.
123	[office use only]	Defra and DfT	Full	12	20	The Context section might benefit from using some of the communications guidance developed in AQ1010 (see link above) on communicating about air quality topics.	Thank you for this comment.
124	[office use only]	Defra and DfT	Full	8	26	<p>Traffic calming: Section 1.4.2 suggests that road humps should be redesigned to minimise sharp decelerations and consequent accelerations. During the development of road humps and other traffic calming measures, substantial research was carried out to ensure that the eventual design would slow traffic down without causing unnecessary negative impacts. The research was carried out by the Transport Research Laboratory and informed the permitted dimensions set out for road humps in the Highways (Road Humps) Regulations 1999.</p> <p>It is important not to lose sight of the primary purpose of speed</p>	Thank you for this comment. The recommendation (now 1.5) has been amended to clarify the difference between 20mph limits and 20mph zones. The guideline does not recommend the removal of traffic calming measures which are, as noted, often required for injury reduction purposes.

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						<p>humps, and other traffic calming measures, which is to reduce vehicle speeds in areas where inappropriate speed is a problem. This is particularly evident in built-up areas where the more vulnerable road users are likely to be present. Traffic calming therefore plays an important role in improving road safety and each 1 mph reduction in vehicle speed resulting from traffic calming has been found to reduce accidents by around 5%. Traffic calming provides a proven and effective way of reducing casualties and saving lives.</p> <p>While removing traffic calming might result in reduced emissions, an unintended consequence may be a rise in road traffic accidents and the risk of this should be highlighted in the guidelines. Road humps should of course be properly installed and maintained so that unnecessary stop-go movement is reduced. However, it is difficult to see how the permitted design of road hump could be changed to facilitate smoother driving without compromising the speed reduction benefits.</p> <p>A key factor is better education for drivers so that they do not drive in a stop/start manner across road humps.</p> <p>The traffic calming measures available for use by local authorities are not restricted to road humps. Other methods include, for example, rumble devices, narrowings, chicanes, and vehicle activated signs. However, these are not always as successful as road humps at reducing speeds.</p>	
125	[office use only]	Defra and DfT	Full	8	28	<p>Use of signs indicating current speed: Paragraph 1.4.3 suggests that signs displaying a driver's current speed should be used to reduce unnecessary accelerations. Our research shows that these have only a limited short-term effect on driver behaviour. Regular users of the road soon come to see them as irrelevant and ignore them; particularly as they have no statutory status (we do not consider them to be 'traffic signs' within the legal meaning of the term). At worst they can be a potentially dangerous distraction.</p>	Thank you for this comment. The committee felt that this was a reasonable extrapolation from the evidence considered. Please note that this is a weak recommendation of an action that could be considered.
126	[office use only]	Defra and DfT	Full	48	20	<p>Cycle routes: Page 48, line 20-21: suggests that the resource impact on the public sector of implementing the recommendations on cycle route design would be negligible if they are implemented at the design stage. We would question this; the guidelines suggest creating off-road routes, planting dense foliage to screen cyclists, and reducing the time</p>	Thank you for this comment. This sentence in the committee's discussion section of the final guideline has been amended and the impact of the recommendation focuses more on improving the current provision of cycle routes.

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						cyclists spend at busy sites. All of these require extra land, design work, political agreement locally, and so on. Our knowledge of local authority experiences putting in cycle routes shows that even where this is considered desirable locally it is not cheap in either time or local authorities should ensure that not only the Local Plan. Using hedges as barriers may lead to other issues, particularly security as it may create a space that is not overlooked and could feel unsafe, leading to people choosing not to use it. It is also a significant ongoing maintenance issue, to ensure that pruning is regularly carried out.	In relation to safety concerns of using dense foliage as barriers, the second bullet point in recommendation 1.6.3 of the final guideline (1.5.2 in the consultation version) now includes a reference to the need for visibility and for consideration relating to personal safety.
127	[office use only]	Defra and DfT	Full	5	24	Regarding recommendation 1.1.5, Highways England has investigated the use of physical barriers alongside the Motorway to see if they have air quality benefits. Trials of both 4 metre and 6 metre barriers showed that they were not effective in mitigating NOx emissions.	Thank you for this comment. Barriers are not recommended in the final guideline.
128	[office use only]	Defra and DfT	Full	8	12	Regarding recommendation 1.3.6, Highways England is currently trialling two Mitsubishi Petrol/ Electric Hybrid Vehicles, as part of its fleet of Traffic Officer vehicles. These are being used primarily for escort duties at the Dartford crossing. However, the vehicles do not meet the core specification for Traffic Officer motorway vehicles, so it is likely that diesel vehicles will continue to be used for much of the fleet for the moment, as there is currently no viable alternative in production.	Thank you for this comment.
129	[office use only]	Defra and DfT	Full	8	17	Regarding recommendation 1.4.1, there is already an extensive network of controlled motorways and smart motorways with variable speed limits and the current Road Investment Strategy includes plans for a significant increase over the coming years, with other schemes already under construction. Variable speed limits are used regularly on these roads to improve traffic flow and reduce congestion. However, this is not done primarily with the aim of improving air quality, and there is limited evidence to support its use as a tool for addressing air quality. Changing speed limits can also have an effect on demand for road use and vehicle routing choices, which may have varying effects on air quality and other consequences, positive or negative, depending on the specific conditions. More details are given below.	Thank you for this comment. The recommendations on smooth driving and speed reduction in section 1.5 of the final guideline (section 1.4 in consultation version) has been amended to clarify the difference between 20mph limits and 20mph zones. The wording in the 'impacts of the recommendations on practice' section in the committee's discussion section has been amended to clarify that reducing speed limits in residential area 'while making sure that it does not result in an increase in vehicle emissions, will reduce road danger, injuries and air pollution'.
130	[office use only]	Defra and DfT	Full	General	General	More generally, there are already various measures in place aiming to improve air quality on the Strategic Road Network. The National	Thank you for this comment. The final guideline does not contain recommendations

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	only]					<p>Networks National Policy Statement (NN NPS) (https://www.gov.uk/government/publications/national-policy-statement-for-national-networks) published in 2014 includes provisions relating to the air quality impacts of major infrastructure, including strategic roads. It notes that “Increases in emissions of pollutants during the construction or operation phases of projects on the national networks can result in the worsening of local air quality (though they can also have beneficial effects on air quality, for example through reduced congestion).” Air quality impacts should be considered as part of the planning process when approval for new schemes is being decided. Applicants should consider air quality impacts and any necessary mitigation measures as part of their environmental assessment and the Secretary of State should give weight to air quality impacts and potential mitigation when deciding on applications.</p> <p>For example, the recent Development Consent Order for the M4 junction 3-12 smart motorway scheme included a requirement that air quality impacts must be monitored once the scheme is opened and mitigation put in place if the monitoring showed this was necessary.</p> <p>The Government’s Road Investment Strategy (RIS) of December 2014 sets out the Government’s plans on the Strategic Road Network over the period 2015-2020, which Highways England is expected to deliver. This includes a £100 million Air Quality Fund, specifically to target improvements in air quality. Highways England is taking forward a number of projects under this fund. These include a trial of a Mineral Polymer Barrier, using a new material that showed promise in absorbing NO2 pollution, on the M1, between junctions 28 – 29, in Derbyshire, which started in January 2017; establishing a National Air Quality Monitoring Network; and four geographic pilot studies, in Sheffield, Manchester, Derby and the West Midlands. These involved detailed data collection using air quality monitoring, traffic counts, traffic model outputs and land use development. Highways England will combine these extensive findings to develop a detailed understanding of the quality of air in these areas, which will inform where efforts should be focussed to make the greatest difference.</p>	<p>aimed at national motorways.</p> <p>No evidence was included on materials that absorb NO₂ and so no recommendations are included. Evidence arising from on-going trials may be included in future iterations of the guideline.</p>

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131	[office use only]	Defra and DfT	Full	21	15	<p>Motorway Barriers:</p> <p>Highways England is aware of a wide range of studies both in the United States and in Europe exploring the potential changes in air quality concentrations behind barriers. The outcome of Highways England literature review highlighted a high degree of uncertainty either because of the limited number of sampling points or the extrapolation of one pollutant type to another.</p> <p>In brief we noted that from previous studies undertaken by the Rijkswaterstaat (<i>Dutch Roads Authority</i>) as part of their wide ranging air quality mitigation studies in the mid to late 2000's saw some reductions in NO_x and NO₂ concentrations at two ground level locations behind the barrier. American studies based on Computational Fluid Dynamic (CFD) modelling showed the potential for reduced ground level concentrations, but the potential for an increase in pollutant levels at the equivalent first floor of a property.</p> <p>Highways England commissioned in 2015 its own investigation into the effects that a 4m barrier could have on NO_x and NO₂ concentrations behind a barrier. The research was set up to monitor concentration at both ground level and 1st floor (1.5m and 4.5m respectively) approximately 6m intervals up to 50m from the motorway. Automatic air quality monitors were used in all transects.</p> <p>In January 2016 the southern barrier was raised to 6m and NO₂ concentrations measured for a further 6 months.</p> <p>The emerging draft analysis is that the neither 4m nor the 6m barrier showed any discernible change in NO₂ concentrations behind the barrier. Consequently based on the evidence a 4m or 6m barrier would not be an effective measure to reduce pollution and we do not support promotion of this technique as a mechanism to reduce levels of NO₂.</p> <p>As an aside Highways England is continuing to work with the Dutch Roads Authority to commission further monitoring in the Netherlands to measure NO₂ concentrations behind one of their approx. 9m high over-hanging barriers. The monitoring for this study has not started yet.</p>	<p>Thank you for this comment. Please note the recommendation on solid barriers (1.1.5 of the consultation version) has been removed.</p> <p>Recommendation 1.1.2 of the final guideline recommends as an action to consider that when 'plan making', including information on how physical barriers will affect the distribution of air pollutants</p> <p>There is a surveillance process for future updates of the guideline and evidence arising from on-going trials may be included in future iterations of the guideline.</p>

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						Historically Highways England has also tested a barrier coated in titanium dioxide (TiO ₂). In keeping with other studies in the UK and Europe, the air quality monitoring undertaken as part of the study showed no discernible difference in measured NO ₂ sampled from behind the section covered in TiO ₂ compared to the control barrier. We have currently started a research project to evaluate a brand new mineral polymer material, which in earlier laboratory testing showed real potential to absorb NO ₂ . This project has only just been commissioned and information in the mineral polymer performance will not be available until later in the year.	
132	[office use only]	Defra and DfT	Full	General	General	<p>The evidence provided by NICE is acknowledged as weak and has a number of limitations. We do not support the use of speed control as a wide-scale measure leading to notable improvements in air quality.</p> <p>There are a number of elements to consider in the work provided by Keuken <i>et al</i> (2010).</p> <ol style="list-style-type: none"> 1. His work focuses on the use of a 50mph (80kph) speed limit to offset the impact of congested traffic conditions. It is unclear from the work presented the actual state of congestion i.e. is it truly 'stop-start' or more general reduction in the overall speed with potential increase in engine dynamics. 2. The introduction of the 50mph speed limit also coincides with a reduction in the number of vehicles travelling along the relevant section of the motorway. 3. No explanation is provided as to the impact of meteorological conditions or broader reported in NO₂ concentrations between the 2 years, which could also reasonably explain the difference in measured NO₂. <p>The work presented by Dikjeme <i>et al</i> (2008), again an 50mph speed limit and the basis for the economic analysis, focuses on PM₁₀; this study demonstrated no discernible change in measured NO₂ concentrations with the 50mph operating regime.</p>	<p>Thank you for this comment. The committee felt that there was sufficient evidence to support the recommendation (now 1.5.1). Reference to motorways and major roads has been removed.</p> <p>The references cited by the stakeholder have been considered. These are included in evidence review 2 (ES6.4).</p> <p>There is a surveillance process for future updates of the guideline and evidence arising from on-going trials may be included in future iterations of the guideline.</p>

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						<p>It is also unclear as to the applicability of the camera costs put forward and there is no recognition of the potential wider costs and impacts likely to be incurred e.g. changes to journey times, displacement of traffic on to local roads, duration of congestion periods, staffing costs. The age of the studies also affect the confidence that can be placed on their analysis with the vehicle fleet likely to be notably different today than 10 years ago i.e. more Euro 4/IV and 5/V vehicles compared to Euro 2/II and 3/III vehicles. The consequence of this is more modern vehicles can have different emissions characteristics and hence the impact on resultant concentrations.</p> <p>Highways England has been reviewing the evidence of emissions associated with congested conditions versus free flow over the last several years and continues to do so. Highways England already makes allowance for the impact of changing emissions between congested and free flow driving conditions in published guidance (Interim Advice Note 185/15¹ – Speed Bands).</p> <p>Looking at the broader picture Highways England has also been looking at the wider scale impact of a range of speed and traffic management interventions. The broad conclusions were that enforcing a 50mph speed limit, even for the 12 hours during the day led to a notable displace of traffic off the motorway and on to the local roads. This is highly likely to lead to far wider adverse impacts on air quality for receptors along local roads.</p> <p>Highways England already operates a number of SMART motorways where speed limits are already in use during periods of congestion to help manage traffic flows at these times. Although the use of speed control, is not to manage air quality.</p> <p>Going forward Highways England continues to explore the variance in emissions in for different driving conditions. We are working with a range of research organisations to explore the emerging emissions data and models and also continue to review our monitoring data under different driving conditions. Where the</p>	

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						evidence clearly identifies potential traffic management solutions to reduce emissions, Highways England will explore how these can be delivered. Given the weak evidence and the lack of consideration / assessment of the wider scale impacts Highways England does not support promotion of this technique as an effective mechanism to reduce levels of NO ₂ .	
133	[office use only]	Defra and DfT	Full	General	General	The guidelines look to be helpful and consistent with much of what we say in the clean air zones framework about encouraging walking, cycling and using procurement etc.	Thank you for this comment
134	[office use only]	Defra and DfT	Full	1	5	Aim of the guidelines: It seems confusing about who the guidelines are directed at and who will use it. Given it is fairly superficial advice in places, uncertain what benefit it will bring to a local authority or why they would look at this.	Thank you for this comment. The guideline aims to support greater local action to address air pollution across the country.
135	[office use only]	Defra and DfT	Full	6	4	On the section on Clean Air Zones, these are about bringing together a range of initiatives and rather than the actions that follow in that section, it may be helpful to refer to the Clean Air Zone framework which has a wider set of measures, to ensure a consistent approach.	Thank you for this comment. The committee felt that it would be helpful to avoid reference to the framework as this is currently (April 2017) being redrafted.
136	[office use only]	Defra and DfT	Full	7	4	The point about introducing a congestion charge zone in clean air zone may be confusing – a Clean Air Zone is about changing the mix of cleaner vehicles. A congestion charge zone has a different focus.	Thank you for this comment. The committee felt that there were circumstances where a congestion charge zone could be beneficial in addition to a clean air zone, principally where congestion (and not just vehicle type) was thought to be a key part of the problem.
137	[office use only]	Defra and DfT	Full	8	16	Variable speed limits on motorways would be for Highways England (or DfT) not local authorities – not sure they are the audience for this.	Thank you for this comment. The 'who is it for?' section in the overview of the guideline has been amended to include staff working in transport and highways authorities.
138	[office use only]	Defra and DfT	Full	General	General	The document as whole doesn't seem to say much about the role of local communities, local businesses, or bus companies etc and how Local Authorities might work with them.	Thank you for this comment. The guideline contains recommendations on strategic planning across local authorities (section 1.1) and recommendations that may act as lever for local communities when considering clean air zones (section 1.3).
139	[office use only]	Defra and DfT	Full	General	General	Some context should be put around these recommendations, in particular around the importance of tackling air quality in	Thank you for this comment. Recommendation 1.3.3 addresses working

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	only]					partnership, whether that be local, national, European and international, or across local/national policy boundaries, such as economic growth, land use planning, transport, the environment and public health.	across local authority boundaries. Recommendations on national policy is outside the remit of NICE.
140	[office use only]	Defra and DfT	Full	4	3	<p>Planning: Paragraph 1.1.1. – local authorities should ensure that not only the Local Plan but also all other relevant local plans and strategies are considered in relation to the air quality impacts of new development, for example the Core Strategy, the Local Transport Plan, Environment Strategy, Health and Wellbeing Strategy.</p> <p>Paragraph 1.1.1 1st bullet – for single, two-tier and unitary authorities, we expect all departments across the authority/ies to work together to identify suitable measures to address air quality. This includes measures in relation to local transport, highways, land use planning, environmental health and public health. Guidance is available in the Local Air Quality Framework.</p>	Thank you for this comment. Other relevant local plans and strategies have been added.
141	[office use only]	Defra and DfT	Full	General	General	<p>Trees and air pollution: The Government takes air pollution very seriously and we are committed to improving the UK's air quality, reducing health impacts and fulfilling our legal implications. Trees can provide a useful contribution to improving air quality, dependent on the context. The Air Quality Expert Group, a group of independent experts responsible for advising government, is currently finalising a report on the effects of vegetation on urban air pollution. Early indications suggest that trees can improve air quality, with benefits varying depending on the planting approach, as just one part of a broader strategy to improve air quality.</p>	Thank you for this comment. The guideline includes recommendations relating to trees and vegetation, and the committee's discussion notes the potential for other areas of benefit associated with vegetation. We will pass the comments about the Air Quality Expert Group report for consideration where relevant support activity is being planned.
142	[office use only]	Defra and DfT	Full	General	General	<p>The research base is valuable – noting that some of this in respect to driver training and smooth driving is not of good quality. NICE have drawn attention to this in the supporting evidence, although the main document appears presents evidence more definitively. Something seized on by the media.</p> <p>The proposals on driver training are generally valid ones, and many are already supported under the £2.8m annual programme providing support and guidance to government and to business fleets on reducing fuel costs. For example around 10,000 van and car fleet</p>	Thank you for this comment. Our recommendations are aimed at local authorities and the public sector. They are also relevant to other employers. Recommendations on national policy are outside NICE's remit.

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						<p>drivers will receive efficient driver training this year.</p> <p>NICE has proposed that fleet drivers could be tested on fuel efficient driving when making new appointments. For cars and vans driving skills are a matter for the employer – they will be best placed to decide whether to recruit those with existing skills or whether this is best addressed through the company's training programme. It is generally not for government to intervene unless there is market failure leading to major detriment.</p> <p>For professional drivers of heavy duty vehicles a Certificate of Professional Competence is already needed which includes a requirement for 35 hours periodic training every five years to stay qualified. This can include supplementary safe and efficient driving skills.</p>	
143	[office use only]	Defra and DfT	Full	General	General	It is pleasing to see that they are using lots of the Defra economic assessment methodology to value air quality impacts including the links to NO2 mortality and valuing health outcomes. However, the costings of some of the measures are different to what Defra has considered in the air quality plan. It would be useful if NICE colleagues could contact us to discuss further the underpinning evidence including the morbidity and treatment costs as we would like to work with NICE to support the use of evidence.	Thank you for this comment. We will be happy to discuss with Defra and DfT teams potential opportunities to enrich its existing evidence base for modelling financial costs of different interventions to tackle air pollution to inform future updates of this guideline.
144	[office use only]	Eastleigh Borough Council		4	10	Technical guidance in the form of practical unambiguous planning practice guidance to provide advice to developers /planning officer/ environmental health departments to assist with the design of development sites to mitigate air pollution impacts would assist with plan making and decision making.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
145	[office use only]	Eastleigh Borough Council		5	1	This advice should be strengthened to prioritise development / greater density of dwellings in urban centres and / or within walking / cycling distance of good public transport / work / shops. High quality design will be necessary to ensure the impacts of noise / overheating are properly addressed at the same time	<p>Thank you for this comment. The guideline includes recommendations to promote zero- and low-emission travel.</p> <p>Please note that the focus is on air pollution and issues relating to noise and overheating are outside the remit of this work.</p>
146	[office use only]	Eastleigh Borough Council		5	7	In areas identified either locally or nationally as being impacted by elevated air pollution inclusion of air pollution policy in local plans should be a requirement or at least require a justification as to why is not being fully considered as part of development decision	Thank you for this comment. It is beyond NICE's remit to make its inclusion a requirement.

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						making..	
147	[office use only]	Eastleigh Borough Council		5	20	CIL guidance should be clearer on appropriateness of the use of such monies to support air quality monitoring. Increasing the housing stock and commensurate increases in traffic are likely to offset actual and predicated improvements in transport based air pollution in the short / medium term.	Thank you for this comment. Please note that the focus of this guideline is on air pollution rather than the full potential use of funds such as CIL. Recommendation 1.2.2 of the final guideline (1.1.3 in the consultation version) has been amended to suggest actions that could be included in the regulation 123 list.
148	[office use only]	Eastleigh Borough Council		5	24	See comment 1. Clear and authoritative guidance to support high quality sustainable design as promoted by the National Planning Policy Framework, NPPF is required. This would mitigate against unintended consequences, or allow them to be identified and mitigated. This should be part of technical guidance to support planning approaches to minimise / mitigate air pollution impacting on, or arising from new development. We also need to consider noise and overheating impacts to ensure these are not caused / worsened by 'defensive' building / development designs.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
149	[office use only]	Eastleigh Borough Council		6	6	Clean air zones should be legislated to replace Action Plans produced under Air Quality Management Areas. This would increase the profile of air pollution, and consolidate actions and activities. The legislation giving rise to these plans should give powers to Local authorities to take the necessary steps to tackle air pollution in their boroughs.	Thank you for this comment. Legislation is beyond the remit of NICE.
150	[office use only]	Eastleigh Borough Council		6	10	The evidence provided confirms that air pollution has demonstrable negative impacts on the health of people / communities at levels lower than the target levels in current UK/EU legislation. This is potentially confusing and contradictory and in the light of UK leaving the EU needs to be addressed urgently. A progressive programme of reducing pollution limits would send a clear signal that emissions must be reduced, clear timescales and objective target levels also allows business to plan for these changes in advance.	Thank you for this comment. The amended guideline includes aiming for WHO levels (recommendation 1.3.1).
151	[office use only]	Eastleigh Borough Council		7	1	This should be required where needed to address traffic flows across authority and county boundaries. Current measures are not strong enough.	Thank you for this comment. The word 'consider' has been removed (amended recommendation 1.3.3 in the final guideline).
152	[office use only]	Eastleigh Borough Council		7	7	See 1.2.6 preventing migration of emissions to other areas	Thank you for this comment. The committee discussed the risk of movement of problems as a result. Recommendation 1.3.7 notes the need to monitor to see if problems are arising and address them if they are.
153	[office	Eastleigh				Which areas will have the biggest impact on practice and be	Thank you for your response. Your

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	use only]	Borough Council				<p>challenging to implement? Please say for whom and why.</p> <p>A Clean air strategy, CAS, would have the biggest impact as it can link up with other policies in the council more effectively than air quality Action Plans currently can. It can include a comprehensive range of polices (as the consultation indicates) which beyond the traffic based actions typically included (because traffic was the reasons for a failure of target levels) which is normally what we see. Other policies and plans would include the Local Plan for planning, sustainability / health and wellbeing / transport policies etc.. This also makes it more challenging as a CAS would have to compete with other priorities of the council and may be seen to run counter to some, e.g. provision of new housing. Objective tools are needed to allow decision makers (more correctly, those advising them) to balance the costs and benefits of actions / interventions etc. across varying activities, e.g. how do we weigh up the health cost impacts on the community from increased air pollution against increased wellbeing from better housing or job creation as the result of a particular development proposal?</p>	<p>comments will be considered by NICE where relevant support activity is being planned.</p>
154	[office use only]	Eastleigh Borough Council				<p>Would implementation of any of the draft recommendations have significant cost implications?</p> <p>Provision of improved public transport and schemes to support early adoption of ULEV / Electric vehicles (these should be focussed on removing the oldest vehicles out of circulation)</p>	<p>Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.</p>
155	[office use only]	Eastleigh Borough Council				<p>What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.)</p> <p>A consistent and well funded system of support from central government focussing on supporting the measures that work, rather than repeated competitive bids with limited warning and timescales to respond, such an approach does not engender good quality or value for money. . Better funding of the Defra team supporting LAs in the delivery of air quality improvements.</p>	<p>Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.</p>
156	[office use only]	Eastleigh Borough Council				<p>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?</p>	<p>Thank you for this comment. Please note it has been agreed to remove the reference to the Defra proposal and the recommendation (now 1.3) suggests aiming to meet WHO air quality guideline levels.</p>

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						Yes, Clean air zones and strategies are likely to be essential in getting local authority policies and plans moving in the right direction to affect change.	
157	[office use only]	Eastleigh Borough Council				<p>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?</p> <p>We do not have any information although we have recently launched such a system and would be happy to take part in research. Local groups representing health impacted and fitness centred groups have all shown interest in this information particularly being available via smartphone apps.</p>	Thank you for this comment. NICE does not carry out primary research. The guideline contains research recommendations which may be used by funding bodies to encourage activity in key areas. A report on relevant ongoing NIHR funded research projects will be published along with the guideline.
158	[office use only]	Eastleigh Borough Council				<p>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?</p> <p>We would justify costs on the basis of reduced NOx and PM10 emissions (expressed as mass emissions rather than concentrations in air) and commensurate reduction in health impact costs (this can only be done crudely, see Sussex air planning advice . Also see comment 10 above about the need for the development of objective tools to allow health and other costs to be considered objectively in decision making</p>	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned.
159	[office use only]	Eastleigh Borough Council				<p>Apart from broadening beyond the five cities, does recommendation 1.2 add anything to the DEFRA draft?</p> <p>Yes it identifies the issue of setting appropriate target levels for air pollution both now and in the future.</p>	Thank you for this comment.
160	[office use only]	Faculty of Public Health	Full	4 - 5	5-20, 1-6	<p>1.1.1 There is growing evidence in support of the benefits of mixed land use and higher densities which demonstrate that the approaches to planning most likely to have the greatest health benefits are ones where walking, cycling and public transport use are supported by policy and safe infrastructure and prioritized over private vehicle use (Urban Design, Transport and Health, <i>The Lancet</i>, Vol. 388, No.</p>	Thank you for this comment. Recommendation 1.1.2 addresses the need to reduce the need for motorized travel. It has been amended address siting away from highly polluted areas (as opposed to busy roads).

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						<p>10062). Optimising development density and encouraging developments with a mix of uses, for example, residential, retail, leisure and / or commercial uses, reduces the need to travel by car. Higher density development should be encouraged near public transport links, to minimise the need for car use.</p> <p>Reducing the overall use of motorised vehicles, particularly private vehicles, is the key intervention required to reduce air pollution. Local planning policies should ensure that developers provide for safe, convenient and attractive active travel opportunities into their proposals, and minimise the use of private cars. New developments should have stipulations for public transport viability and for very low levels of private car parking . Developers should have to include an assessment of the impacts of their proposal on public transport capacity and local traffic volume, and associated increases in air pollution, noise and road traffic injuries. Such measures are also required to ensure sustainability and minimize environmental impacts while maximizing the co-benefits such as reductions in noise pollution and traffic injuries.</p> <p>Additional planning policies that enable more journeys to be walked or cycled and discourage unnecessary car trips include:</p> <ol style="list-style-type: none"> 1. Requiring direct desire lines for walking and cycling, for example, through filtered permeability 2. Requiring high levels of well thought out cycle parking in developments 3. Protecting local high streets through, for example, not permitting the conversion of retail to residential premises and resisting car based out of town retail developments 4. Zero car parking in commercial developments <p>("local action to mitigate the health impacts of cars" Faculty of Public Health, 2016)</p> <p>There are potential negative unintended consequences from advising on the siting of living accommodation, schools, nurseries and retirement homes away from busy roads. For example, reductions in social interaction and access to essential services, and increased commute and travel times incurred by certain urban designs and segregated land use. Siting buildings away from busy</p>	

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						roads can lead to unsafe inactive frontages making them inhospitable to walking and cycling due to lack of natural surveillance. A better approach would be to provide wide pavements lined with trees and greening and cycle tracks while minimizing the speed and volume of motorized traffic. Approaches that minimize traffic and dis-incentivize the use of private motor vehicles decrease the likelihood of high traffic volumes (NICE PH Guidance 8).	
161	[office use only]	Faculty of Public Health	Full	5	7-10	<p>1.1.2</p> <p>Such plans are needed and we value this addition by NICE to the guidelines. However, such actions require a multi-sectoral approach so that all aspects beyond air pollution are also incorporated into the plan for all benefits to health, the environment and the economy to be maximized. Local plans or SPDs that focus solely on improving air quality risk having unintended consequences and missed opportunities to capitalize on the wider potential health benefits to the community</p> <p>This needs to be discussed in more detail in this section with reference made to the health outcomes to be included in such plans.</p>	Thank you for this comment. The recommendation is to include air pollution within plans not to make them the sole focus.
162	[office use only]	Faculty of Public Health	Full	5	11-19	<p>1.1.3</p> <p>Although there are measures available to reduce to some extent the impacts of road-traffic-related air pollution they vary significantly in their impact and sustainability (http://joaquin-staging.dev1.o-a.be/en/rankings). When addressing air pollution, a hierarchical approach is needed, for example, starting with a consideration of the most effective measures to address the source of air pollution and deliver health co-benefits, followed by measures in decreasing order of effectiveness to then mitigate the effects. For example only where more effective initiatives are demonstrated not to be technically/economically feasible, should less effective initiatives such as "green walls" be considered. For example, evidence indicates that 'green walls' have a minimal effect on local air quality (at best) compared with measures to restrict car use. There is evidence to suggest that the use of urban vegetation for alleviating local air pollution hotspots is unlikely to be a viable solution (Vos et al., Improving local air quality in cities: to tree or not to tree? Environ Pollut, 2013: 183).</p> <p>Adopting a hierarchical or step-wise approach, like that adopted by</p>	<p>Thank you for this comment. The guideline notes the variable impact of vegetation depending on local circumstances and does not suggest their use to alleviate air pollution hotspots.</p> <p>Examples of useful resources can be considered by our resource endorsement team. More information on endorsement can be found here.</p>

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						the Sustainable Development Commission to develop their transport strategy outlined in Fairness in a car-dependent society (Kay et al, Fairness in a Car Dependent Society, Sustainable Development Commission, February 2011), would benefit this guideline. This would help ensure clarity on what measure should be instituted over others to have the greatest impact on air quality and improving health.	
163	[office use only]	Faculty of Public Health	Full	5	20-22	<p>1.1.4 Local authorities are having to use increasingly limited resources and budgets to ensure the health, wellbeing and economic prosperity of their communities. It is therefore imperative that any resource or funding, such as the Community Infrastructure Levy (CIL), is used effectively to address multiple issues simultaneously and maximize co-benefits to health and the environment with close consideration given to sustainability. For example, use of the CIL to support public transport systems or create environments that support physical activity through walking and cycling thereby improving health and wellbeing while realising co-benefits of reductions in air pollution, noise and heat.</p> <p>This recommendation needs to discuss in further detail methods of using resources and funding such as the CIL at a local level that maximize the co-benefits to health and the environment while simultaneously addressing air pollution.</p>	<p>Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.</p> <p>Please note that the focus of this guideline is on air pollution rather than the full potential use of funds such as CIL.</p>
164	[office use only]	Faculty of Public Health	Full	5-6	23-29, 1-3	<p>1.1.5 Trees planted today will take a considerable amount of time before there is a risk of developing a canyon of air pollution. During this time, it is likely that cars may be less polluting than observed at present.</p> <p>Planting of trees and other vegetation can provide shade and shelter and improves the attractiveness of streets and promotes walking and cycling while simultaneously influencing driver behavior (subconscious cues to be wary of unseen pedestrians or cyclist), with a subsequent reduction in travel speeds.</p> <p>It is also important to note that the type of trees planted may influence air pollution. For example, some species are more likely to emit volatile organic compounds (VOCs) in comparison to others</p>	<p>Thank you for this comment. This recommendation has been amended. Recommendation 1.1.2 addresses using vegetation where it will not reduce ventilation, and 1.2.2 addresses management of trees and vegetation.</p> <p>Please note that this guideline is about air pollution. While other impacts of trees and vegetation are discussed and may be significant they are not the focus of the recommendations.</p>

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						<p>(Defra, What impact do trees have on air pollutant concentrations?, 2010).</p> <p>We acknowledge the importance of planning and urban design in minimizing possible contributions to air quality and welcome this consideration within the guidelines. Green spaces and vegetation are becoming increasingly recognized as beneficial to health and wellbeing with a correlation between health and wellbeing and the amount of exposure to green environments. Indeed, a recent publication from the King's Fund strengthens the case for the beneficial uses and impacts of gardens and other greens spaces (Buck, D. Gardens and Health, implications for policy and practice, The Kingsfund 2016)</p>	
165	[office use only]	Faculty of Public Health	Full	6	5-9	<p>1.2.1</p> <p>The NICE PH Guidance 8 recommends restricting all vehicles, irrespective of tendency to contribute to pollution, to maximize health benefits of road user charging (increased active travel and reduced road danger). In the current climate of austerity and limited resources, actions taken need to address multiple issues simultaneously when possible and maximize the health and environmental co-benefits gained.</p> <p>Of note, to be effective, restrictions require constant monitoring and enforcement.</p> <p>The guideline should also highlight that although zero emission vehicles are less polluting from tail pipe emissions, they contribute to air pollution from brakewear and tyres.</p>	<p>Thank you for this comment. Please note that NICE guidance PH8 is currently being updated.</p> <p>Pollution from non-tail pipe contributions are included in the discussion section.</p>
166	[office use only]	Faculty of Public Health	Full	6	10-11	<p>1.2.2</p> <p>In many places, concentrations of particulates are now within EU limits. However, these limits are not health-based threshold values; in fact, there is no safe threshold for exposure to PM_{2.5}. There is also mounting evidence that NO₂ also causes health effects at levels below EU legal limits (World Health Organisation.2013. Review of Evidence on Health Aspects of Air Pollution-REVIHAAP Project. WHO Regional Office for Europe, Copenhagen). Therefore, reducing pollutant levels to within the legal limit values should be considered a minimum target.</p> <p>Again, reference should be made to how such targets are met. Using methods that focus solely on reducing the levels of air</p>	<p>Thank you for this comment. Recommendation 1.3.1 includes aiming for WHO levels.</p>

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						pollution without specific references to the impact of air pollution on health and the environment increases the risk of unintended negative repercussions as well as missed opportunities to simultaneously benefit health and the wider environment. The need to maximize the co-benefits needs to be emphasized within all recommendations.	
167	[office use only]	Faculty of Public Health	Full	6	12-20	1.2.3 It should be emphasized within this guidance that while the evidence of encouraging walking and cycling to improve air quality is only weak the health benefits of increasing physical activity levels through active travel are much greater. In London a person would need to cycle for 7 hours or walk for 16 hours in a day for the health benefits of active travel to be outweighed by the pollution impacts (Tanio M. <i>et al.</i> Can air pollution negate the health benefits of cycling and walking.) Prevention Medicine 2016: 87. This guidance should make the relative size of health impacts much more explicit as policy makers in the transport and planning sector are not tackling individual health issues but need to know what delivers the biggest overall benefit to population health.	Thank you for this comment. The guideline provides recommendations to encourage walking and cycling. It also includes research recommendations to clarify the health impact of air pollution using different modes of travel.
168	[office use only]	Faculty of Public Health	Full	6	21-27	1.2.4 As all these initiatives require the allocation of financial and staff resources further discussion comparing their effectiveness and cost effectiveness is required and a hierarchy of approaches provided. Comparison with other approaches is also required to ensure resources are not used ineffectively. The need for ongoing enforcement and the resources required to maintain this also needs to be explicitly stated in this section as the effectiveness of these initiatives is dependent on such enforcement. Care must be taken when using the term smooth traffic flow which requires distinction from the term smooth driving style. The former refers to a measure of journey time reliability i.e. reducing road works and network disruptions that add unexpected time onto a journey and is therefore not the same as driving at a constant speed to reduce acceleration and deceleration.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned. It is very difficult to develop a hierarchy of approaches in the general case, as local factors are highly likely to influence the relevance and effectiveness of a specific intervention in a given area. The economic report has highlighted for each intervention the circumstances under which it is most likely to be effective. This could provide the starting point for considering – for a given local area – the potential success of the different interventions for a specific authority. This, in turn, could be used as a starting point for undertaking more detailed analysis for a shorter list of specific interventions, using local datasets. We did consider the costs of monitoring and

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							enforcement to the extent that data allowed; where considered, this is highlighted in the report.
169	[office use only]	Faculty of Public Health	Full	6	28	<p>1.2.5</p> <p>The awareness raised by car free days and who receives these messages need further consideration and more detailed guidance. Car free days and car free streets initiatives are growing around the world with very mixed evidence of effectiveness and the impact on inequalities. For example, evidence from such schemes implemented in New York City highlights inequalities in whom benefits with regards to knowledge and physical activity (Wolf et al. The Impact of a Temporary Recurrent Street Closure on Physical Activity in New York City. <i>J Urban Health</i>. 2015 Apr; 92(2): 230–241.) Carefully planned measures are needed to address these inequities and ensure maximum benefit for all is realized from such initiatives. The guidance needs to elaborate on the messages that can be delivered through initiatives like car free days, capitalising on the opportunity to highlight the co-benefits such as physical activity, social interactions, noise and heat reductions in addition to the effects on air pollution in order to maximize impact. Car free days can also be used to raise awareness of the space dedicated to cars such as roads and parking places that could, if cars were restricted or banned, be used for other purposes such as creating more green spaces and thereby improving health and social interaction (Nieuwenhuijsen MJ and Khreis H. Car free cities: Pathway to healthy urban living. Environment International 2016).</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned. Please note that this recommendation has been moved to recommendation 1.7 (awareness raising).
170	[office use only]	Faculty of Public Health	Full	7	4-6	<p>1.2.7</p> <p>A congestion charging zone is a type of road user charge requiring motorists to pay for the externalities they produce in their choice to drive. Road user charging should therefore be considered not only when there is a congestion problem but anywhere where it is viable to use as this is more likely to influence the use of motorized transport for discretionary use and achieve a modal shift towards more sustainable alternatives. Minimizing exemptions to such charging schemes is essential to maximise the impacts observed.</p> <p>A modal shift away from predominant use of private motor vehicles to use of walking, cycling and public transport for residents and</p>	Thank you for this comment. We will pass this information to our resource endorsement team. More information on endorsement can be found here .

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						visitors and to reduce discretionary travel by white vans, servicing, freight, taxis and private hire vehicles is needed to have the greatest impact on air pollution and health improvement. There are multiple and varied measures that can be adopted to de-incentivize use of private motor vehicles and can be implemented at every stage in travel planning and choices ("local action to mitigate the health impacts of cars" Faculty of Public Health, 2016).	
171	[office use only]	Faculty of Public Health	Full	7	7-11	<p>1.2.8</p> <p>There are many other ways to address issues of increased traffic on the margins of the zone including behaviour change measures to discourage discretionary use of motorized vehicles and measures to reduce the convenience of driving short local trips on residential streets e.g. filtered permeability.</p> <p>This guidance needs to provide recommendations on the modelling that can be undertaken to allow positioning of the boundaries least likely to lead to displacement and having measures in place to mitigate such effects prior to the instillation of the boundaries. Monitoring post enforcement is an important part of ongoing evaluation but only trying to mitigate the impacts after placing the boundaries seems a less efficient approach.</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
172	[office use only]	Faculty of Public Health	Full	7	12-13	<p>1.2.9</p> <p>Disadvantaged groups suffer the greatest impacts of the externalities of car use (Fairness in a Car-dependent society, Sustainability Development Commission, February 2011). Failing to introduce road user charging because it may disproportionately impact on the most disadvantaged groups only considers one part of the issue. A more considered approach would be to ensure there is subsidized travel on high quality public transport for those disadvantaged groups in addition to introducing the charges.</p> <p>Whilst flat rate charges may disproportionately affect the less well off, it is important to note that individuals in the lowest socio-economic group are both more likely to be exposed to poor air quality (Fecht, D <i>et al.</i> Associations between air pollution and socioeconomic characteristics, ethnicity and age profile of neighbourhoods in England and the Netherlands. J Environ Pollut 2015; 198: 201-210) and more susceptible to the effects of air pollution on their health (RCP / RCPCH. <i>Every breath we take.</i> London: RCP, 2016</p>	Thank you for this comment. The guideline committee's discussion section notes that disadvantaged groups suffer disproportionately from poor air quality. However, it is important that local implementation takes account of particular needs of vulnerable groups.

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						<p>www.rcplondon.ac.uk/file/2912/download?token=5pFurNnk. Children in the lowest socioeconomic group are also up to 28 times more likely to die on the roads than children in the top socioeconomic group (Fairness in a Car-dependent society, Sustainability Development Commission, February 2011). The distribution of the benefits accrued through improved air quality, reduced road traffic injuries and increased physical activity must be considered as well as any potential inequality in the distribution of the financial impacts.</p> <p>Disabled people do not use black cabs in London any more than non-disabled people so one must not assume that exempting taxis and private hire vehicles reduces inequalities for these groups. Creating safe and welcoming streets on which everyone can walk, cycle and access good quality public transport services reduces inequalities in the round.</p> <p>The UK Faculty of Public Health's evidence submission to the London Assembly Transport Committee's investigation into traffic congestion in London, the faculty of public health stated:</p> <p><i>"The need for taxis and PHVs for disabled people is overstated; more than 8 out of 10 disabled Londoners are not wheelchair users and are able to use a range of transport options – most commonly walking (78% of disabled Londoners walk at least once a week) and the bus (56%). Wheelchair users also use a range of transport options, and do not use taxis more than non-wheelchair users. Disabled people are amongst the most physically inactive and socially isolated in London, and the number of disabled people in London is expected to increase significantly over the coming decades due to rising levels of long term conditions and people continuing to work at older ages. There is therefore an urgent need for London's public transport and public realm to enable them to build activity into their daily routine and to interact with other people."</i></p> <p>(http://www.fph.org.uk/uploads/FPH%20response%20to%20the%20LA%</p>	

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						20Transport%20Committee%20investigation%20into%20traffic%20congestion%20in%20London%20Aug%202016.pdf)	
173	[office use only]	Faculty of Public Health	Full	7	14-15	1.3 We welcome the inclusion of this section within the guidance. However, more emphasis should be placed on the need to minimise the use of vehicles within the commercial sector and the need for employees to drive as part of their job. Such actions should be taken prior to investing resources into driver training. Again, introducing a hierarchy of recommended measures would be beneficial.	Thank you for this comment. Recommendation 1.1.2 address the need to reduce the need for motorised travel. A particular emphasis on use of vehicles within the commercial sector has not been included in the recommendation. However, recommendation on public sector fleets could be relevant. This guideline recommends a number of actions in combination, as multiple interventions, each produce a small benefit are likely to act cumulatively to produce significant change. A hierarchy of approaches have not been recommended, as local factors are highly likely to influence the relevance and effectiveness of a specific intervention in a given area. The economic report has highlighted for each intervention the circumstances under which it is most likely to be effective.
174	[office use only]	Faculty of Public Health	Full	8	8-10	1.3.5 As such monitoring requires considerable time and resources, more detailed guidance is therefore required to ensure appropriate use of resources. How often should such monitoring be performed and which pollutants? When should it be deemed that such an approach is succeeding or failing to contribute to a reduction in air pollution and what levels are expected? Close consideration regarding who should provide the resources to do such an evaluation is needed and how this alters the cost-effectiveness of such an initiative.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
175	[office use only]	Faculty of Public Health	Full	8	11-14	1.3.6 Procurement of low-emission vehicles for the public sector transport fleet should be included as a standard requirement. In light of the recent High Court ruling against the government	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.

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						(https://www.theguardian.com/environment/2016/nov/02/high-court-rules-uk-government-plans-to-tackle-air-pollution-are-illegal), restrictions and/or charges for using higher polluting or diesel vehicles is likely in the future and is therefore a future economic risk for organisations who do not factor this shift in national policy into their procurement policies. An additional benefit of this is that it demonstrates the capabilities of low-emission vehicles to a wider audience.	
176	[office use only]	Faculty of Public Health	Full	8	15	1.4 To mitigate the harms imparted by road transport and improve societal and individual health the UK Faculty of Public Health (FPH) recommends a “major shift away from cars in favour of active travel: walking, cycling and public transport”. Addressing air pollution, just one example of the health impacts of transport, with the intention of achieving simultaneous health improvement requires working in line with this recommendation and those outlined in the supporting guidelines “local action to mitigate the health impacts of cars” FPH 2016.	Thank you for this comment. The amended recommendations on walking and cycling in section 1.6 of the final guideline supports a general shift from motor vehicles to more active travel.
177	[office use only]	Faculty of Public Health	Full	9	2-3	1.5.1 Highly polluted routes in urban areas tend to be where the shops and services are located; these are the services that cyclists want to access. The busiest and more highly polluted roads also tend to be the most direct route; cyclists do not like to divert from the most direct route. These streets also have the advantage of natural surveillance and life on the streets, even late at night, making them more attractive routes for people to cycle on and where people feel safer. Given that the benefits of cycling far outweigh the harms of air pollution exposure (Tanio M. <i>et al.</i> Can air pollution negate the health benefits of cycling and walking? <i>Prevention Medicine</i> 2016:87) the choice of route for cycle tracks should be based primarily on what will be most attractive for most people (Physical activity and the environment, NICE Guidance 2008). Off road routes and quiet streets are less popular because they are indirect and feel less safe from a personal security perspective (Health on the Move 2, The Transport and Health Study Group 2011). In cities, such as London, cycle super highways are being	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ‘ physical activity: walking and cycling ’ (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.

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						implemented to encourage a modal shift with the aim of realising benefits to health and air pollution for example. This guidance should compare the effectiveness of installing high quality segregated infrastructure with potential for convenience and large scale capacity with siting cycle routes along what are usually low capacity and indirect routes via quiet and small streets and discuss the evidence for behavior change in adopting such indirect routes.	
178	[office use only]	Faculty of Public Health	Full	9	4-11	<p>1.5.2 Dense foliage can cause personal safety concerns for vulnerable road users, this should be taken into account.</p> <p>Reducing the impact of busy roads on health is essential. However, adopting the approached as outlined in recommendation 1.5.2 would result in differential protection between those using different modes of transport. For example, air pollution affects those in cars as well as pedestrians and cyclists. Reducing the impact on cyclists by reducing the time they spend at busy junctions in urban areas would require preferentially maintaining the flow of cyclists through junctions resulting in pedestrians and vehicle users being exposed to air pollution for longer periods. Encouraging a modal shift away from private vehicle to walking, cycling and use of public transport will have a far greater impact on air quality and the subsequent health impacts.</p>	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline 'physical activity: walking and cycling' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
179	[office use only]	Faculty of Public Health	Full	9	12	<p>1.6 When considering the use of awareness raising to have positive outcomes and to ensure efficient and effective use of recourses, insight gained from recent behaviour change models and studies is needed to guide such approaches. The provision of more information, as the following sections suggest performing, without addressing the structural and material environments in which behaviours develop and are sustained has been repeatedly shown to have limited short-lived or no effects. The need for adopting an ecological approach that places behaviour change within a wider multi-level framework is increasingly being recognised in the field (Dreibelbis R, <i>et al.</i> The integrated behavioural model for water, sanitation and hygiene: A systematic review of behaviour change model and a framework for designing and evaluating behaviour change interventions in infrastructural-restricted settings. <i>BMC Public Health</i> 2013). Furthermore, it is the behaviours that lie behind</p>	Thank you for this comment. The recommendation (now 1.7) includes reference to the NICE guidelines on behaviour change . The discussion section notes that one aim of awareness raising is to provide support for other actions to address the causes of air pollution.

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						the primary sources of poor air quality, namely discretionary car use, that need to be addressed with less focus on behaviours to avoid or reduce the harms of air pollution. Such approach will have the greatest impact on air quality and health.	
180	[office use only]	Faculty of Public Health	Full	9	13-16	1.6.1 Behaviour change should be focused on reducing discretionary car use rather than taking less direct routes on foot or bicycle to reduce air pollution. The problem need to be tackled at source.	Thank you for this comment. This recommendation (now 1.7) has been amended to include actions such as avoiding unnecessary vehicle use.
181	[office use only]	Faculty of Public Health	Full	9	17-19	1.6.2 The evidence around whether air quality alerts are effective in reducing health risks is uncertain. The limited evidence suggests that air quality alerts should be developed and targeted for higher risk groups as evidence suggests they will benefit most from air quality alerts. It is difficult to simultaneously communicate different messages to at risk groups and to the general public, and the benefits to the general public of staying active outweigh the risk from exposure to air pollution even during episodes of poor air quality. Care must be taken with the messaging to ensure that it is focused and clear, and does not create exaggerated concern or alarm. This could discourage healthy people taking exercise outdoors, lead to over-medication in at-risk groups, encourage driving or increase unnecessary use of NHS services.	Thank you for this comment. The guideline includes a research recommendation to address this gap.
182	[office use only]	Faculty of Public Health	Full	9	21-27	1.6.3 This guidance needs to provide more detail regarding the effectiveness and cost-effectiveness of such an approach in isolation in comparison to being implemented as part of a wider initiative to reduce air pollution through changes to wider environmental and policy infrastructures that encourage modal shift. For example, how effective are such initiatives if adopted as the sole measure as opposed to complementing other measures aimed at increasing physical activity and active travel. It is also important to stress that idling is not the sole cause of driver	Thank you for this comment. The aim of these recommendations (now 1.7) are in part to support the development of other actions. This is discussed in the committee's discussion section of the guideline.

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						exposure to air pollution. The key message is that being in a car versus walking or cycling increases air pollution exposure as well as increasing risk of other health issues associated with sedentary behavior and traffic injuries.	
183	[office use only]	Faculty of Public Health	Full	10	1-7	<p>1.6.4</p> <p>Further measures can be taken by local businesses to reduce their contribution to road-traffic related air pollution. For example, efforts can be directed to consolidating deliveries to reduce vehicle miles. Procurement of low emissions fleets can be adopted also.</p> <p>Guidance on approaches to legislating fleets and delivery times at a local level and the effectiveness of these is needed.</p> <p>More detail is required here in relation to methods and initiatives to encourage cycling to work and effectiveness of these. For example, providing secure bicycle storage sites, workplace-based cycle training programmes, cycle clubs etc.</p>	<p>Thank you for this comment.</p> <p>Recommendation 1.4.6 of the final guideline (1.3.6 in the consultation version) includes a recommendation on procurement of vehicles, including selection of low-emission vehicles. Recommendations 1.3.5 and 1.7.4 highlight the importance of taking action to minimise congestion caused by delivery schedules to reduce emissions within the clean air zones and road-traffic-related air pollution, respectively.</p> <p>Recommendation 1.6.1 of the final guideline cross -refers to the related NICE guideline on physical activity: walking and cycling (PH41). Methods and initiative to encourage cycling to work are included in the recommendations within this guideline.</p>
184	[office use only]	Faculty of Public Health	Full	10	9-11	<p>1.6.5</p> <p>Clarification as to how to test and demonstrate understanding is needed.</p>	<p>Thank you for this comment. The recommendations in section on awareness raising (section 1.7 in the final guideline) now includes references to the NICE guidelines on behaviour change and community engagement which can help form the basis of actions to raise awareness.</p>
185	[office use only]	Faculty of Public Health	Full	10	12-22	<p>1.6.6</p> <p>This should only be done with care as many people are not sufficiently active and discouraging active travel could cause more harm than good. Adequate levels of physical activity are beneficial to many people with long-term conditions that place people at higher risk of the effects of high air pollution and a delicate balance is therefore needed when alerting these individuals to the effects of varying levels of air pollution. While the healthcare workforce is valuable in their role in raising awareness of the health impacts of air pollution and the risk to certain vulnerable groups, given the</p>	<p>Thank you for this comment. The committee's discussion section of the guideline outlines the potential benefits and harms of awareness raising about the possible health effects of air pollution.</p> <p>The committee's discussion highlights the wider impact of the recommendations on awareness raising- which is by preventing health conditions from escalating, particularly among the most vulnerable groups, it can also reduce the need for potentially more</p>

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						potential to have negative repercussions, training of staff needs to be standardized and evaluated.	expensive and less effective remedial action later. The 'Putting this guideline into practice' section of the guideline has approaches to implementation of recommendations
186	[office use only]	Fife Council	FULL	10	1-2	It is noted that one of the recommendations in the NICE report is to: <i>"Make businesses aware that they can reduce road-traffic-related air pollution and improve fuel efficiency"</i> Fife Council has been proactive in this area through the introduction of the Fife ECO Stars scheme. The ECO Stars Fleet Recognition Scheme is a free, voluntary scheme that provides recognition, guidance and advice on operational best practice to operators of goods vehicles, buses and coaches. It is being rolled out in Fife to help fleet operators improve efficiency, reduce fuel consumption and reduce emissions - all helping to improve local air quality and at the same time, make cost savings. Further details can be found at www.fifedirect.org.uk/ecostars	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline. We will also pass this information to our local practice collection team. More information on local practice can be found here .
187	[office use only]	Fife Council	FULL	56	29-30	It is noted that one of the "gaps in evidence" referred to in the NICE consultation document relates to: <i>"Effectiveness of traffic management"</i> . Fife Council has implemented traffic management measures at two Air Quality Management Areas (AQMAs) at Bonnygate, Cupar (co-ordinated traffic queue relocation system) and Appin Crescent, Dunfermline (road lane signage) that has produced noticeable improvements in air quality at these locations. Fife Council would be happy to contribute these as case study examples to the NICE guidelines in promoting knowledge sharing with other stakeholders. Further information is available at www.fifedirect.org.uk/airquality	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
188	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	General	General	There are references throughout the document to improving air quality by getting people to shift mode to walking/cycling or to drive in a more environmentally responsible manner, but no suggestion of encouraging modal shift to public transport, planning for public transport, travel plans or providing measures such as bus priority. Looking at the end of the report (see comment 15 below) suggests that this may be due to lack of suitable evidence available to the researchers. But whatever the reason, this makes the report appear to reject public transport as a suitable mode to promote and that is a	Thank you for this comment. Integrated public transport networks are now included in recommendation 1.3.4.

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						<p>very harmful position both from a wide environmental perspective, and from a narrower one in respect of public transport itself. There are a great many sections in the report where reference to promotion of and encouragement to use public transport would be beneficial – these are not enumerated below. Bus operators are already making great efforts to minimise the time spent stationary at bus stops by minimising boarding/dwell times through the use of customer facing technology including smart, contactless and mobile ticketing which also therefore speed up bus journeys making them more attractive to passengers and more efficient and environmentally beneficial to operate.</p> <p>A further issue not explored in the report is that of making efforts to improve traffic flow in cities, particularly for buses, working to reduce the negative effect of pinch points / bottle necks in order to reduce unnecessary idling, and stop/start traffic flow.</p>	
189	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	8	8	Worth noting that such training and monitoring is widespread amongst public transport operators	Thank you for this comment.
190	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	8	21	Implementing widespread 20mph zones in urban and suburban areas would have a seriously deleterious effect on local bus services, both in terms of the resources required to operate the services and their attractiveness to actual and potential passengers. This could act to reverse the positive modal shift to public transport and lead some bus users to turn to car use. That the cars would be subject to the same limit is immaterial as there is a subjective perception that the car driver is more “in control” of their destiny than when they are being driven in a bus.	Thank you for this comment. The recommendation (now 1.5) has been amended to clarify the difference between 20mph limits and 20mph zones.
191	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	17	22	The impact of the higher standards is also reduced due to their gradual introduction across the vehicle fleet, and since traffic congestion militates against the most efficient and least polluting operation of vehicles due to stop/start and slow running conditions. Euro VI buses are delivering the expected levels of emission reduction - some individual cars are producing more NOx emissions than buses. But the benefits from Euro VI will not be fully realised until the legislative “loop-hole” which still allows Euro V vehicles to be bought is closed.	Thank you for this comment.

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192	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	20	24	New developments should be located where they can be best served by public transport and on routes where a "churn" of boarding and alighting passengers can be achieved to best enable commercial operation of services.	Thank you for this comment. Recommendation 1.2 highlights actions that can be taken into account when planning for new developments to reduce the number of motorised trips.
193	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	28	10	Specific issues should instance the provision of bus priority measures to take buses out of the adverse effects of congestion and allow them to fulfil their role of persuading car users to shift modes, whilst also overcoming the operational problems referred to in point 5 above.	Thank you for this comment.
194	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	30	20	Areas for reinvestment of such money include bus priority measures and public transport information services	Thank you for this comment. Making a recommendation on how local government can allocate funds is beyond the remit of this guideline.
195	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	34	1	Automatic stop-start systems are already fitted to the most modern buses	Thank you for this comment. The US studies highlighted in the committee's discussion section evaluate the effect of anti-idling information campaigns for school bus drivers published in 2013. The evidence was considered partially applicable. The committee recognised that as fleets and new vehicles are purchased some of the actions will automatically be met, this is why they recommended taking a progressive approach over time so that further gains can continue to be made. This is noted in the committee's discussion of the final guideline.
196	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	35	22	The impact of Clean Air Zones needs careful consideration to prevent unforeseen adverse consequences. For instance, requiring bus operators (whose vehicles are in many cases not the source of the air quality problems) to meet the highest current standard well in advance of normal fleet replacement imposes a potentially huge additional cost which can lead to service cuts and fares increases, both of which will tend to lead to modal shift away from public transport and back to the car.	Thank you for this comment. The cost effectiveness and resource use section in the committee's discussion on low-emission zones does not specify that bus operators would need to meet the standards in advance of other vehicle fleets. The rationale for recommendation 1.4.6 clarifies that procurement of less polluting vehicles can happen as older vehicles are replaced and the committee have noted this as an action to

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							consider. The scope of the DEFRA Clean Air Zone proposal is outside the remit of NICE.
197	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	36	13	The recommendation that restrictions of vehicle types being based on impact on health is very valid and should be applied to all Clean Air Zone and similar proposals, rather than simply applying a "blanket" proposal to restrict buses and coaches to Euro VI as currently envisaged by DEFRA – see comment 10 above	Thank you for this comment.
198	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	37	27	Bus and coach operators already deploy this across their driving establishments	Thank you for this comment.
199	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	38	15	This is also best practice amongst bus and coach operators	Thank you for this comment.
200	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	51	20	A further example of good practice- use information signs to show not just the number of parking spaces available but also Park & Ride schemes and public transport routes that drivers can use, with differential journey times to the site/centre by car and public transport.	Thank you for this comment.
201	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	55	13	Whilst data about bus services and operations may not have been taken into account by the researchers, there is a large body of such evidence available and public transport clearly forms part of the solution. As written the report suggests that this is not the case and could be damaging to bus in particular. FirstGroup and the wider bus industry would be pleased to engage with NICE to provide evidence of how bus and coach can work to reduce air pollution and improve air quality.	Thank you for this comment. The recommendations were based on the evidence identified following systematic searches, 2 calls for evidence, expert testimonies and committee expertise. Evidence identified relating to bus services and operations have been taken into account where possible. In some instances, the evidence was considered to be uncertain or the committee noted that local factors would be particularly significant limiting the applicability of the evidence to support a general recommendation (please see the section on 'Evidence statements not used to make recommendations' in the final guideline).

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202	[office use only]	FirstGroup plc (UK Bus Division)	Draft guideline	General	General	<p>To answer the specific consultation questions:</p> <p>1 The biggest challenge will be for the private motorist getting them to change their personal behaviour. The availability and promotion of high quality public transport will be a key factor in achieving this.</p> <p>2 All the proposals could have significant cost implications for individuals affected by the specific measures</p> <p>3 There are a great many examples of good practice available from bus and coach operators and we would be pleased to engage further to provide details</p> <p>4 Comments 10 and 11 above make specific reference to the DEFRA proposals but a lot of detailed work remains to be done before these can be implemented</p> <p>5 No</p> <p>6 Grants are available towards (inter alia) purchase of and retrofit equipment to buses and coaches to reduce their environmental emissions, and for some forms of roadside or site specific electrical charging and gas supply infrastructure, but they are generally awarded on a "challenge" basis and the process of evaluation is not always transparent.</p> <p>7 Not applicable</p> <p>8 Our response is covered in points 10 and 11 above – bus travel should be seen as a major part of the solution to such air quality problems rather than as part of the problem</p> <p>9 Ditto</p>	<p>Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here. Your comments will be considered by NICE where relevant support activity is being planned. We have also passed it to the NICE resource impact assessment team to inform their support activities for this guideline.</p>
203	[office use only]	Faculty of Public Health Royal College of Physicians	Full	General	General	<p>The Faculty of Public Health (FPH) is committed to promoting a vision of society in which governments, devolved and local, and public sector organisations actively invest in 100% renewables, and reduce the production of harmful emissions and waste².</p> <p>The Royal College of Physicians (RCP) plays a leading role in the delivery of high-quality patient care by setting standards of medical practice and promoting clinical excellence. The RCP provides physicians in over 30 medical specialties with education, training and support throughout their careers. As an independent charity representing 32,000 fellows and members worldwide, the RCP</p>	<p>Thank you for this comment. The scope of this guideline is to produce recommendations for action by local authorities and others locally. Recommendations on national policy are outside the remit of NICE.</p> <p>Additional benefits associated with actions to address air pollution, including the impact on physical activity levels and emission of greenhouse gases are included in the committee's discussion sections. The</p>

² The Faculty of Public Health. Start Well, Live Better – A manifesto for the Public's Health. Retrieved from: http://www.fph.org.uk/start_well_live_better_-_a_manifesto

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						<p>advises and works with government, patients, allied healthcare professionals and the public to improve health and healthcare.</p> <p>The FPH and RCP welcome this consultation and the government's commitment to address air quality. However, we are concerned that the proposals are too modest and narrow given the nature of the exposure sources, the scale of health impacts, and the apparent reliance on local authority interventions without effective <i>national</i> actions.</p> <p>We consider that the draft guidance misses an opportunity to significantly reduce the health inequalities associated with the elevated exposures experienced by deprived communities, the very populations with risk factors that increase susceptibility^{3 4 5}. We are also concerned that the economic opportunities of reducing the enormous costs of treating NO_x related morbidity and mortality will not be fully exploited given the apparently limited new investments being proposed.</p> <p>It is clear that emissions from diesel vehicles are the principal cause of NO_x exceedences and that assumptions about the effectiveness of current controls have been hugely compromised by the disparity between vehicle test and real-world driving conditions, as well as the recent VW scandal⁶. While it is encouraging to see a portfolio of interventions being recommended, including Clean Air Zones, Central Government action to reverse the increase in the proportion of diesels in our national fleet as part of this wide-ranging portfolio of actions is fundamental to addressing mono-nitrogen oxides (NO_x) and other dangerous air pollutants such as particulates. This should include incentives such as scrappage and retrofit schemes as well as encouragement for drivers to change from diesel to petrol. Non-mobile diesel engines (e.g. airports not just serving London, but</p>	<p>guideline includes reference to the distribution of air pollution and the increased burden in deprived groups (the committee's discussion section for recommendation 1.3.8).</p>

³ The Faculty of Public Health. 2013. Transport and Health [Briefing statement]. Retrieved from: <http://www.fph.org.uk/uploads/briefing%20statement%20transport%20V2.pdf>

⁴ Jephcote C. Chen H. 2012. Environmental injustices of children's exposure to air pollution from road-transport within the model British multicultural city of Leicester: 2000-09. Science of The Total Environment. 414:140-151. Retrieved from: <http://www.sciencedirect.com/science/article/pii/S0048969711013544>

⁵ Goodman A, Wilkinson P, Stafford M, Tonne C. Health Place. 2011. Characterizing socio-economic inequalities in exposure to air pollution: a comparison of socio-economic markers and scales of measurement. Health and Place. 17(3): 767-774. Retrieved from: <http://www.ncbi.nlm.nih.gov/pubmed/21398166>

⁶ Oldenkamp R et al. Environmental Pollution 212 (2016) 121-127

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						<p>regional airports as well), those used on construction sites and ships running their engines while in dock despite having facilities to link up to electrical power when docked) are also important and sometimes major sources of NO_x and should be included in Clean Air zones. Local authorities also need to be given more powers than those currently available through planning powers to inspect and control the non-mobile sources of NO_x and other pollutants.</p> <p>Responsibility for the delivery of the guidance is being left entirely with local authorities, but we are very concerned that, without adequate funding or enabling and supportive regional/national policies and interventions, achievement of the goals of the guidance is unrealistic and is a major barrier to implementation. Seriously addressing NO_x requires significant national as well as local action together with shared responsibility and accountability, yet there is little reference to national actions or investments. It is especially unreasonable to expect local authorities to bear the risk of failure when there is no timetable for implementation or assurance of adequate support, particularly at a time of major funding cuts to local authorities.</p> <p>Local authorities must be reassured that they have the partners and tools, including adequate funding, to deliver the programme. Without meaningful national commitment to address this national issue, including serious action on the diesel vehicle fleet, there will be scepticism about the programme and concern about the local accountability for the consequences of failure. Highly visible commitment and a joined up approach between key agencies, including the Department for Transport and the Highways Agency, is required to address the issue as a whole. In addition, devolution could be a tool for diverting Vehicle Excise Duty to local authorities to use for funding effective local interventions. This should form the future basis of a new Clean Air Act which in large part needs to bring together the many stakeholders that need to be involved in bringing down pollution from internal combustion engines, especially those powered by diesel and other lower volatile fuels.</p> <p>With the transfer of NHS public health responsibilities in 2013, local authorities have the prime responsibility for protecting and promoting the health and well-being of their communities. Air quality</p>	

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						is such a clear driver for multiple adverse health effects (see RCP & RCPCH Report ' Every breath we take: The lifelong impact of air pollution ') that it must be considered a core public health issue; local action could mobilise more effective working across professional and departmental boundaries within councils. These relationships will inform and enable further action in other public health areas which should be seen as a benefit by local authorities. To maximise this potential, the inter-relationships between emissions, exposures, effects and interventions should be emphasised; for example, NO _x emissions are also important greenhouse gases linked to climate change and the guidance should consider how best to encourage joint initiatives addressing both impacts. Implicit in all the proposed pollution mitigation and sustainability policies must be a major push for giving serious support to enable local authorities to invest in effective public transport and importantly in active travel, walking and cycling strategies as is proving so successful in other European Countries.	
204	[office use only]	Faculty of Public Health Royal College of Physicians	Full	General	General	The definition of vulnerable groups should include deprived populations, given the evidence of increased exposure and susceptibility to air pollution (see RCP & RCPCH report 'Every breath we take: The lifelong impact of air pollution'). All recommendations specifically related to vulnerable groups should include deprived people and populations. Very minor point-Committee is singular not plural.	Thank you for this comment. The guideline includes reference to the distribution of air pollution and the increased burden in deprived groups (please see the committee's discussion section for recommendation 1.3.8)
205	[office use only]	Faculty of Public Health Royal College of Physicians	Full	1	box	We consider the guidance is directly relevant to healthcare professionals in both the primary and secondary healthcare sectors who are responsible for dealing with the human consequences of air pollution. It is also important to recognise that the NHS has a vital role in the prevention as well as the treatment of such consequences. NHS staff (9% of the UK workforce) represent a powerful potential resource for informing, educating and empowering the public and driving behaviour.	Thank you for this comment. This text has been amended.
206	[office use only]	Faculty of Public Health Royal College of Physicians	Full	6	6-9	It is important to acknowledge that Clean Air Zone controls apply only to commercial vehicles and exclude private vehicles. Low emission and ultra Low emission zones (e.g. the Mayor of London's air pollution policies) should also be included as an option for local authorities	Thank you for this comment. Clean air zone controls should be determined by the local bodies.
207	[office use]	Faculty of Public Health	Full	7	1	Working across local authority boundaries is an essential requirement for tackling local air pollution, especially in urban areas.	Thank you for this comment. The word consider has been removed.

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	only]	Royal College of Physicians				Such cross-boundary cooperation must be a requirement, not an option	
208	[office use only]	Faculty of Public Health Royal College of Physicians	Full	8	12-14	Given the evidence of the contribution of diesel vehicles to NOx levels, this recommendation must be a requirement rather than an option. It is also essential that the public sector sets an example to private car and transport fleet managers.	Thank you for this comment. The use of consider is standard NICE wording based on the strength of the evidence considered.
209	[office use only]	Faculty of Public Health Royal College of Physicians	Full	9	21-27	Recommendation should include providing information to the public on the specific hazardous contribution of diesel vehicles. A new education programme highlighting the harms of air pollution to health needs to be rolled out in which the health sector has a key role to play, working with local and national government.	Thank you for this comment. Recommendation 1.7.4 of the final guideline (1.6.3 in the consultation version) has been amended to include additional areas that health care professionals could provide information on.
210	[office use only]	Faculty of Public Health Royal College of Physicians	Full	10	1-7	This recommendation should include making businesses aware of the specific hazardous contribution of diesel vehicles and the contributions to air pollution made by their own buildings (e.g. via heating appliances/systems).	Thank you for this comment. The committee's discussion section refers to the evidence from expert testimony (expert paper 3) that contribution of diesel cars to NO ₂ pollution is substantial. This was taken into account when developing recommendations on clean air zones. Please see recommendations 1.3.1 and 1.3.2 in the final guideline which addresses restrictions of vehicles. NICE was asked to develop a guidance on reducing ill-effects of outdoor air quality on health and the scope was limited to focus on how local authorities can reduce exposure to air pollution from road traffic. Hence other sources of air pollution are outside the scope of this work.
211	[office use only]	Faculty of Public Health Royal College of Physicians	Full	12	22-26	This section should identify the specific contribution of diesel vehicles using real-world emission factors, reflecting the disparity between these and those under test cycle conditions along with the emission advantages from a switch from petrol to diesel. The exposure and health impacts of the VW emissions testing scandal and the broader issue of the failure of Euro standards to abate real-world emissions from diesel should also be highlighted (Oldenkamp R et al. Environmental Pollution 212 (2016) 121-127, Carslaw & Rhys-Tyler Atmospheric Environment 81 (2013) 339 -347,	Thank you for this comment. The context section aims to present the key need for this guideline and has not been amended.

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						Department for Transport, 2016 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/548148/vehicle-emissions-testing-programme-web.pdf)	
212	[office use only]	Faculty of Public Health Royal College of Physicians	Full	16	22-28	While we agree that multiple interventions are required, the Oldenkamp analysis strongly suggests that national actions on diesel emissions could have a substantial impact on their own.	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
213	[office use only]	Faculty of Public Health Royal College of Physicians	Full	30	22-24	We accept the limitations on NICE restricting local authority funding decisions but this is a recommendation not a directive and local authorities do have discretion in terms of how they manage their overall spending.	Thank you for this comment. Making a recommendation in this area is beyond the remit of the guideline.
214	[office use only]	Faculty of Public Health Royal College of Physicians	Full	35	8-12	If large scale schemes are shown to be effective why are they not being recommended?	Thank you for this comment. Clean air zones are recommended in section 1.3 of the final guideline. However due to the strength of the evidence , these are recommended as actions to consider.
215	[office use only]	Faculty of Public Health Royal College of Physicians	Full	38	21-24	Where there is evidence that diesel vehicles and other diesel sources of pollution are the primary drivers of air quality contraventions, why isn't their replacement with less polluting options recommended?	Thank you for this comment. The recommendations in section 1.4 aim to reduce unnecessary motor vehicle journeys and to support zero- and low- emission travel.
216	[office use only]	Faculty of Public Health Royal College of Physicians	Full	39	26-30	As local authorities have statutory duties in this area and given the evidence that diesel vehicles are a primary source of local air quality contraventions, related recommendations should be requirements rather than considerations.	Thank you for this comment. Due to the strength of the available evidence, the recommendations remain actions to 'consider'. Please see the NICE manual on developing and wording recommendations .
217	[office use only]	Faculty of Public Health Royal College of Physicians	Full	40	1-2	Does this not contradict the 'consider' recommendation?	Thank you for this comment. This sentence has been removed in the final version of the guideline.
218	[office use only]	Faculty of Public Health Royal College of Physicians	Full	56	17	While welcoming this discussion of gaps in the evidence, these should include the benefits of reversing the dieselisation of the national vehicle fleet.	Thank you for this comment. The gaps identified are based on the committee's assessment of the evidence and expert testimonies.

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219	[office use only]	Greener Jobs Alliance and Furzedown Low Carbon Zone and Battersea and Wandsworth Trades Union Council	Full	General	General	<p>The comment above also reflects the duties on the Government as signatories to the Paris Climate Agreement. Article 7 on Adaptation requires the adoption of measures that will respond to climate change. The link between Air Quality and Climate Change is clear. The experience of coal burning in China and the impact on air quality is an example of this. Action to reduce the pollution from fossil fuel burning will help improve air quality. This link should be highlighted in the guidance. As far back as 2007 Defra published a report entitled 'Air Quality and Climate Change: A UK Perspective'. Recommendation number 1 stated '<i>Impact analysis of policies or specific developments, whether for industry, transport, housing etc, should take account of the interlinkages of emissions of air quality and climate change pollutants.</i></p> <p>https://uk-air.defra.gov.uk/assets/documents/reports/aqeg/full</p>	<p>Thank you for this comment. The guideline notes that interventions to address air pollution are also likely to help reduce climate change from emissions of CO₂.</p> <p>Please note that air pollution from coal burning would be outside the scope of this guideline. Recommendations on national policy are outside the remit of NICE.</p>
220	[office use only]	Greener Jobs Alliance and Furzedown Low Carbon Zone and Battersea and Wandsworth Trades Union Council	Full	General	General	<p>As with the lack of reference to our obligations under the Paris Agreement (above) there is insufficient context in the document related to UK obligations under the UN Sustainable Development Goals which are also not referenced. SDG 11 requires signatories to 'Make cities inclusive, safe, resilient and sustainable'. Target 6 specifically states:</p> <p><i>'By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management'.</i></p> <p>http://www.un.org/sustainabledevelopment/cities/</p>	<p>Thank you for this comment. Inclusion of obligations under international agreements is not part of the standard NICE template for guidelines.</p>
221	[office use only]	Greener Jobs Alliance and Furzedown Low Carbon Zone and Battersea and Wandsworth Trades Union Council	Full	General	General	<p>The wording on the target group needs to be clearer and strengthened. Page 1 has a heading 'Who is it for?' The term 'may' be relevant for Healthcare professionals, Employers in all sectors etc is too weak. The evidence shows that this is a public health priority and the Guideline must make this clear. It follows that the 5 target groups identified will be relevant.</p>	<p>Thank you for this comment for this comment. The audiences for the guideline have been amended to show that it is relevant to healthcare professionals.</p>
222	[office	Greener Jobs	Full	8	11-14	The use of the action verb 'consider' tends to dilute the duty	Thank you for this comment. As noted, the

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	use only]	Alliance and Furzedown Low Carbon Zone and Battersea and Wandsworth Trades Union Council				throughout the document. The justification employed is ' <i>where there is less certainty in the strength of the evidence base</i> ' In some sections of the guidance like 1.3.6 on Procurement it is hard to see the validity of this approach. The rationale for this is given on Page 39 Paras 16-20 ' <i>The committee agreed that procurement of the right type of vehicles is important when aiming to reduce road-traffic related emissions. Members noted that this could be done as older vehicles are replaced. Because the evidence was weak, the committee made a 'consider' recommendation</i> '. There is plenty of evidence that shows that the impact of changing your vehicle fleet is strong not weak. For example, the switch to hybrid buses in London illustrates this.	use of consider is standard NICE wording based on the strength of the evidence considered .
223	[office use only]	Greener Jobs Alliance and Furzedown Low Carbon Zone and Battersea and Wandsworth Trades Union Council	Full	9	21-27	The duty on 'Awareness raising' needs more targeted content. The 5 groups mentioned on Page 1 – Healthcare professionals, employers in all sectors, voluntary sector, people working in education and the General public should all have clear guidance. Only the 'General public and businesses' are mentioned. All 5 groups need to be provided with targeted information as all of them have a vital role to play in awareness raising. Involving the public rather than them being the passive recipients of information is needed. There are many examples of where 'citizen science' has been important in many parts of the country in identifying pollution hotspots. Engagement with these groups should be included in local authority air quality action plans.	Thank you for this comment. The recommendation (now 1.7) includes the need to develop strategies based on NICE guidelines for behaviour change and community engagement.
224	[office use only]	Greener Jobs Alliance and Furzedown Low Carbon Zone and Battersea and Wandsworth Trades Union Council	Full	10	1-7	A group other than the public that is mentioned are 'businesses'. Their role needs to be highlighted far more. The document states that they should 'consider' certain actions related to transport policy. These sections require strengthening in order to address one of the root causes of air pollution. The majority of air pollution is caused by work and people travelling to work. Workers are exposed to and create pollution to fulfil contractual obligations to employers. Employers must have much stronger responsibilities in this guidance. Currently they are informed that ' <i>they could consider</i> ' 3 transport-related initiatives. Their responsibilities on air pollution should go much wider than that and be commensurate with their role in an economy responsible for this public health crisis. It should include their energy management policies, procurement and low carbon transition strategy. Their role in the awareness raising of their workforce is something that requires planning in conjunction	Thank you for this comment. The use of 'consider' is standard NICE wording based on the strength of the evidence the committee considered. The evidence contributing to recommendation 1.7.4 in the final guideline (1.6.4 in the consultation version) was uncertain therefore the committee recommend that this is an action to 'consider'.

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						with employees and their representatives policy. This should be wide-ranging on air pollution and related issues like climate change.	
225	[office use only]	Hydrock Consultants Ltd	Full	17	6 - 7	<p>The section on monitoring states that "Measurements of traffic will also provide the high-quality information needed for planning changes". Currently traffic data for most roads is ad hoc and of poor quality. Accurate high resolution data on vehicle classifications and speeds is hard to obtain. This impacts the quality of Air Quality Assessments that is possible and the speed with which they can be undertaken. It also impacts the scope of city traffic signal setups. The majority of UK cities are still modelled using average speed models which incorrectly assume a quicker, less congested journey consumes less energy and emits fewer pollutants. Traffic signals are synchronised over small areas resulting in more stops and starts than are necessary. The technology exists to have real time 99% accurate vehicle classification, speed, origin destination and route data to develop microsimulation models of cities, which can be used to optimise signal setups to reduce energy consumption and emissions.</p> <p>Question</p> <p>Our company has had experience of optimal traffic signal optimisations would be willing to submit its experiences to the NICE shared learning database. Contact:</p>	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
226	[office use only]	Hydrock Consultants Ltd	Full	13	1	<p>Non-exhaust emissions 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 include reducing stops and starts, lighter vehicles, Kinetic Energy Recovery to reduce friction braking and solid wheel transportation such as trams and trains.</p>	Thank you for this comment.
227	[office use only]	Insall & Coe	Full	General	General	<p>It is not clear what you mean by 'full' or 'short' versions. We are commenting on the draft published December 1st and currently on the NICE website.</p>	Thank you for this comment. Please note public health guidelines produce only one version of the guideline.
228	[office use only]	Insall & Coe		General	General	<p>As you know, we lobbied for NICE to be mandated to produce air quality guidance and were delighted to see the commission. This draft is both welcome and timely: with mounting political and legal pressure on government to tackle the issue, good guidance will be</p>	Thank you for this comment.

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						vital. Much of the content we consider good, so please where we have not offered comment, take that as approval.	
229	[office use only]	Insall & Coe		General	General	Although we regard most of the content as good, we urge you to consider making the general approach more assertive. The draft acknowledges the central role in air pollution played by motor traffic, but it seems to concentrate on palliative and mitigating approaches and interventions rather than eradicating the root causes, motor traffic in particular. We will return to this point.	Thank you for this comment. Recommendations address reducing the need to travel as well as reducing emissions from vehicles and avoiding unnecessary exposure of people to poor air quality.
230	[office use only]	Insall & Coe		General	General	We feel there is an uncomfortable imbalance in the recommendations. Quite a lot of space and detail are allocated to relatively minor changes, such as fuel efficient and smooth driving, not in our view enough about reducing the totality of vehicular emissions.	Thank you for this comment. The guidelines include recommendations aimed at reducing emissions from vehicles. It is unlikely that single actions locally will achieve the desired effect, rather benefit will arise from the cumulative impact of multiple actions.
231	[office use only]	Insall & Coe		General	General	Clearly, NICE cannot advocate specific types of intervention for which the evidence is unavailable, but given that we know how important vehicular emissions are in this problem, can the guidance not simply recommend that local planning and transport strategies and programmes identify motor traffic reduction as a key objective?	Thank you for this comment. The recommendations include actions to reduce motor traffic and this aim has been clarified in the document.
232	[office use only]	Insall & Coe		General	General	You will have noted, as we did, the serious misrepresentation by various media of the draft guidance at launch. This may or may not have been deliberate or malicious, but it is an indicator that the main messages in the guidance must be clearer. In our view, of course, the central message must be about the need to reduce motor traffic where people live.	Thank you for this comment. Any media coverage (where NICE has been asked to comment on or input into) will reflect the full content of the final guideline.
233	[office use only]	Insall & Coe		General	General	We are pleased that the draft acknowledges the complexity of the air quality issue, including the possibility of unintended negative impacts. It is complex but not as wicked in resolution as some other public health areas of concern and we feel you have this balance right. We particularly welcome references to public health co-benefits: we think it is important that you have iterated the other areas of benefit arising from a shift from motorised to active travel.	Thank you for this comment.
234	[office use only]	Insall & Coe		PP 4 - 11		The way the recommendations are structured is hard to understand. Given that many of the areas of recommendation bridge across a number of policy areas (or, if you prefer, national and local government departments) we understand that you have not sought to group recommendations in that way. However, it might be possible to restructure the recommendations in what we would see as a more logical framework, for example:	Thank you for this comment. The committee felt that the organisation of the recommendations in the draft guideline was appropriate. Recommendation 1.1 has been divided to provide further clarity.

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						Please insert each new comment in a new row	Please respond to each comment
						<ul style="list-style-type: none"> - Policies, strategies and plans, including much of 1.1 - Built environment, including much of 1.1 and 1.5 - Regulatory and fiscal approaches, much of 1.2 - Public sector fleets (with a possible separate section for the role of the private sector) - Behaviour change approaches - 1.6 as it stands. 	
235	[office use only]	Insall & Coe		P 4	L 3	If you decline our suggestion above, please note that 1.1 appears to conflate 'planning' – the development of local plans and strategies – with 'Planning' the work done by land-use planners.	Thank you for this comment. Recommendation 1.1 has been subdivided for clarity.
236	[office use only]	Insall & Coe		P 6	L 4 et seq	Likewise, elements of recommendation 1.2 are not really about Clean Air Zones.	Thank you for this comment.
237	[office use only]	Insall & Coe		P 4	L 14 – 15	The proposition that people's living accommodation should be laid out so as to prevent them using certain rooms because of air pollution is quite dystopian. In 21 st century Britain, people – whether or not from 'vulnerable groups' – really should have the right to live where the air will not damage their health. This recommendation should focus on removing the sources of the pollution, rather than ways individuals can structure their lives around hiding from it.	Thank you for this comment. The guideline includes recommendations to remove the sources of pollution. However, the committee felt it appropriate to include recommendations about the design of areas to avoid unnecessary harm in addition.
238	[office use only]	Insall & Coe		P 4	L 15 – 17	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 would prefer "take action to reduce motor traffic levels and pollution where facilities such as schools, nurseries and retirement homes are to be located".	Thank you for this comment. Recommendation 1.1.1 aims to promote zero- and low- emission travel (including walking and cycling). This recommendation is aimed at avoiding placing vulnerable groups in harm's way during the planning process. It has been amended to avoiding locating them in areas where pollution is high for clarity.
239	[office use only]	Insall & Coe		P 6	L 10 – 11	If you accept our suggested restructuring of recommendations, 1.2.2 would move to the strategic planning section. Either way, we would suggest this should be more specific as to how pollutant levels are to be reduced, eg by adding "by reducing levels of motor traffic" (you might wish also to refer to other major pollutants).	Thank you for this comment. Recommendation 1.3.2 (1.2.2 in the consultation version) has been retained in the section on clean air zone (section 1.3 of the final guideline). However it has been amended and a reference to WHO air quality guidelines has been added.
240	[office use only]	Insall & Coe		P 6 – 7		There is something inherently unsatisfactory about the concept of a clean air 'Zone'. Shouldn't clean air be the norm – perhaps with some dispensation to permit a dirty air zone where a case could be made (I'm not sure where this might be). This is not just a semantic issue. The default state where people	Thank you for this comment.

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						live should not be for an unhealthy environment, where this is avoidable. Clearly in the case of polluting motor traffic, it is avoidable.	
241	[office use only]	Insall & Coe		P6	L 15 – 18	We were happy to see reference in the draft to non-tailpipe emissions: our fear is that many local authorities are hoping the growth in use of Low Emission Vehicles will solve the problem for them and obviate the need to take action. Would it be possible to mention explicitly that LEVs are only a partial solution?	Thank you for this comment. The guideline has been amended so that zero-emission vehicles are placed before low-emission vehicles throughout.
242	[office use only]	Insall & Coe		P 7	L 5 et seq	The recommendations regarding road user charging are very diffident, and we would like to see a more direct statement f recommendation (as in PH8). It is unfortunately quite likely that a clean air zone may cover only a small geographical area, and so to incorporate a charging zone within it may do no more than move the problem to nearby streets.	Thank you for this comment. The hope is that clean air zones will take an area wide approach.
243	[office use only]	Insall & Coe		P 9	L 2	Cycle routes are planned in the same way as other transport infrastructure, to address movement need. 'Avoid siting cycle routes on highly polluted roads' has the argument the wrong way round, and could in practice translate as 'make cycle routes inconvenient'. If a cycle route is needed between two points and the appropriate road is polluted, the pollution (in practice, the traffic causing it) should be removed. The type of urban road used for a cycle route may well also be used by walkers. Walkers should not have to run the gauntlet of vehicular (or other) pollution, any more than cyclists.	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline 'physical activity: walking and cycling' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
244	[office use only]	Insall & Coe		P 11 - 12		We presume the 'Putting this guideline into practice' section is generic and may have been written with an audience such as local welfare charities in mind. We are concerned that it may seem patronising. Have you had any feedback from local authorities, to confirm that they like this type of presentation?	Thank you for this comment. This is standard to all NICE guidelines.
245	[office use only]	Insall & Coe		P 12	L 21 – 27	It may be useful here to expand slightly on the importance of vehicle related emissions. You have rightly pointed out the predominance of vehicular emissions at urban test sites, and it might be helpful to explain briefly why that is (the fact that certain major industrial and generation sources are located away from urban areas, for example).	Thank you for this comment. The context section of the guideline aims to present the key need for this guideline and has not been amended.
246	[office use only]	Insall & Coe		P 13	L 1 – 3	We are pleased you have included this clarification, as we fear that many professionals, including in transport, don't know it yet. We would suggest replacing 'other' in line 2 with 'non-exhaust' or 'non-tailpipe', just to be super clear.	Thank you for this comment.
247	[office			P 18	L 4 –	The reference to equality is important. As with some other aspects	Thank you for this comment. Further down in

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	use only]	Insall & Coe			13	of car usage, the imposition of disease on the poorest is particularly cruel. However, we challenge the concept that car owners in the poorest communities (and the worst afflicted by air pollution) should be given a licence to pollute. Please think very hard about this element, which seems to us to mirror lobby group arguments against, for example, minimum unit pricing on alcohol.	this section, the committee's discussion concludes that the committee agreed that removing older vehicles from the road would reduce health inequalities, provided these groups could get to the places and services they need.
248	[office use only]	Institute of Air Quality Management	Full	General	General	<p>The draft provides no recommendations that are not already included in existing statutory and non-statutory guidance for local authorities (LA) including for Local Air Quality Management, the draft Clean Air Zone Framework, National Planning Policy Framework and the EPUK/IAQM planning document</p> <p>There is already a <u>statutory</u> duty for LAs to work towards achieving the air quality objectives set out in Regulation, and a recommendation encouraging LAs to include regarding PM_{2.5} (recognising that most of the PM_{2.5} is imported into a LA from elsewhere).</p> <p>The added value of the NICE guidance is currently unclear and it may be useful for its aim to be more clearly stated.</p> <p>It may also be useful to explicitly aim it at LA Public Health Directors (PHDs) and Medical Practitioners as these audiences need educating on the health effects of air quality and action that can be taken by institutions and individuals. The PHDs should have influence within their LA while Practitioners are well placed to advise their patients.</p> <p>LAs are often unable to address air quality adequately because of a lack of resources and unless this is addressed there is unlikely to be widespread change in LA's policies. There is simply very little political will or money to improve air quality. Whereas once every LA with an air quality management area had at least one air quality officer, in many LAs air quality officers are now shared between two or more authorities.</p> <p>Imprecise language is used in many places leading to a lack of clarity. For example the National Air Quality Framework is referred to in several places. IAQM is not aware of this document. Does it</p>	<p>Thank you for this comment. The recommendations are based on the existing evidence base and aim to support effective local action to address the health impact of road transport related air pollution.</p> <p>Recommendations are aimed at people working in local authorities, including in public health roles. The guideline aims to provide additional support to those wishing to make changes in these areas.</p> <p>The reference to the national air quality framework has been removed.</p> <p>National funding is beyond the remit of NICE.</p> <p>The contribution of non-exhaust sources is mentioned in the context section.</p> <p>The guideline contains sections on 'Terms used in this guideline' as well as a glossary.</p>

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						<p>mean the 2015 national Air Quality Plan (AQP)? Or the Clean Air Zone Framework that Defra have recently consulted upon?</p> <p>The High Court's order for the Government to amend the AQP is not mentioned. This is likely to mandate more than 5 LAs to introduce Clean Air Zones, and if there are new duties, it will need funding by central Government. Should NICE wait for the new Plan before issuing its guideline, or will it quickly become out of date?</p> <p>The current Air Quality Grant is £300m; 100 LAs have applied for funding. An average of £30,000 is insufficient for real change. In contrast the Mayor of London's business plan includes £875m to improve air quality.</p> <p>Would it be useful to mention non-exhaust PM which will soon dominate traffic PM emissions, as more vehicles are fitted with particle filters.</p> <p>It would be useful to include a glossary in the guideline if it is to effectively reach a new audience.</p> <p>IAQM comments below from the early sections of the guidance need to feed into the main part i.e. from page 18 onwards.</p>	
249	[office use only]	Institute of Air Quality Management	Full	5	17	There is mixed evidence on the impact of trees on air quality, as they can adversely affect dispersion as well as reduce PM concentrations. See page 6 lines 1-3. Suggest a caveat is put in p5, line 17 to link the two statements.	Thank you for this comment. The discussion section addresses the mixed evidence. Recommendation 1.1.2 supports the use of vegetation where this will not impact on ventilation and so dispersion.
250	[office use only]	Institute of Air Quality Management	Full	6	20	CIL can only be used for projects included in the list of infrastructure projects (Reg 123 list). It may be more appropriate to used planning obligations (S106 agreements)	Thank you for this comment. The recommendation has been amended to suggest actions that could be included in the regulation 123 list (see recommendation 1.2.2).
251	[office use only]	Institute of Air Quality Management	Full	6	10	What is a 'progressive target'?	Thank you for this comment. This has been clarified.
252	[office use only]	Institute of Air Quality	Full	8	19	Should it be NOx not NO ₂ ?	Thank you for this comment. This has been amended.

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	only]	Management					
253	[office use only]	Institute of Air Quality Management	Full	8	19	What is the current optimum driving speed? Does it exist or, more likely, is it technology dependent?	Thank you for this comment. This refers to the optimum speed to avoid causing additional congestion.
254	[office use only]	Institute of Air Quality Management	Full	9	19	Needs to be clearer – social media is national media (e.g. local and national print, broadcast and social media).	Thank you for this comment. The committee felt that this division was clear.
255	[office use only]	Institute of Air Quality Management	Full	13	1	Suggest 'around 20%' or '21% in X year'	Thank you for this comment. This figure has not been amended because this is intended to be an estimate.
256	[office use only]	Institute of Air Quality Management	Full	13	23	'Higher relative concentrations' compared to what? Should say 'often have the highest concentrations...'	Thank you for this comment. This has been amended to 'higher concentrations'.
257	[office use only]	Institute of Air Quality Management	Full	14	1	Delete 'So'.	Thank you for this comment. This has been removed.
258	[office use only]	Institute of Air Quality Management	Full	15	2	Replace particle counts with particle number	Thank you for this comment. This has been amended accordingly in the final guideline.
259	[office use only]	Institute of Air Quality Management	Full	15	17	Unclear what is meant by metrics of nitrogen oxides	Thank you for this comment. The term 'metrics' has been amended to 'measures of particles'.
260	[office use	Institute of Air Quality	Full	15	20	Using fuel efficiency as a proxy for NOx emissions can be problematic; engine-out NOx emissions increase with increased fuel	Thank you for this comment. This statement was based on the committee's expert

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	only]	Management				efficiency, and many (but not all) after-treatment devices increases fuel consumption.	knowledge and has not been amended in the final guideline.
261	[office use only]	Institute of Air Quality Management	Full	15	26	It contains more than targets, i.e. mandatory limit values	Thank you for this comment. The sentence has been amended in the final guideline and includes the term 'mandatory limits'.
262	[office use only]	Institute of Air Quality Management	Full	16	18	What does it mean by "... the way the environment is viewed..."	Thank you for this comment. This relates to the perception of the environment people may have when deciding whether to use a space.
263	[office use only]	Institute of Air Quality Management	Full	17	13	Not a 'Common approach' in the UK – there are only 6 LEZs and all but London applying to buses (i.e. captive fleets).	Thank you for this comment. The term 'common approach' used in this sentence relates to strategies to tackle air pollution and not stating that low emission zones is a common approach within the UK. This has been amended to a 'recognised approach' in the final guideline.
264	[office use only]	Institute of Air Quality Management	Full	17	24	NO ₂ not NO _x ?	Thank you for this comment. This has been amended to NO ₂ in the final guideline.
265	[office use only]	Institute of Air Quality Management	Full	17	28	There is good evidence from the UK and elsewhere that they are higher e.g. Department of Transport's Vehicle Emission Measurement Programme found Euro 6 diesel cars, on average, emitted over 6 times the limit value when driven on the road. Petrol cars have on road emissions at or below the limit value. The guidelines need to be clear that the comments relate to diesel cars/light goods vehicles, not petrol vehicles (virtually all heavy duty vehicles are diesel fuelled).	Thank you for this comment. This sentence in the committee's discussion section has been amended to clarify 'diesel vehicles'.
266	[office use only]	Institute of Air Quality Management	Full	18	1	From September 2017 for cars; already a requirement for heavy duty vehicles.	Thank you for this comment. The paragraph in the committee's discussion section has been amended to include details on existing requirement for emission tests for heavy duty vehicles and change in requirements for cars from September 2017.

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267	[office use only]	Institute of Air Quality Management	Full	18	4-13	Note that poorer people tend to have older cars but drive them a lot less than more affluent people (see work by Tim Chatterton, UWE).	Thank you for this comment.
268	[office use only]	Institute of Air Quality Management	Full	19	11	'are low' not 'will be low'.	Thank you for this comment. This part of the sentence in recommendation 1.1.2 in the final guideline (1.1.1 in the consultation version) has been amended to 'where pollution levels will be high'.
269	[office use only]	Institute of Air Quality Management	Full	19	1-20	Add low NOx boilers.	Thank you for this comment. Thank you for the suggestion however this amendment has not been made in this instance.
270	[office use only]	Institute of Air Quality Management	Full	25	17-18	This is wrong, there is a real cost; it requires an experienced and knowledgeable air quality officer to have the time to review all air quality assessments accompanying planning applications and to challenge developers when necessary. Planning officers do not have the necessary expertise. Note comment in item 1 regarding the increasing sharing of air quality officers across LAs.	Thank you for this comment. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline
271	[office use only]	Institute of Air Quality Management	Full	27	9	What is the draft national air quality framework? Also p28 line 25; p31 line 11.	Thank you for this comment. The 'draft national air quality framework' refers to the Defra's consultation document on the implementation of clean air zones in England . The reference to the draft plan has been removed from the recommendation.
272	[office use only]	Institute of Air Quality Management	Full	29	11-17	Timescale is very important; government policy has been to promote ultra-low emission vehicles (EVs and plug in hybrids). It will be a number years before these are significant proportion of the vehicle fleet (currently <0.1% of the car fleet). They remain more expensive than petrol/diesel cars. Petrol cars and even some diesel cars have low on road emissions. Reference to the EQUA Index which provides the public with information on real driving emissions from cars would be useful.	Thank you for this comment. Thank you for the suggested amendment but it has not been included on this occasion.
273	[office use only]	Institute of Air Quality Management	Full	30	20-24	The charges may not fully cover the cost of running the scheme. LEZ charges do not and have to be subsidised.	Thank you for this comment. Please note the committee's discussion section in relation to

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	only]	Management					this section has been amended to emphasise the public health benefit of the schemes.
274	[office use only]	Institute of Air Quality Management	Full	31	14	What is ES6.3?	Thank you for this comment. 'ES6.3' refers to the 3 rd evidence statement included in the evidence review for review question 6. ES6.3 summarises the evidence on the effect of low emission zones. Further details on the studies are reported in the guideline and in evidence review 2 .
275	[office use only]	Institute of Air Quality Management	Full	35	14	See comment 26	Thank you for this comment.
276	[office use only]	Institute of Air Quality Management	Full	36	24	Is this true?	Thank you for this comment. The sentence in the committee's discussion section of the final guideline has been amended from 'required to sign off' to 'should sign off'.
277	[office use only]	Institute of Air Quality Management	Full	38	22	Replace NO ₂ with NO _x	Thank you for this comment. This amendment has been made to recommendation 1.4.6 of the final guideline (1.3.6 in the consultation version).
278	[office use only]	Institute of Air Quality Management	Full	39	29	Add commercial boilers	Thank you for this comment. The remit of the guideline is for road-traffic-related air pollution.
279	[office use only]	Institute of Air Quality Management	Full	40	7-9	There was no assessment of the long term impact, and without continual training/education it is likely that behaviours will revert.	Thank you for this comment. The reference to a public health sector training programme has been removed in the final guideline.
280	[office use only]	Institute of Air Quality Management	full	59	21-25	What does 'environmental change' mean in this context? Also the term land-use planning is clearer than development planning; or does it mean infrastructure planning? It is unclear What is meant by 'urban space'? Public open space?	Thank you for this comment. The comment does not appear to be relevant to page 59 lines 21-25 of the consultation version of the guideline.

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							If this is referring to the title of evidence review 1 'environmental change and development planning', in this context it would refer to interventions to develop public transport routes, routes and infrastructure to support low emission modes of transport, or measures such as use of natural or artificial barriers or urban greening to reduce the health impact or exposure to traffic-related air pollution.
281	[office use only]	Integrated Transport Planning Ltd.	Short	4	7-12	We would agree with these statement, but it's not clear how these differ from current planning guidance. What's required is a stronger basis for determining the soundness of plans based on an air quality perspective. A key test here will be how important planning inspectors consider air quality when assessing plans.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned
282	[office use only]	Integrated Transport Planning Ltd.	Short	4	18	But if we are to create denser land use patterns, which in turn promote greater opportunity to walk, cycle and use public transport, then it will be inevitable that this will result in higher and denser buildings in urban areas. The challenge is making sure these dense urban networks are not subject to congested traffic conditions, rather than advocate avoiding them altogether (which risks resulting in urban sprawl and greater use of private car).	Thank you for this comment. The guideline does not advocate avoiding dense networks. These will support zero- and low-emission travel, and recommended in 1.1.1.
283	[office use only]	Integrated Transport Planning Ltd.	Short	5	14	Greater emphasis should be placed on the need for 'effective' travel plans, and that travel plans are most effective when combined with car parking reduction / pricing.	Thank you for this comment. The recommendation relating to travel plans has been amended. It is now included in recommendation 1.2.1. It focuses on including air pollution outcomes. Recommendation 1.2.1 also addresses parking policies.
284	[office use only]	Integrated Transport Planning Ltd.	Short	6	5	We would support the use of Clean Air Zones, albeit the economic model does not necessarily demonstrate value for money. There appears to be a missing reference to park and ride / park and share, walk, cycle, which has potential for capturing car trips on outskirts of towns / cities (subject to certain controls)	Thank you for this comment. Public transport (including park and ride) have been included in what is now recommendation 1.3.4. Active travel is included in recommendation 1.3.1.
285	[office use only]	Integrated Transport Planning Ltd.	Short	7	21	This will be difficult to implement in practice as this often relates to drivers needing to keep to timetable, which is an essential element in securing passenger support for public transport and growing patronage (reliability and frequency of service). A stronger message should be given to relieve congestion and provide public transport	Thank you for this comment. Please note that this is not intended to be restricted to public transport operators. Provision of public transport is included in recommendation 1.3.5.

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						priority which is the root cause of the problem.	
286	[office use only]	Integrated Transport Planning Ltd.	Short	7	27	We are not sure this is true as our understanding is that lower emitting vehicles can and do require more fuel.	Thank you for this comment. This refers to changing driving style to reduce fuel consumption and at the same time fuel emissions.
287	[office use only]	Integrated Transport Planning Ltd.	Short	9	5/6	Local Authorities have introduced on-road cycle lanes across the country with the gap between cyclists and vehicles being very small. The NICE guidance could suggest methods of increasing the separation distance between vehicles and cyclists on roads with sufficient room e.g. planters. The inclusion of case studies highlighting examples of best practice would be beneficial. It is important that Local Authorities invest in the right infrastructure to encourage people to take up cycling. The idea of grade separated cycle routes has been used some places, for example in Milton Keynes. Despite an extensive network (Milton Keynes has 290 kilometres of multi-use paths known as Redways) cycle levels are low. In the Cycling Strategy for Milton Keynes (Milton Keynes Council, 2013) the reasons for the low levels of usage are due to a perception that they are indirect and unsafe, but more also should be said about the relationship between sustainable transport choice and parking provision.	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline 'physical activity: walking and cycling' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
288	[office use only]	Integrated Transport Planning Ltd.	Short	9	7/8	The suggestion of using dense foliage to screen cyclists is problematic for several reasons: <ul style="list-style-type: none"> • Security – vegetation along routes has the potential to provide cover for • Maintenance - Local Authorities are under increasing financial pressures and consequently many have had to reduce the amount of money they spend on trimming vegetation usually by reducing the frequency with which cutting of vegetation occurs. Screening routes will only add to this pressure and result in users being discouraged by vegetation growing across the route. • Space - It will be extremely difficult to introduce dense vegetation along many cycle routes, particularly along routes in urban areas, due to the lack of space available. • Visibility – vegetation may obscure the visibility of users and increase the likelihood of accidents. 	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline 'physical activity: walking and cycling' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
289	[office	Integrated	Short	9	9/10/11	It is likely to be difficult to reduce the amount of time cyclists spend	Thank you for this comment.

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	use only]	Transport Planning Ltd.				at busy sites and no suggestions for doing so are given on how to achieve this in the NICE guidelines. Advanced stop lines can help to separate cyclists from the traffic behind them at traffic lights. Another key area in which cyclists will be exposed to particulates is at crossings. Priority is given to vehicles at crossings to ensure as many vehicles go through between green phases for pedestrians/cyclists. In areas with high levels of traffic signal times will be optimised. The longer cyclists/pedestrians wait to cross the longer their exposure to particulates. There are currently no recommended waiting timings for pedestrians published by the Department for Transport (DfT). The NICE guidance should encourage Local Authorities to take steps to minimise exposure through crossing design and active prioritisation for those exposed to air pollution (cyclists and pedestrians).	Recommendation 1.6.1 of the final guideline links to NICE's guideline on physical activity and the environment (PH8). This guideline includes recommendations on actions to take when developing or maintaining transport routes. Please note this guideline is currently being updated.
290	[office use only]	[King's College London Environmental Research Group]	Full	14	22	There is no discussion of ozone. While local actions to reduce local production of ozone is difficult (ozone production takes time so the air mass is likely to be somewhere else by the time it has an effect), local actions can increase ozone concentrations. This is because ozone is destroyed in a reaction with nitric oxide (producing nitrogen dioxide). Thus, ozone is suppressed in urban areas, below the regional background. Reductions in NOx emissions remove this suppression via reductions in NO. Whether this is a good or bad thing depends on interpretation of the health evidence. Generally ozone is thought to have more of an adverse effect on health than nitrogen dioxide (it is a stronger oxidant). Currently the apparent evidence on the effect of long-term exposure on mortality is stronger for NO2 than for ozone. However, this is complicated by uncertainties over to what extent the evidence represents an effect of NO2 itself rather than that of other traffic pollutants. Also, the evidence on long-term exposure to ozone and mortality may be masked by negative correlations between ozone and particles or NO2. (In other words, mortality may be higher when ozone is low not because ozone is having no effect but because ozone concentrations are low in winter (time-series) and urban areas (cohort studies) where PM and NO2 are high.	Thank you for this comment. The primary focus of this guideline is on emission from road- traffic-related air pollution. The effect of emissions from this on secondary pollutants was considered if the evidence allowed this.
291	[office use only]	[King's College London Environmental Research	Full	General	General	The analysis seems rather broad brush. There is no referencing to specific evidence in the main text. Although there are references in the supporting documents that does not link to specific statements necessarily.	Thank you for this comment. The guideline follows standard NICE template for guidelines. Discussion of the evidence supporting the recommendations is included in the committee's discussion section. The full

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		Group]					evidence reviews are available on the NICE website.
292	[office use only]	[King's College London Environmental Research Group]	Full	15	13-16	<p>This is a very limited discussion of the interventions evidence. It is very challenging to do studies linked to health impacts and there has been a lot of discussion of this e.g. a report from the Health Effects Institute https://www.healtheffects.org/publication/proceedings-hei-workshop-further-research-assess-health-impacts-actions-taken-improve and WHO http://www.euro.who.int/en/health-topics/environment-and-health/air-quality/publications/2016/who-expert-consultation-available-evidence-for-the-future-update-of-the-who-global-air-quality-guidelines-aggs-2016</p> <p>If not requiring direct research evidence of effects on health and working on the basis of changes in air pollution concentrations, there is an enormous amount of cost-benefit analysis work done by national government some published e.g https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221088/pb12637-icgb.pdf and unpublished.</p>	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
293	[office use only]	[King's College London Environmental Research Group]	Full	59	23-28	Getting sufficient statistical power is challenging for intervention studies on air pollution alerts ssee http://www.kcl.ac.uk/lsm/research/divisions/aes/research/ERG/research-projects/ASPIREreportKingsfinal.pdf	Thank you for this comment.
294	[office use only]	[King's College London Environmental Research Group]	Full	29	5	The COMEAP statement on nitrogen dioxide in December 2015 did not recommend no cut-off. It recommended a range including no cut-off and a low cut-off yet to be determined.	Thank you for this comment. This sentence is not included in the final guideline and the discussion on the rationale for recommendation 1.3.1 of the final guideline has been amended.
295	[office use only]	[King's College London Environmental Research Group]	EP1-6	General	General	The expert testimony documents are restricted to less than a 1000 words. This is nowhere near enough to give a full understanding of the factors driving health impacts. For example, small scale interventions would not give whole numbers for serious but rare outcomes such as mortality. The health evidence on other outcomes such as respiratory symptoms therefore also needs to be considered.	Thank you for this comment. The expert testimony documents follow standard NICE template. The committee have an opportunity to ask questions to experts to ensure they have an understanding of the issue.
296	[office	[King's	ER1 and	General	General	Well organised and structured but is only looking at journal articles.	Thank you for this comment. The evidence

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	use only]	College London Environmental Research Group]	others			A lot of work on interventions will be in the grey literature such as research reports and government reports.	reviews were not exclusively limited to journal articles. A number of websites were examined for evidence that met the inclusion criteria.
297	[office use only]	[King's College London Environmental Research Group]	Economic tool	General	General	The economics approach uses damage costs. Defra advises that this is only used as a screening tool or when air pollution impacts are a minor byproduct of a different policy aim. The latter point does not apply here. Ideally the first would not either. The consequence is that a full impact pathway analysis would need to be done on these interventions before conclusions on whether or not they were cost beneficial. It is hard to say whether the benefits would be over or underestimated by the damage costs – longer term follow up of policies would give an overestimate as the damage cost approach uses a repeated annual pulse assuming the years are independent. This is not true as deaths in the previous year affects the impact of air pollution the following year due to changes in size and age structure of the population.	Thank you for this comment. The main aim of this economic modelling is to provide an indicative assessment of cost-effectiveness of these local authority interventions in a general case. Of course, for evaluating the full impact of an intervention for a specific case will require a full impact pathway approach. Moreover, we have tried to improve the estimation of benefits by calculating health benefits using different endpoints for a change in pollution concentration (which is in essence the impact pathway approach). We understand that the method used can overestimate the long term benefits because of the repeated annual pulse approach used, and this has been acknowledged in the report. However, our conclusions on cost-effectiveness were based mostly on the indicative benefits and cost in the short-term alone, and hence these do not suffer from this problem.
298	[office use only]	[King's College London Environmental Research Group]	Economic tool and economic paper	General	General	Insufficient time to comment in detail – can do so later if there is a later opportunity. Great care is needed in interpretation of adding PM and NO2 effects. The overlap may be more considerable than the 30% assumed. Also this 30% was only applied to NO2 when it should be applied to PM too (expert advice on this is still being developed).	Thank you for this comment. This guideline has been developed in accordance with the NICE manual , a second consultation is not planned. Caveats around areas such as this are included in the modelling report.
299	[office use only]	[King's College London Environmental Research Group]	Full	General	General	While the scope was only looking at local interventions, this substantially limits the opportunity to make more significant improvements. For example, low emission zones are crucially dependent on regulations to ensure more modern vehicles are substantially cleaner. Significant changes in travel mode need substantial infrastructure investment, probably at a regional or	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.

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						national level. It is important not to give the impression that only small improvements can be made with minor local tweaks, when cooperation across local levels (not just near neighbours) could assist in implementation of national policies.	
300	[office use only]	[King's College London Environmental Research Group]	Economic report	General	General	Connected with comment 8. Atmospheric dispersion modelling is needed. The damage costs approach is not able to take into account several factors including non-linearities in production of NO2	Thank you for this comment. The aim was to determine cost-effectiveness of interventions for a typical local authority rather than those relating to a specific authority. The atmospheric dispersion of pollutants is dependent on local meteorological conditions. Although it yields potentially more accurate results for specific authorities, it was beyond the scope of this study to undertake this detailed modelling for all of the case studies examined in the research. In this respect, we have acknowledged the limitations of using damage cost approach in our study. Regarding non-linearity in production of NO ₂ from NO _x , our model used changes in NO ₂ concentration as a result of the intervention, instead of changes in NO ₂ resulting from changes in NO _x emissions. Additional text has been added to the report to this effect.
301	[office use only]	Kirklees Council – Public Health	Full	9	2	DISAGREE - OFF ROAD ROUTES CANNOT BE USED DURING THE WINTER OR AT NIGHT UNLESS THEY ARE LIT. UNLIKELY TO BE LIT DUE TO COST. INTRODUCE GOOD QUALITY CYCLING INFRASTRUCTURE ALONG SIDE ALL ROADS, REGARDLESS OF POLLUTION LEVELS AND IT WILL EVENTUALLY LEAD TO MORE PEOPLE USING IT AND THEREFORE LESS POLLUTION.	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
302	[office use only]	Kirklees Council – Public Health	Full	9	4	NEEDS TO BE SEGREGATED GOOD QUALITY ROUTES. AGREE TO USING GREEN INFRASTRUCTURE AS THE SEGREGATION. AGREE WITH REDUCING THE AMOUNT OF TIME CYCLISTS SPEND AT BUSY JUNCTIONS, SHOULD SAY 'WHERE THIS CAN BE DONE WITHOUT INCREASING THE TIME THAT OTHER VULNERABLE GROUPS SPEND EXPOSED TO POOR AIR QUALITY'	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.

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303	[office use only]	Lambeth Local authority	Draft Guidelines recommendation			<p>Overall:</p> <ul style="list-style-type: none"> -Focus on local authority . However local authority does not have the leverage to influence all sectors affecting outdoor air quality, at least in London where most of the heavy traffic is on TFL road and the responsibility for TFL road is with GLA, as well as the ability to influence investment in making public transport affordable. - Also not everyone is exposed to air pollution with most disadvantaged exposed to more air pollution . So what about acting on wider determinant (rent prices) to allow vulnerable population (most deprived are also likely to have the highest rate of CVD) to live far from the traffic busy roads. - I have not seen anything about motorbikes and pollution ...however my experience as cyclist is that they emit !! - Can you confirm that "Review question 2: Are interventions to develop public transport routes and services, effective and cost effective at reducing the health impact of, or people's exposure to, traffic-related air pollution" looked at extensively the cost effectiveness of promoting affordable public transport compared to improving the emission of private vehicle? 	<p>Thank you for this comment. Staff working in transport and highways authorities have been added to the audience.</p> <p>Action on rent prices is beyond the scope of this guideline.</p> <p>Classes of vehicles to restrict or charge would need to be determined by local conditions (see recommendation 1.3.2).</p> <p>The protocols for the reviews are available here. This provides further details on the inclusion criteria for evidence reviews, including the interventions and comparators. In relation to review question 2 there were no effectiveness studies identified.</p> <p>It was not the aim of the economic analysis to analyse the practical difficulties in implementing an intervention. The effect of air pollution on vulnerable population was undertaken using the separate relative-risk coefficients for them as far as the data permitted. The suggested analysis above will not determine cost-effectiveness of an intervention for vulnerable population group.</p> <p>Magnitude of effects of motorbikes on air pollution was not found in the literature for inclusion in the economic analysis separately.</p> <p>Economic analysis didn't include review question 2 due to lack of data on effectiveness of various interventions that fall under this category.</p>
304	[office use only]	Lambeth Local authority		P5		<p>P5 /61: "Provide an infrastructure...": no mention of building/making public transport affordable</p> <p>-We would welcome evidence to show low emission public transport should be heavily invested in. We need to ensure that the most</p>	<p>Thank you for this comment. Developing integrated public transport networks has been added to this section.</p>

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						vulnerable, who are more likely to use public transport, are not exposed to unsafe levels of pollutants	
305	[office use only]	Lambeth Local authority		P21	24	Not clear . is the issue the kind of tree, the environment (high raise building, building corridors.....) ??? -We require evidence regarding the best practice to protect from current exposure. Is this dispersion or absorption of the pollutant?	Thank you for this comment. This discussion (now 1.2.2) has been amended. Please note that information on local practice can be found here .
306	[office use only]	Lambeth Local authority		P9	21	What is the evidence that it impacts on exposure , and on health outcomes for vulnerable people??	Thank you for this comment. The discussion notes that awareness raising is also important to develop support for other actions to reduce air pollution. The committee considered the evidence from expert paper 1 on the impact of air pollution on exposure, particularly for vulnerable groups.
307	[office use only]	Lambeth Local authority		P9	21	Some research on constraints to change behaviours will be welcomed ... for example what lead parents to drive their children to school? It is not only a safety issue ..also socioeconomic??	Thank you for this comment. The guideline includes a number of areas for future research which could potentially inform future updates following NICE processes.
308	[office use only]	Lambeth Local authority		P10	26	I suggest to include “pregnant women” into at risk groups as well as the social economically deprived	Thank you for this comment. The potential impact on unborn foetuses has been added to the definition of vulnerable groups.
309	[office use only]	[Landscape Futures CIC on behalf of ParksHerts]	Full	22	13-28	We believe the NICE guidelines should: <ul style="list-style-type: none"> examine and refer to the more recent research that exists relating to trees and air pollution be made more positive by deleting lines 13-28 on page 22 and instead saying words to the effect of “Research appears to suggest that the retention and planting of suitable street trees at appropriate densities can be designed to benefit not only air quality in the street, but health outcomes in towns and cities more generally.” REASONS: Hertfordshire Association of Cultural Officers (HACO) Greenspace Managers Group (aka ‘ParksHerts’) confirms a desire to see green infrastructure in general and street trees in particular contribute to public health outcomes and accept that air pollution is an important consideration. ParksHerts has some concerns, however, about the	Thank you for this comment. The evidence identified relating to trees and air pollution was based on a systematic search of published and grey literature up to September 2015 and 2 calls for evidence. In addition, relevant studies identified by stakeholders have now been added to evidence review 1 . The Jeanjean et al study cited by the stakeholder was excluded as it did not meet the inclusions criteria. In relation to second point, this section has been reordered and amended so that the benefits of trees and vegetation are highlighted and takes into account potential harms that may arise from poor design and maintenance.

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						<p>emphasis placed on certain research in the draft guideline and the effect that the limited scope of the work may have.</p> <p>Firstly, while we do not claim to be experts, a quick search for more recent research suggests the weakness of some of the research used by NICE. Last year, for instance, Jeanjean et al (http://www.sciencedirect.com/science/article/pii/S1352231016307336) reviewed Vranckx et al (2015), which is quoted in the NICE work, and pointed out the importance of having city-wide studies rather than just street canyon studies. It highlighted the contribution that trees can make to increasing dispersion via increased turbulence, a factor that is not always fully appreciated, particularly by studies that focus on air-scrubbing. It concluded that, at higher windspeeds, street trees are beneficial. It also happens to further remind readers that the effect of trees is minor in comparison with potential to achieve through reduction in traffic and improvement in emissions.</p> <p>Secondly, it is difficult to reconcile the arguably negative-leaning view of the NICE guidelines with the more recently and presumably equally authoritative report by the Nature Conservancy Council (https://thought-leadership-production.s3.amazonaws.com/2016/11/07/14/13/22/685dccba-cc70-43a8-a6a7-e3133c07f095/20160825_PHA_Report_Final.pdf). This says for example: "We estimate that trees are currently providing on average 1.3 million (Low scenario to High scenario range: 0.0 to 6.1) people at least a 10 µg/m³ reduction in PM_{2.5}, 10.2 million (1.0 to 15.4) people at least a 5 µg/m³ reduction, and 52.1 million (23.8 to 63.1) people at least a 1 µg/m³ reduction. Similarly, trees are already providing 68.3 million people with a roughly 0.5 to 2.0° C (0.9 to 3.6° F) reduction in summer maximum air temperatures. As discussed in detail in the report, this magnitude of impact on PM and temperature has real health benefits for those affected."</p> <p>The most important point we would contend for NICE, however, is that the relationship between trees and air pollution not the only consideration when seeking health outcomes. For example, as quoted on the NHSForest website (http://nhsforest.org/evidence), research in the Netherlands and Japan has indicated "that people</p>	<p>The committee acknowledge the gaps in evidence on how vegetation and trees influence urban air quality and health outcomes and therefore have made a research recommendation on this topic.</p>

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						<p>were more likely to walk or cycle to work if the streets were lined with trees and live longer and feel better as a result” (Van den Berg, A.E., Koole S.L., and van der Wulp N.Y. 2003. Environmental preferences and restoration: (how) are they related? Journal of Environmental Psychology 23, 135-146.) Also pointed out on that site, street trees have been found to have decrease the risk of negative mental health outcomes. (Research note: Urban street tree density and antidepressant prescription rates—A cross-sectional study in London, UK. Taylor MS et al. Journal of Landscape and Urban Planning 136 (2015) 174-179). A holistic approach much surely be NICE’s objective.</p> <p>This issue of scope is of more than academic importance and the consequences of guidelines emerging which are dismissive of out-of-scope factors, and insufficiently caveated is significant. Apart from failing to achieve other important health outcomes, there is a real danger if NICE’s concerns about disputed canyon effects is taken out of context, it could be (mis)used as a further argument for removal of trees by those who are understandably keen to reduce tree survey and tree maintenance liabilities or, with arguably less grounds, object to trees’ effect on leaf-litter, car cleanliness, CCTV coverage, increased numbers of birds roosting, solar panel effectiveness, and TV signals.</p> <p>The wording we have suggested by implication allows for the possibility of poor street tree design but chooses to focus on the positive effect on health outcomes of good design, which should be the objective that is encouraged.</p>	
310	[office use only]	LANDSCAPE INSTITUTE – TECHNICAL & RESEARCH COMMITTEE	Full	5, 19, 26		<p>On these pages, the Report rightly considers that trees can add significant benefits to the quality of life in urban areas, and have the potential to greatly assist in the mission to reduce air pollution. That said, we are of the view that this might be stated much more positively in the text of the Report. Much research and advocacy over recent years has focused upon documenting the human benefits that arise from integrating urban tree planting into urban design and planning – see the FAO’s <i>Guidelines on Urban and Peri-Urban Forestry</i> for example : report no 178 [www.fao.org/forestry/58718/en/] or <i>Planting Healthy Air</i> Report [</p>	<p>Thank you for this comment. A range of benefits of street trees has been included in the committee’s discussion section of the final guideline however the committee felt that the potential harms (because of poor placement or maintenance of trees) needs to be considered as well.</p>

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311	[office use only]	LANDSCAPE INSTITUTE – TECHNICAL & RESEARCH COMMITTEE	Full	6,20,21, 22,24		<p>www.nature.org/healthyair] .</p> <p>We would agree however that there can be dis-benefits from retaining / incorporating trees into the design of urban areas and that, on occasion, they may well not have as positive effect as they might have on helping to mitigate air pollution. This can occur, as suggested in the report, where tree canopies meet over roadways in street 'canyons', but there are not many examples of this occurring in the UK. Trees can also emit biogenic volatile organic compounds [bVOCs] as a reaction to stress in their environment, and there is also a synergistic effect between pollutant concentrations and the health response of people to tree pollen. We are well aware of these matters, and can select appropriate tree species to counter such dis-benefits. It is these negative aspects of urban trees that seem to have been stressed more in the Report rather than the benefits, which we would suggest far out-weigh the dis-benefits. As a result, it is the dis-benefits that seem to have been picked up and published by the Press, giving a rather distorted view of the truth as a result. Again, we would strongly maintain that planting trees of the right species, in the right place, in the right way and for the right reasons can greatly assist in helping to mitigate the effects of both particulate and gaseous pollution in urban areas.</p>	Thank you for this comment. The committee's discussion section in the final guideline includes points raised in this comment, including taking into careful consideration of choice of species, siting and maintenance.
312	[office use only]	LANDSCAPE INSTITUTE – TECHNICAL & RESEARCH COMMITTEE	Full	51-52		<p>Under the Recommendations for Research in this Report, it suggests that more research needs to be carried out into barriers and how street trees influence urban air quality. We would wholeheartedly agree that much more work needs to be carried out, but we would also wish to point out that there is perhaps more research available that is acknowledged in the Report. We know, for example, which tree species attract the most particulate pollution; we know how leaf size can influence this [it's not always the biggest leaves for example], we know which tree species to avoid due to their excessive pollen production; we know which trees produce the most bVOCs; we know the benefits that single lines of street trees can bring to mitigating air pollution in certain situations, etc. etc. This Report doesn't seem to acknowledge this perhaps quite as positively as it might. There is much data and information available on trees and air pollution and, as professionals in this field, landscape architects would agree with Edwards Deming when he said that "Without data, you're just another person with an opinion". We would hope that in the final version of this Report that the positive relationships between trees and urban air pollution are</p>	Thank you for this comment. The guideline includes the use of trees and vegetation where this will not reduce ventilation in recommendation 1.1.2. Please note that examples of local practice can be sent to our local practice collection team. More information on local practice can be found here .

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						given at least as equal coverage as the dis-benefits, something that the current draft does not do. We all have a vested interest in improving the health and well-being of the people who live in or visit our towns and cities, and urban trees can play a significant role in this. Trees do not offer a solution to completely removing air pollution from our cities, but they do have a significant role to play when properly co-ordinated with traffic planning and local implementation. Clearly we do not have all the answers, but we can contribute a great deal to the subject area. That said, we would also concur with Einstein when he noted that "Not everything that counts can be counted, and not everything that can be counted counts".	
313	[office use only]	LANDSCAPE INSTITUTE – TECHNICAL & RESEARCH COMMITTEE	Full	General	General	<p>Further to the references mentioned in Section 2, we would suggest that the information contained in the following references should also be considered by the authors of this report:</p> <p>Calfapietra, C, et al [2013] <i>The Role of Biogenic Volatile Organic Compounds (BVOC's) emitted by urban trees on ozone concentration in cities: a Review</i>. Environmental Pollution Vol 83. pp.71-80.</p> <p>Chen, J, et al [2015] <i>The concentrations and reduction of airborne particulate matter [PM10, PM2.5, PM0.1] at a shelterbelt site in Beijing</i>. Atmosphere Vol 6[5] pp.650-676.</p> <p>Gromke, C, Blocken, B, [2015] <i>The Influence of avenue trees on air quality at the urban neighbourhood scale. Part 2: Traffic pollutant concentrations at pedestrian level</i>. Environmental Pollution Vol 196. pp.176-184.</p> <p>Irga, P, et al [2015] <i>Does urban forestry have a quantitative effect on ambient air quality in an urban environment?</i> Atmospheric Environment Vol 120. pp. 173-181.</p> <p>Janhäll, S, [2015] <i>Review on urban vegetation and particle air pollution – deposition and dispersion</i>. Atmospheric Environment Vol 105. pp.130-137.</p> <p>Jeanjean, A P R, et al [2016] <i>Modelling the effectiveness of urban trees and grass on PM2.5 reduction via dispersion and deposition at a city scale</i>. Atmospheric Environment Vol 147. pp.1-10.</p>	<p>Thank you for this comment. The following 3 studies identified by the stakeholder have been included in the updated evidence review 1 on environmental change and development planning; Nowak (2013), Selmi (2016) and Tallis (2011). The additional studies did not alter the recommendation but the committee's discussion section has been amended to reflect the additional content.</p> <p>The following 3 studies identified by the stakeholder were included in evidence review 1 on environmental change and development prior to consultation: Pugh (2012), Vos (2013) and Vranckx (2015).</p> <p>The following references identified by the stakeholder were excluded as the study did not meet the inclusion criteria: Calfapietra (2013), Chen (2015), Irga (2015), Jeanjean (2016), Ørby, (2015), Salmond (2016) and Yang (2015)</p> <p>The following references were identified in the searches and were excluded prior to consultation as they did not meet the inclusion criteria: Gromke (2015), Janhall (2015), Jim (2008), Jin (2014), Maher (2013), and Sæbø (2012).</p>

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						<p>Jim, CY, Chen, WY, [2008] <i>Assessing the ecosystem service of air pollutant removal by urban trees in Guangzhou [China]</i>. Environmental Management Vol 88[4], pp.65-76.</p> <p>Jin, SJ, et al [2014] <i>Evaluation of impacts of trees on PM2.5 dispersion in urban streets</i>. Atmospheric Environment. Vol 99. pp.277-287.</p> <p>Maher, BA, et al [2013] <i>The impact of roadside tree lines on indoor concentrations of traffic-derived particulate matter</i>. Environmental Science & Technology Vol 47[23]. pp.13737-13744.</p> <p>Nowak, D J, [2013] <i>Modelled PM2.5 removal by trees in ten US cities and associated health effects</i>. Environmental Pollution Vol 178. pp.395-402.</p> <p>Ørby, P V, et al [2015] <i>An assessment of the potential for co-exposure to allergenic pollen and air pollution in Copenhagen</i>. Urban Climate 14[3] University of Worcester Research & Publication. pp.457-474.</p> <p>Pugh, T A, et al [2012] <i>Effectiveness of green infrastructure for improvement of air quality in urban street canyons</i>. Environmental Science & Technology Vol 46[14] pp.7692-7699.</p> <p>Salmond, J, et al [2016] <i>Health and climate related ecosystem services provided by street trees in the urban environment</i>, in Environmental Health, 15 [Suppl 1]: Vol 36, pp.95-111.</p> <p>Sæbø, A, et al [2012] <i>Plant species differences in particulate matter accumulation on leaf services</i>. Science of the Total Environment Vol 427. pp.347-354.</p> <p>Selmi, W, et al, [2016] <i>Air pollution removal by trees in public green</i></p>	

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						<p><i>spaces in Strasbourg city, France.</i> Urban Forestry & urban Greening Vol17. pp.192-201.</p> <p>Tallis, M, et al [2011] <i>Estimating the removal of atmospheric particulate pollution by the urban tree canopy of London under current and future environments.</i> Landscape & Urban Planning Vol 103 [2] pp.129-138.</p> <p>Vos, PEJ, et al [2013] <i>Improving local air quality in cities : to tree or not to tree?</i> Environmental Pollution Vol 183. pp.113-122.</p> <p>Vranckx, S, et al [2015] <i>Impacts of trees on pollutant dispersion in street canyons: a numerical study of the annual average effects in Antwerp.</i> Science of the Total Environment Vol 532. p.474-483.</p> <p>Yang, J, et al, [2015] <i>Ranking the suitability of common urban tree species for controlling PM2.5 pollution.</i> Atmospheric Pollution Research Vol 6[2]. pp.267-277.</p>	
314	[office use only]	Leeds City Council The Office of the Director of Public Health				<p>PLEASE NOTE – The comments below are from a number of Leeds City Council Directorates. These include Public Health, Transport, Cycle strategy, Planning, Environmental Health, Clean Air Zone implementation team and corporate fleet.</p> <p>Please note that I have included the initials of the person making each comment in case you wish to follow up their comment.</p>	Thank you for this comment.
315	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	10	27	It is disappointing that “children” are bundled together with older people and people with health problems, instead of specific recommendations being made for this population group whose activities and needs are unique.SY	Thank you for this comment. Recommendations 1.1.2 and 1.3.5 include actions relating to schools.
316	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	18	3	<p>The consideration of Equality issues is too limited. The proposed approach of individual behaviour changes to reduce exposure will have wide equality implications for e.g. deprived families living in areas of high pollution; children who need to play outside in such areas; Children’s Centres, nurseries and schools in polluted area where children need to play outside.</p> <p>This is also answering question 1, behavioural change will have the</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.

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						biggest impact on practice but it will be challenging to implement for local government. Especially when ensuring equality issues for vulnerable groups. SY	
317	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	52	8	The proposal that children (included in vulnerable groups) should avoid strenuous activity outside in polluted areas is unrealistic for deprived families living in highly polluted areas where children may play in streets, or attend Children's Centres and school in polluted areas. The needs of children should be treated separately and balanced recommendations made taking account of the importance to play and physical activity for children and the impact of poverty.SY	Thank you for this comment. The guideline recommends [emphasis added] 'avoid or <i>reduce</i> strenuous activity outside, especially in highly polluted locations such as busy streets, <i>and particularly</i> if experiencing symptoms such as sore eyes, a cough or a sore throat' as an action to consider in recommendation 1.7.7(1.6.6 in the consultation version). The committee's discussion highlights the wider impact of the recommendations- which is by preventing health conditions escalating particularly among the most vulnerable groups, it can also reduce the need for potentially more expensive and less effective remedial action later. Recommendations 1.1.2 and 1.3.5 include actions relating to schools.
318	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	5	14-16	We fully support the role of travel plans to encourage and direct organisations towards sustainable travel practices and activity. This is backed up locally with Supplementary Planning Guidance (SPD). RH	Thank you for this comment. The recommendation is to include air pollution within plans not to make them the sole focus.
319	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6	12-15	The provision of appropriate infrastructure to enable people to walk, cycle, and access/use low emission vehicles is important to achieve behavioural change. Successful delivery will be made through an integrated and balanced approach to infrastructure provision and the delivery of behavioural change programmes. The introduction of Electric Vehicle Charging Points (EVCP) has been introduced in Leeds as planning guidance. RH	Thank you for this comment. The guideline makes recommendations relating to the provision of infrastructure to achieve behaviour change. In relation to recommendation 1.3.3 (1.2.3 in the consultation version) infrastructure such as provision of electric charging points is recommended to encourage uptake of zero- or low -emission vehicles.
320	[office use only]	Leeds City Council	Full	9	2	Off road routes can be attractive for leisure, family cycling and also for older people returning to cycling. However, they seldom provide	Thank you for this comment. The recommendation (now 1.6) has been

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	only]	The Office of the Director of Public Health				<p>good commuter routes due to the following factors:</p> <ul style="list-style-type: none"> • These are almost inevitably shared routes with pedestrians and can be very slow – a consideration when you are promoting cycling as the way to 'beat the traffic'. E.g. the A65 in Leeds is paralleled by a good quality, upgraded cycle route along the Leeds-Liverpool canal, which is traffic free and attractive. It is used by cyclists, but large numbers of cyclists chose to use the A65 instead due to good provision of bus and cycle lanes, facilitating fast journeys, especially into the city. • On winter evenings in particular, there are concerns over personal safety on off road routes, particularly if unlit or poorly lit. • Routes may be unusable in winter due to lack of gritting. <p>Having a choice of routes seems to be the key for catering for a variety of cyclists and uses. KS</p>	amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
321	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	5	Roadside space is often quite limited. Whilst the buffer between cyclists and the carriageway may be desirable, it will be impractical to run a cycle track adjacent to the line of the buildings (and so farther away from the carriageway) as this would lead to increased conflict with pedestrians leaving premises. KS	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
322	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	7	There will be implications for road safety in having cyclists screened from traffic. This will be appropriate on some continuous routes with no junctions, no vehicular accesses - essentially where no manoeuvring is taking place. With cyclists using a segregated facility they are not interacting with traffic, which means that drivers are not looking to their left and are largely unaware of the presence and the speed of cyclists. This then leads to priority conflicts at junctions, which will be exacerbated if cyclists are additionally screened by dense foliage. There may also be implications for the usability of the facility if leaf mould is allowed to accumulate (slip risk) and increased risk of punctures e.g. from hedge trimmings, beech nuts etc. KS	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
323	[office use only]	Leeds City Council The Office of	Full	9	9	This appears impossible to reconcile. If you increase the green time/frequency to one user group at a junction you are impacting on all other users. So more green for cyclists may mean longer waits for	Thank you for this comment. Recommendation 1.6.3 (bullet point 3) (1.5.2 in the consultation version) is an action to

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		the Director of Public Health				pedestrians, also exposed to roadside pollution. If you provide more green time/ frequency for both pedestrians and cyclists and hold back traffic the pollution at the junction from idling vehicles waiting at the signals will increase, and longer queues will mean longer exposure time for pedestrians and cyclists traveling along a busy corridor. KS	consider and notes 'where this can be done'. The committee's discussion notes that pedestrians are also exposed to air pollution. However, no evidence directly relating to citing of facilities for pedestrians was found so the committee was unable to make recommendations in this area. However they made a research recommendation.
324	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	13	As a starting point we would recommend the use of walking and cycling journey planners that provide 'quietest' route options to avoid vehicle emissions and traffic danger. E.g. nationally – walkit.com and Cycle Streets. RH	Thank you for this comment. Recommendation 1.7.4 includes changing route to avoid polluted areas.
325	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	18	8	There is potential to make low emission vehicles available through purchase-hire schemes available to disabled people, such as Motability. However, there may be equality impact of an increase in electrical vehicles on blind and partially sighted people who may orientate themselves by roadside traffic noise and use the noise of engines or its absence to determine whether it is safe to cross the road. KS	Thank you for this comment. The equality impact assessment document notes the potential impact of recommendations which restrict access to specific vehicle classes on some people with disabilities.
326	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	27	15	Consider supporting flexible working/ flexible school times to enable active travel. KS	Thank you for this comment. These interventions were not identified in the evidence reviewed (review 3). This could be addressed in travel planning (see recommendation 1.2.1).
327	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	41	15, 16	Maintaining tyre pressure and avoiding aggressive driving will also produce road safety benefits. KS	Thank you for this comment. Thank you for the suggestion but the sentence has not been amended on this occasion.
328	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	43	19-29	Evidence on the benefits of 20 mph speed limits is welcome. KS	Thank you for this comment. Please note the recommendations on smooth driving and speed reduction in section 1.5 of the final guideline (1.4 in the consultation version) has been amended to clarify the

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							<p>difference between 20 mph and 20 mph zones.</p> <p>The evidence used to develop the recommendations on smooth driving and speed reduction evidence review 2 on traffic management and enforcement, and financial incentives and disincentives [ES5.2, ES5.3, ES6.4] and evidence review 3 on travel planning and advice [ES11.1].</p> <p>Evidence on using lower speed limits, encouraging smoother driving and providing real-time information showed that reducing 'stop-go' driving could help reduce emissions of air pollutants. This was supported by the committee's understanding of air pollution and the effect of accelerations and decelerations.</p> <p>Some evidence on physical speed reduction measures like humps and bumps suggested that individual measures may increase motor vehicle emissions by encouraging decelerations and accelerations. But evidence from area-wide schemes does not back this up.</p> <p>The committee were also of the NICE guideline on unintentional injuries on the road (PH31) that recommends 20 mph zones to reduce injuries. The committee extrapolated this as they anticipated area wide 20 mph limits (zones) would promote smoother driving thus reduce the issues associated with humps and bumps which are 'stop-go' driving.</p>
329	[office use only]	Leeds City Council The Office of	Full	49	24	Cycle routes and users visible from the carriageway may increase the perception of safety, especially at night, and also may encourage more people to cycle if the alternative to car travel is high	Thank you for this comment.

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		the Director of Public Health				profile, high quality and very visible. KS	
330	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	51	5-8	We agree that raising awareness of air quality is a necessary part of engaging people to change their travel behaviour as part of a multiple interventions approach. We suggest that the traditional scope of travel plans (i.e. to reduce travel in single occupancy private cars) should be extended to include air quality awareness. RH	Thank you for this comment. Recommendation 1.2.1 in the final guideline has been amended to state 'incorporating air quality outcomes in travel plans' and the explanation of the term 'travel plans' has been amended in the glossary section of the final guideline to refer to the effects that new developments could have on air pollution.
	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	56	9	There have been a number of studies in the UK into the effectiveness of Personalised Travel Planning (PTP). See for example http://www.sustrans.org.uk/our-services/what-we-do/engaging-communities/personalised-travel-planning RH	Thank you for this. The citation referred to in the stakeholder's comment refers to a report published following the searches in September 2015 and was not submitted as evidence during 2 calls for evidence.
331	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	General	General	Our experience of travel choice behaviour change projects over 16+ years suggests that a large majority of the general public are unlikely to abandon their private vehicles in the absence of coercive transport policies; and there is little indication that these will be introduced. Therefore, the most effective policy guidance at this stage will concentrate on increasing the proportion of low and zero emission vehicles in the national fleet. RH	Thank you for this comment. The guideline includes recommendations aimed at reducing the need to use motor vehicles and to encourage modal shift to zero- and low-emissions transport as well as to change driving styles to reduce the emission of air pollutants. National actions are outside the remit of NICE.
332	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	General	General	Greater emphasis on facilitating modal shift, so recommendations to emphasise active travel and benefits of public transport and enable/encourage strategies and investment to support these. KS	Thank you for this comment. The guideline includes recommendations on promoting active travel and other forms of zero- and low-emission transport.
333	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	17	1.6.2 – This would be challenging to implement as forecasting doesn't seem very accurate. Additionally, localised air pollution might occur if there is an increase in vehicles in a particular area due to an event going on. I think the challenge would be to ensure that the message is clear –	Thank you for this comment. The recommendation has been amended to include actions such as avoiding unnecessary vehicle use.

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						<p>if suddenly there were air pollution forecasts with the weather forecast saying there would be moderate pollution levels, could this scare people into thinking they should drive their car to work/school/etc... to avoid it?</p> <p>To overcome this I think the guidance needs to state that with these forecasts there needs to be clear and consistent advice about how to resolve the issue. E.g. Suggest not taking journeys by car unless absolutely necessary...</p> <p>The issue is that there isn't the granularity of data at this stage to provide specific guidance or advice that is relevant in terms of individual journeys. As such only 'generic' warnings can be provided that could be counterproductive. AH</p>	
334	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	10	19	<p>1.6.6 – Closing external doors and windows “to help stop highly polluted air getting in” – They need to be more careful with the choice of words here. This suggests it stops polluted air getting in completely and people may be unaware of indoor air pollution. To overcome any confusion there really needs to be a national initiative providing clear guidance and using accurate information.</p> <p>PM will permeate doors/windows as well as there being indoor sources of air pollution. The idea that ‘staying indoors’ is a valid response could risk people associating staying in a car with closed windows as a valid response to avoiding exposure – therefore discouraging active travel and encouraging the car. AH</p>	<p>Thank you for your comment. The committee considered the potential benefits and harms of the actions included in this recommendation (1.7.7 in the final guideline). The committee’s discussion section notes that actions to reduce the amount of polluted air from entering a home (such as closing windows) might increase indoor levels of air pollutants, if there are other sources of pollution in the house. Please note NICE is currently developing a guideline on indoor air pollution.</p>
335	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	23	<p>1.6.3 It would be useful if NICE could provide clear guidelines on whether exposure and overall health benefits are derived when active travel options are compared with sedentary travel modes (car). AH</p>	<p>Thank you for this comment. Evidence review 3 on Travel planning and advice examined whether personalised or setting-based travel planning interventions to support low emission travel choices are effective and cost effective at reducing the health impact of, or people’s exposure to, traffic-related air pollution. There were no studies identified comparing active travel options to sedentary travel modes.</p> <p>The related NICE guideline on physical activity: walking and cycling (PH41) contains recommendations on active travel approaches based on evidence to promote physical activity (rather than reduce air pollution) leading to associated health benefits.</p>

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336	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9 Q.1	5	1.5.2. Providing as much space as possible between cyclist and motorised vehicles is a laudable objective – it clearly makes cyclists 'feel' safer & therefore more likely to cycle. However delivery of this is a challenge – there is limited space on most roadways as such expansion of highways is needed & this is expensive. It may be most cost effective to reduce road use (through seeking to make car travel less attractive – e.g. fiscal penalties for diesel) rather than seek to make roads bigger. AH	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
337	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6	6	1.2.1 Leeds is an area included within the national plan as such it will be compliant with the government's plan through delivering a CAZ in line with the final national Framework. AH	Thank you for this comment.
338	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6	10	1.2.2 Leeds will fall in line with the National targets for emissions but is also seeking to encourage fleets moving beyond those. For example developing measures to encourage ULEV/ZEV uptake. AH	Thank you for this comment.
339	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6 Q.6	12	1.2.3 Leeds has a free parking permit for ULEVs that meet the Gov'ts Plugged in grant criteria. This acts as an incentive for ULEVs. We are also working regionally to develop an EV charge point network that is open access & pay as you go. We are also working with businesses to engage on how they can utilise ULEVs in their fleets & operations. AH	Thank you for this comment.
340	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6	19	1.2.3 Specifying emission standards for Taxi & PH is challenging. In Leeds the minimum standard will be set initially via the CAZ – Euro 6 diesel/Euro 4 Petrol by 2020. However we are encouraging uptake of ULEV/ZEVs. The challenge to setting licensing standards based on zero emission or even ULEV standards is the lack of availability of such vehicles on the market & the costs of those that are available. This is a low margin business & there is reluctance to invest in new vehicles – if licensing is restrictive then it may reduce supply as some are forced out of the sector, and could lead to action being taken by the trade. Licensing can be a useful lever – but it	Thank you for this comment. We will pass this information to our local practice collection team. More information on local practice can be found here .

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						must be tied in with gov't support for ULEV/ZEV vehicles, charging facilities and in line with availability of vehicles at an affordable level. AH	
341	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6	22	There is significant work already done to reduce emissions at schools for example (Modeshift Stars) plus no parking road markings. No idling areas are a possibility – if NICE were to publish clear benefits from this it would support delivery of these. AH	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
342	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6 Q1	26	Driver training is a useful tool – however use of telematics to manage and monitor driving would deliver better results. This isn't without challenge though – these systems can be expensive and require management and planning for delivery plus resource to monitor effectively. AH	Thank you for this comment. Please note telematics is included as a research recommendation.
343	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6	28	Car Free days may be useful as a way of raising awareness – however to deliver significant change national policy needs to be exercised. Fiscal changes to disadvantage diesel and replace with ULEV/ZEV via fuel levy/VED will deliver better results. Setting a date to ban sale of diesel vehicles followed with a ban on the sale of diesel fuel will drive an immediate shift to lower emission vehicles. AH	Thank you for this comment. Please note that this recommendation has been moved to recommendation 1.7 (awareness raising). National recommendations such as fiscal changes are beyond the remit of NICE.
344	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	7	1	1.2.6 Leeds is working at West Yorkshire Combined Authority (WYCA) level – e.g. the West Yorkshire Low Emission Strategy as an example that can be demonstrated to NICE. AH	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
345	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	7	5	1.2.7. A congestion zone doesn't necessarily improve AQ – it is a timed measure unlike a CAZ. It may be challenging to attempt a CAZ AND Congestion zone. The difference can be difficult discern across the wider public, so attempting both may be problematic. Also it may be difficult to try & impose two different types of charging schemes related to traffic at the same location. AH	Thank you for this comment. The committee felt that there were circumstances where a congestion charge zone could be beneficial in addition to a clean air zone, principally where congestion (and not just vehicle type) was thought to be a key part of the problem.
346	[office use]	Leeds City Council	Full	7	14	1.3 reducing emissions from public transport fleets can be challenging for 3 clear reasons:	Thank you for this comment. Your comments will be considered by NICE where relevant

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	only]	The Office of the Director of Public Health		Q.1		<ul style="list-style-type: none"> • Availability of suitable low emission alternatives (e.g. minibuses) • Cost – ULEV/ZEVs are typically more expensive. • Fuel –Power supply to depots is often limited – this means that it is often insufficient to support anything more than a few EV charge points. AH 	support activity is being planned
347	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	General Q.4	General	LCC made a full submission in response to the DEFRA CAZ Draft Framework consultation – until the results of this are known it is difficult to comment on particular elements of the CAZ delivery guidance. Also the UK gov't will be issuing a new AQ improvement plan for consultation in April 2017 with the final plan published in July 2017. This will have a greater influence on AQ planning in Leeds that the NICE guidance is likely to as we will be bound by law to be compliant with the DEFRA/UK gov't plan – so decisions will be aligned to those requirements. AH	Thank you for this comment. The guideline makes recommendations to support actions to reduce air pollution.
348	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	General Q.1	General	In terms of raising awareness – behaviour change can be very difficult to deliver & even harder to maintain. Behaviours are more likely to be changed by policy/fiscal levers than good intention (e.g. smoking ban) as such it would be useful of the NICE guidance was clear in its requirements for National Policy direction rather than relying on local action. AH	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
349	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	General Q.9	General	It needs to be clearly detailed that AQ may be broadly good/satisfactory in a city that is named as a CAZ city. A CAZ may be required due to localised issues – with Air Pollution concentrations at very specific locations. Whilst it is clear that these would need to be tackled it may be unhelpful for citizens to be given the impression that a CAZ city has generalised 'poor AQ' as this may discourage certain positive behaviours like active travel AH.	Thank you for this comment. The guideline notes the importance of addressing air pollution.
350	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	12	General	We don't dispute the values for emission source apportionment although the contributions do indeed vary by location. For example, in our experience, in AQMAs road transport accounts for circa 80% of NOx emissions. RC	Thank you for this comment.
351	[office use only]	Leeds City Council The Office of	Full	57	24	We are concerned that the message regarding the potential effects of street trees/barriers will be misinterpreted as all will have a negative impact in some situations.	Thank you for this comment. That is not the intention and the rationale for research recommendation 1 notes that the impact of

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		the Director of Public Health				There will also be practical issues to consider in being able to locate such measures in the areas where there is most need of improvement. More research is required to inform on any future policy considerations. RC	the type and species of tree or how trees are sited or how they are maintained are areas that need further research. Please note 'barriers' has been removed from the research question.
352	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	58	11	The term "modal shift" used in the document is confusing and appears to conflate the term used to describe changing mode of travel from private car to public transport, cycling or walking with changing to a low emission vehicle. Some public transport options may utilise low emission vehicles such as hybrid buses but modal shift in a transport context generally refers to the former. RC	Thank you for this comment. The term 'modal shift' has been used in relation to changing 'active travel' such as walking or cycling in the final guideline. The research recommendation on shift to zero- and low-emission travel has been amended and the word 'modal' removed from the research question.
353	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	58	20	<p>The Clean Air Zone (CAZ) will specify the emission standard for they types of vehicle within its scope.</p> <p>It is understood that whilst the volume of HGVs and buses are small, they do have a disproportionate contribution of NOx and particulate emissions.</p> <p>Vans used for commercial use generally have proportionate effect; however compliant vans that meet Euro 6 standard have only been available since September 2016 therefore businesses wishing to enter the CAZ without incurring a financial penalty will require vehicles that are less than 3 years old which may present significant financial burdens, particularly on smaller businesses.</p> <p>Although work is on-going to predict outcomes, there is concern that meeting the aims of the CAZ in some locations may not be achieved without including private vehicles. However including private vehicles potentially places increase financial burdens on those already disadvantaged and who are also more likely to live in areas where poor air quality exists.</p> <p>Where buses need to be CAZ compliant there may be displacement of fleets such that older buses are diverted to areas outside the CAZ resulting in a deterioration of air quality there whilst newer, lower emission buses only operate within the CAZ.</p> <p>Q.6 Leeds has submitted a bid to the Office of Low Emission</p>	Thank you for this comment. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.

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						Vehicles for funding to encourage electric charge points to develop a regional network and specific site for taxis to encourage the uptake of electric vehicles by removing some of the barriers such as charge point provision and accessibility. RC	
354	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	59	5	Telematics have a place by influencing driver behaviour such as those used by the insurance industry where "good driving" is rewarded by financial incentives. Research is required to better understand how driver behaviour is influenced in the long term and how the data can inform on vehicle behaviour where pollution occurs and develop strategies to actively manage vehicle emissions in problem zones. RC	Thank you for this comment. The research recommendation and the rationale has been amended to include specific gaps in the current research.
355	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	General		Fundamentally, vehicles are chosen not necessarily with emissions in mind, but a variety of other factors. Although some will feel misled into buying diesel cars by a presumption that diesels are lower emission than petrol cars and the weighting of vehicle excise duty based on CO2 rather than other pollutants. Local (district or regional) controls are ineffective in steering a change on the scale necessary to reduce transport emissions with the financial incentives appear weighted towards buying diesel vehicles even if it is not actually the case. Therefore national policies need to contribute as they are best placed to do so. RC	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
356	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	59	17	The use of air alerts is a useful tool to inform the wider population of air quality issues as well as those that are more susceptible to its effects such as those with heart and lung conditions. That said, currently there appears to be a lack of consistent message from the various bodies that attempt to communicate this information and there is a need to have more detailed local information. Some work was trialled in Leeds where dispersion modelling was undertaken based on the previous days' data and 24 hour meteorological forecast to produce a reliable local prediction for the following day. This required further development and resource to reach a point where messages could be sent out via social media and/or txt alerts. RC	Thank you for this comment.
357	[office use only]	Leeds City Council The Office of the Director of	Full	60	2	We agree that more research is required to establish stronger links between mode of transport and pollutant exposure Cyclists may breathe pollutants deeper into their lungs however the emissions may be more diluted than those experienced within a vehicle that is	Thank you for this comment.

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		Public Health				<p>enclosed and drawing air through the vents.</p> <p>Segregated footways and cycle lanes that provide distance separation where possible may help alleviate exposure to cyclists and pedestrians, but do not always provide the safest or quickest routes. RC</p>	
358	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	Q4		<p>Implementing the CAZ based on the current draft proposals is fraught with difficulty in its practicality, the timescales and resources provided and the many unknowns. The modelled data that Defra used is coarse and may not include areas that are also failing the air quality objectives however, demonstration of compliance is to be done via modelling rather than measurement.</p> <p>There could be huge economic burdens placed on local businesses that are unlikely to be fully aware of the implications of the CAZ despite the requirement for it to be implemented within 3 years. There is also the financial and political implications should detailed modelling show that compliance cannot be achieved without including private vehicles.</p> <p>There appears to be a lack of coherent national strategy and resources to address the problem and implement national measures such as vehicle excise duty for example. Funding appears to be granted in a piecemeal nature with no clear direction between different government departments</p> <p>The problem therefore seems to be city-wide rather than a national/global one where the concept of trans boundary nature of pollutants is recognised. RC</p>	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
359	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	12	General	We don't dispute the values for emission source apportionment although the contributions do indeed vary by location. For example, in our experience, in AQMAs road transport accounts for circa 80% of NOx emissions. RC	Thank you for this comment.
360	[office use only]	Leeds City Council The Office of	Full	57	24	We are concerned that the message regarding the potential effects of street trees/barriers will be misinterpreted as all will have a negative impact in some situations.	Thank you for this comment. That is not the intention and the rationale for research recommendation 1 notes that the impact of

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		the Director of Public Health				There will also be practical issues to consider in being able to locate such measures in the areas where there is most need of improvement. More research is required to inform on any future policy considerations. RC	the type and species of tree or how trees are sited or how they are maintained are areas that need further research.
361	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	4	5	Cycling needs to be part of cohesive cycle plan. AH	Thank you for this comment. This is noted in the linked NICE guideline ' physical activity: walking and cycling ' (PH41).
362	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	7	5-11	The report confuses the Clean Air Zone where potentially a penalty charge for infringing the environmental regulation may apply with that of a road user charge, of which a congestion charge is one distinct form, where the charge is more specifically for the use of the road. These are two different things. Good engineering has the potential to assist air quality through effective design and appropriate green infrastructure but the narrative in the recommendations is very crude and simplistic on this point. Road users need to have a clear rationale for the regulation and mixing schemes will confuse and potentially undermine confidence in the environmental and health improvement purpose. AH	Thank you for this comment. The committee were aware of the difference between clean air zones and congestion charge zones. They felt that there were circumstances where a congestion charge zone could be beneficial in addition to a clean air zone, principally where congestion (and not just vehicle type) was thought to be a key part of the problem.
363	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	8	17	There may well be benefits for variable speed limits on other than major highways and to use these more explicitly for air quality rather than journey time and congestion management. However, the advice is very generic with the presumption of wider use where there are no examples given and we know that potentially on some of the most polluted urban routes it is a very unlikely solution. On this front what is probably missing is the future trajectory of technology and the combination of ULEV and autonomous vehicles. AH	Thank you for this comment. The wording of this recommendation (1.5.1 in the final version) has been amended to include an action on 20 mph limits in urban areas.
364	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	8	21-27	In relation to reducing speed, the need for good design that tames the traffic and smooths driving in traffic calmed areas is recognised. This should be capable of being accomplished without undue cost. However it should be noted that some of the better designs come at a premium which this NICE guidance does not provide any	Thank you for this comment.

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						compelling reason to incur, given that the benefits of such designs are potentially marginal. There is no substantive evidence that such designs lead to better road safety outcomes and therefore highway authorities would generally prioritise finite budget to securing the road safety and casualty reduction outcome. With greater preponderance of ULEV vehicles in the traffic this becomes a diminishing issue. AH	
365	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	8	28-29	The use of Speed Indicating Device (SID) signs is suggested as a method for smoothing traffic. Whilst there is some evidence for a general benefit for such signs their use as a method for smoothing traffic flow in already calmed area does not seem will justified or evidenced with benefits that would be very marginal at best. AH	Thank you for this comment.
366	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	2, 3	Recommends using off-road and quiet streets yet this contradicts cyclists' desire, like other journey makers, to take the most convenient route and not to be diverted to a sub optimal alternative. There needs to be choice. AH	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline 'physical activity: walking and cycling' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
367	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6 7 Q9	4-28 1-13	It's hard to see the style and drafting of the section 1.2 recommendations acting as leverage for communities due to the poor drafting and presentation of the arguments.	Thank you for this comment. Following stakeholder consultation, changes to the guideline have been implemented to address your concerns and aid clarity.
368	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	7	14, 15	In order to reduce emissions from public sector transport services and vehicle fleets, a fleet review or service analysis of the vehicles used to reduce the numbers of fleet in the first instance, subsequently then all the other points should follow. TP	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
369	[office use only]	Leeds City Council The Office of	Full	Q1		Clean air zones potentially have a significant place but will be challenging to introduce. Also it should not be assumed that such schemes generate a surplus. AH	Thank you for this comment. We appreciate that there will be challenges with implementation. The guideline includes

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		the Director of Public Health					recommendations about highlighting the level of health damage which may support introduction of changes.
370	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	Q4		In answer to Question 4, it is difficult to see the NICE narrative making a meaningful difference. AH	Thank you for this comment.
371	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	4	7	We strongly support the view that we need a more integrated approach to reducing air pollution. There are not many people who have nothing to contribute, both public and organisations. LB	Thank you for this comment.
372	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	5, 10	1, 1	It is important to support large organisations to develop and implement green travel plans, as will help them to consider the impact they, their business and their staff are currently having on air quality, and what they could do differently in the future to reduce their impact. LB	Thank you for this comment. Travel plans are included in recommendation 1.2.1.
373	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6	13	An enhanced approach would aim to be pro-active in incentivising for greener choice/low emissions, in the first instance than penalising for damaging choices. However financial penalties are often the only way that some people will change. LB	Thank you for this comment. This would require national action and as such is beyond the remit of NICE.
374	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	6	13	Perhaps promoting walking along with supporting people to use as active transport is better in the shorter term, due to the minority who are unable to walk. It would also be more logical to be active most days rather than be sedentary, for example to pay for a gym membership and not use it. Promote Walkit.com and embed into everyday conversations (including health professionals). LB	Thank you for this comment. The guideline contains links to the NICE guideline on 'physical activity: walking and cycling' (PH41).
375	[office use only]	Leeds City	Full	9	5	Cycling needs to be promoted, however it is difficult to expect	Thank you for this comment. The

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	use only]	Council The Office of the Director of Public Health				people to use overcrowded dangerous roads. Also again-active transport rather than cycling as leisure pursuit needs selling. LB	recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
376	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	11	18	To facilitate action to improve better air quality, we need a walking and cycling person e.g. Commissioner as in London. He/she will work closely with the Mayor, Deputy Mayor for Transport, and TfL to make healthy, and active, non-polluting travel easier in London. LB	Thank you for this comment.
377	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	11	16,17	It is a good idea to have car free days and to promote this in local communities. However most of the traffic in Leeds seems to be commuter traffic- perhaps working from home one day a week could be promoted where possible (or various traffic restricting schemes that necessitate/encourage this). Additionally, this could aid staff wellbeing. LB	Thank you for this comment. No evidence was found relating to home working.
378	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	22,13, 26	This advice is necessary and needs to be given in the short term. However this doesn't fix the problem and people with e.g. respiratory illnesses should not be isolated any more than absolutely essential. This also goes against other areas of the health system trying to get people out and about and to be active. Resulting in them paying the price without many cases having had the benefits of car use. LB	Thank you for this comment. The intention of the recommendations in section 1.7 on awareness raising was not to isolate vulnerable groups. The points in recommendation 1.7.7 are recommended as actions to consider. The committee's discussion section notes that by raising awareness on the impact of air pollution on health, it can prevent health conditions escalating, particularly among the most vulnerable groups. It would reduce the need for potentially more expensive and less effective remedial action later. Please note the recommendations in this section have been amended to include

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							actions to reduce the number of motor vehicle journeys, change in driving style and changing routes to avoid highly polluted area (recommendation 1.7.4).
379	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	8 9 10 10	4 22, 23 26 6 13	<p>An important issue to include and address is whether or not walking or cycling in polluted environments negates the health benefits of active travel and exercise by increasing exposure to airborne pollutants. The report in The Lancet Public Health by Magda Cepeda and Colleagues⁷ provides clarity to this question. This systematic review compares exposure to carbon monoxide, black carbon, nitrogen dioxide, and fine and coarse particles between commuters using active and motorised transport. It also examined differences in life expectancy. On the basis of 42 studies selected from among over 4000 potentially eligible reports, the authors found that car commuters had higher exposure to all pollutants than did active commuters in 30 (71%) of 42 comparisons (median ratio 1.22 [IQR 0.90–1.76]).</p> <p>However, active commuters had higher inhalation doses of pollutants than did commuters using motorised transport because of their increased proximity to traffic, higher air exchange, and longer trip times. Most importantly, commuters using motorised transport were found to lose up to 1 year of life expectancy compared with cyclists. This conclusion provides strong and welcome evidence for the benefits of active transportation. It shows that the gains from aerobic exercise outweigh the risks. KMc</p>	Thank you for this comment. The committee are aware of this work and have made recommendations in support of promoting walking and cycling.
380	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9 10	22 10	Long-term exposure to certain air pollutants, nitrogen dioxide and fine particulate matter, were associated with higher dementia risk, but the researchers pointed out that these common pollutants are likely only part of the problem. They suspect that other air pollutants, or even exposure to traffic noise, might also play a role. ⁸ KMc	Thank you for this comment. The reference cited by the stakeholder is published post searches (September 2015).

⁷ Cepeda M, Schoufour J, Freak-Poli R, et al. Levels of ambient air pollution according to mode of transport: a systematic review. Lancet Public Health 2016; published online Nov 25. [http://dx.doi.org/10.1016/S2468-2667\(16\)30021-4](http://dx.doi.org/10.1016/S2468-2667(16)30021-4).

⁸ Chen, H. et al. (2017) Living near major roads and the incidence of dementia, Parkinson's disease, and multiple sclerosis: A population-based cohort study. Available at: [http://thelancet.com/journals/lancet/article/PIIS0140-6736\(16\)32399-6/abstract](http://thelancet.com/journals/lancet/article/PIIS0140-6736(16)32399-6/abstract) (Accessed: 16 January 2017).

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381	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	4	10	“Assess site plans from an air quality perspective”: the Rapid Health Impact Assessment template adopted (in theory...) by West Yorkshire’s Chiefs of Planning includes all these factors, however there are varying views on its application. I know Kirklees and Wakefield have used this to assess major planning applications, but not in Leeds. ME	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
382	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	5	3	“Cycling and walking route”: this has the added benefit of reducing physical inactivity levels which in itself yield significant improvements in quality of life, reducing ill health and deaths. ME	Thank you for this comment. The co-benefits of activity are noted in the guideline. However, please note that the focus is on air pollution.
383	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	7 Q1	4-11	Also in answer to Question 1, the challenge, for those trying to implement policies relating to cleaner air, is overcoming political pressures as they would argue it adversely affects economic development therefore jobs etc... ME	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
384	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	7	12-13	How will the impact of any proposed charges be measured? Who are the “disadvantaged groups”? This could be more detailed... ME	Thank you for this comment. Vulnerable groups are identified in the guideline. Please see the ‘Terms used in this guideline’ section of the final guideline.
385	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	7	19-28	In reference to section 1.3.2- the training and testing of staff and maintenance of vehicles have resource/financial implications for the public sector, which needs to be recognised. ME	Thank you for this comment. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
386	[office use only]	Leeds City Council The Office of	Full	9	5-6	In reality this is always a compromise of competing interests e.g. City Connect “Cycle Super Highway” is a long distance segregated cycle line located next to a busy road, yet it has addressed the	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of

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		the Director of Public Health				barrier of 'feeling unsafe' and has given people a cost effective (time/money) option to travel into the city centre. ME	routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
387	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	12-19	How much impact does raising awareness actually have? ME	Thank you for this comment. Awareness is important in providing support for other recommendations (see discussion section).
388	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	9	21-27	You can provide info on air quality, but what is the 'call to action' without inadvertently contradicting other activity that benefits health e.g. children, people with LTCs, elderly people to stay indoors therefore reducing physical activity and social interaction! So not just telling people 'what not to do' but what are the alternatives to that? Also, where it relates to campaigns, who should own this/lead on this? PHE or DH, similar to Keeping Well this Winter, One You?! A national brand which can be localised in each area. ME	Thank you for this comment. The recommendation has been amended to include actions, such as reducing vehicle use that will help reduce the adverse effects of air pollution. Please note that recommendations on national policy are beyond the remit of NICE.
389	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	10	9-11	This is a good idea in theory BUT what about its practical application? The same long standing issue is a barrier to other similar projects such as Keep Warm and Well... Contractually there are no incentives. ME	Thank you for this comment. The 'impact of the recommendations on practice' section within the committee's discussion section of the final guideline has been amended to highlight the wider benefits of this action.
390	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	10	12-14	The high risk groups appear to be the same as those at risk of cold weather. I feel the 'vulnerable groups' are way too broad and need to be more specific; otherwise it's impossible to know where you can make the most difference. ME	Thank you for this comment. The committee's discussion section notes that the vulnerable groups identified were based on expert paper 1 . The expert testimony highlighted that children, older people and those with chronic health problems are amongst the most vulnerable to air pollution.
391	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	4	3	In terms of the points raised on Planning 1.1 – these do not really go any further than the requirements currently set out as part of the National Planning Policy Framework (NPPF). The sustainable location, form and layout of development are integral to the NPPF and reflect the thrust of the draft document. In implementing these principles however the guidance could	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.

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						<p>usefully make cross reference or help clarify a number of points. These include:</p> <ul style="list-style-type: none"> • Cross reference to the existing provisions of the NPPF & NPPG • Cross refer to the role of sustainability appraisals in comparing alternative options/project implementation - in balancing economic, environmental and social objectives and their relationships and impacts on each other. These outcomes can then be used to identify interventions for mitigation. • Help clarify how to reconcile often competing policy objectives. For example, a key government objective is to regenerate brownfield land – such land is often situated within urban areas where there are air quality issues already. What are the practical tools/solutions to deliver these objectives at the same time? • The guidance needs to be clear that solutions derived through planning need to be complemented by other measures. For example – higher levels of modal shift, to low carbon modes via sustained investment in public transport with clean technology, ‘smart city’ applications to monitor pollution levels associated with development. DF 	
392	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	General Q8 Q9	General	<p>These guidelines and recommendations are not particularly helpful other than to list possible solutions to the AQ issues we all face in one document. It is either stating the obvious or puts forward ideas that we already consider as a matter of course or have given some thought to in the past.</p> <p>There is not golden bullet solution that exists. The fact is that there are very few ways to tackle the source of the pollution that would have widespread benefits – and central government shy away from them because of the cost implications. Most efforts [hopefully] result in marginal gains that cannot be measured in isolation but which in combination will ultimately deliver a worthwhile improvement.</p> <p>At best, this document is a list of possible actions that might make a difference, although it is difficult to see some of them to get past the listing stage – for example, lets divert cyclists and pedestrians onto longer tortuous routes to get them away from the direct route that’s used by every other traveller simply because the longer route is less</p>	Thank you for this comment. The guideline presents evidence based approaches to addressing the issues. It notes that gains will arise from the additive effect of multiple changes and the recommendations encourages further actions to address the health problems associated with transport related air pollution.

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						polluted. JT	
393	[office use only]	Leeds City Council The Office of the Director of Public Health	Full	General Q.1,2,3	General	<p>The NICE guidance should provide guidance to challenge and inspire Public Health's relationship with road transport related air pollution. The guidance could be strengthened by providing evidence based practice for health and wellbeing improvement interventions. For example, promoting active travel with cycling and walking and evidence between active travel and exposure to air pollution (what is the benefit or harm in cycling to work on a busy road). The guidance would be welcomed to consider or align with other documents that focus on the following issues:</p> <ol style="list-style-type: none"> How to address the recent decline in the number of people that regularly take part in physical activity and deliver a long-term sustainable increase in active travel; What type(s) of active travel should be encouraged and how should they be measured; How to specifically encourage active travel in under-served populations, where participation needs to be addressed with a range of cultural norms; How to maximise the potential of new technology to increase participation; How to use the power of active travel to achieve broader health and wellbeing outcomes. <p>The guidance again could be strengthened by aligning to greater and more significant challenges that will have a greater impact on road transport related air pollution. The reading of the guidance does seem to place the burden of addressing air pollution at a local authority level (transport, planning etc.). Local activity does make a difference but the greater impact will be from international, national and regional infrastructure including taxation, legislation, policy and appropriate and affordable public transport networks. KM</p>	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
394	[office use only]	Leeds City Council The Office of the Director of Public Health	Full			<p>The guidance is focused on the road transport related air pollution but will there be further guidance on other forms of pollution. For example, industry, construction i.e. generators and vehicles on site, biomass, electricity generation and housing and insulation. Although road transport is the major contributor it should not be considered in isolation. KM</p>	Thank you for this comment. The referral was to produce guidance on road transport related air pollution. The nature of any future guidelines will depend on NICE being asked to produce these by DH.
395	[office use]	LEICESTER CITY	Full	General	General	<p>General: In 2015 Leicester City Council adopted a comprehensive "Air Quality Action Plan 2015/2026", that was jointly developed the</p>	Thank you for your response. We will pass this information to our local practice collection

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	only]	COUNCIL				Public Health and Transport Strategy departments. The basis of the plan is to reduce the 162 premature deaths per year attributed in some way to air quality in Leicester. The plan which has over 45 projects in 16 actions spread over 4 themes, has been welcomed by DEFRA and the Joint Air Quality Unit as something other authorities should follow. During summer 2016 the Joint Unit were concerned that other authorities were not acting promptly to address the issue of air quality and this has been reflected in the large number of authorities not able to submit their new Annual Status Report by the summer deadline. A copy of our plan is available at: http://www.leicester.gov.uk/media/180653/air-quality-action-plan.pdf .	team. More information on local practice can be found here .
396	[office use only]	LEICESTER CITY COUNCIL	Full	General	General	Question 1: Of all the challenges in the document we feel behaviour change of the individual and ensuring they maintain a sustainable modal change choice is the most important. We keep providing a number of carrots and tools for individuals to use, but ensuring they move to more sustainable modes of transport and then carry on using them is of utmost importance.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
397	[office use only]	LEICESTER CITY COUNCIL	Full	9	1.6.1 - .2	Question 1: In the urban context access to schools is of particular challenge, it is widely acknowledged that roads are busier during term time and this should be addressed. The introduction of choice of school for the parent has made a large difference to congestion, and has removed a number of more sustainable transport options such as walking and cycling, as the schools are no longer "local". A focus needs to be made on the air quality impacts of the school run and why there is not the emphasis on improving school performance through local communities.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
398	[office use only]	LEICESTER CITY COUNCIL	Full	General	General	Question 2: The introduction of "Clear Air Zones" or "Low Emission Zones" would have significant implementation costs depending on the area covered and vehicles that are included. There is also a perceived cost affecting the attractiveness of the urban area by introducing the zones. This could result in transfer of emissions to zones previously with good air quality.	Thank you for this comment. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline. The guideline emphasises the need to work collaboratively with other areas to try to avoid issues of this sort.
399	[office use only]	LEICESTER CITY COUNCIL	Full	General	General	Question 2: The purchase of the equipment especially "Automatic Number Plate Recognition" cameras and back office co-ordination could be organised at a national, providing economies of scale and	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support

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						saving local authorities funding and resources in terms of staff time.	activities for this guideline. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
400	[office use only]	LEICESTER CITY COUNCIL	Full	General	General	Question 3: Although our air quality action plan is helping overcome challenges locally, we feel more responsibility should be taken by government. Especially in promoting the issues nationally through media promotion and branding. For example we already have seen an effective campaign on smoking cessation and the adoption of smart meters for energy consumption so why not air quality.	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.
401	[office use only]	LEICESTER CITY COUNCIL	Full	18	1 - 2	Question 3: There is a mention of on-road testing being included from 2018 but we feel there should also be more effective testing during vehicle MOT's. The inclusion of a standard NOx and PM test would encourage the proper maintenance of the vehicle and reduce emissions.	Thank you for this comment.
402	[office use only]	LEICESTER CITY COUNCIL	Full	2 / 27	1.2.x	Question 4: We feel the reference is key to the guideline as the initiative has the highest potential to reduce road emissions. In 2014 we commissioned consultants Ricardo AEA to undertake the study LESTAir proved this case. From the study and as part of our Air Quality Action Plan, we are planning to introduce two Clear Air Zones. The first for December 2017, will be a Low Emission Zone covering buses and taxis in the city centre. A second more ambitious Ultra-Low Emission Zone that looks to include all vehicles we have just commissioned a feasibility study into. However, both diesel and petrol cars should be included at between them over 50% of all nitrogen dioxide emissions from all sources comes from these in the city.	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned
403	[office use only]	LEICESTER CITY COUNCIL	Full	General	General	Question 5: We support the general provision of air quality but only at a regional scale, e.g. east midlands, or similar to national weather coverage. Small scale analysis of air quality at a city or smaller area could unfairly portray places to be poor when there are good unavoidable reasons for this. For example Leicester's poorest air quality is found on a hill with traffic lights at the top. The lights often stop the traffic and the power required by the vehicles to move generates excess emissions.	Thank you for this comment. Air quality information is likely to be at a regional scale. However, poor air quality will impact on health no matter what the reason for the build-up of pollutants.

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404	[office use only]	LEICESTER CITY COUNCIL	Full	General	General	<p>Question 6: Current grants / schemes that we are targeting to deliver our air quality action plan include:</p> <ul style="list-style-type: none"> • Leicester Council Capital / Revenue • Prudential "Spend to Save" local authority facility • Office for Low Emission Vehicle bids • Department for Transport funds e.g. Greener Technology Fund • DEFRA / Joint Air Quality Unit: Air Quality Grant • European Union funds: e.g. Horizon 2020 and INTERREG • DCLG managed funds: European Structural Investment Fund 	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
405	[office use only]	LEICESTER CITY COUNCIL	Full	General	General	<p>Question 7: As described in comment 8 above, we had undertaken an assessment of a number of air quality schemes through our LESTAir report. However, each of the Air Quality Action Plan projects is fully apprised before work starts. Although the emissions may not be measureable we do have projections of the benefits for each intervention.</p>	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned.
406	[office use only]	LEICESTER CITY COUNCIL	Full	6 / 27	1.2.2	<p>Question 8: We support the stance of reducing levels below the EU limits and also feel more should be made to push for PM_{2.5} clarification and promotion before the proposed introduction in 2020.</p>	Thank you for this comment.
407	[office use only]	LEICESTER CITY COUNCIL	Full	6 / 28	1.2.5	<p>Question 8: 1.2.5 Car Free Days are a good promotional tool I have not seen directly linked with clean air zones which could be used increasingly leading upto a full scale implementation of a zone.</p>	Thank you for this comment. This recommendation has been moved to 1.7 (awareness raising).
408	[office use only]	LEICESTER CITY COUNCIL	Full	6 / 28		<p>Question 9: No</p>	Thank you for this comment.
409	[office use only]	LEICESTER CITY COUNCIL	Full	7 / 37-38	1.3.x	<p>Other: The review of drivers by their supervisors and managers has moved on in Leicester City Council from those discussed in the document. For a number of years a "Greener Safer Driving" course has been required for all council drivers. However, the introduction of tracker systems to all fleet vehicles now provides us with a greater deal of information. We now interrogate this information to analyse the performance of the vehicles and drivers, identifying</p>	Thank you. We will pass this information to our local practice collection team. More information on local practice can be found here .

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						individually the vehicles and drivers which need to improve their driving style or need modifications to the vehicle. In future we hope to use this information to identify the routes which are most problematic and look at devising road and traffic improvements to improve performance.	
410	[office use only]	LEICESTER CITY COUNCIL	Full	8 / 38	1.3.6	Other: Although we have pledged £3million to replace polluting diesel vehicles with ultra-low variants, there is a frustration that the vehicles are not available, especially for light goods vehicles which comprise of two thirds of our fleet. We also look forward to the introduction of the new ISO standard (20400) for sustainable procurement.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned
411	[office use only]	LEICESTER CITY COUNCIL	Full	8 / 43	1.4.2	Other: We wholly agree with the introduction of 20mph zones and are currently working through a seven year programme of 45 zones to be completed by 2022. We would also be interested in any work to review the impact of speed hump design on air quality as there is only limited suppliers and designs available.	Thank you for this comment. The evidence found in the reviews is available on the NICE website.
412	[office use only]	LEICESTER CITY COUNCIL	Full	10 / 51	1.6.4	Other: Although there is reference to walking and cycling, as the section refers to business as well as public, there should be the inclusion of business fleet vehicles.	Thank you for this comment. Selection of vehicles is addressed in recommendation 1.4.
413	[office use only]	Living Streets	Full, all comments on the draft guideline out for consultation	General	General	<p>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.</p> <p>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).</p>	Thank you for this comment. The final guideline emphasises the benefits of modal shift, including the health benefits of active travel. Links are included to other relevant NICE guidelines. We anticipate that the LCWIP process would be included in the strategic planning processes addressed in 1.1.1.
414	[office use]	Living Streets		1	Box, paragra	Why is driving style listed first? Driving appears to be seen as a given, when really we need to focus on changing behaviour – which	Thank you for this comment. This overview text has been amended to reflect the content

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	only]				ph 2	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.	of the guideline.
415	[office use only]	Living Streets		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>	<p>Thank you for this comment. Recommendation 1.1 has been subdivided for clarity.</p> <p>Your comments will be considered by NICE where relevant support activity is being planned.</p>
416	[office use only]	Living Streets		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 levels and pollution where facilities such as schools, nurseries and retirement homes are to be located”.</p>	Thank you for this comment. Other recommendations more directly address reducing motor vehicle travel and promoting zero- and low-emission travel. This recommendation is aimed at avoiding placing vulnerable groups in harm's way during the planning process. It has been amended to avoiding locating them in areas where pollution is high for clarity.
417	[office use only]	Living Streets		5	1	This should be to support and 'encourage'.	Thank you for this comment. 'Encourage' is implicit in this wording. Please note the text is now in recommendation 1.1.1.

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418	[office use only]	Living Streets		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.	Thank you for this comment. The guideline includes support for walking and cycling.
419	[office use only]	Living Streets		6	1-3	The guidance should also acknowledge the shelter provided by trees and their aesthetic value.	Thank you for this comment. This is included in the committee's discussion section. However, the guideline is focused on actions to address air pollution.
420	[office use only]	Living Streets		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.	Thank you for this comment. This is the aim of the guideline. Recommendation 1.3 includes a range of actions to encourage behaviour change.
421	[office use only]	Living Streets		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.	Thank you for this comment. This would require a national approach and is beyond the remit of NICE.
422	[office use only]	Living Streets		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).	Thank you for this comment. The guideline includes recommendations to promote alternatives. It is beyond the remit of NICE to identify how revenues are spent.
423	[office use only]	Living Streets		8	1-4	Also consider the use of Intelligent Speed Adaptation, in other words speed limiters for fleet vehicles.	Thank you for this comment. This was not addressed in the evidence reviewed and therefore is not included in the recommendation.
424	[office use only]	Living Streets		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	Thank you for this comment. This has been amended to urban areas.

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						<p>less than 20mph zones because it is not necessary to include traffic calming measures.</p> <p>20mph limits may help to change perceptions of acceptable traffic speeds and smooth traffic flows (less stopping and starting).</p>	
425	[office use only]	Living Streets		9	2-3	Cycle routes <u>and</u> 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.	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
426	[office use only]	Living Streets		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.	Thank you for this comment. The evidence considered did not contain any specific actions in relation to pedestrians. However, as the guideline links to the NICE guideline on ' physical activity: walking and cycling ' (PH41) the title of the recommendation (1.5) has been amended to include walking.
427	[office use only]	Living Streets		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.	Thank you for this comment. The recommendation (now 1.7) has been amended to include avoiding unnecessary motor vehicle trips.
428	[office use only]	Living Streets		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.	Thank you for this comment. The recommendation (now 1.7) has been amended to include reducing unnecessary motor vehicle travel.
429	[office use only]	Living Streets		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.	Thank you for this comment. There was limited evidence identified in the review on personalised travel planning to support low emission travel (evidence review 3). The committee felt there was insufficient evidence from 1 low quality study examining personalised travel planning in students to base a recommendation. However

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							recommendation 1.7.6 in the final guideline, is linked to the NICE guideline on physical activity: walking and cycling (PH41) which makes recommendations on these approaches for workplaces to promote physical activity (rather than to reduce air pollution).
430	[office use only]	Living Streets		10	12-22	See comment on page 9 lines 17-19. The key point here is that we need to drive less!	Thank you for this comment. The recommendations on awareness raising (now section 1.7) has been amended to include avoiding unnecessary motor vehicle trips.
431	[office use only]	Living Streets		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.	Thank you for this comment. Thank you for the suggestion but the context section has not been amended.
432	[office use only]	Living Streets		13	1-3	See above. Please specify what you mean by 'other sources' of non-exhaust emissions.	Thank you for this comment. Other sources of non-exhaust emissions are from the direct wear of tyres, brakes and the road (noted in the previous paragraph).
433	[office use only]	Living Streets		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.	Thank you for this comment.
434	[office use only]	Living Streets		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	Thank you for this comment. The recommendation highlighted in the comment relates to improving the environment to improve physical activity. This is linked to the physical activity: walking and cycling (PH41) guideline and the physical activity and

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							environment guideline (which is currently being updated).
435	[office use only]	Living Streets		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 .	Thank you for this comment.
436	[office use only]	Living Streets		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.	Thank you for this comment. The recommendations on awareness raising (now section 1.7) has been amended to include avoiding unnecessary motor vehicle trips.
437	[office use only]	Living Streets		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.	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
438	[office use only]	Living Streets		23	13-14	How about levels of physical activity or user satisfaction (pedestrians, cyclists and public transport)?	Thank you for this comment. The outcomes that matter most were based on committee's discussions.
439	[office use only]	Living Streets		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.	Thank you for this comment. Please note the reference to DEFRA proposal has been removed and the recommendation (now 1.3) suggests aiming to meet WHO air quality guideline levels.
440	[office use only]	Living Streets		31	18	Finally the guidance gets to the point and says that low emission zones have only slightly improved air quality "...partly because of ...	Thank you for this comment. Thank you for the suggestion but the sentence has not been

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	only]					the failure to address the overall volume of traffic". This should be nearer the front of the document.	moved as it relates to the specific paragraph on low-emission zones.
441	[office use only]	Living Streets		31	26-30	The guidance should mention 20mph limits here; there is less stop-go driving at slower speeds.	Thank you for this comment. Recommendation 1.5.1 in the final guideline has been amended to include 20 mph limits.
	[office use only]	Living Streets		37	1-6	Who would coordinate this national approach, for example, to charging schemes?	Thank you for this comment. Recommendations on clean air zones (section 1.3 of the final guideline) are targeted towards transport authorities, district councils and directors of public health. The section indicated is the committee's deliberations and discussion of the evidence from their expert perspectives and not a recommendation. National policy recommendations are outside the remit of NICE guidelines.
442	[office use only]	Living Streets		37	27-28	Many local authorities outsource their services. Therefore, we suggest writing these conditions into new contracts.	Thank you for this comment.
443	[office use only]	Living Streets		44	10-14	Actions could include the use of average speed cameras, radar speed signs and speed limiters in fleet vehicles.	Thank you for this comment. The section on smooth driving and speed reduction (1.5 in the final guideline) includes a recommendation on displaying drivers' current speed. Interventions such as speed limiters was not addressed in the evidence reviewed and therefore is not included in the recommendation.
444	[office use only]	Living Streets		46	30	Major roads 'and junctions'	Thank you for this comment. Thank you for the suggested amendment however it has not been incorporated in this instance.
445	[office use only]	Living Streets		47	4-5	Mention other measures such as 'filtered permeability' to reduce route options for vehicles.	Thank you for this comment. Thank you for the suggested amendment however it has not been incorporated on this occasion.
446	[office use only]	Living Streets		47	18-24	Why does the guidance not recommend reducing the number of vehicles and the pollution that they produce?	Thank you for this comment. The guideline makes recommendations on reducing motorised travel.

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447	[office use only]	Living Streets		48	20-21	Note that cycle ways and footways are much cheaper to maintain than roads.	Thank you for this comment.
448	[office use only]	Living Streets		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.	Thank you for this comment. Section 1.5 links to the NICE's guideline physical activity: walking and cycling (PH41) which covers in further details the measures to create a more supportive environment to encourage people to cycle or walk.
449	[office use only]	Living Streets		50	18-19	Concern about air quality can put people off walking too.	Thank you for this comment. The 'why we need recommendations on this topic' within the committee's discussion section has been amended to acknowledge pedestrians.
450	[office use only]	Living Streets		52	26-28	We agree that better scheduling to avoid use of delivery vehicles when streets are congested may help to reduce pollution.	Thank you for this comment.
451	[office use only]	Living Streets		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 homes (e.g. to reduce damp from drying laundry indoors).	Thank you for this comment. The main emphasis of the guideline is on reducing traffic-related outdoor air pollution. This particular recommendation on closing external doors and windows has been included as an action to consider when giving advice to those who are particularly vulnerable. The committee's discussion section does acknowledge that such an action might increase indoor levels of air pollutants, if there are other sources of pollution in the house.
452	[office use only]	Living Streets		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?	Thank you for this comment. The evidence relating to this section on travel incentives can be found in evidence review 3 on Travel Planning and other initiatives providing information, advice, education and skill development.
453	[office	Living Streets		60	27	Include abrasion of the road surface as a source of PM ₁₀ and PM _{2.5} .	Thank you for this comment. Thank you for

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	use only]						the suggested amendment however this has not been incorporated on this occasion.
454	[office use only]	London Borough of Hackney		4	3	Points generally supported, especially guidance on location and siting of buildings to mitigate local air quality issues.	Thank you for this comment.
455	[office use only]	London Borough of Hackney		4	4	Car free or car capped developments should be standard if there is suitable public transport, walking and cycling access.	Thank you for this comment. The guideline includes recommendations to support zero- and low- emission travel. This could include car free or capped developments.
456	[office use only]	London Borough of Hackney		6	10-11	Clean air zone should <i>commit</i> to reducing pollutant levels below the EU limits, not just <i>consider</i> .	Thank you for this comment. Recommendation 1.3.1 includes aiming for WHO levels.
457	[office use only]	London Borough of Hackney		6	15-18	London has ambitious targets with regards to low emission vehicles which are detailed in the Ultra Low Emission delivery plan (http://content.tfl.gov.uk/ulev-delivery-plan.pdf). More locally, Hackney has set a target of every resident being within 500m of an electric vehicle charge point by 2025. Other authorities should be similarly ambitious.	Thank you for this comment.
458	[office use only]	London Borough of Hackney		7	1-3	Hackney has a number of tri-borough initiatives to reduce air pollution in the City fringe area (working alongside Islington Council and Tower Hamlets Council). These are successful projects and the benefits and outcomes are realised in all three boroughs. This is supported and encouraged.	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
459	[office use only]	London Borough of Hackney		7	14-15	In the first instance, public sector services should consider how to reduce their reliance on car/van travel.	Thank you for this comment. Recommendations on reducing motorised travel are in section 1.6 of the final guideline.
460	[office use only]	London Borough of Hackney		8	11	Introduce policy to encourage the uptake of electric vehicles where any new vehicle is electric unless there is no other viable option.	Thank you for this comment. This is beyond the remit of NICE.
461	[office use only]	London Borough of Hackney		9	1	Excess motor traffic discourages active travel modes such as walking and cycling. Road closures and filtering access has the impact of eliminating rat-running through residential roads, creating	Thank you. The guideline links to the NICE guidelines on ' physical activity: promoting walking and cycling ' (PH41) and physical

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						safer walking and cycling conditions and subsequent improvements to air quality locally.	activity and the environment (PH8). Please note that this guideline is currently being updated.
462	[office use only]	London Borough of Hackney		10	1-7	No mention of consolidation of deliveries. This reduces the number of vehicles on the road and maximises vehicle capacity.	Thank you for this comment. The consolidation of deliveries was not specifically searched for in the evidence reviews. Recommendation 1.3.5 of the final guideline now includes 'minimise congestion caused by delivery schedules' as a possible action to reduce emissions within a clean air zone.
463	[office use only]	London Borough of Hackney		10	1-7	No mention of low emission deliveries: electric vans, cargo bikes etc.	Thank you for your comment. A specific reference to low emission deliveries has not been included as an action in this recommendation. However, the committee recommended selecting low-emission vehicles, including electric vehicles as an action to consider when making procurement decisions (recommendation 1.4.6 of the final guideline). In addition, a recommendation to support the use of zero- and low-emission vehicles, such as providing charging facilities for electric vehicles has been included in section 1.2 (Development management) of the final guideline.
464	[office use only]	London Borough of Hackney		General	General	Walking routes are not adequately covered by the guidance (over and above walking being referenced in the cycle routes section) – more specific recommendations are needed.	Thank you for this comment. No specific evidence was found relating to air pollution and walking. However, walking is included in the linked NICE guideline on physical activity: walking and cycling (PH41).
465	[office use only]	London Borough of Hackney		General	General	We feel that there should be a section on sustainable transport. This should include, but not limited to: <ul style="list-style-type: none"> behaviour change, shift to walking and cycling (link to cycle guidance) car clubs with targets around access; where possible and funding allows, these should be low emission car clubs reducing the reliance on private cars; schools, business travel plans etc. 	Thank you for this comment. While the guideline does not include a separate section on sustainable travel the issues are addressed throughout the recommendations.

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466	[office use only]	London Borough of Hackney		General	General	<p>1. Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why.</p> <p>Challenges:</p> <ul style="list-style-type: none"> Hackney Council want to transform Hackney's streets and places into the most attractive and liveable neighbourhoods in London, however this can only be achieved by reducing the dominance of the private motor vehicle both in terms of traffic and congestion on our roads and managing excessive parking on our streets. Excessive motor traffic on our streets discourages residents from spending time there and using active travel modes such as walking and cycling. High motor traffic flows and congestion also contribute to an unsafe environment and poor air quality, with its negative health impacts on residents. Creating a better balance between pedestrians, cyclists and motor vehicles is therefore critical if we are to make our neighbourhoods more attractive and liveable for everyone. Managing motor traffic levels on our street network and its associated negative impacts requires close co-ordination between Council departments such as planning policy, development management, air quality and parking as well as with external partners including TfL and neighbouring boroughs. Hackney has introduced policies to reduce air pollution. However these local policies may differ to those of neighbouring boroughs, not enabling ambitious local policies to be realised in full e.g. exogenous vehicular traffic coming through the borough as a result of geographical location and impacting on highway condition, air quality and highway safety targets. In addition, local councils do not fully control some borough roads (such as Hackney Road) making interventions more difficult. <p>Most effective interventions:</p> <ul style="list-style-type: none"> Planning levers to reduce car dependence where appropriate, such as car free development and restrictions placed on purchasing a parking permit. 65% of households in Hackney are car free. 	Thank you for this comment. We appreciate there are many practical difficulties in implementing the recommendations. Your comments will be considered by NICE where relevant support activity is being planned.

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						<ul style="list-style-type: none"> Restrictions on the number of vehicles, this could include: closed roads or filtered permeability to encourage walking and cycling; priority for low emission vehicles (emissions based parking permits, electric access only); road pricing, for example workplace parking levy, road user charging (pay for what you use) etc. 	
467	[office use only]	London Borough of Hackney		General	General	<p>2. Would implementation of any of the draft recommendations have significant cost implications?</p> <p>1.1 Planning</p> <ul style="list-style-type: none"> Potential for increases in costs in coming to decisions on applications with negotiation needed on design. Development opportunities in inner London are limited and the proposed sites may not be capable of feasibly and/or viably delivering on air quality. <p>1.2 Clean air zones</p> <ul style="list-style-type: none"> Electric vehicle charging infrastructure can be costly. Private partnerships should be encouraged and use of grants available to support the purchase and installation of infrastructure. <p>1.3 Reducing emission from public sector transport services</p> <ul style="list-style-type: none"> Introduce policy to encourage the uptake of electric vehicles where any new vehicle is electric unless there is no other viable option. The cost of doing this may be prohibitive and access to larger fleet vehicles is still limited, but local authorities should look to reduce emissions where possible as best practice. <p>1.7 Awareness raising</p> <ul style="list-style-type: none"> Office for Low Emission Vehicles offer a number of grants to assist businesses to purchase low emission vehicles. 	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
468	[office use only]	London Borough of Hackney		General	General	<p>3. What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice)</p> <p>Good examples: ZEN (Zero Emissions Networks), LEN</p>	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .

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						(Low Emissions Networks), London ULEZ (Ultra Low Emission Zones), support for road user charging on a wider scale.	
469	[office use only]	London Borough of Hackney		General	General	<p>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?</p> <ul style="list-style-type: none"> OLEV grants Go Ultra Low City Scheme (4 streams) Private investors offering EV infrastructure Defra e.g. http://laqm.defra.gov.uk/laqm-faqs/faq137.html Boroughs (local councils have been offering grants to sustainable transport initiatives for over 10 years) 	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
470	[office use only]	London Borough of Hackney		General	General	<p>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?</p> <ul style="list-style-type: none"> Borough is already over EU limits. Council buy in through adopting Air Quality Action Plan and Transport Strategy that clearly state we will implement these measures. Justification of match funding – usually required as part of bids to TfL/Mayor's air quality fund. 	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned.
471	[office use only]	London Borough of Hackney		General	General	<p>Guidance could have included specific recommendations for healthcare system actions. This could include consideration of poor air quality forecasts in service and capacity planning.</p> <p>Recommendations could also have been included for local authorities and health professionals to share information about patients with COPD or asthma specifically – e.g. to inform decisions about housing of these residents away from busy roads and/or ensuring they have access to warning systems/alternative walking routes. Recommendations could also be considered for local authorities (including public health teams) to work with schools to ensure warning systems are in place and guidance is available for schools sited on busy roads and action to take during high pollution episodes. It might also be worth recommending the inclusion of air pollution considerations in decisions about the siting of new GP</p>	Thank you for this comment. Actions for healthcare professionals about advice are included in recommendation 1.7. Recommendation 1.1.2 addresses siting of residential premises away from areas of high pollution.

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						surgeries, hospitals and other health settings, as well as actions that may be taken to mitigate poor air quality where they are sited on busy roads and how to reduce pollution from their own fleets.	
472	[office use only]	London Borough of Hackney		General	General	There is a danger with broad brush recommendations that they are rolled out across areas without consideration of local circumstances, potentially being either ineffective on a cost benefit basis or resulting in worse air quality. Therefore there needs to be consideration in all actions of local circumstances.	Thank you for this comment. The guideline acknowledges in the committee's discussion section that effect and the cost of any intervention will be highly dependent on factors specific to the local setting.
473	[office use only]	London Borough of Hackney		General	General	From a local perspective many of the recommendations relate to actions that will have already been implemented, e.g. driver behaviour initiatives on public sector fleets put in place to achieve cost savings.	Thank you for this comment. Examples of good practice can be submitted to our local practice team. More information on local practice can be found here .
474	[office use only]	London Borough of Hackney		General	General	The document does mention other sources of pollution such as boilers, etc. This list could be more comprehensive, as locally such sources can be more significant for outdoor air quality. Industry, sidings/train lines, waterways can also be significant sources. Poor local air quality may also be exacerbated by outdated buildings (i.e. insulation and inefficient heating/energy systems). Significant pollution episodes which impact on health are quite often from long range industrial/dust emissions and so perhaps these should be considered too. The guidance also don't appear to have considered road closures or excluding certain vehicle types/all vehicles from areas.	Thank you for this comment. NICE was asked to examine road transport related air pollution. Hence other sources of air pollution are outside the scope of this work. Restrictions of vehicles are addressed in recommendation 1.3.2.
475	[office use only]	London Borough of Hackney		General	General	To be effective, many of the recommendations need to be delivered consistently across local authority areas. For example cycle networks, 20mph roads, congestion charging, etc. really need to be implemented strategically across broader areas across borough boundaries in order to maximise impact.	Thank you for this comment. Action will need to be taken by many areas. The need for cross boundary cooperation is addressed in recommendation 1.3.3.
476	[office use only]	London Borough of Hackney		General	General	We would like to have seen a recommendation to include (outdoor) air quality as a local public health issue in Joint Strategic Needs Assessments, to inform Joint Health and Wellbeing Strategies.	Thank you for this comment. Inclusion of air pollution in strategic plan making (including health and wellbeing strategies) is addressed in recommendation 1.1.1.
477	[office use only]	London Borough of Hammersmith & Fulham	Full	4	13	The council acknowledges the importance of protecting vulnerable groups although the effects of air pollution are experienced by all groups. NICE guidelines, therefore should not only single out vulnerable groups but include all groups.	Thank you for this comment. The guideline addresses all groups, however in some circumstances additional consideration for those who are particularly vulnerable is

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		(Officer level response only)					justified.
478	[office use only]	London Borough of Hammersmith & Fulham (Officer level response only)	Full	5	11-19	This section should suggest the restriction of daytime commercial deliveries in the planning permission	Thank you for this comment. Consideration of delivery planning is included in recommendation 1.3.5.
479	[office use only]	London Borough of Hammersmith & Fulham (Officer level response only)	Full	7-8	general	This section should include recommendations and measures for Council's to discourage vehicle transport and to take up active travel including provision of access to bicycles, etc.	Thank you for this comment. The guideline contains recommendations to reduce unnecessary motor vehicle travel and to encourage zero- and low- emission travel (including walking and cycling).
480	[office use only]	London Borough of Hammersmith & Fulham (Officer level response only)	Full	general	general	Actions councils may take to reduce the number of diesel vehicles specifically, like using the pricing of parking, should be included. This is already a key action in the Mayor of London's air quality action plan template.	Thank you for this comment. Identification and action to restrict specific vehicle groups would need to be taken following consideration of the local conditions and sources of air pollutants. This is addressed in recommendation 1.3.2.
481	[office use only]	London Borough of Hammersmith & Fulham (Officer level response only)	Full	8	20-29	This recommendation would benefit from including a definition of the circumstances in which 20mph limits (with or without traffic calming) would be beneficial or at least provide a neutral air quality impact.	Thank you for this comment. Clarification of the difference between 20mph limits and 20mph zones has been added. The committee felt it was not possible to provide a clear set of circumstances as you suggest.
482	[office use only]	London Borough of Hammersmith & Fulham	Full	9	5-8	This recommendation would benefit from advising how authorities should balance the air quality gains from encouraging modal shift with the potential air quality disbenefits of reducing highway/junction capacity and risking increased congestion and pollution.	Thank you for this comment. This is beyond the remit of this guideline.

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483	[office use only]	London Borough of Hammersmith & Fulham (Officer level response only)	Full	general	25-27	When this consultation was announced, it was perceived by some that the guidelines advised that speed bumps are inherently bad for air quality; though this is not the case. It would be helpful if the final guidance document could spell this out more clearly.	Thank you for this comment. The recommendations in section 1.5 on smooth driving and speed reduction of the final guideline (1.4 in the consultation version) has been clarified.
484	[office use only]	London Borough of Hammersmith & Fulham (Officer level response only)	Full	general/10	general/5	In addition to scheduling deliveries to minimise congestions, freight consolidation and logistics should be recommended. This should not only be a part of section 1.6, but also a recommendation for Council's to implement as part of our own services	Thank you for this comment. Freight and deliveries are addressed in recommendation 1.3.5. Addressing public sector vehicle emissions are included in recommendation 1.3.5 and 1.4.
485	[office use only]	London Borough of Hammersmith & Fulham (Officer level response only)	Full	9-10	general	Members of the public can also help reduce congestion by selecting "green van slots" for deliveries (a method to consolidate deliveries to single area to reduce the number of multiple vehicle trips) or to have packages delivered to designated drop-off locations in neighbourhoods. It would be recommended that NICE guidance included this in general public actions. In order to raise public awareness of this a Business action should include the provision of environmental information to members of the public about green van slots and consolidated delivery locations. Business should highlight air quality benefit alongside the climate change benefit of using these	Thank you for this comment. No evidence was seen relating to this issue. However, from the committee discussion recommendations about considering actions to address congestion from deliveries has been included (see recommendations 1.3.5 and 1.7.5).
486	[office use only]	London Cycling Campaign				The London Cycling Campaign (LCC) notes that London's air quality not only continues to breach EU legal limits, it's much worse than the standards called for by the World Health Organisation. The equivalent of almost 10,000 Londoners die prematurely every year as a result of air pollution. Much, approximately 40%, of air pollution in London is generated by motor vehicles. Almost a quarter of primary schools are sited in areas that breach the legal limit for nitrogen dioxide (NO ₂). Doctors report that children	Thank you for this comment. The guideline contains evidence based recommendations which include actions to reduce the need for motor vehicle travel, restrict polluting vehicles, promote zero- and low-emission travel (including active travel), reduce emissions from vehicles where possible and raise awareness of the health impact of air pollution. The specific details of the

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						<p>spending their early years in parts of the city are suffering serious, long term (sometimes permanent) impacts to their health and development. London's dirty air also costs the economy £3.7 billion.</p> <p>LCC has been active in promoting active travel (i.e. walking and cycling) in London since 1978 and we have always noted the individual and community benefits that cycling brings. It is evident that cycling, as opposed to motoring, does not have air quality impacts. By replacing journeys made by car or other motorised transport cycling can help reduce air pollution. We note that a recent survey for the London Assembly by Populous found that 18% of car drivers who considered changing their changing the transport mode were considering a switch to cycling.</p> <p>A notable success story in London is the significant growth in cycle use from fewer than 300,000 journeys per day in 2003 to more than 670,000 in 2016. The scale of that growth (currently concentrated in Central and Inner London but with an even greater growth potential in Outer London) and its steady progress demonstrates the willingness of London's population to consider cycling as a transport mode; and urveys carried out for TfL show that a quarter or more of Londoners would consider cycling or would like to cycle more if it were safe and convenient to do so. There is no reason to believe that the same would not be true for the UK as a whole in the right circumstances</p> <p>While some people may be switching from tube or bus to cycle, rather than from a car, that switch is in turn making it more attractive for others to switch from a car to a less crowded tube or bus for their journey. The continuing growth in cycling is also helping meet the transport needs of London's growing population without increasing car use or putting extra pressure on an already overcrowded (at peak time) public transport system. The 2011 census showed that in some London boroughs cycle commuting had outstripped car commuting.</p> <p>The well-known example of the Netherlands demonstrates that a north European population can achieve a cycle mode share of a third with a consequent reduction in motor transport emissions provided priority is given to investing making streets safer for</p>	<p>implementation of the recommendations will need to take local factors into account.</p> <p>The guideline aims to encourage further action to reduce air pollution and to promote health.</p> <p>It is beyond NICE's remit to comment on the Mayor of London's proposal to improve air quality and the London Cycling Campaign's response to this.</p>

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						<p>cycling.</p> <p>The comments below focus on measures being taken in London to improve air quality by London Mayor, Sadiq Khan. LCC supports these measures but wants the Mayor to reduce pollution further to make cycling and walking more attractive and also to reduce road danger by providing safer conditions for cycling and walking.</p> <p>We commend the air quality and Healthy Streets measures being considered or enacted in London to NICE and we also urge that our recommendations on how to improve these Mayoral proposals be considered as well, both in the case of London and in other urban environments.</p> <p>Mayor Sadiq Khan's proposals</p> <ul style="list-style-type: none"> • Introduce a new "Toxicity" or T Charge into the Congestion Charge area for the most polluting vehicles • Bring the implementation of the central London Ultra Low Emission Zone (ULEZ) forward by one year to 2019 • Expand the ULEZ (Ultra Low Emissions Zone) beyond central London in 2020 • Give Transport for London (TfL) the go-ahead to start looking at a diesel scrappage scheme as part of a wider national scheme that the Mayor is calling on the government to run • Keep Londoners better informed and alerted when pollution is at its worst • Make sure Transport for London cleans up its bus fleet and buying only hybrid or zero emission double-decker buses from 2018 <p>LCC's comments on the Mayor's proposals</p> <ol style="list-style-type: none"> 1. We believe that the ULEZ should be extended to the whole of London: the centre's air has the highest concentration of pollutants but illegal levels of pollution occur all over London and everyone deserves protection. 2. It is not enough to tackle tailpipe emissions. To radically improve air quality the Mayor should incentivise "modal 	

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						<p>shift" to walking and cycling: the Mayor must make walking and cycling safe and attractive enough to become the norm (particularly for local journeys), as well as improve public transport and access to car-sharing schemes (as an alternative to car ownership). Mass modal shift is vital to reduce motor traffic and thus help clean up London's air, and the potential to do so is enormous: surveys show 25% of Londoners would like to cycle of cycle more (compared to the 2-3% of trips currently made by cycle), and in some parts of London around 50% of car journeys are under 3 miles in length. The need and opportunity to maximise modal shift requires the same attention by the Mayor as his justified focus on pollution.</p> <p>Further, we note that Oslo has pledged to reduce motor traffic reduction by 20% by 2019, and phase out private car use in its city centre altogether. Large areas of Copenhagen are car-free, and Paris has begun to make areas of the city car free (albeit only at certain times). London, which is of course a much bigger city than those cited can learn from these examples and itself introduce car free zones across the city. Plans to make Oxford Street motor traffic free are an excellent start.</p> <ol style="list-style-type: none"> 3. London , and other cities, should incentivise modal shift for deliveries and services: we also note that there is a significant opportunity to assist businesses to switch to using cycles (including electrically-assisted cargo/freight cycles) to deliver goods and services within cities : local authorities must incentivise modal shift of this kind too, and highlight the joint pilot initiative of the city of Hamburg and UPS as an example of how this may be done. 4. Local authorities should invest in walking, cycling, public transport and smarter car use: funds generated from the charging schemes , as in London, must be used to help ensure that investment in cycling infrastructure/other measures to make cycling safer and more attractive is accelerated and expanded. 5. Local authorities should use models based on the London 	

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						Please insert each new comment in a new row	Please respond to each comment
						<p>Mini-Holland /Healthy Streets programmes (both presented in the Mayor's City for all Londoners document) to reduce pollution hotspots in town centres and high streets: Such programmes help clean up the air in high streets and town centres where localised air pollution can be very high.</p> <p>6. Local authorities should not pursue policies that increase motor traffic, pollution and congestion: Cities must avoid policies that would heighten pollution and thus undermine efforts to improve air quality , through the increased motor traffic and congestion that they would cause. This includes not going ahead with new road schemes unless for purposes of providing new walking, cycling and public transport links.</p> <p>7. Local authorities should join up policies on pollution, climate change transport, public health and quality of life under a unifying strategic framework: Pollution-reduction programmes can be a platform to also drive down carbon emissions (London's 60% carbon emissions reduction target looks increasingly at risk of not being met), reduce congestion, improve public health and create better places to live, work and play.</p> <p>Concluding Remarks</p> <p>Cleaning up air quality is a life and death issue that NICE has rightly put on its agenda. LCC recognises the formidable challenges ahead and the need for civil society to play its role in overcoming the many hurdles to creating pollution free cities where walking and cycling and clean public transport are the predominant forms of travel.</p> <p>The necessity to promote active travel to improve individual health is something that NICE has already documented and on which it has provided relevant guidance to government. We would welcome a similarly strong case to be made for the promotion of active travel as an alternative to the continued growth of polluting motor traffic.</p>	
487	[office	London	Full	General	General	The comments below take your nine questions above in order. On	Thank you for this comment. Your comments

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	use only]	Forum of Amenity and Civic Societies				question 1, the most challenging area may well be establishing clean air zones; but equally this is likely to have the biggest effect if implemented effectively. The challenge will be especially for local authorities, as they will have to balance a series of conflicting priorities including likely controversy. A further challenge will be to implement in a way that is compatible with limited financial resources for them.	will be considered by NICE where relevant support activity is being planned.
488	[office use only]	London Forum of Amenity and Civic Societies	Full	General	General	Question 2. Clean Air Zones could have significant cost implications. But this depends very much on how they are implemented. In London, where this organisation is most involved, the Mayor has already budgeted in costs. Moreover a system of charging for cars and lorries means that direct costs to the public sector will be limited as far as possible. The lesson from this is that charging is likely to be an essential ingredient for clean air zones, which is in any case consistent with the 'polluter pays' principle.	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
489	[office use only]	London Forum of Amenity and Civic Societies	Full	General	General	Question 3. Across the UK, London is ahead of other cities in having considered the issues even though there is much more to do in implementation. So spreading best practice between local authorities in particular is important. So is the involvement of the health sector in raising public awareness about the health risks of air pollution, in order to convince enough of the electorate that there is a problem that needs to be tackled. There is considerably more that could be done in the latter area, for example in using medical premises used by the public to spread the word about the need to address the issue and action that the public can take for example on transport choices. The availability of appropriate expertise will be crucial: not only air quality and health experts, but also planners, traffic engineers and tree experts, with training on air pollution and the motivation to regard it as an important consideration.	Thank you for this comment. The guideline notes the importance of raising awareness, not only for its own sake but also to support other actions to reduce air pollution. Examples of good practice to our local practice collection team. More information on local practice can be found here .
490	[office use only]	London Forum of Amenity and Civic Societies	Full	General	General	Question 4. We are not happy about the way in which reference is made to Defra's proposals on clean air zones. There are several problems. First the reference is to an out of date set of proposals, which are due to be revised following, especially, court judgments during 2016. Second the documents under reference from the NICE draft list only existing plans, at the time of writing the overall Defra plan, by various local authorities and do not refer forward to what might be needed looking to the future; yet virtually every authority of	Thank you for this comment. This recommendation (now 1.3) has been amended to avoid reference to the draft proposals. It is not restricted to NO2 and suggests aiming to meet WHO air quality guideline levels. Questions of the key vehicle classes which

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						<p>those listed recognises that more needs to be done. Third, the plans under reference cover only NO₂, (since the context for these plans was the breach of EU air quality limits); but there is also a substantial issue about the health risks from emissions of particulates. Finally the draft guideline is insufficiently specific about what the principal objectives and coverage of clean air zones should be, including on such basic questions as the choice between petrol and diesel vehicles and Euro standards that should apply. (On this last, it seems important that the guideline does expose the need to limit the use of diesel vehicles in clean air zones.) While we can appreciate that there is a limit to the detail into which the guideline can get, it does need to set out some principles of NICE's own of such questions, rather than simply referring to the plans set out by Defra.</p> <p>In addition, designating an inadequate number of clean air zones will create a danger that the most polluting vehicles would simply be redeployed to other, but still polluted, parts of the country.</p>	may need to be restricted in a particular location will need to be determined by examination of local factors.
491	[office use only]	London Forum of Amenity and Civic Societies				No comments on Question 5.	Thank you for this comment.
492	[office use only]	London Forum of Amenity and Civic Societies	Full	General	General	Question 6. 2 sets of grant schemes could be referred to. First by Defra on funding for local authorities to help establish clean air zones. Second grants by the Department of Transport on funding cleaner vehicles including buses, to address air pollution, including funding from the Office of Low Emissions Vehicles (OLEV). In each case the latest position on the availability of these grants will need to be checked with the departments before finalising the guidelines.	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
493	[office use only]	London Forum of Amenity and Civic Societies				Question 7. Not applicable to this organisation	Thank you for this comment.
494	[office use only]	London Forum of Amenity and	Full	General	General	Question 8. The recommendations at 1.2 clearly do add to the Defra plans, even in the way they are currently drafted, for example in stressing the need to raise awareness of the issue and on	Thank you for this comment. This recommendation (now 1.3) has been amended and does not cross reference to the

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		Civic Societies				considering alternatives to mechanised road travel. But for the reasons given in comments to Question 4 above, NICE do need to flesh out further their views on the objectives and principles that should govern clean air zones, and not over-rely on cross referencing to Defra plans, designed, as noted above, essentially to meet specific EU and UK legal challenges.	DEFRA plans.
495	[office use only]	London Forum of Amenity and Civic Societies	Full	General	General	Question 9. The fact that the draft guideline does cover clean air zones prominently is definitely helpful in associating an influential body, such as NICE, with the need to introduce clean air zones. But the benefits from this to local authorities is diluted by the fact that the draft is not sufficiently specific about the objectives, principles and coverage (especially in terms of types of vehicles covered) that should inform the establishment of clean air zones.	Thank you for this comment. It is not possible to be specific about the means to achieve the overall goals of a clean air zone as these will depend on local circumstances.
496	[office use only]	London Sustainability exchange	Full	4-5	general	<p>Question 1: <u>Planning guidance is crucial for under resourced local authorities.</u></p> <p>Including air pollution in strategic planning across local authority departments will be challenging to implement. Many Local Plans have already being submitted and are being inspected, before the local planning authority can move ahead to the final stage of 'adoption'; the process of creating or changing a local plan is a long and slow one. As stated in 1.1.2, <i>if the local plan does not address air pollution, should consider developing local guidance on how to design buildings and spaces to improve local air quality</i>, however many councils are not properly resourced to take on the task of incorporating air quality issues into their local plans, or developing Supplementary Planning Documents. Nevertheless, planners should be advised on how to refine 'Local Development Frameworks'. Last but not least; unless Supplementary Planning Documents or Air Quality is mentioned in the local plan, there is a lack of policy 'hook' to implement the guidance even if it is written. Thus, further guidance from NICE as to how local plans can consider air pollution would be advised, in order for local authorities to implement this recommendation.</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
497	[office use only]	London Sustainability exchange	Full	4	10	<p>Question 1: <u>Including construction in the guidance</u> Recommendation 1.1.1 suggests to 'assess site plans from an air quality perspective'. This is a good suggestion; it also highlights the</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.

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						<p>need for clear construction guidance for developers and contractors. Clear standards and guidance will make it easier for building contractors to engage. So far there is not enough guidance in implementing the suggestion, one that will undoubtedly be complex to deliver. In a few cases, air quality is sometimes taken into account in planning such as in teh London Borough of Croydon, which is being promoted by teh GLA. However consideration in most cases is light touch and does not take into account the full complexity of the air quality problem. Also more training will be required for officers in order to ensure standards are properly enforced.</p> <p>Construction guidance and training for construction guidance could be considered by local authorities and highways agencies as they create collaborations to reduce pollution.</p>	
498	[office use only]	London Sustainability exchange	Full	5	3	<p>Question 1: <u>Cycle and walking provision</u> Under recommendation 1.1.1 developing cycling and walking routes will be challenging for local planning and transport authorities to implement. Our communities agreed that local authorities need to join up in order to be able to implement this effectively. Routes must comfortably integrate between boroughs and areas. Routes also need to be designed in a way that encourages more people to cycle, for example if local authorities don't design direct routes, people are less likely to cycle a longer route. Thus further guidance is required to assist local authorities in overcoming this challenge, and ensuring the effective implementation of this recommendation.</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
499	[office use only]	London Sustainability exchange	Full	General	General	<p>Question 1: <u>Electric charging points</u> In both 1.1.1, 1.2.3, developing charge points for electric vehicles will be complex for local planning and transport authorities to deliver. More local provision of charge point infrastructure for electric vehicles and low emission car club parking spaces, are essential in order to develop DEFRA's clean air zone's and implement this guidance.</p> <p>The logistics in terms of providing the power to charge electric vehicles may prove challenging in the short term, in terms of locating them and working with the DNO (Distribution Network Organisation providing the power). Making provision within the</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.

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						planning process is fundamental, i.e. developers could be required to provide charging points for all vehicles within the planning process. This will lead local authorities to a low emission economy and more guidance should be provided here to support planners and developers along with effective awareness raising of the need for these measures. Transport and air quality is intimately linked, and when discussing a move to electrification of infrastructure, energy use and efficiency also comes in to play. Further guidance that considers this would be advised.	
500	[office use only]	London Sustainability exchange	Full	General	General	<p>Question 2: <u>Cost implication in strategic planning: skills</u> Including air pollution in strategic planning will have cost implication on councils that are already under capacity. Moreover, environmental and planning officers in councils have limited capacity, and in some cases planning officers do not have the expertise or knowledge required to implement this guidance. Local authorities will need to explore alternative sources of revenue and collaborative partnerships, in order to lead to timely and efficient roll-out of the measures suggested. They might consider developing training programmes for planning officers as they develop partnerships to tackle pollution.</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned. Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
501	[office use only]	London Sustainability exchange	Full	General	General	<p>Question 2: <u>Budgets: costs and savings could be shared</u> Implementation of recommendation 1.2 Clean air zones, will have cost implications. Resources are spread thinly and in particular resources for public engagement. Implementation of cycle routes will undoubtedly also incur costs. Cross department cost benefit analysis showing overall cost reduction from public health budgets from the benefits of active travel/reduced exposure may help in freeing up resource to put towards initiatives, however it is not yet clear how the costs and savings can be shared.</p>	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
502	[office use only]	London Sustainability exchange	Full	General	General	<p>Question 2: <u>Implementation of bylaws, skills and enforcement.</u> In recommendation 1.2.3 using bylaws to support 'no vehicle idling' areas, from discussions with communities and local authorities, there are issues with enforcement. The challenge is that councils do not have the resources to issue penalties notices albeit they can gain income from doing so.</p>	Thank you for this comment. This is now included in recommendation 1.3.5. Your comments will be considered by NICE where relevant support activity is being planned.

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						There is a lack of expertise in enforcement. One point that has been suggested is the potential to add this into the contract of traffic wardens. Nevertheless we believe that further guidance should be provided, such training programmes and guidance could be established as local authorities develop partnerships to tackle pollution.	
503	[office use only]	London Sustainability exchange	Full	5	5	<p>Question 3: <u>Costs and contracts for provision of electric charging points</u> Local authorities find it challenging to implement charge points for electric vehicles in residential and commercial areas, due to being financially restricted, and skills in developing contracts with providers.</p> <p>They could seek support from The Office for Low Emission Vehicles, established by the central government or pool contract negotiation skills for developing relationships with providers as local authorities develop partnerships to tackle pollution.</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
504	[office use only]	London Sustainability exchange	Full	10	9	<p>Question 3: <u>Pollution awareness delivered by health professionals</u> Recommendation 1.6.6 directed at health professionals (health professionals could raise awareness of poor air quality and advise high risk groups on how to minimise their exposure and its impact). There is strong evidence on the effects of air pollutants on vulnerable people's health. Thus this recommendation could be strengthened, whereby health professionals should be advising high risk groups on how to minimise their exposure.</p>	Thank you for this comment. The evidence on raising awareness directed at health professionals was uncertain (evidence review 3) therefore the committee recommended this as an action to 'consider'. Please see the NICE manual on how we develop and word recommendations .
505	[office use only]	London Sustainability exchange	Full	9	13-16	<p>Question 3: <u>Employers responsibility</u> Employers could be made more aware in terms of their responsibility in determining people's choices of transport. Guidance for employers' such as providing support for people to take up low and zero-emission travel, cycling provision showers, loans for public transport, flexible working hours could also help reduce peak congestion, and thus could be included in the guidance.</p> <p>People may get the environmental message, but not have environmental choices to get to work. Further guidance needs to be provided that takes into consideration the social dimension.</p>	Thank you for this comment. These should be addressed in travel planning, included in recommendation 1.2.1.
506	[office	London	Full	General	General	Question 3:	Thank you for your response. Your

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	use only]	Sustainability exchange				<p><u>Guidance for collaboration of local authorities</u> Reference can be made in the NICE guidance to national guidance and initiatives which will be set out in the Modern Transport Bill announced in the Queens speech in May 2016. Secretary of State for Transport, Chris Grayling said, "Our ambition is for nearly all new cars and vans to be zero emission by 2040, and we are taking real steps to achieve this in the Modern Transport Bill" (Oct 2016). They can also refer to the Ultra-Low-Emission-Vehicle strategy from 2013 which lays out a number of points including that "infrastructure should be targeted where it is needed most; to allow people and businesses to make the journeys they want."</p> <p>This points towards a collaborative approach with local implementation, but supported by national initiatives as this localised infrastructure must fit in to wider infrastructure projects such as those for power supply and demand.</p> <p>The current government has committed £600 million over its term to support growth of low emission infrastructure with an initial pot of £35 million to install new charging points announced in October 2016. Linking this to the relevant recommendations for users to take into consideration could be considered by NICE.</p>	comments will be considered by NICE where relevant support activity is being planned.
507	[office use only]	London Sustainability exchange	Full	6	7	<p>Question 4: <u>Clean Air Zones</u> The reference to clean air zones from DEFRA is helpful. Introducing Clear Air Zones in areas outside those targeted by the national plan is a great suggestion. We received positive feedback from our communities that they want more guidance on how policies can be joined up.</p>	Thank you for this comment. It has been agreed to remove the reference to the DEFRA clean air zones draft proposals and the recommendation (now 1.3.1) suggests aiming to meet WHO air quality guideline levels.
508	[office use only]	London Sustainability exchange	Full	6	8-9	<p>Question 4: <u>Reducing the number of vehicles</u> Under recommendation 1.2.1 in encouraging the use of less polluting ways of travel, it is not sufficient to only encourage the use of less polluting ways of travel. The guidance could state that the aim is to reduce the number of mileage by car users.</p>	Thank you for this comment. The recommendations aim to reduce unnecessary motor vehicle journeys and to support zero- and low- emission travel.
509	[office use only]	London Sustainability exchange	Full	6	28	<p>Question 4: <u>Public awareness</u> Yes the guidance does offer holistic addition to the Clean Air Zones</p>	Thank you for this comment. Please note that recommendation 1.7 addresses awareness raising. The committee's discussion section

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						information. However in the Clean Air Zone section of the Guidance, public awareness is limited raising awareness to car-free days. As indicated in the public engagement section of the guidance, wider public needs to be engaged more in order to have their support for the implementation of actions locally. Local authorities implementing Clean Air Zones may need to be reminded to have a strong communications element to their Clean Air Zone delivery.	notes the importance of this in gaining support for other recommendations.
510	[office use only]	London Sustainability exchange	Full	6	12	Question 4: <u>Renewable Energy</u> How the energy is generated has pollution implications. Under recommendation 1.2.3, there could be a suggestion of considering the use of renewable energy. Recommendation 1.2.3 discusses 'support for low and zero emission travel', under which further guidance for considering the adoption of renewable sources of energy can be created. Solar roads, solar bus stops, solar car parking can be developed that could then be used to charge electric cars.	Thank you for this comment. Generation of energy is beyond the remit of this guideline.
511	[office use only]	London Sustainability exchange	Full	6	General	<u>Diesel vehicles</u> The guidance falls short of discouraging the use of diesel vehicles and reducing their number under the clean air zone recommendation. <ul style="list-style-type: none"> • Diesel cars have been shown to be responsible for approximately 12% of the 50% transport related air pollution. • Long-term exposure to combustion-related fine particulate air pollution from diesel vehicles, is an important environmental risk factor for cardiopulmonary and lung cancer mortality. • Exposure of children to traffic pollution in central London is associated with decreased lung function and lung volumes, as discussed by Griffiths et al (2016) in their study of 2,297 children, aged 8-9 living in London's Low Emission Zone. The guidance support limiting diesels in cities.	Thank you for this comment. Recommendation 1.3 addresses restrictions or charges for classes of vehicles. Decisions on which vehicles should be included will need to be made locally based on local issues.
512	[office use only]	London Sustainability exchange	Full			Question 8: <u>Reducing miles driven</u> Under recommendation 1.2.1 it is not sufficient to only encourage the use of less polluting ways of travel; NICE could add further to DEFRA by expressly suggesting a reduction in car use. The	Thank you for this comment. Recommendation 1.1.2 addresses the need to reduce the need for motorised travel.

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						Department for Transport issued a report in 2015, predicting 19-55% growth in miles driven by 2040 (not necessarily by electric vehicles). Local authorities in their own transport plans could identify how they could reduce mileage (for example, reducing a reliance on cars through their travel plans). Further guidance can be created to support the implementation of this.	
513	[office use only]	London Sustainability exchange	Full			Question 9: When considering clean air zones, recommendation 1.2 acts as a point of information whereby communities are able to better understand how clean air zones work and whose responsibility it is. A recommendation ensuring that local authorities include clear information in their action plans, in terms of who is doing what, and the responsibilities of the various stakeholders could be recommended in the guidance.	Thank you for this comment. Recommendation 1.1 on planning has been amended to clarify that air pollution should be included in 'plan making' by all tiers of local government. It is not possible to specify the responsibility of the various stakeholders. Recommendation 1.3.3 (section 1.3 in the final guideline) recommends working across local authority boundaries.
514	[office use only]	Medway Council		general	general	<p>Medway Council are active members of the Kent & Medway Air Quality Partnership, which is a stakeholder for NICE and contributed technical advice and information to NICE in its original consultation on the draft scope in August 2015.</p> <p>The Environmental Protection Team supports the continued development and implementation of the NICE draft guideline on air pollution as the majority of the recommendations are consistent with the Medway Air Quality Action Plan that was adopted in December 2015. The main difference is in the area of Clean Air Zones, and allied to this Congestion Charging. Medway Council is not currently pursuing this type of measure as it was screened out during development of the air quality action plan.</p> <p>The action plan, which is available on the Council's website, contains 12 measures, aimed at tackling poor air quality in the Medway Air Quality Management Areas, but also more widely across Medway.</p> <p>In line with good practice, an air quality steering group has been formed from key Medway Council departments, and includes representatives from Environmental Protection, Integrated Transport, Planning, Public Health, Green Spaces and Procurement. The group is responsible for overseeing further development and implementation of the action plan, and meetings of</p>	Thank you for this comment. We will pass this information to our local practice collection team. More information on local practice can be found here .

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						<p>the group are chaired by the Assistant Director of Front Line Services, providing sufficient seniority to facilitate progress on implementation of measures.</p> <p>We look forward to final publication of the guideline in due course.</p>	
515	[office use only]	Medway Council		1	5	<p>Public Health Team comment</p> <p>The list: healthcare professionals, employers in all sectors etc..... should be included in the section : who is it for and the statement : it may also be relevant for -deleted . We feel the guidance is also relevant for these groups.</p>	Thank you for this comment. This text has been amended to indicate that it is relevant for these groups.
516	[office use only]	Medway Council		4	13	<p>Public Health Team comment</p> <p>Minimising the exposure of vulnerable groups..... – vulnerable group should be clearly defined here and to include pregnant women. Pregnant women are disproportionately exposed and susceptible to air pollutants. Air pollution affects health at every stage of life, including prenatally.</p>	Thank you for this comment. The guideline includes a definition of vulnerable groups. Risk to unborn foetuses has been included in this.
517	[office use only]	Medway Council				<p>Ques 1. Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why.</p> <p>Public Health Team comment</p> <p>The guideline makes recommendations covering various interventions for road transport; however, the effectiveness of these measures will depend largely on the promotion and commitment of implementation. Each local authority faces huge cuts and there are competing priorities. It will be helpful if organisations e.g. PHE take lead in areas such as awareness raising, consistent information provision for both healthcare professionals and the public. This would be a more cost effective approach, avoiding duplication of efforts.</p>	Thank you for your comment. NICE has engaged with PHE throughout the development of this guideline and the guideline will be co-badged. This will support the implementation of the guideline when published.
518	[office use only]	Medway Council				<p>2. Would implementation of any of the draft recommendations have significant cost implications?</p> <p>Public Health Team comment</p> <p>Awareness raising and provision of information to both health care professionals and the public as well as equipping healthcare professionals with adequate training could be costly. The later can be addressed through Continuing PD. Significant cost savings can be realised if agencies such as PHE could take the lead to ensure this information is made available nationally and then amplified</p>	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned.

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						locally.	
519	[office use only]	Medway Council				<p>3. What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.)</p> <p>Public Health Team comment Nationally driven initiatives see comments 2</p>	Thank you for this comment. Recommendations on national policy are beyond the remit of NICE.
520	[office use only]	Medway Council				<p>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?</p> <p>Public Health Team comment Yes certainly, as the guidance is intended to assist local authorities in identifying and implementing appropriate measures to improve air quality. This should complement NICE recommendations.</p>	Thank you for this comment. Please note it has been agreed to remove the reference to the DEFRA current draft proposals for clean air zones and the recommendation (now 1.3.1) suggests aiming to meet WHO air quality guideline levels.
521	[office use only]	Medway Council				<p>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?</p> <p>Public Health Team comment Was research undertaken by Kingsfund considered as well ? : http://www.sussex-air.net/reports/ASPIREreportKingsfinal.pdf</p>	Thank you for this comment. NICE is aware of this work, however it does not look at the effectiveness of interventions.
522	[office use only]	Medway Council				<p>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?</p> <p>Public Health Team comment Not aware of any</p>	Thank you for this comment.
523	[office use only]	Medway Council				9. Does recommendation 1.2 from NICE act as a lever	Thank you for this comment.

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	[office use only]					Public Health Team comment Yes. NICE guidelines are usually more widely available to healthcare professionals and so more likely to support behaviour change among this group.	
524	[office use only]	NHS England				We can confirm that there are no comments to be made on behalf of NHS England.	Thank you for this comment.
525	[office use only]	[North Hertfordshire District Council]	Full	18	27	<p>This section fails to emphasis the cumulative impact of development and the potential for small scale developments to impact on local air quality when considered alongside other local developments. To remedy this there is a need to move away from air pollution modelling as a means of defining the need for air quality mitigation associated with developments. With the exception of major scale developments (e.g. EIA scale development) such modelling will require no air quality mitigation from the developer and even in some major scale developments will reach the same conclusion. Therefore the expectation should be that air quality mitigation is required of all developments, regardless of the scale of the development. The difference between the scale of the development being reflected in the amount of air quality mitigation being required, not a presence or absence of mitigation.</p> <p>There is recognised and good practice in use in pockets across the Country, including the West Yorkshire and the Black Country local authorities and a number of local authorities in Hertfordshire are also implementing such practice. http://www.north-herts.gov.uk/home/environmental-health/pollution/air-quality/air-quality-and-planning</p> <p>Detailed Air Pollution Modelling should still be required for Major developments to ensure that more mitigation, additional to the default for such developments, is required where 'adverse impacts' are actually predicted.</p> <p>The principle of refusal of planning permission on local air quality grounds should remain a viable option for Local Planning Authorities.</p>	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
526	[office use only]	[North Hertfordshire District Council]	Full	19	21	Para.1.1.2 is a reasonable recommendation, but it should be noted that if a Local Authority has failed to get an Air Pollution/Quality Policy in their Local Plan, they will have a considerable battle to get a Supplementary Planning Document accepted. It should also be recognised by NICE that the recent aim (last 5-6 years) of Central	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.

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						Government, much to the disappointment of Local Authority Officers, has been to simplify the Planning Regime and reduce the use of both centrally supported planning guidance and local SPDs. Furthermore, this approach has resulted in air quality being removed as a material planning consideration for a number of categories of developments that fall within the Prior Approval Notification system (e.g. conversion of offices into residential regardless of whether or not they are in or neighbouring an Air Quality Management Area). So this recommendation and the focus on the planning system, whilst welcomed, could be considered to be in conflict with Central Government's view of the planning system.	
527	[office use only]	[North Hertfordshire District Council]	Full	25	16	The planning system provides local authority environmental departments with its most significant opportunity to have a positive impact on local air quality. It enables us to: <ul style="list-style-type: none"> - Influence the location and layout of developments to have regard to air quality and the provision of alternatives to road vehicles for travel - Obtain financial contributions to support the collection of air quality data and understand the impact of development in its area - Influence behaviour and decision making of residents through the effective and enforceable use of travel plans - Remove a barrier to the uptake of Plug-In Electric Vehicles by requiring the incorporation of an EV recharging point in new build commercial and residential developments. 	Thank you for this comment.
528	[office use only]	[North Hertfordshire District Council]	Full	3	4 – 7	All recommendations within these sections have merit. I have not commented specifically on these sections because I have seen the Hertfordshire County Council (joint Highways and Public Health) response to this consultation and I am supportive of it.	Thank you for this comment.
529	[office use only]	[North Hertfordshire District Council]	Full	51	4	An opportunity has been missed to emphasis the potential for local air quality to be incorporated within the school curriculum. This would have the potential to reach children from primary and secondary school age but also raise awareness among parents. Local air quality issues have relevance to many aspects of the national curriculum: <ul style="list-style-type: none"> - Science: biology (respiratory system from inhalation route through to exchange of gases (and other contaminants) to and from the blood stream) chemistry (the nature and behaviour of gases in the 	Thank you for this comment. It is beyond the remit of this guideline to develop recommendations on the content of school curriculum.

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						<p>atmosphere)</p> <ul style="list-style-type: none"> - physics (the structure, size and behaviour of particulates) - Geography: populations and the associated impact on the built and natural environment and how those environments impact on the generation and behaviour of air pollutants - Citizenship: how the behaviour and decisions taken by individuals impacts on the well being of themselves and others. <p>the roles and responsibilities of central government, local government and health authorities in working to ensure the well-being of the population</p> <p>School education packs are in existence (and could be developed further) as a means of providing local context to the importance of the role of science and geography etc while raising awareness and encouraging behaviour change.</p>	
530	[office use only]	[North Hertfordshire District Council]	Full	1	1	It is valuable to have NICE involved and recognising the public health issues arising from local air pollution. It is hoped that NICE can use its status to maintain the visibility of air quality as a significant health issue and bring influence to bear on decision makers in terms of the need for appropriate resource allocation, legislation and a coherent government approach. However, the document is not ambitious or demanding enough to make a significant difference at this stage. It largely regurgitates practices that exist in a patchwork across the Country and in some instances fails to recognise some best practice and a number of opportunities.	Thank you for this comment. It is the intention that the guideline will support evolution of best practice across the country. Please note that information can be shared with our local practice collection team. More information on local practice can be found here .
531	[office use only]	Public Health England				Public Health England (PHE) welcomes the NICE guidelines as they will help local authorities with their plans to improve air quality and thus prevent a range of adverse health effects associated with air pollution.	Thank you for this comment.
532	[office use only]	Public Health England				<p>We would like to make the following observations:</p> <ul style="list-style-type: none"> • We welcome the publication of these guidelines to support decision making at local authority level. PHE recognises the need for clear and unambiguous local guidance on interventions. • These guidelines will facilitate discussions about the link between air quality and health & wellbeing e.g. link with active travel and measures to improve physical activity. We are pleased that the 	Thank you for this comment. While no formal published evidence on planning elements was found NICE took expert testimony to help formulate the recommendations.

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						<p>guidelines recognise that walking and cycling are good for our physical and mental health. Switching more journeys to active travel will improve health, quality of life and the environment, and local productivity, while at the same time reducing costs to the public purse. These are substantial 'win-wins' that benefit individuals and the community as a whole.</p> <ul style="list-style-type: none"> We note that there are a number of recommended interventions and we recommend that any intervention put in place is evaluated in order to strengthen the evidence base. We welcome the guideline recommendations to include air pollution in strategic planning across local authorities and the assessment of site plans from an air quality perspective so as to minimising for example, the exposure of vulnerable groups to air pollution by siting buildings away from busy roads. We would question whether planning elements such as 'permitted development rights' have been considered within the guidelines / evidence gathering and what measures or advice could be used to encourage the consideration of air pollution interventions in these planning decisions. 	
533	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	General	General	<p>Outdoor air quality and health is an important issue for Royal Borough of Greenwich (RBG) Public Health and Wellbeing Team. We have recently completed a Joint Strategic Needs Assessment on Air Quality – see Air Quality chapter. This will be presented to our Health and Wellbeing Board (HWB) and will inform the next iteration of our HWB strategy (due to take effect from 2018).</p> <p>Having a completed NICE Guideline would help with Local Authorities such as ours to complete JSNAs and this should be considered as a key audience for the Guideline.</p>	Thank you for this comment. The 'who is it for?' section in the overview text of the final guideline includes local authority staff working in public health.
534	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	General	General	<p>Based on the research for our Joint Strategic Needs Assessment, we concluded that the following three areas would be the most important to focus on to lead to benefits for air quality and also co-benefits for health:</p> <ul style="list-style-type: none"> Bold action to encourage a strong modal shift towards active forms of transport – walking and cycling. This may include traffic management, car-free days, walking clubs, or initiatives with schools and workplaces. 	Thank you for this comment. These areas are addressed in the guideline.

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						<ul style="list-style-type: none"> • Planning for healthy environments - such as making new developments walkable, cycle-able and less car-orientated. Embedding approaches such as Healthy Streets into regeneration and development planning, developing a walkable Green Grid and aligning cycling infrastructure across the Borough can all help. • Work to reduce health risk among the most vulnerable groups - young people, older people and those with pre-existing diseases. Potential actions could be running anti-idling measures at schools and hospitals, delivering educational sessions for schools about active travel, and awareness-raising through our Expert Patient Programme. 	
535	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	General	General	<p>Air pollution is fundamentally linked with other determinants of population health: particularly levels of physical activity, aspects of the built environment which can promote physical and mental health, and levels of greenhouse gas emissions.</p> <p>Cleaning up air quality has the potential to deliver strong co-benefits: actions that improve air quality, increase physical activity and reduce emissions will address three of the major public health problems at once.</p> <p>The guideline would be strengthened if these co-benefits from improving air quality could be more thoroughly included and considered throughout. For example, see points 6, 7 and others below.</p>	Thank you for this comment. The focus of this guideline is air pollution, however co-benefits such as physical activity are referred to and links to other NICE guidelines are included.
536	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	4	5	<p>Incorporating AQ concerns into the local plan is essential to ensure the built environment is developed in a way that improves air quality. In Greenwich, several Borough-level strategies – such as the Local Plan – include explicit objectives to improve air quality.</p> <p>It may also be useful to refer to other local strategies – such as Growth Strategies, Health and Wellbeing Board strategies, Transport Strategies – which should also refer to Air Quality.</p>	Thank you for this comment. The recommendation has been amended to include other strategies, including health and wellbeing strategies.
537	[office use only]	[Public Health and Wellbeing Department,	Draft Guideline	4	10	We agree that it is important to assess site plans and development plans from an air quality perspective; however are mindful of the potential resource implications involved.	Thank you for this comment. We have passed your comments to the NICE resource impact assessment team to inform their support

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		Royal Borough of Greenwich]					activities for this guideline.
538	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	4	13-17	<p>This recommendation would benefit from adding reference to the co-benefits that could come about from planning in a healthier way. For example, designing developments in a way which is away from roads *and* provides safe space for children to play could improve both AQ and levels of physical activity.</p> <p>See for example Bornat D, <i>Housing Design and Community Life</i> Research Project. Online here.</p>	Thank you for this comment. Co-benefits are discussed in the committee discussion section. However, please note that the guideline focuses on air pollution.
539	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	5	3-4	<p>Providing infrastructure for walking and cycling is likely to lead to larger benefits for health than is providing charging points for Electric Vehicles, due to the additional co-benefits that come from increased physical activity. This should be noted.</p> <p>Furthermore, infrastructure for cycling and walking should be implemented in a way which is appealing and accessible to the whole community – particularly those (older people, young people and those with LTCs) who are more at risk from negative impacts of air quality. The GLA's "Healthy Streets" approach is one useful way to ensure active transport infrastructure is in place for all parts of the population – not just those who are already active.</p>	Thank you for this comment. The guideline notes the additional co benefits from physical activity.
540	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	5	20-22	As noted in point 5, again we are mindful of the resource implications involved and it would be useful to clarify whether CIL moneys can be used for the purpose of funding posts to ensure the implementation of these plans.	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
541	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	6	6-9	<p>Royal Greenwich is implementing a Low Emissions Neighbourhood – see here. In addition to those suggested actions for inclusion (lines 7-9), our LEN aims to implement:</p> <ul style="list-style-type: none"> • car-free days in the town centre • new technology trials to encourage the take-up of electric vehicles or vehicles with cleaner emissions • new, green public spaces and pocket parks • community-focused streets that are more pedestrian- and 	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .

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						<p>cyclist-friendly</p> <ul style="list-style-type: none"> • an incentive scheme to encourage walking and cycling • bus priority measures • initiatives to improve air quality in and around schools • better management of freight and servicing transport to help reduce local pollutants in the air. 	
542	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	6	13-14	Encouraging walking and cycling is likely to lead to larger benefits for health than is encouraging Electric Vehicles, due to the additional co-benefits that come from increased physical activity. This should be noted.	Thank you for this comment. The additional benefits of physical activity are noted in the discussion section.
543	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	6	22-25	Many Public Health teams already have good existing work with schools, hospitals and care homes. If Transport teams were to work on supporting no-vehicle idling areas at these locations, it may be useful to do so in conjunction with public health teams	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
544	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	6	21	Another fuel-efficient driving initiative which may be worth mentioning is fleet recognition schemes, such as the ECO-Stars initiative. We work with fleet operators across Greenwich to drive fleet improvements using this scheme.	Thank you for this comment. Reference to fleet recognition schemes has been added (see recommendation 1.3.5).
545	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	9	2	<p>While siting cycle routes away from highly polluted areas is desirable, it is also essential that they are sited in locations which will make them used.</p> <p>There is clear evidence that at current levels of pollutants witnessed in the UK today, the benefits of physical activity outweigh the pollution risks, except for groups with existing vulnerabilities (such as COPD sufferers). Therefore providing good cycling infrastructure should be the priority, and while siting away from highly polluted roads is ideal it should not be considered essential.</p>	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline 'physical activity: walking and cycling' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.
546	[office	[Public Health	Draft	9	13-19	It is important that any communications for the broad public continue	Thank you for this comment. The guideline

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	use only]	and Wellbeing Department, Royal Borough of Greenwich]	Guideline			to emphasise the benefits of active travel and physical activity which, for the majority of people, outweigh the risks posed by exposure to air pollution. While exercising does increase respiration and therefore increase exposure to pollutants, ^x there is no evidence that increased exercise in levels of pollutants experienced within London would have any negative impact for people without particular vulnerabilities. ^{xi} In fact models have shown that the health protection offered by exercise far outweighs the negative impacts, at even the highest levels seen in London. ^{xii}	emphasises the benefits of active travel.
547	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	9	17-19	We currently commission the AirText service in London along with several other Boroughs and the GLA. While writing the JSNA we became aware of the recent Welsh study on negative impacts of a personal alert system (<i>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</i>). It would be useful if the NICE guidelines produced concrete recommendation on the use or otherwise of such systems	Thank you for this comment. NICE was aware of this study which was published after the completion of the reviews relating to the use of air alerts. This study is now included in the updated evidence review 3 . It does not provide adequate evidence to support a more definitive recommendation. The guideline includes a research recommendation to address this gap.
548	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	9	21-27	It is important that any communications for the broad public continue to emphasise the benefits of active travel and physical activity which, for the majority of people, outweigh the risks posed by exposure to air pollution. While exercising does increase respiration and therefore increase exposure to pollutants, ^{xiii} there is no evidence that increased exercise in levels of pollutants experienced within London would have any negative impact for people without particular vulnerabilities. ^{xiv} In fact models have shown that the health protection offered by exercise far outweighs the negative impacts, at even the highest levels seen in London. ^{xv}	Thank you for this comment. The guideline emphasises the benefits of active travel.
549	[office use only]	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	Draft Guideline	10	27-28	An additional at risk groups are those at risk geographically – i.e. those living in high-pollution areas or next to main roads.	Thank you for this comment. The groups considered as 'vulnerable' for this guideline is based on expert paper 1 .
550	[office use	Royal Borough of	Full	4	13	The council acknowledges the importance of protecting vulnerable groups although the effects of air pollution are experienced by all	Thank you for this comment. The guideline addresses all groups, however in some

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	only]	Kensington & Chelsea (Officer level response only)				groups. NICE guidelines, therefore should not only single out vulnerable groups but include all groups.	circumstances additional consideration for those who are particularly vulnerable is justified.
551	[office use only]	Royal Borough of Kensington & Chelsea (Officer level response only)	Full	5	11-19	This section should suggest the restriction of daytime commercial deliveries in the planning permission	Thank you for this comment. Consideration of delivery planning is included in recommendation 1.3.5.
552	[office use only]	Royal Borough of Kensington & Chelsea (Officer level response only)	Full	7-8	general	This section should include recommendations and measures for Council's to discourage vehicle transport and to take up active travel including provision of access to bicycles, etc.	Thank you for this comment. The guideline contains recommendations to reduce unnecessary motor vehicle travel and to encourage zero- and low- emission travel (including walking and cycling).
553	[office use only]	Royal Borough of Kensington & Chelsea (Officer level response only)	Full	General	General	The council's Local Plan policies and Supplementary Planning Guidance cover similar issues to those highlighted in the recommendations and ensure that local air quality impacts are taken into account as part of the planning process. The Planning related recommendations set out on Pages 4-5 are therefore welcomed and supported by the council.	Thank you for this comment. We will pass this information to our local practice collection team. More information on local practice can be found here .
554	[office use only]	Royal Borough of Kensington & Chelsea (Officer level response only)	Full	general/ 10	general /5	In addition to scheduling deliveries to minimise congestions, freight consolidation and logistics should be recommended. This should not only be a part of section 1.6, but also a recommendation for Council's to implement as part of our own services	Thank you for this comment. Freight and deliveries are addressed in recommendation 1.3.5. Addressing public sector vehicle emissions are included in recommendation 1.3.5 and 1.4.
555	[office use	Royal Borough of	Full	5	11-19	This section should suggest the restriction of daytime commercial deliveries in the planning permission	Thank you for this comment. Consideration of delivery planning is included in

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	only]	Kensington & Chelsea (Officer level response only)					recommendation 1.3.5.
556	[office use only]	Royal Borough of Kensington & Chelsea (Officer level response only)	Full	9-10	general	Members of the public can also help reduce congestion by selecting "green van slots" for deliveries (a method to consolidate deliveries to single area to reduce the number of multiple vehicle trips) or to have packages delivered to designated drop-off locations in neighbourhoods. It would be recommended that NICE guidance included this in general public actions. In order to raise public awareness of this a Business action should include the provision of environmental information to members of the public about green van slots and consolidated delivery locations. Business should highlight air quality benefit alongside the climate change benefit of using these	Thank you for this comment. No evidence was seen relating to this issue. However, from the committee discussion recommendations about considering actions to address congestion from deliveries has been included (see recommendations 1.3.5 and 1.7.5).
557	[office use only]	Royal College of General Practitioners	General			A document which must be supported and gives a thoughtful summary of suitable measures-educational,fiscal and legislative to try an effect behaviour change and new technology where the economic consequences may be considerable and yet the health consequences seem increasingly grave	Thank you for this comment.
558	[office use only]	Royal College of General Practitioners				The epidemiology is rather uncertain, and the true problem in shape, size, scale and over time hard to enumerate. The use of Health needs Assessment and Health Impact Assessments are essential	Thank you for this comment. Overall evaluation of the extent of the problem nationally is based on reports from COMEAP. Evaluation of the health impact locally would require additional work. Your comments will be considered by NICE where relevant support activity is being planned.
559	[office use only]	Royal College of Physicians and Surgeons of Glasgow	Full	general	general	This guideline is extremely welcome and has the potential to make a big impact on both the general public's awareness of the health hazards of air pollution in addition to encouraging changes in behaviours related to air pollution and to lead to fundamental changes in infrastructure which will hopefully lead to a healthier outdoor environment which will benefit the health of the population. The College welcomes the overall thrust of the guideline which is in line with its own object of improving the health of the whole population. There are however implications for people with chronic	Thank you for this comment. The guideline is aimed at local authorities and it is beyond NICE remit to develop recommendations for central Government. Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .

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						<p>respiratory and cardiac disease. We have taken advice from experts in Public Health and respiratory disease.</p> <p>There is no doubt that outdoor air pollution is a major cause of poor health. The understanding behind this relationship is complex, quite incomplete in many ways and has been so for many years. Nevertheless, there has been a developing acceptance that air pollution to any degree is potentially harmful, particularly for those who have established illness, but not exclusively so, because some cancers are also air pollution related, where it is thought that worldwide, 1.3 million lung cancers occur annually from this cause. ¹</p> <p>The Clean Air Act of 1956 was the UK Government response to the major disaster in London in 1952 when thousands of deaths occurred during a period of high air pollution. Perhaps, the unfortunate consequence of the 1956 Act was that there was an implication from the name that the air was then safe to breathe, and if maintained at that level would deal with any threats to air quality, which manifestly it did not. More recently, there have been a steadily increasing number of scientific papers about aspects of air pollution and health, which have reinforced epidemiological links with insidious lung pathology, cardiovascular diseases, and carcinogenicity. A sentinel publication in 1993 from Harvard clearly linked higher level pollution with cardiopulmonary disease of all causes in a prospective study in six US cities.² Likewise, the practical application of improving science, largely reflecting better measurement and analysis of inhalable particles, has significantly advanced research in the subject. One major example, concerns small particles, which were previously thought to be innocuous, and of little relevance to medicine, now recognised as highly important because of their ability to move across the lung into the circulation.⁴</p> <p>In recent years, air pollution control limits have been introduced across the world in an attempt to reduce the effect on health, although the accepted control limits vary from country to country depending on the rules and vagaries of government which are sometimes with the best intention in mind rather than most effective. Small particle and NO₂ exposure, largely from vehicle exhausts are</p>	<p>The guideline makes recommendations on awareness raising (section 1.7), which includes an action to consider on providing information on air quality with weather forecast and pollen index.</p> <p>In relation to the final point made by the stakeholder on correcting an engineering induced problem, NICE received a remit to produce guidance on reducing the ill-effects of outdoor air quality on health and the scope defined the focus on how local authorities can reduce exposure to air pollution from road traffic. The public consultation of the scope did not highlight this issue. Please note there is a surveillance process for future update.</p> <p>Please note the guideline links to NICE guidelines on physical activity: walking and cycling (PH41) and physical activity and the environment (PH8) which addresses issues related to infrastructure and planning.</p>

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						<p>now recognised as key factors, particularly related to the widespread use of diesel fuel. There is strong evidence from clinical and scientific studies, which links these exposures to the development of stroke and myocardial infarction as well as exacerbation of chronic lung diseases such as COPD and asthma. Consequently, the established advisory groups which deal with these environmental issues (COMEAP in the UK) have drawn attention to the risks, and NICE has produced the draft guideline. The guideline is a collection of the evidence and proposals, which support further controls of air pollution in the UK in an attempt to prevent the associated diseases in a manner successful for cigarette smoking. It is recognised that public behavioural change is an aspect of this, for instance the advised change in the use of cars, and making sure that those in the population who are most susceptible are not exposed to the pollutants.</p> <p>A similar approach has been adopted in several states in the USA (e.g. 'Save the Air' in California) where practical pollution education begins in schools and also gives advisory forecasts about air pollution so that people who wish to exercise can do so when the air pollution levels are lowest, or if affected by illness, can then modify activity or remain indoors. Likewise, in Scotland, there is a predictive alert text message system in use for patients with cardiac and pulmonary disease (Know & Respond), which is funded by the Scottish Government – about 1000 patients are registered on this free website, but uptake has been slow. In a focus group study performed by our own group that looked at high-level training in Scottish university students, one student from the USA commented about this knowledge system.⁵ "That's great. I can plan my training here just as I did in New York". In the same study we asked a graduate jogging group about their knowledge about avoiding traffic fumes when running where we found that none took precautions about such exposures. Running in well-lit main streets was a major practise because of concern about safety issues in city backstreets where pollutants would have been lower. In a different type of group (patients on long term oxygen) we found that 60% had text access, and that 40% used a mobile phone only for emergency calls. It is recognised that such patients often have low incomes and live close to major roads. In the east end of Glasgow many chronic lung disease patients who attend for hospital management,</p>	

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						<p>live on the major thoroughfares. ⁶ It is a reasonable hypothesis that air pollution linked to poor building design and poor street ventilation with nearby heavy industry has been at least part of the cause of the high mortality and morbidity figures in industrial cities such as Glasgow, which remain among the worst in Europe.</p> <p>The proposal from NICE is that individuals are encouraged to minimise use of polluting vehicles in cities, and to gradually change to non-polluting transport. Likewise, it is advised that traffic is kept away from houses, and those who are susceptible to effects of air pollutants. Town planning must therefore play a major role in this to make sure that roads are well ventilated and that airflow is not slowed by trees for instance as the report points out. Likewise it would seem sensible to have the largest working populations sited at the edge of conurbations rather than centrally, for example, in health care or manufacturing, when critical exposures in pollution incidents might then be less harmful, and travel related pollution diluted by cleaner air because of shorter, and perhaps more fuel efficient journeys. It is fair to say that these latter thoughts do not seem to be a consideration in Scotland so far, although historical planning errors are part of our inheritance, such as major motorways built through the middle of major cities. In a tangential way it is reasonable to assume that if our sandstone buildings are affected by air pollution then our people are too.</p> <p>Clearly, the draft document is a worthwhile objective, however the mechanism of change is largely left to the effectiveness of local government statute enforcement or central government legal change. Some pollution incidents have already been managed locally in susceptible areas of the world. Paris, Athens and cities in China have restricted vehicle access during high pollution episodes. The international convention for city marathons is to host these on Sundays so that the athletes do not have to contend with traffic as well as the exhaust. A similar simple solution should be also applicable for patients. An additional question, which has not been addressed by NICE, is quite why engineers are not correcting an engineering induced problem?</p>	
560	[office use only]	Royal College of Physicians and Surgeons	Full	51	Section 1.6	<p>There are two aspects here.</p> <p>Firstly, education and awareness as to the harmful effects of air</p>	<p>Thank you for this comment. The committee's discussion section notes that education (addressed in recommendations</p>

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		of Glasgow				<p>pollution. Secondly, measures that can be taken to mitigate harmful health effects of high level of air pollution exposure, especially for vulnerable groups.</p> <p>In the first instance, we would encourage a greater emphasis on education, especially in the following groups:</p> <ol style="list-style-type: none"> 1) School children. If we can change the mind-sets of our younger members of society regarding air pollution, this will have great benefits in the future 2) Health care professionals: Improving the understanding of the harmful effects of air pollution for health care professionals will increase the priority this is given in clinical practice (an area lacking at present). Encouragement of healthcare organisations to arrange more educational events/opportunities incorporating air pollution issues would be beneficial 3) Vulnerable patient groups. With greater education and understanding within the healthcare professional groups, improved education to targeted vulnerable patient groups will be possible. <p>Secondly, specific education as to measures that can be taken to combat the harmful effects of air pollution, will complement the above and can be incorporated into patient self management plans, in collaboration between health care professionals and patients.</p> <p>We are keen that these matters are strongly highlighted in the guidance</p>	1.4.1 to 1.4.5) is an element that can help alter driving behaviour. The recommendations on awareness raising (section 1.7) includes specific recommendations for health care professionals and vulnerable people.
561	[office use only]	Royal Town Planning Institute	Full	General	General	<p>Question 1: The guidance strengthens the links between public health, environmental health and planning to address issues for development, which is welcome. The RTPI has been calling for an integrated approach to public health issues at local level for example in our publication Promoting Healthy Cities. While none of the implementations may have significant cost implications for the recommendations in section 1.1, it should be noted that there has been a 46% change in budgeted spend for planning and development in single-tier authorities and country councils from 2010-11 to 2013-14. The recommendations would take time and expertise to implement for planning departments that are under</p>	Thank you for your response. Your comments will be considered by NICE where relevant support activity is being planned. We have also passed it to the NICE resource impact assessment team to inform their support activities for this guideline.

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						<p>pressure.</p> <p>Question 3: It would be beneficial for planners to have examples of good practice around planning new developments and avoiding unintended adverse effects on air pollution, for instance new schemes where monitoring has suggested a reduction in motorised travel, or best design practice that avoided exposure of residents to air pollution in high-density environments.</p>	
562	[office use only]	Royal Town Planning Institute	Full	4	11	<p>Question 1: We strongly support “Siting new buildings and estates so that the need for motorised travel is minimised.” However we need to be very clear what “siting” means here. Our chief concern is that the right <i>locations</i> for development are chosen. For example within a county, are locations in and adjoining existing towns chosen, or are far flung locations chosen. Given that local planning authorities often control only part of functional economic areas, NICE is right to refer to “strategic planning” but this needs to be understood to embrace planning over wide areas involving a number of adjoining planning authorities. This can be very challenging indeed although steps are being made in the right direction in a number of places. The RTPI gives further insight in to this activity in its policy paper on this subject.</p> <p>Current government policy in the National Planning Policy Framework (NPPF) can militate against this where the emphasis is on the speed of housing delivery and on providing a return to land owners and developers. Remote locations can be easier and faster to purchase and develop. Our Location of Development research is currently monitoring this issue for 165,000 housing permissions across England. To date the performance of the English planning system is reasonably satisfactory: 75% of homes within 10 km of a major employment cluster 13% within walking distance of a train or metro station 46% within an existing built up area</p> <p>Close attention should be paid to any changes in the NPPF following the Housing White Paper expected in early 2017 which might alter the balance between sustainability objectives and maximising the number of housing permissions.</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned. We have also passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
563	[office	Royal Town	Full	4	13	Question 1: We are concerned that the approach NICE is taking	Thank you for this comment. Your comments

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	use only]	Planning Institute				<p>runs contrary to urban design best practice. "Siting buildings away from busy roads" would encourage and perpetuate a long-standing and lamentable trend of car-based city design solutions which create unwelcoming urban environments with high degrees of separation between communities and discourage walking and cycling.</p> <p>Main roads may well be suitable locations for high density development which can take advantage of high frequency bus or tram services running along them, and of ample cycling and walking facilities. The aim should be to change the characteristics (and thus the pollution generated) of such private and polluting vehicles, not to drive buildings away from them. The DCLG and DfT Manual for Streets p 53 shows how wide roads can be very suitable places for siting buildings provided that their "business" is better managed.</p> <p>By reallocating road space a far greater number of useful social economic and health outcomes can be achieved. The priority should be to reduce traffic emissions substantially, <u>not</u> to shape urban form so as to accommodate them.</p>	will be considered by NICE where relevant support activity is being planned.
564	[office use only]	Royal Town Planning Institute	Full	4	15	<p>Question 1: The location of schools is a very problematic issue in urban planning which involves consideration of a wide range of issues. We would agree that schools should not be located on busy roads. But also, they must be located in places where access by sustainable modes of travel is the obvious choice. Ideally therefore easy access to bus routes is critical, as is avoiding car dependent locations in remoter residential areas. Good urban design can address – and solve - these questions.</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
565	[office use only]	Royal Town Planning Institute	Full	4	18	<p>Question 1: We are concerned that the approach NICE is taking runs contrary to urban design best practice. "Avoiding the creation of street and building configurations (such as street canyons)" could (if applied insensitively) damage the close relationship between building and street which is the foundation of good urban design. We would agree that the use of very tall tower like buildings in confined spaces can be undesirable for a variety of reasons (wind for example). But a reasonable building height in close proximity to</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.

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						<p>the street is good practice because it enables good use of urban land, discourages “dead frontages” and encourages the use of streets by walking and cycling. The DCLG and DfT Manual for Streets (p 53) and the Urban Design Compendium from the Homes and Communities Agency illustrate best practice on road width to building height ratios. Generally speaking the wider the road the higher the building.</p> <p>Again the priority must be to reduce emissions, not accommodate them.</p>	
566	[office use only]	Royal Town Planning Institute	Full	5	7	<p>Question 1: Most local plans have now gone through the system, post publication of the NPPF. Although many local authorities have now published SPGs or SPDs on air quality, for a local planning authority to develop a SPD/SPG to address air quality, there should be a 'policy hook' in the Local Plan, which may not be present in each case.</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
567	[office use only]	Royal Town Planning Institute	Full	5	14	<p>Question 1: We support the proposals around travel plans. The questions for practice are: Can this be achieved through a Section 106 agreement? Is there is a strong local plan policy to base this on? Will DCLG and the Planning Inspectorate will support <i>refusals</i> of permission in cases where developers are not prepared to make such plans? (According to the NPPF <i>development viability</i> is an overriding criterion in such cases.) How can they be enforced in a time of severe constraint in local planning departments resources?</p>	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
568	[office use only]	Royal Town Planning Institute	Full	18	11	<p>Equality issues: Planning has an important role in tackling the inequality of access to services, as outlined in research published by the RTPi in May 2016 (Poverty, Place and Inequality). The location of new developments has also a range of social and economic as well as environmental impacts, which is the focus of the next report in our Location of Development work programme.</p>	Thank you for this comment.
569	[office use only]	Somerset County Council Public Health		general		<p>The need to reduce motor vehicle usage in urban areas, and in particular diesel vehicles, is paramount and is not stated sufficiently strongly in the draft guidance. An exception can be made for EuroVI vehicles on the basis of real world testing, and the same may be</p>	Thank you for this comment. The guideline includes recommendations aimed at reducing unnecessary motor vehicle traffic and for a move to zero- or low- emission vehicles (and

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						true for Euro6 vehicles in due course. A strong message from NICE on this would be extremely helpful to local authorities in making the case to the public, businesses and fleet managers for reducing older diesel vehicle usage, and considering other transport choices.	active travel). Recommendation 1.3 addresses restrictions; however as noted in 1.3.2 the classes of vehicle restricted or charged will need to be determined locally based on an assessment of the local sources of air pollutants.
570	[office use only]	Somerset County Council Public Health		6	1-3	Street trees have many beneficial effects for health and wellbeing, including flood prevention, reduction of street level temperature in summer, positive mental health etc. I am concerned that this recommendation, based on weak evidence, may be used by highway engineers as another reason to avoid having street trees, or even to remove existing trees.	Thank you for this comment. The recommendation has been amended and including vegetation where this does not restrict ventilation is now in recommendation 1.1.2.
571	[office use only]	Somerset County Council Public Health		6	10-11	Recognition that the current limits are just that; limits, not targets below which no further action is required, is welcome. However, it would be helpful to make clear how far below the current limits action to improve air quality is likely to be cost-effective. Is there scope to recommend, on the basis of cost-benefit, interim targets below the current limits?	Thank you for this comment. Recommendation 1.3.1 includes aiming for WHO levels.
572	[office use only]	Somerset County Council Public Health		7	5-6	There is evidence that parking controls and demand-responsive charging are effective at reducing traffic circulating to find a space to park, which may amount to up to 10% of moving traffic at times.(http://shoup.bol.ucla.edu/CruisingForParkingAccess.pdf) Similarly real time advance signage of car park spaces available can avoid the same problem of cars circulating or idling waiting for spaces at full car parks, or cruising for on-street parking. See the work of Donald Shoup for the evidence. Parking controls and intelligent charging policies can be a more cost-effective solution to congestion and flow issues than congestion charging. The availability of parking, especially free parking, at home and destination is also key to travel mode choices. Much of the evidence is not from the UK, so there may be a research requirement here for UK evidence.	Thank you for this comment. Parking policies are included in recommendation 1.2.1.
573	[office use only]	Somerset County Council Public Health		9	2-11	I am deeply concerned at this recommendation. Cyclists, current and potential, want to get from A to B quickly and safely, just like any other road users. Often circuitous back street and off-road routes which do not enable cyclists to reach their destinations, such as urban high streets, are far from ideal, and especially for home to work journeys at peak times, just when you want to achieve modal	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline ' physical activity: walking and cycling ' (PH41). Reference to the need for visibility and for

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						shift. Cycle routes need to go where people in general need to go. Surely the recommendation should be to reduce the pollution on these roads by addressing the source, not discouraging non-polluting modes such as cycling, bearing in mind that pedestrians are still, presumably expected to use these roads, and residents live alongside them. There are measures that should be taken to reduce motor vehicle volume on such roads, and to provide kerb or parking separated cycleways, that have the benefit of providing greater separation from motor traffic of residents and other kerbside users. The suggestion to use dense foliage as a screen is likely often to present a safety hazard regarding visibility, and potentially to reduce the sense of subjective safety for the cyclist.	consideration relating to personal safety have also been added.
574	[office use only]	Somerset County Council Public Health		10	8	Currently DEFRA issues air quality alerts, but the focus of these is entirely on the potential victims of poor air quality, and not on the source. At the very least when air quality is forecast to be poor, DEFRA should be advising against driving in the affected areas, particularly diesel vehicles. At local authority level I would suggest that the Director of Public Health should also issue such advice, and government should consider whether powers are needed to enforce non-driving during episodes of high pollution, whether at national, regional or local level.	Thank you for this comment. The wording in the recommendation has been amended to clarify source of the daily air quality index and methods to disseminate this information has been noted in the recommendation. However as the evidence was uncertain these are actions to 'consider'.
575	[office use only]	Somerset County Council Public Health		general		There are many potential measures available to highway authorities to reduce air pollution through traffic reduction measures. There is considerable evidence around the issue of induced demand, whereby new and "improved" roads and junctions with greater vehicle carrying capacity induce new journeys and traffic, with congestion soon problematic again. Eg Purnell et al, World Transport Policy and Practice 5(2) 1999, pp28-48. Conversely, removing capacity for motor vehicles can reduce traffic, which simply disappears rather than being shifted. There is emerging evidence for this in Waltham Forest where the mini-Holland scheme is reducing traffic. Both phenomena arise from the multiple small decisions people make about journey choice and timing, bearing in mind that in urban areas around 40% of trips are very short. Reducing motor vehicle traffic should be a recommendation in itself.	Thank you for this comment. The guideline makes recommendations aimed at reducing unnecessary motor vehicle journeys and to achieve a modal shift to zero- or low-emission vehicles, including active travel. Evidence from schemes such as those you mention may be considered when the guideline is updated in line with NICE processes.
576	[office use only]	Somerset County Council Public Health		4	15-17	Schools should ideally be located within their catchment neighbourhood. Locating schools in less polluted areas (greenfield?) could mean many more car trips on the school run with an overall negative public health impact, not just from air pollution. I would suggest wording to the effect that location of schools should take	Thank you for this comment. This recommendation has been amended to avoiding locating them in areas where pollution is high for clarity.

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						account of air pollution, with measures taken to reduce it in the vicinity of schools.	
577	[office use only]	Somerset County Council Public Health		4-5		There is an issue with cumulative impact, which is not addressed by this guidance. Each major application will typically include a traffic assessment, and this will also often include an air quality impact assessment which will invariably conclude that the impact of the development will be negligible. There is a need to address cumulative impact in the local plan process, as each individual development places upward pressure on pollution levels towards the air quality limits. Setting a lower target level may help with resisting car based developments. At present it appears virtually impossible to resist individual residential planning applications on the basis of air quality considerations.	Thank you for this comment. The guideline includes incorporation of air pollution issues in strategic plans such as the local plan to address these issues.
578	[office use only]	South Gloucestershire Council	Full	general	general	<p>You state that the guidance is aimed at local authority staff working in Planning, Transport, LAQM, and Public Health / Environmental Health, yet other than public health none of those professions were represented on the committee members' panel who appear to be mainly drawn from a public health / epidemiology background.</p> <p>In South Gloucestershire, Planning and Transport professionals are often very aware of the health issues around air quality and take account of this agenda. There already exists guidance in these areas, provided for example, by the National Planning Policy Framework (NPPF) and Guidance (NPPG) and the Department for Transport, in addition to guidance provided by relevant professional bodies such as the Royal Town Planning Institute and Town and Country Planning Association.</p> <p>The NICE recommendations in general are less robust than those already provided by other organisations listed above. Therefore, an evaluation of the conflicting evidence, to provide evidence-based guidance on taking one course of action over another would be welcome.</p>	Thank you for this comment. Although the committee included topic members with a public health and epidemiology background it also included members with expertise in the areas you identify.
579	[office use only]	South Gloucestershire Council	Full	4	4	Planners and Transport Planners are already provided with guidance on these areas and from our experience have been taking it into account for some time. What we find in practice is that air quality (and other health) considerations are often outweighed by competing planning priorities such as economic development, pressure on housing etc. What would be useful would be evidence based evaluation of the relative benefits of air quality mitigation	Thank you for this comment. The intention of the guideline recommendations is that it will provide additional weight to the health benefits from addressing air pollution within a range of local plans. The recommendation has been amended to include these, including health and wellbeing strategies.

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						compared with other competing policy elements. We would also recommend that at a strategic level NICE guidance links to the NPPF to strengthen these associations and encourage take up by Planning professionals.	
580	[office use only]	South Gloucestershire Council	Full	5	5	This recommendation will be a challenging change in practice because there are difficulties in retrofitting existing environments with electrical charging points. We would welcome evidence on the relative benefits of technological fixes and behaviour change. Also we question whether electric charging points at workplaces are a taxable benefit and this therefore acts as a disincentive to use.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
581	[office use only]	South Gloucestershire Council	Full	5	7	Air quality issues are already often included in policy, supplementary planning and guidance documents. What would be useful is additional evidence to evaluate against competing policy elements. See point 3 above	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
582	[office use only]	South Gloucestershire Council	Full	5	14	Developers are already required to produce travel plans for new sites as a condition to discharge planning consent. Has there been evaluation of the impacts?	Thank you for this comment. The recommendation relating to travel plans has been amended. It is now included in recommendation 1.2.1. It focuses on including air pollution outcomes. Evidence relating to travel plans is identified in the guideline.
583	[office use only]	South Gloucestershire Council	Full	5	17, 18	The costs of maintenance of trees and green spaces will be raised as an issue. Local Authorities often no longer maintain trees unless they are adjacent to highways. Ongoing maintenance and management arrangements also act as a disincentive to install. The benefits of green infrastructure on air quality are not well summarised in the evidence.	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
584	[office use only]	South Gloucestershire Council	Full	5	20	Developer viability assessment for sites determines whether they will go ahead. Funding for air quality monitoring is often well down the priority list. Relying on CIL to fund additional air quality monitoring will delay the development of baseline and routine monitoring for new housing developments and transport infrastructure. A more detailed explanation of how CIL could be used would be welcome, with examples.	Thank you for this comment. This has been amended to include measures to reduce emissions.
585	[office use only]	South Gloucestershire Council	Full	5	27	You state that there should be 'consideration' of the provision of a solid barrier to mitigate noise versus the provision of a non-solid barrier to mitigate adverse effects on air quality. It would be helpful if you were to provide evidence of the relative benefits of each.	Thank you for this comment. Please note that this recommendation has been amended. The effect of any barriers would depend on local circumstances so it would be impossible to

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586	[office use only]	South Gloucestershire Council	Full	6	1-3	This recommendation is somewhat vague and does not clarify the issue What is the evidence base around trees, vegetation and impacts on hyperlocal air quality? There is differing professional opinion on this issue - further clarification is required and more detailed guidance.	provide this evidence in general. Thank you for this comment. This recommendation has been amended to clarify the actions to consider in relation to trees and vegetation to reduce the risk of restricting street ventilation. The committee based this recommendation on the evidence included in ES4.4 in evidence review 1 . The committee's discussion section outlines the committee's consideration of the evidence and their deliberation on benefits and harms of using trees.
587	[office use only]	South Gloucestershire Council	Full	6	10	Require clarification on the position with regard to BREXIT. European limits are not currently being met.	Thank you for this comment. The amended guideline includes aiming for WHO levels (recommendation 1.3.1).
588	[office use only]	South Gloucestershire Council	Full	7	16	All the recommendations in this section on driver training are 'consider'. This section does provide an opportunity for a council to take a local lead, but there is insufficient evidence to convince stakeholders to bring about policy / procedure change. Is there any evidence around cost recovery through reduced premiums or fuel efficiency which could be used to support implementation of the recommendations?	Thank you for this comment. The committee's discussion section outlines the evidence discussed by the committee on this topic. This includes evidence from expert paper 4 relating to influencing driving behaviours in fleet drivers and other and evidence on travel planning and advice (evidence review 3). The committee's discussion notes that because of the savings generated by better fuel efficiency, providing support to help people change their driving style would be cost-neutral.
589	[office use only]	South Gloucestershire Council	Full	8	20	Reduced speed in urban areas. Transport planners already consider 20mph zones base on existing evidence and the needs for safety issues and air quality so is there something more specific you are alluding to?	Thank you for this comment. The intention is to ensure air pollution issues are taken into account as well as safety issues.
590	[office use only]	South Gloucestershire Council	Full	9	1	The debate about cycle and pedestrian route location is well known, however transport planners are working in an environment of conflicting priorities, often trying to adapt ancient street patterns to accommodate modern requirements. Some practical examples of good practice would be helpful.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned. Please note that NICE has a local practice collection team to support sharing of local experience. More information on local practice can be found

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							here.
591	[office use only]	South Gloucestershire Council	Full	9	12	You are already aware of the latest research on air quality alert system effects on health service usage.	Thank you for this comment.
592	[office use only]	South Gloucestershire Council	Full	9	20	All considerations which are fully recognised already by professionals working in this area. These issues are challenging to implement because of inadequate resources over many years.	Thank you. National resource issues are beyond the remit of NICE.
593	[office use only]	South Gloucestershire Council	Full	12	1	In point 5 of Putting this guideline into practice, it is suggested an Action Plan is developed. How should this sit with Air Quality Action Plans that LAs already have in place for Air Quality Management Areas?	Thank you for this comment. This is standard NICE text and refers to a general action plan on implementation of the guideline.
594	[office use only]	South Gloucestershire Council	Full	22	13	Require more specific guidance about best practice in relation to tree planting/siting in developments to reduce air pollution/improve air quality?	Thank you for this comment. The recommendations are based on the best available evidence.
595	[office use only]	South Gloucestershire Council	Full	25	22	Was there any evaluation of heatwave and climate change co-benefits?	Thank you for this comment. The guideline notes that interventions to address air pollution are also likely to help reduce climate change from emissions of CO ₂ .
596	[office use only]	South Gloucestershire Council	Full	36	15	It is stated that the committee noted the contribution of diesel cars to NO ₂ pollution was substantial but this has not translated into any recommendations in the draft guidelines to address this. Instead the issue has been side-stepped by saying "Which vehicle types need to be restricted in a particular area to protect health would need to be assessed in light of local conditions".	Thank you for this comment. The recommendations are aimed at local action. Local prioritisation will depend on local factors.
597	[office use only]	South Gloucestershire Council	Full	36	27	Similar to above in that it is stated the committee agreed that although road traffic was a key contributor to poor air quality, other sources (e.g. gas and biomass domestic heating and combined heat and power stations) would need to be tackled as well but stops short of making any recommendations, saying "these would depend on local circumstances....".	Thank you for this comment.
598	[office use only]	Southwark Council	Full	General	General	To provide the support required for meaningful impact on air pollution and health, and ensure resources are allocated appropriately, the following specific aspects could be included:	Thank you for this comment. The recommendations are aimed at local action. NICE does not have a remit to make recommendations on national policy. The

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						<ol style="list-style-type: none"> 1. The document could include guidance on the scale (local vs. regional vs. national) required for each recommendation to have a beneficial impact on health. This would avoid organisations spending time and money on interventions that are unlikely to succeed at the level they operate. Like other health areas, there needs to be a call for air quality to be 'everyone's business' and summarise what is being done locally, nationally and globally to produce a better buy-in from everyone. 2. It would be useful to assess the relative impact of each intervention included. This would assist organisations with prioritising work to tackle air quality. 3. The guidance should be extended to include the adoption of measures that will address both air pollution and other local priorities. The guidance should highlight any health co-benefits associated with each recommendation. Also more details about engaging the medical profession would be helpful. 4. It is well recognized that air pollution contributes to widening of health inequalities. This needs to be addressed in the recommendations. People living in more deprived areas are generally exposed to higher levels of air pollution often because their homes are situated close to roads or industry with higher concentrations of emissions. 5. Links with climate change also need to be discussed. Tackling CO2 emissions has led to a diesel society and a reverse scenario could happen which needs to be avoided. This needs to be thought out carefully. Hospitals have sustainability workers within the organisations and air quality can be an additional component to this work. 	<p>committee noted that multiple interventions are likely to be needed to address air pollution. Local prioritization will depend on local factors.</p> <p>The guideline notes (in the committee's discussion sections) that measures may have other health co-benefits (in particular promotion of active travel). However the remit of the guideline is on addressing road transport related air pollution.</p> <p>Inequalities in exposure to poor air quality are addressed in the guideline, as are links with climate change (please see the committee discussion sections).</p>
599	[office use only]	Southwark Council	Full	General	General	In Southwark the recommendations which need to be implemented involve air quality integration into the local plan, working with medics, idling enforcement and the use of buttons and tables rather than road humps. Most of this is underway. Some of the actions require low cost input in engagement and co-ordination. It is very	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.

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						helpful to have more officers working in the area of air quality such as Public Health and to work collaboratively with other departments of the council i.e. transport and housing. Further evidence to support change is required to write business cases with regards to transport and enforcement. Enforcement funding needs will increase due to new legislative powers being implemented.	
600	[office use only]	Southwark Council	Full	General	General	In Southwark, there are many Victorian built schools on busy major highways across the Borough and it would be useful to consider recommendations around prioritising and working with schools in this position.	Thank you for this comment. Children are included in the definition of vulnerable groups, and recommendations 1.1.2 and 1.3.5 include actions relating to schools.
601	[office use only]	Southwark Council	Full	General	General	Having good practice guidelines on specific issues for example engaging with businesses would be beneficial. . Alternatively a directory of projects, their evaluations and who organised them so that learning from experience can be shared.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned. Please note that NICE has a local practice collection team to support sharing of local experience. More information on local practice can be found here .
602	[office use only]	Southwark Council	Full	General	General	Clean Air Zones It is helpful to understand more about the five cities and this regional collaborative work. Any international examples would be helpful.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned. Please note that NICE has a local practice collection team to support sharing of local experience. More information on local practice can be found here .
603	[office use only]	Southwark Council	Full	General	General	We would suggest the addition of a recommendation around making joined up campaigns available to the public in order for them to better understand air pollution. Idling campaigns and active travel campaigns are good examples.	Thank you for this comment. Recommendation 1.7 addresses awareness raising. Please note that the guideline is aimed at local action and national recommendations are beyond its remit.
604	[office use only]	Southwark Council	Full	General	General	Published evidence and local air quality data should be routinely incorporated into local Joint Strategic Needs Assessments (JSNA) so that the Health and Wellbeing Board can take focused action on the issue. A specific recommendation could be made in regard to this.	Thank you for this comment. Recommendation 1.1.1 now includes incorporating air pollution into strategic plan making locally, including health and wellbeing strategies.

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605	[office use only]	Southwark Council	Full	General	General	An issue that is sometimes raised locally is that of the efficacy of wearing face masks to protect people from air pollution, especially when engaging in active travel. Anecdotally, use of these masks appears to be increasing in the London cycling population. Although this would need to be presented sensitively, it would be useful to have some information on the evidence (or lack of) for using masks in polluted areas. We are concerned that increasing use of these masks may actually deter people from going outside and engaging in physical activity as it gives the impression that air quality is very poor and likely to be damaging to health.	Thank you for this comment. The guideline does not include recommendations on the use of masks. No evidence on this was reviewed.
606	[office use only]	Southwark Council	Full	51	13	In section 1.6.3, information that could be provided to the general public is presented. It could be helpful to look at evidence that compares the benefit of increasing physical activity with the potential harm from exposure to air pollution while engaging in active travel. As active travel is such an important means of improving air quality, it is important to make the case that overall, health is likely to benefit more from becoming physically active. The following study is an example of literature that could support the statement. http://www.bmj.com/content/343/bmj.d4521	Thank you for this comment. The reference cited by the stakeholder was excluded as it did not meet the inclusion criteria.
607	[office use only]	The Dirac Foundation	Full	General	General	We are concerned that some points are deemphasised or neglected in these expert testimonies. These comprise primarily (a) the need for data of the effects of duration in chronic exposure, with a need for sensors and coupling of measurements of levels detected to clinical or cross sectional study data, and (b) in particular we are concerned with the potential accumulative cross-effects of traffic emissions in area where there is chronic exposure and close proximity to petrol stations, landfill (notably hydrogen sulphide emissions) and/or industrial emissions. This needs new data and Systematic Review/Meta-analysis of available data, e.g. B. Robson (2016) "Studies in Using a Universal Exchange and Inference Language for Evidence Based Medicine. Semi-Automated Learning and Reasoning for PICO Methodology, Systematic Review, and Environmental Epidemiology" Comput. Biol. Med. 79, 299-323. 2016 Oct 17. https://www.ncbi.nlm.nih.gov/labs/articles/27846446/	Thank you for this comment. Further evidence will be needed to clarify the significance of these types of issues. However the focus of the guideline is on making recommendations for effective action. This is supported by our current understanding of the epidemiology relating to air pollution, predominantly using the work of COMEAP.
608	[office use only]	The Dirac Foundation	Full	General	General	As above.	Thank you for this comment.

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609	[office use only]	The Dirac Foundation	Full	General	General	As above.	Thank you for this comment.
610	[office use only]	The Dirac Foundation	Full	General	General	As above.	Thank you for this comment.
611	[office use only]	The Dirac Foundation	Full	General	General	As above.	Thank you for this comment.
612	[office use only]	The Dirac Foundation	Full	General	General	As above.	Thank you for this comment.
613	[office use only]	The Forestry and Woodlands Advisory Committee Urban Network (uFWAC)	Full	general	general	uFWAC welcome and strongly support the inclusion of the role of trees in the evidence base and as something to be considered in the planning process. Taking trees and green spaces properly into account will require consultation with arboricultural professionals early in the planning process. Arboricultural professionals should be recognised as key professional contributors to the multi-disciplinary teams needed to implement guidance such as this (see also p26, lines 12-13, where the key role of arboriculturalists should be noted).	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
614	[office use only]	The Forestry and Woodlands Advisory Committee Urban Network (uFWAC)	Full	4	10-20	The guidelines correctly state that there can be beneficial and adverse outcomes when traffic and vegetation are co-located (p21). It is not easy to predict when benefits will outweigh adverse outcomes in every context. However, when local pollution sources from traffic and space heating can be excluded, the effect of vegetation will always be to clean the air passing through it. This implies that, although effects may not be easy to quantify, heavily vegetated pedestrianised areas will always have somewhat lower air pollution than the equivalent space without vegetation. There are, therefore, settings where the beneficial effects of vegetation are guaranteed to outweigh adverse effects.	Thank you for this comment. The guideline includes a discussion of the benefits of vegetation, and the risks where they exist (from reductions in ventilation). The recommendations (1.1.2) have been amended to reflect the benefit of vegetation where ventilation is not an issue.
615	[office use only]	The Forestry and Woodlands Advisory	Full	5	17-19	Internationally leading guidance to operationalise the use of trees and green space to maximise urban well-being is provided by the Trees & Design Action Group (TDAG http://www.tdag.org.uk/). This peer-reviewed guidance includes a strategic element ("Trees in the	Thank you for this comment. We will pass this information to our resource endorsement team. More information on endorsement can be found here

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		Committee Urban Network (uFWAC)				Townscape") relevant at this point in the NICE guidelines, and a technical element ("Trees in Hard Landscapes") that helps to ensure that tree planting (e.g. for air pollution mitigation) is successfully delivered. P5, lines 12-13 could make the reader aware that such best practice guidance exists, rather than simply ask the reader to think about using trees in the abstract.	
616	[office use only]	The Forestry and Woodlands Advisory Committee Urban Network (uFWAC)	Full	5	20-22	It is important to balance the costs of implementing a mitigation strategy with an appreciation of the benefits, particularly where such costs and benefits can be put on a common monetary basis. Valuation tools such as iTree (http://www.forestry.gov.uk/fr/itree), and more broadly Natural Capital Accounting, demonstrate the life-time benefits of investment. The Atlantic Gateway Community Environment Fund –a levy on developers, providing funding for green infrastructure - http://development.atlanticgateway.co.uk/communityenvironmentfund is a good example of innovative financing.	Thank you for this comment. We will pass this information to our resource endorsement team. More information on endorsement can be found here .
617	[office use only]	The Forestry and Woodlands Advisory Committee Urban Network (uFWAC)	Full	6	1-3	The implication here is that the trees arrive in the streetscape after the traffic pollution. In most urban areas, street trees pre-date the traffic causing the pollution. Transport planners should take account of the tree stock when considering the appropriate traffic (and, hence, pollution) load for a street. It can be highly deleterious to the maintenance and proper functioning of the urban forest to run the argument in reverse as is done here.	Thank you for this comment. The recommendation has been amended and including vegetation where this does not restrict ventilation is now in recommendation 1.1.2.
618	[office use only]	The Forestry and Woodlands Advisory Committee Urban Network (uFWAC)	Full	57	23ff	We strongly agree with the need for further research on how barriers and street trees impact on urban air quality. To qualify as high-quality evidence in future editions of the NICE guidelines, or equivalent, such research will require measurements over an extended period (to account for variations in meteorology) with and without the barriers and street trees. Most changes to the urban form do not allow for measurements ahead of the change, limiting their potential to produce the required evidence.	Thank you for this comment. Research recommendation 1 in the final guideline has been amended and now notes research is needed on a range of factors including 'impacts across the course of a year'.
619	[office use only]	[Transport for Greater Manchester]	Full	general	general	This is intended to be used by local authority staff working in the fields of transport, planning, local air quality management and public health and may be relevant to a range of others, including the general public. However, it is unclear how this is intended to relate	Thank you for this comment. The recommendations are based on the available evidence and are described using terms standard across NICE guidelines. The

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						<p>to the existing legislative, policy and guidance frameworks covering outdoor air quality and related fields, and consequently unclear what regard local authorities and others should have to it in undertaking their functions.</p> <p>Most of the individual guidelines begin with the word 'Consider', indicating less certainty in the strength of the evidence, and in most cases requiring further work to be done to assess whether or not the guideline is appropriate. Whilst there are positive aspects to the guidelines, mostly repeating policy and guidance from elsewhere, there are negative aspects too. Some of the guidelines are, without much more detailed assessment, confusing and potentially contradictory, and often identify solutions that would be very difficult to deliver. The guidelines cover a lot of topics related to air quality without offering any clear solutions to this admittedly complicated problem. It is worth noting that planning policies are set through a legalistic process that takes into account a range of evidence, objectives and perspectives, not just health impacts. This means that considerable care and thought is needed in writing planning policies, which can be challenged by third parties and are subject to an independent public examination, before coming into effect.</p> <p>The principal concern with the above is that when a respected body such as NICE produces guidelines concerning an increasingly topical subject such as air quality, they carry weight, even if they are sometimes vague and unhelpful. They are also widely and not always accurately reported, meaning that the often nuanced or caveated guidance provided can be mis-communicated. For example references to trees and vegetation screens having potentially negative effects on air quality by impeding ventilation is an example of where guidelines can be miscommunicated. There are very, very few circumstances where street trees would have a negative impact on air quality in towns and cities.</p>	<p>guideline recognises, local circumstances will be very important in interpreting and implementing the recommendations and this is a matter for local bodies. The guideline aims to support effective action to deal with air pollution and so benefit health.</p>
620	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 1. Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why.</p> <ul style="list-style-type: none"> Clean Air Zones (CAZs) will have the biggest impact, however the resource and costs involved will be challenging. Early indication from the Greater Manchester study indicates that the CAZ areas need to consider cars to really make a difference Many of the Planning actions will have a significant 	<p>Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.</p>

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						resource and cost implications for developers, and thereby affect their viability. Therefore this may be disadvantageous to local authorities if developers choose to invest elsewhere if standards are not consistent across regions. Air quality is an important consideration for development proposals, although only one of many; as a result the ability of the planning system to manage air quality can be overstated.	
621	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 2. Would implementation of any of the draft recommendations have significant cost implications?</p> <ul style="list-style-type: none"> Clean Air Zones/ Congestion Charge Zones The introduction of cycle routes that are off road/quiet streets (1.5.1-2) 	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
622	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 3. What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.)</p> <ul style="list-style-type: none"> Links into other cities initiatives and sharing best practice more. Provision of more case studies to provide positive examples of implementing the recommended actions. 	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
623	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 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?</p> <ul style="list-style-type: none"> It is generally helpful to include reference to the Defra Clean Air Zone implementation guidance, however, it should be noted that the guidance is not yet finalised.. Good to see progressive targets to reduce pollutant levels beyond current legal levels because of the positive health impacts, however, the primary focus should be to achieve the current targets, before extending them further. 	Thank you for this comment. Please note it has been agreed to remove the reference to the DEFRA clean air zones draft proposals and the recommendation (now 1.3.1) suggests aiming to meet WHO air quality guideline levels.
624	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 5. The guideline includes reference to providing general advice on air quality. NICE is aware of information published</p>	Thank you for this comment.

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	only]	Manchester]				<p>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?</p> <ul style="list-style-type: none"> No 	
625	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 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?</p> <ul style="list-style-type: none"> NERC/ Defra air quality grants/ local sustainable transport fund/ transport technology research grant/ OLEV 	Thank you for your response. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
626	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 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?</p> <ul style="list-style-type: none"> Greater Manchester is currently conducting a feasibility study into the potential impacts of a CAZ, including cost – benefit analysis, and the results of the study will influence how we proceed. 	Thank you for your response. We will pass this information to our local practice collection team. More information on local practice can be found here .
627	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 8. Apart from broadening beyond the five cities, does recommendation 1.2 add anything to the DEFRA draft?</p> <ul style="list-style-type: none"> Yes, considering introducing progressive targets to reduce pollutant levels below the EU limit values. The Defra Clean Air Zone draft implementation guidance currently only mentions introducing progressively tighter vehicle Euro Standards. Given concerns that Euro standards for cars are not achieving the improvements in air quality that are achieved in laboratory conditions, progressive emission targets would be helpful. 	Thank you for this comment.
628	[office use only]	[Transport for Greater Manchester]	Full	general	general	<p>Question 9. Does recommendation 1.2 from NICE act as a lever for local communities when considering clean air zones?</p> <ul style="list-style-type: none"> It is not considered to be a lever above and beyond the 	Thank you for this comment. The guideline encourages greater examination of the health effects of air pollution locally and acknowledges the health benefits of lower

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						Defra guidance	pollution levels. Please note it has been agreed to remove the reference to the DEFRA clean air zones draft proposals and the recommendation (now 1.3.1) suggests aiming to meet WHO air quality guideline levels.
629	[office use only]	Transport for London	Full	General		We believe that the guidelines do not give adequate emphasis to the potential health gains that can come from aligning activities to reduce the wider impacts of motorized vehicles with other public health objectives, such as increasing physical activity and promoting the shift to a low carbon society. Greater emphasis should be placed on the links between the causes of air pollution and other health outcomes, such as sedentary behaviour, obesity, road traffic injuries and poor mental health. Developing policy interventions without due consideration of the wider implications has in the past resulted in unintended, but foreseeable, harm to health; for example, policies that focused on switching to 'cleaner' fuels instead of those aimed at reducing the use of cars for short trips that could be walked or cycled.	Thank you for this comment. The committee's discussion section notes the links with other health benefits, in particular physical activity. The guideline also provides links in the recommendations to other NICE guidelines such as 'physical activity: walking and cycling' (PH41). However, please note that the remit of the guideline was to produce recommendations on addressing road transport related air pollution.
630	[office use only]	Transport for London	Full	General		While the cumulative impact of small measures taken locally is important, the impact on health outcomes locally over the short-term as a result of improvements in air quality is likely to be marginal. Given the nature of the air pollution problem and current financial constraints, those interventions that have wider health benefits and a long term impact (i.e. greatest net benefit), will be essential to support local authorities seeking to make the case for action.	Thank you for this comment. The guideline notes that it is likely that multiple actions will be required.
631	[office use only]	Transport for London	Full	General		The guidance should specify the intended outcome(s) targeted by the proposed intervention; for example, a reduction in local emissions, reduction in exposure of vulnerable individuals to high levels of air pollution, etc.	Thank you for this comment. The committee's discussion section identifies likely outcomes of relevance for the recommendations.
632	[office use only]	Transport for London	Full	General		The guidelines should include an indication of the scale of the intervention required to achieve the intended outcome and its cost effectiveness.	Thank you for this comment. In relation to the scale of intervention and its cost effectiveness this is difficult to do in the general case as the scale will be highly influenced by local factors.
633		Transport for	Full	General		The financial constraints faced by local authorities are such that	Thank you for this comment. The remit of

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	[office use only]	London				activities must be prioritized and all proposals locally are scrutinized as to their impact on health, the environment and the local economy. It should be clear in the guidance which activities should be prioritized (e.g. those with the potential to improve health via multiple pathways) on the basis of evidence of their effectiveness and cost effectiveness in terms of health impacts related to air quality as well as the impacts on wider determinants of health. Ideally, this should include a consideration of the timescale within which the intervention will confer the intended benefit.	<p>NICE is to present evidence based recommendations for action. Prioritisation of these will need to be carried out by local bodies based on local circumstances.</p> <p>Our analysis is focused on developing outputs in the general case. Under these circumstances, it is difficult to compare the cost-effectiveness measures for different interventions in our economic analysis, as the outputs are based on results from interventions from different countries, and also (in some cases) measuring different health end-points. However, the overall outputs from the CBA – in terms of the ratio of costs to benefits - provide an indication of the order of magnitude of the anticipated benefits, which could be used to as a starting point for undertaking more detailed analysis at a local level.</p> <p>For those interventions included within the economic analysis, the analysis of wider benefits gives some indication of those interventions which may result in other health benefits beyond those relating to air pollution. We included some discussion on the impact of time for some of the interventions. In many cases, the case study data suggests benefits are seen relatively quickly – within a year or so of the intervention. However, in some cases benefits are expected to decline over time after that point due to changes in vehicle fleet.</p>
634	[office use]	Transport for London	Full	General		We would like clarity on how these guidelines fit with other NICE guidelines on related public health topics, such as physical activity ⁹ and where NICE Guidelines are not aligned, an explicit indication as	Thank you for this comment. The recommendations relating to cycle lanes (now 1.6) have been amended to clarify that a

⁹ <https://www.nice.org.uk/guidance/ph41>

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	[only]					to which recommendations should take priority. For example, a cycle track that is placed away from a busy urban road may be less direct or convenient, may be less attractive or well used; therefore, it may have a smaller net health benefit than a direct route cycle track that is well used by cyclists.	range of routes should be supported to encourage modal shift and that these should include low pollution options.
635	[office use only]	Transport for London	Full	General		In summary: Recognising that the purpose of NICE Guidelines is to improve and promote health and well being, we feel that these guidelines need further development and a stronger focus on how interventions to reduce air pollution locally can confer wider health benefits. Input from a transport planner and/or transport and health specialist would be helpful for subsequent revisions. <u>TfL is willing to offer expertise in this area.</u>	Thank you for this comment. Changes have been made to the guideline to add emphasis on the wider benefits.
636	[office use only]	Transport Planning Society	Full	19	21	Question 1: The Transport Planning Society agrees that many Local Plans do not adequately address air quality issues, and would welcome much greater involvement of local authority public health professionals in the formulation of transport policies. Wherever possible, this should be within a wider remit of promoting positive health outcomes through increased everyday physical activity, reduced air pollution, safer streets and improved multi-modal accessibility.	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.
637	[office use only]	Transport Planning Society	Full	4	11	The siting of development to minimise the need for motorised travel is absolutely crucial from our perspective. The current National Planning Policy Framework does not provide strong grounds for planners to reject developments on the grounds of transport- and health-related issues. We would welcome the use of supplementary planning guidance to promote public health outcomes through the appropriate siting of development.	Thank you for this comment.
638	[office use only]	Transport Planning Society	Full	4	13 & 18	While we strongly support the aims of these guidelines, we are concerned that these particular sentences are poorly formulated and could be mis-interpreted as supporting the most car-dependent, obesogenic urban layouts, which would ultimately have a counter-productive effect on air quality. For example, too many isolated residential developments are set back from main roads, but are not	Thank you for this comment. Your comments will be considered by NICE where relevant support activity is being planned.

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						<p>integrated with traditional street patterns, provide very little internal connectivity and offer no safe walking and cycling connections by to nearby facilities.</p> <p>Therefore we would strongly including a formulation along the lines of “[], while guaranteeing urban layouts that provide opportunities to travel by other modes than the car”.</p> <p>Reference can be made to existing guidance on urban layouts, including: Department for Transport (2007) <i>Manual for Streets</i> Chartered Institute of Highways and Transportation (2010) <i>Manual for Streets 2</i> Commission for Integrated Transport (2009) <i>Land Use and Transport: Settlement patterns and the demand for travel</i></p>	
637	[office use only]	Transport Planning Society	Full	5	1	<p>This recommendation should be worded more strongly to stress the need to support zero-emission travel and “to create the conditions for much greater levels of walking, cycling and public transport use”. Ultimately it is the shift to less car-dependent lifestyles that will meet air pollution reduction and other health policy targets.</p> <p>For example, two recent publications illustrate the clear links between transport policy, the built environment and health outcomes. The International Physical Activity and Environment Network (IPEN) has recently concluded a study in 14 cities across 10 countries around the world linking physical activity rates to residential density, public transport accessibility, connected walkable neighbourhoods and access to green spaces (Sallis et al, 2016). And a recent study of physical activity as part of everyday travel in London demonstrates clearly that car ownership is by far the most significant explanatory variable linked to inactivity (Fairnie et al, 2016).</p>	Thank you for this comment. This is now addressed in recommendation 1.1.1.
638	[office use only]	Transport Planning Society	Full	7	4	<p>We welcome the recognition of road user charging as a means to reduce congestion and improve air quality.</p> <p>There are different approaches to charging that could be appropriate for Clear Air Zones.</p> <p>A simple cordon charge, such as London’s congestion charging</p>	Thank you for this comment. The committee felt that there were circumstances where a congestion charge zone could be beneficial in addition to a clean air zone, principally where congestion (and not just vehicle type) was thought to be a key part of the problem.

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						<p>zone, is a relatively blunt instrument but was successful in reducing the volume of private cars in the city centre.</p> <p>Alternative charging systems, such as distance-based charging, may have a greater behavioural impact over wider areas. It is noteworthy that the Greater London Authority Transport Committee is pressing the Mayor to go further with road pricing as a means to tackle air quality problems</p> <p>In the TPS member survey, National Lorry Road User Charging for HGVs is strongly supported (2nd only to charging all vehicles) and is particularly important for health, due to the much higher emissions of particulates, NOx and the recirculation of road pollutants compared to cars. We think that the diversion of freight from HGVs into cleaner, quieter delivery vehicles in urban areas and sustainable modes generally needs to be included.</p> <p>In local policy, Nottingham has successfully used a workplace parking levy as a means to dissuade car travel into the city centre. This policy is being considered by a number of other UK authorities and should be mentioned as an option. TPS members considered them 2nd only to developer levies as a means of raising local revenue for transport.</p>	
639		UK Health Alliance on Climate Change	Full	4	7-9	<p>We welcome the recommendation that local authorities should include air pollution in strategic planning across their departments. We would suggest that the guideline explicitly encourages local authorities to develop air pollution strategies that deliver both health and environmental benefits whilst also improving safety and accessibility.</p> <p>However, we are concerned that the guidance is targeted primarily at local authorities, without fully acknowledging the essential role of central government policy and funding decisions in reducing traffic related air pollution. Many of the recommendations set out in the document may have already been considered by local authorities when rolling out their local air pollution plans. It is likely to prove impossible for many local authorities to set out their vision and finance effective projects in the current funding environment.¹ Existing resources to help most local authorities improve air quality</p>	Thank you for this comment. Please note that the guideline is aimed at local actions. National actions are outside the remit of NICE.

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						are inadequate. Defra's £500,000 air quality grant scheme for 2015/2016 and the £3 million Air Quality Grant announced to fund English local authorities' work on air quality are inadequate to tackle the scale of the problem. A more adequate response can be seen in Transport for London's £875 million budget allocated to improve air quality in London alone by 2021/2022.	
340		UK Health Alliance on Climate Change	Full	7	5-6	<p>As Clean Air Zones will be implemented across the country and will require substantial planning and investment from local authorities, it is critical to ensure that they deliver the best possible outcomes.</p> <p>The draft framework published by Defra only requires five UK cities to implement Clean Air Zones. Yet many UK cities breach legal limits for NOx and particulate matter. We welcome the recommendation to incorporate congestion charge zones within the clean air zone 'where traffic congestion contributes to poor air quality'. However, this could be extended to recommend the introduction of clean air zones with charging zones in UK cities exceeding EU limits beyond the five identified in Defra's Clean Air Zones framework. To this end, the NICE guideline should highlight the opportunity to include more cities in Defra's plan. This is particularly timely as a revised framework will be published and put to consultation in April following the High Court Judgment that the Government failed to tackle illegal air pollution across the UK.</p> <p>As a whole, the guideline highlights the cost effectiveness of Clean Air Zones, however does not use this evidence to justify the need to urgently implement Clean Air Zones in more cities.</p>	Thank you for this comment. The guideline does not restrict the recommendations to the cities identified by DEFRA. They should be considered in all areas.
341		UK Health Alliance on Climate Change	Full	7-8		It is important that the guideline incorporates the role of the public transport sector, and acknowledges the various policy options that exist beyond training staff drivers to reduce their vehicle emissions. For both men and women, commuting by public or active transport was independently associated with significantly lower rates of	Thank you for this comment. Recommendation 1.3.4 includes the development of integrated public transport networks.

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						<p>overweight compared with commuting by private motorized transport¹⁰.</p> <p>A good public transport system must be convenient to use and offer quick transit from a suburb into an urban area. However traffic congestion adversely affects public transport, and discourages its use. For instance, Transport for London (TfL) has reported that the average speed of traffic in the centre of the capital dropped to 7.8 mph last autumn and that bus passenger numbers are down five per cent, as a result of congestion. Investment in improved public transport from central Government level should be accompanied by measures to restrict congestion, such as Clean Air Zones, to ensure public transport remains an effective means of transport.</p> <p>Greener and more affordable public transport also has a key role to play in tackling air pollution and protect health. Retrofit programmes, such as the one developed by TfL are sensible public health interventions, which could be considered within this guideline, and expanded nationwide.</p>	
642		UK Health Alliance on Climate Change	Full	9	2-3	<p>To the extent that the consultation considers cycle routes, this is limited to cyclists' exposure to air pollution and to hazards from poorly designed cycle routes. The guideline should also emphasise the positive elements of active transport on both physical and mental health, and the fact that on balance, such problems should not dissuade policy-makers from investing in cycling. There is ample evidence to suggest that, done correctly, health benefits of cycling and walking greatly outweigh the harm from inhaling air pollutants.¹¹ Although such risks must not be overlooked, we believe that the primary focus should be on bolder policy options to ensure cycling becomes an integral part of the urban environment.</p>	<p>Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline 'physical activity: walking and cycling' (PH41). Reference to the need for visibility and for consideration relating to personal safety have also been added.</p>

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		UK Health Alliance on Climate Change	Full	14	7-13	Although the guideline rightly indicates that climate change is linked to increased risk of extreme weather and other events that have an adverse effect on health, it misses the opportunity to fully consider the health benefits of mitigation policies addressing climate change and air pollution simultaneously. For instance the guideline could highlight that investing in cycling and walking, two emission-free modes of transport, would benefit health by increasing physical activity and improving air quality but also by helping to reduce health-related risks linked to climate change.	Thank you for this comment. The guideline notes (in the committee's discussion section) that measures may have other health co-benefits (in particular promotion of active travel). The guideline notes that interventions to address air pollution are also likely to help reduce climate change from emissions of CO ₂ .
643		UK Health Alliance on Climate Change	Full	16	11-12	<p>The draft guideline should more fully capture the enormous health benefits available from physical activity that can result from measures to reduce air pollution. Increased physical activity is briefly mentioned in the 'additional impacts' section but could be incorporated and considered far more fully. Active transport helps integrate and increase levels of physical activity into everyday life for the majority of the population, including the most vulnerable.</p> <p>There is a wealth of evidence which demonstrates that regular physical activity contributes towards preventing obesity and excess weight as well as most chronic conditions including coronary heart disease, stroke, type 2 diabetes, cancer, mental health problems and musculoskeletal conditions. Moreover, the impact of the ageing population on health and social care services requires ambitious policies that combat sedentary lifestyles and encourage people to be physically active and mobile.</p> <p>Non-communicable diseases are largely preventable through modification of behaviour and lifestyles including physical activity. The NHS Five Years Forward View argues for a 'radical upgrade in prevention and public health' and NHS Health Scotland strategy for 2012-2017 'A Fairer Healthier Scotland' calls for stronger support for action for prevention. Similarly, one of NHS Wales' key strategic objectives for the period 2015-2018 is to set up a national system for health and prevention by the end of 2017/2018. Synergistic policies to address air pollution through active transport would deliver substantial health and economic benefits and help shift to a model of prevention.</p> <p>Walking and cycling are also the most sustainable forms of transport</p>	<p>Thank you for this comment. The guideline includes recommendations supporting active travel, including walking and cycling (please see section 1.6 of the final guideline). The guideline notes (in the committee's discussion sections) that measures may have other health co-benefits (in particular promotion of active travel). However the remit of the guideline is on addressing road transport related air pollution.</p> <p>Please note that NICE is also currently updating the guideline on physical activity and the environment (PH8).</p>

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						<p>and therefore contribute to tackling climate change, a major threat to public health. Promoting active transport would therefore help mitigate the health risks linked to climate change including poor air quality.</p> <p>Without fully embracing the co-benefits of physical activity and carbon reductions, this guideline risks underestimating the potential opportunities presented by measures to tackle air pollution, both in terms of reductions in burden of disease, and in the potential economic benefits available from reduced healthcare costs and a healthier workforce.</p>	
644		UK Health Alliance on Climate Change	Full	18		<p>Whilst the recommendation that air quality issues should be integrated in to local planning is a sensible one, this should be coupled with the recommendation that central Government should also consider air pollution in all policies and implement a comprehensive cross-departmental approach. Clear targets at local and national levels, including levels of NOx and particulate matter that the UK was supposed to reach in 2010, increased percentage of trips being made by active transportation and cycle journeys per day, and clear deadlines are needed. National government oversight is key to ensure that local authorities can report lack of funding and additional resources are properly considered in central government budget decisions.</p> <p>In addition, the UK Government should develop a strategy to decarbonise the transport system and reverse the dieselisation of our fleet including incentives such as scrappage and retrofit schemes. If the guideline recommends more charge points for electric vehicles in residential areas, the use of electric vehicles will only increase if the adequate incentives to encourage private road users to use low emission vehicles are in place.</p> <p>As far as national policy is concerned, the time has arrived for more action on transport and especially the use of diesel transport. Important steps might include a levy on diesel, a scrappage scheme for diesel vehicles and removal of diesel vehicles from sale in the UK. Similarly air pollution from idling engines in our shipping ports and railway stations as well as in and around airports must be included in any joined-up pollution reduction strategy.</p>	Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.

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645		UK Health Alliance on Climate Change	Full	32	3-5	<p>A major overhaul of the UK transport policy is critically needed as it currently focuses heavily on certain means of transport such as trains, planes and automobiles but not active transport. Transport planning is an underused force for health and wellbeing, and needs to be fundamentally reconsidered in a way that supports active transport, rather than focusing only on automobiles, trains, and planes. The Department for Transport (DfT) strategic plans should fully consider cyclists, which are also road users, and support more investments in infrastructure that enables people to walk and cycle. Up until now there has been a lack of investment in walking and cycling infrastructure. The current cycling budget is less than £1 per person in England. DfT's most recent Road Transport Strategy has allocated £100 million worth of investment in projects that improve cycling and walking for the whole of the UK. This contrasts with far more ambitious projects such as Transport for London's draft business plan, which allocates £154 million per year on cycling over the next five years in London, amounting to £17 per person per year.</p> <p>The NICE guideline should make note of these investments, and consider whether recommendations of a more holistic approach to transport policy (both for central and local Government) should be considered.</p>	Thank you for this comment. We have passed it to the NICE resource impact assessment team to inform their support activities for this guideline.
646		UK Health Alliance on Climate Change	Full	35	9-12	<p>Action at the city level is also important. Further devolution of powers to cities and municipalities that allows them to restrict traffic during acute exacerbations of air pollution is one solution which has demonstrated potential in other countries such as Greece and France and must be considered for UK. Cities and city councils should be encouraged to explore alternative options to limit access in certain areas and at certain times. For instance, Edinburgh has a policy where a number of streets are closed one hour before, and after school hours.</p>	Thank you for this comment.
647		UK Health Alliance on Climate Change	Full	36	15-16	<p>A historical exponential increase in motorised road transport, combined with policies to encourage diesel engines, has led to dramatic rises in air pollution. The draft guideline indicates that diesel cars, taxis and small package vans are among the most substantial contributors to NO2 pollution, and recognises that an</p>	Thank you for this comment.

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						<p>effective response must incorporate a modal shift to low- and zero-emissions transport, through policy mechanisms such as Clean Air Zones.</p> <p>We support this recommendation, and believe that minimising car use and reducing traffic volume are important stepping stones to help deliver broader health benefits. To this end, the implementation of Clean Air Zones should go further, also capturing the use of private vehicles in an effort to maximise these benefits.</p>	
648		UK Health Alliance on Climate Change	Full	48	15-18	<p>The guideline should include consideration of the long-term cost-effectiveness of policies that promote a shift from road transport to walking and cycling as part of a national strategy to tackle air pollution.</p> <p>Investing in active transport is acknowledged as a cost-effective measure. Promoting walking and cycling are shown to have early returns on investment with additional social and environmental benefits. Overall, increasing active travel over 20 years would represent £17 billion savings for the NHS, through reduction in the prevalence of type 2 diabetes, dementia, ischaemic heart disease, cerebrovascular disease and cancer¹². The estimated direct cost of physical inactivity to the NHS across the UK is £1.06 billion¹³.</p> <p>Because there are increasing financial pressures on national and local authorities, it is critical to make the right budgetary decisions to invest in the most cost-effective measures that deliver the wider range of co-benefits possible. A joined-up approach that simultaneously addresses two major challenges, air pollution and physical inactivity, can reap enormous health benefits and cost-savings and as such must be taken account of in air pollution reduction strategies.</p>	<p>Thank you for this comment. The guideline is limited to interventions that can be implemented locally. NICE does not have a remit to make recommendations on national policy.</p> <p>We have passed your comment to the NICE resource impact assessment team to inform their support activities for this guideline.</p>
649	[office use	UK Indoor Environments	Full	4	13-17	We support the recommendation that buildings should be sited away from busy roads, and similarly that living accommodation should be	Thank you for this comment. Please note that NICE is developing guidelines on indoor air

¹² Jarret et al. Effect of increasing active travel in urban England and Wales on costs to the National Health Service. Lancet 379(9832):2198-205. 2012. Available at: <http://1.usa.gov/1XmMikA>

¹³ Allender, S, Foster, C, Scarborough, P, Rayner, M: The burden of physical activity-related ill health in the UK. J Epidemiol Community Health 2007, 61(4): 344-8. 2007. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2652953/>

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	only]	Group (UKIEG)				located away from roadside facades. However, there is no explicit reference in the report to building design (and retrofit) considerations pertaining to air pollution. For example, it is important that ventilation supply inlets, where present, are located away from outdoor pollution sources including busy roads.	pollution.
650	[office use only]	UK Indoor Environments Group (UKIEG)	Full	9	12-19	The section on awareness for the general public and businesses does not explicitly mention risks and amelioration strategies for indoor exposure to outdoor-generated air pollutants. It is acknowledged in the report that closing windows to exclude polluted outdoor air can lead to raised levels of pollutants that have indoor sources, but the point also needs to be made that much exposure to outdoor pollutants happens indoors and that consideration therefore needs to be given to strategies that reduce or ameliorate indoor exposures to outdoor air pollutants. More broadly, the general public should not be given the impression that indoor environments are always and significantly safer than outdoor.	Thank you for this comment. Please note that NICE is currently developing a guideline on indoor air pollution.
651	[office use only]	UK Indoor Environments Group (UKIEG)	full	10	19-21	The advice to the general public needs to be as clear as possible regarding whether it is always advisable to close windows, for example considering the risks arising from indoor pollutants (e.g. smoking). Or at least accompanying the advice of closing windows with other advice regarding smoking and other possible indoor sources.	Thank you for this comment. Please note that NICE is currently developing a guideline on indoor air pollution.
652	[office use only]	UK Indoor Environments Group (UKIEG)	full	57		We are supportive of the research recommendations. However, we recommend adding the need for further research on 'Quantifying impacts of outdoor pollution on indoor pollution and indoor exposures'. As most exposure to outdoor air pollutants, particularly of vulnerable groups, occurs indoors, it is important to understand the impact of building characteristics and occupant behaviour on the concentration of (and exposure to) outdoor generated pollutants in indoor environments. This should encompass improved understanding of the fate of pollutants in indoor environments, as well as exposures to additional compounds created by reactive chemistry, and the deposition and resuspension of particulate matter.	Thank you for this comment. Please note that NICE is currently developing a guideline on indoor air pollution .
653	[office use only]	University of Leeds				The economic analysis by Eunomia and UWE is as a thorough well-researched and clearly laid-out piece of analysis. I would like to share the following comments:	Thank you for this comment.
654	[office	University of				1- Uncertainty analysis:	Thank you for this comment. Given the wide

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	use only]	Leeds				Only univariate sensitivity analysis was done, which is a weakness to be acknowledged. Second, it is surprising to see (pp 17) that sensitivity analysis of interventions cost-effectiveness did not account for uncertainties in expected health benefits, which is driven by uncertainty around epidemiological risk estimates and around monetary values used to monetise health benefits. This limitation should be acknowledged as the results provided in report are based on the assumption that the health benefits per a given change in ambient air pollution concentrations are known with certainty.	range of uncertainties involved in the modelling it is very difficult to include multidimensional sensitivity analysis, as this requires developing robust assumptions as to the ranges over which specific model factors are likely to vary. It is for this reason that the sensitivity analysis focused on overall comparisons of the ratio of cost to benefit, as set out above. The latter is also acknowledged as a limitation in the sensitivity analysis. The report has been updated to this effect. Sensitivity analysis was also undertaken around the 95% confidence intervals for the relative risk coefficients. We have updated the report to confirm the results for the other interventions.
655	[office use only]	University of Leeds				<p>2- Cost-utility analysis The QALY computation for CUA merely adjusts LY gain for less than perfect health-related quality of life (HRQoL). Two main comments => An average weight of 0.65 was used to adjust LY gains with HRQoL (pp 15). This weight was obtained from data on YLL and QALYs for a number of disease areas as reported in Claxton et al (2015) report. First, it would be useful to provide the exact computations leading to that weight. Was the UK pop proportion of deaths in each category taken into account to weight the average result? Since air pollution has been mainly associated with cancer and adverse effects on cardio-vascular systems, I am not sure the ratios QALY/YLL for genitourinary, infectious diseases or maternity are relevant for the computation of this weight. => More importantly, the chronic mortality effects of air pollution are expected to be greatly driven by chronic morbidity effects, i.e. development/worsening of life shortening cardio-respiratory conditions. Therefore whilst it is reasonable to assume that individuals died from a specific cause (as reflected in less than 1 HRQoL weight), to properly compute QALY impacts of air pollution exposure, one should account for air pollution's "influence" in driving individuals to the deteriorated health conditions, which eventually lead to their</p>	Thank you for this comment. The average weighting factor of 0.65 is based on the outcomes of all diseases, whilst the weighting applied to diseases associated with air pollution (cancer, cardio-vascular and respiratory diseases) was 0.657. As is suggested by this comment, we will add a further acknowledgement in the report in reflection of the potential underestimation of QALY gains due to exclusion of chronic morbidity effects and associated loss in quality of life.

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						<p>premature death (Schmitt, 2016*). Not doing so, leads to an underestimation of the QALY gain from air pollution reduction, which should be acknowledged here.</p> <p>* Schmitt LHM. QALY gain and health care resource impacts of air pollution control: A Markov modelling approach. Environmental Science & Policy. 2016; 63 ():35-43. 10.1016/j.envsci.2016.05.015)</p>	
656	[office use only]	University of Leeds				<p>3- Intervention modelling</p> <p>Ideally more studies per type of intervention would be useful to understand the uncertainty around the expected change in air pollution concentrations associated with each different measure. I have not read component 1 but I am wondering whether more of the 49 initial intervention studies retrieved from the literature could be used for this purpose. Some reported expected changes in air pollution, based on which benefit-cost ratios were computed, appear large if we compare with data from low emissions zone such as London 2003 Congestion Charging scheme and if one take into account that, at least for PM, local sources/traffic of may not be the main driver of ambient concentrations.</p> <p>With regards to street washing intervention, the 2015 report by Airuse could be useful to provide more data (http://airuse.eu/wp-content/uploads/2013/11/15_B8_Review-of-impact-of-street-cleaning-on-PM10-and-PM2.5-concentrations.pdf).</p> <p>More generally, whilst benefit-cost ratios are high (pages iii-iv) most are based on an optimistic scenario/not directly applicable to the UK. It may be useful to provide a context and geographical scope where these interventions may work best, e.g. street washing works well in areas with a lot of road dust and low moisture.</p>	Thank you for this comment. Studies from the evidence reviews (component 1) were used to inform the modelling work. The committee noted that street washing was less likely to be important in the UK due to differences in roads and climate.
657	[office use only]	Woodland Trust	Full	General		<p>Summary</p> <p>The Woodland Trust recognises the connection between air pollution and ill health and welcomes the opportunity to respond to this important consultation.</p> <p>There is increasing evidence about the benefits of trees to across a range of human health issues, including both mental and physical health. We strongly advocate the planting and management of trees in urban settings to mitigate the effects of air pollution and to provide</p>	<p>Thank you for this comment. The impact of trees and vegetation on air pollution varies with a number of factors as noted in the guideline. The potential benefits in terms of air pollution are noted in recommendation 1.1.2.</p> <p>Please note that the guideline focuses on air pollution. While the potential benefits of trees and vegetation are included in the discussion these are not the focus of this guideline.</p>

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						<p>other benefits to people's health and wellbeing. This includes mitigating the impacts of climate change on urban environments through reducing the so called 'urban heat island effect', where buildings and other hard infrastructure absorb heat causing dramatic temperature variation, which is known to impact on air quality.</p> <p>We work hard with local authorities to encourage more tree planting and management and many now include proactive policies in their local plans. The Government has also repeated its commitment to plant 11 million trees by 2020, and praised community planting schemes, such as the Trust's own 'Trees for Schools' supported by Defra. We are therefore concerned that there are few references in the current draft to the benefits of trees, and that the emphasis is rather more on potential negative effects. We do not feel this is a fair reflection of the critical role of trees to air quality and their wider environmental benefits in urban settings, and are concerned that the guidance could be used by parties seeking to avoid including quality green infrastructure in built development.</p> <p>We hope our comments below will help to redress the balance. It would greatly reinforce the message to decision makers about the importance of trees to air quality and other aspects of the urban environment - and demonstrate a high level of joined-up thinking - if the benefits of trees could be articulated in NICE guidelines on air pollution.</p> <p>On a separate, but related matter, whilst we appreciate the guidance is primarily for staff working at the local authority level, we would like to emphasise that strong <i>national</i> leadership is key to tackling air pollution, as responsibilities cut across departmental and agency boundaries.</p> <p>There have been useful developments. In addition to the Government's 2020 tree planting target there is now an agency in place, in the form of the National Infrastructure Commission (NIC) that could provide the strategic, cross departmental co-ordination required to deliver it. The provision of green infrastructure that would improve air quality is, in the Trust's view, entirely consistent with the NIC's remit to improving quality of life, however, it needs to move up their agenda.</p>	

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						We would very much welcome the opportunity to discuss these points with you further, if that would be helpful.	
658	[office use only]	Woodland Trust	Full	5	After line 6	We propose giving greater prominence to the use of trees and vegetation to mitigate air pollution. Separate bullet: <ul style="list-style-type: none"> Carefully site green infrastructure, including trees and shrubs, where people live, work and travel, in order to help mitigate pollution and improve air quality. 	Thank you for this comment. The recommendations relating to trees and vegetation have been amended. Please see recommendation 1.1.2.
659	[office use only]	Woodland Trust	Full	9	3	Useful to emphasise benefits of natural tree cover. Suggest amending to: <i>'routes, quiet streets, and carefully planned green infrastructure.'</i>	Thank you for this comment. The recommendation (now 1.6) has been amended to include provision of a choice of routes and to link to the NICE guideline 'physical activity: walking and cycling'. Reference to the need for visibility and for consideration relating to personal safety have also been added.
660	[office use only]	Woodland Trust	Full	13	23	The most deprived areas, where pollution is greatest, tend to be inadequately served by green space (<i>Urban Air Quality, The Woodland Trust, April 2012</i>). Suggest this point could be made here: <i>'The most deprived areas, inadequately served by green space, tend to have higher relative concentrations...' etc'</i>	Thank you for this comment. The suggested amendment has not been made as this was not in the evidence considered and the committee did not note this as a factor to include based on their expertise.
661	[office use only]	Woodland Trust	Full	18	23	<i>1.1 Planning</i> . This section makes good recommendations about the use of trees, etc. However, it feels as though there should be an explanatory paragraph in the previous, or possibly following, section, to strengthen the points about their effectiveness in tackling air pollution. We offer the following: <i>'Air quality is often cited as one of the many health benefits of increased tree cover in urban areas.</i> <i>Heat islands' occur because buildings, concrete and other hard</i>	Thank you for this comment and suggested additions. The points raised are included in the committee's discussion section of the final guideline.

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						<p><i>surfaces absorb heat during the day and release it at night. The effects can be dramatic in urban areas, with as much as a 10% difference in temperature between the city centre and surrounding area on some days. 'Heat island' effects can be mitigated by careful planting of vegetation, particularly trees. Trees provide shade, and also reduce the ambient temperature through the cooling effect of evaporation from their leaves.</i></p> <p><i>Although some trees produce pollen, which can effect hay-fever sufferers, the overall benefits of trees to respiratory health are overwhelmingly positive (Hewitt, 2005). Urban trees remove large amounts of air pollution and improve air quality (Nowak et al 2006). Columbia University researchers found that asthma rates among children aged between 4 and 5 were significantly lower in areas with more street trees (Lovasi et al, 2008).</i></p> <p><i>The greatest benefits are achieved where people are close to, or within, green space when moving around towns and cities.</i></p> <p><i>Planting in areas of high pollution, such as at junctions and traffic lights, helps remove pollution. Screening by a single tree has been estimated to reduce PM concentration immediately behind the tree by 15-20% (Beaully et al, 2007; Mitchell and Maher 2009).</i></p> <p><i>Careful selection, and siting, of trees will help maximise the positive benefits, however, large scale planting of almost all tree species will have a positive effect on air quality (Donovan 2005).</i></p>	
662	[office use only]	Woodland Trust	Full	21	20	<p>The following comments also apply to page 22 para 13.</p> <p>Whilst we note the evidence that street canyons can have significant negative effects on air quality, we believe it is important to emphasise that trees and other green infrastructure, carefully sited, need not contribute to this effect, and that they have wider environmental benefits which are important not to lose, including those relating to urban heat island effect. This would in part be addressed by the inclusion of the explanatory paras suggested at para 5.</p> <p>We would argue that it is not trees that are the problem but the way they may have been sited in relation to built infrastructure (and vice</p>	Thank you for this comment. The reference cited by the stakeholder was excluded as it did not meet inclusion criteria.

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						<p>versa). This point needs to be emphasised, therefore we suggest adding the following qualification:</p> <p><i>'However, it should be noted that it is not trees and other green infrastructure themselves that are the problem; the key factor is where they are planted in relation to built infrastructure. With careful siting, the inclusion of trees and other green infrastructure will have a positive effect on air quality and other environmental factors related to climate change.'</i></p> <p>We commend the following research:</p> <p><i>'A CFD study into the effectiveness of trees to disperse road traffic emissions at a city scale', A.P.R. Jeanjean, G. Hinchliffe, W.A. McMullan, P.S. Monks, and R.J. Leigh, which finds that:</i></p> <p><i>'trees have a regionally beneficial impact on road traffic emissions by increasing turbulence and reducing ambient concentrations of road traffic emissions by 7% at pedestrian height on average. This was an important result given that previous studies generally concluded that trees trapped pollution by obstructing wind flow in street canyons'.</i></p>	
663	[office use only]	Woodland Trust	Full	24	11-27	<p>We are inclined to the view that if the 3 modelling studies on the impact of street trees and vegetation on air pollution are considered 'poor quality', and there is deemed to be an 'evidence gap', then it is inappropriate to make even a qualified recommendation that a cautious approach should be taken to planting street trees. To do so risks depriving local communities of the very wide range of health and wellbeing benefits trees provide, of which air quality is just one.</p> <p>Also, the advice seems to be at odds with Para 49 Line 8 (on the design of cycle routes) which says 'shelter provided by vegetation reduces levels of exposure to air pollutants' and the guidance later says this is 'in line with what is known about the dispersion of air pollutants in general'.</p>	<p>Thank you for this comment. The committee's discussion notes the committee's considerations of the benefits and harms of use of trees and because of the wider benefits, including health benefits it was agreed to make a recommendation as an action to consider.</p> <p>The statement on p.49 line 8 (in the consultation version) is a summary of the evidence from 1 poor quality study mainly examining the impact of bicycle route type on exposure to traffic related air pollution and reported the incidental findings on vegetation.</p>
664	[office use	Woodland Trust	Full	49	18	On the benefits of hedging to alleviate air pollution we would commend the following research	Thank you for this comment. The references cited by the stakeholder were excluded as it

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	only]					-'Urban Vegetation as a filter for airborne particles'; M Feliciano, F Rodrigues, F Maia, A Goncalves -Impact of roadside tree lines on indoor concentrations of traffic-derived particulate matter': Barbara A. Maher, Imad A. M. Ahmed, Brian Davison, Vassil Karloukovski, and Robert Clarke	did not meet the inclusion criteria.
665	[office use only]	Woodland Trust	Full	57	23	Whilst we would support further research on green infrastructure and street trees to tackle air pollution we feel strongly that this should not act as a barrier to action to improve green infrastructure and tree cover in urban areas. The role of trees and green infrastructure in mitigating surface water flooding, reducing the impact of urban heat island effect (itself a contributory factor to poor urban air quality) and improving mental health and wellbeing need to be considered alongside the impacts on air quality. We would refer you to the 'Urban Tree Air Quality Score' system developed by Donovan (2005) to identify species choices for air quality purposes.	Thank you for this comment. Section 1.1 of the guideline makes recommendations on including landscape features such as trees and vegetation as an action to consider. A research recommendation in this area has been made to reflect the gap in the evidence and is not intended to be a barrier to action. The research questions is limited to impact on air quality as that is the remit of the guideline. Thank you for the reference. Inclusion of details such as scoring systems or validated scales in the research recommendations section is not usual NICE format.
666	[office use only]	[Worcestershire Regulatory Services]	Full	4	5	WRS provide technical advice on Air Quality and other environmental issues to the 6 Worcestershire district council local planning authorities (LPA). All 6 authorities have been working on revised local plans for last 2 to 3 years and are at very advanced stage i.e. past consultation stage or already adopted so this advice is too late.	Thank you for this comment.
667	[office use only]	[Worcestershire Regulatory Services]	Full	4	11	WRS do not represent but work closely with local planning authorities (LPA). Our experience as a consultee on several local plans is that this recommendation is difficult to adhere to as land allocated for development in rural counties such as Worcestershire is dominated by land made available on former green belt areas external to current urban centres. Locally dominated by rural areas with limited and expensive public transport and significant distances between places of employment and urban centres making the car the favoured travel option.	Thank you for this comment.
668	[office use only]	[Worcestershire Regulatory Services]	Full	4	13	Actioned through the normal planning application process. WRS advise local planning authorities (LPA) on such matters	Thank you for this comment.

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669	[office use only]	[Worcestershire Regulatory Services]	Full	4	18	Actioned through the normal planning application process. WRS advise local planning authorities (LPA) on such matters	Thank you for this comment.
670	[office use only]	[Worcestershire Regulatory Services]	Full	5	3	Supported and focussed on through Worcestershire County Council draft Local Transport Plan 4	Thank you for this comment. We will pass this information to our local practice collection team. More information on local practice can be found here .
671	[office use only]	[Worcestershire Regulatory Services]	Full	5	5	Actioned through the normal planning application process. WRS make recommendations to local planning authorities (LPA) for EV charging points for new developments based on a locally developed criteria and circumstances. Soon to be enshrined in a Supplementary Planning Document. Additionally could add superfast broadband infrastructure to provide for staff homeworking negating need to make any journey for at least part of working time.	Thank you for this comment. No evidence was found relating to home working.
672	[office use only]	[Worcestershire Regulatory Services]	Full	5	7	Agreed. Worcestershire Supplementary Planning Document currently being drafted	Thank you for this comment. We will pass this information to our local practice collection team. More information on local practice can be found here .
673	[office use only]	[Worcestershire Regulatory Services]	Full	5	14	Travel plans to include EV charging points. This indicates a misunderstanding of the planning application process. Travel Plans generally required by Worcestershire County Council relate to modes of travel and not infrastructure requirements. From experience as advisors to LPA, requirements for infrastructure must be incorporated into development by separate condition so could form part of SPD/ local plan separately of Travel Plan requirements. You cannot require infrastructure to be introduced after completion of the construction and occupation of the development when Travel Plans are implemented.	Thank you for this comment. The recommendation relating to travel plans has been amended. It is now included in recommendation 1.2.1.
674	[office use only]	[Worcestershire Regulatory Services]	Evidence Review 3	9	ES9.1a	Travel Planning. No evidence is provided of long term effectiveness of organisational travel plans - ES9.1a only provides results after 3 mth period, what about 1yr 2yr and 5yr required to ensure AQ impacts are maintained and note one of the studies was alongside a workplace charging scheme not Travel Plan in isolation. Experience (of Local Authorities such as one of the Evidence studies) indicates Workplace (Organisational) Travel Plans <i>can</i> be effective when combined with other limitations such as insufficient car parking	Thank you for this comment. The evidence review notes the issues with the evidence identified. However the committee felt it supported making a travel plan recommendation (1.2.1).

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						availability or seating to accommodate all staff in workplace alongside effective IT to support home working. Where there is sufficient and affordable or free local parking available at destination Travel Plans are less effective.	
675	[office use only]	[Worcestershire Regulatory Services]	Evidence Review 3	11	ES10.1	Personalised Travel Plan evidence ES10.1 based on a single 12 year old study from Japan, cultural differences and changing attitudes over intervening time do not appear to have been considered as to the relevance of this study	Thank you for this comment. The committee took into account whether interventions assessed are feasible in the UK context. The committee considered the evidence included in ES 10.1 was considered insufficient and it has not informed any recommendation, as the evidence was considered insufficient. This is noted in the 'Evidence statements not used to make recommendations' section within the committee's discussion section of the final guideline.
676	[office use only]	[Worcestershire Regulatory Services]	Full	General	General	It is noted the recommendations and guidance makes no mention of a key option that is encouraging businesses to provide IT facilities to enable staff to carry out daily duties at home, thus removing any journey to work, reducing congestion, which has beneficial impacts for delivery times, reduced business costs and therefore economic benefits, and social benefits through improved work life balance for employees and reduced emergency vehicle response times.	Thank you for this comment. No evidence was found relating to home working. It is possible that this would have unintended consequences such as longer commutes on days worked in the office.
677	[office use only]	[Worcestershire Regulatory Services]	Full	5	18	Green Walls or Roofs. Experience indicates this is only appropriate where developments are public buildings under LA control. No control in planning regime once developer handed over site to future site users, particularly where development is residential, so from previous discussions with local planning authorities do not believe a scheme would be enforceable and sustainable under planning requirements.	Thank you for this comment.
678	[office use only]	[Worcestershire Regulatory Services]	Evidence review 1	53	ES4.4	Green Walls or roofs. Experience indicates this is only appropriate where developments are public buildings under LA control. The 100% coverage in study area is unlikely to be possible in most AQMAs in Worcestershire as dominated almost exclusively by private residential properties and would require agreement by all current and future homeowners to implement to achieve the AQ impact. Difficult to achieve.	Thank you for this comment. The 100% coverage reported in evidence statement 4.4 is based on a modelling study. The committee's discussion section notes absence of corroboration of the findings from these modelling studies reflects a gap in evidence.
679	[office use	[Worcestershire Regulatory	Full	5	20	Community Infrastructure Levy for AQ monitors – It should be noted that monitoring does not improve AQ just provides data. This	Thank you for this comment. This has been amended to include measures to reduce

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	only]	Services]				recommendation appears to go against Defra's current emphasis in recent revised policy and technical guidance to LA on moving away from monitoring to focus on actions.	emissions.
680	[office use only]	[Worcestershire Regulatory Services]	Full	5	27	Good recognition of potential issue. Should be communicated to other agencies with responsibilities for motorways e.g. Highways England and Department of Transport	Thank you for this comment. Please note that this recommendation (1.1.5 in the consultation version) has been amended and reference to 'solid barriers' has been removed.
681	[office use only]	[Worcestershire Regulatory Services]	Full	6	1	Good recognition of potential issue. Welcome advice	Thank you for this comment for this comment.
682	[office use only]	[Worcestershire Regulatory Services]	Full	General	General	General comment on the recommendations for Planning 1.1 – for most part the recommendations compliment existing LA practices and Air Quality Action Plans, but the advice is considered to be somewhat belated in respect of Local Plans and in some aspects to misunderstand planning requirements. It is noted no expert witness statement from a Local Authority representative or Planning body is included and it is considered the committee could have benefitted from such expertise.	Thank you for this comment. The committee included topic members with experience of local planning. The impact of planning on air pollution was examined in expert paper 6 .
683	[office use only]	[Worcestershire Regulatory Services]	Full	6	5	General comment on the recommendations for 1.2 Clean Air Zones - for most part the recommendations compliment the recent consulted on draft CAZ framework, Defra's Policy Guidance PG16 and Local Transport Plans. With reference to the question posed above WRS consider CAZ's to represent the most challenging action to implement in respect of time, cost and political will but at the same time have the potential to have the biggest impact on reducing AQ nationally and in many areas locally of poor air quality. Implementation is only likely to occur locally with an expansion of the mandatory requirement on the current 5 cities required to cover more areas in the UK in a revised version of the Defra's UK AQAP.	Thank you for this comment. The guideline aim is to help encourage further action to address air pollution.
684	[office use only]	[Worcestershire Regulatory Services]	Full	7	4	Congestion charging zones – although charging and non charging zones are outlined in the framework, a Congestion zone, as in London, differs from proposed CAZ's and the guidance appears out of sync with that framework in this respect	Thank you for this comment. The committee felt that there were circumstances where a congestion charge zone could be beneficial in addition to a clean air zone, principally where congestion (and not just vehicle type) was thought to be a key part of the problem.
685	[office use only]	[Worcestershire Regulatory Services]	Full	29	3	Revision of targets should be directed to central government. In reality LA's will work to towards national targets only due to limited resources available.	Thank you for this comment. Please note that it is not within the remit of NICE to make recommendations for central Government.

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686	[office use only]	[Worcestershire Regulatory Services]	Full	General	General	General comment on the recommendations for 1.3 – Reducing Emissions from public sector transport services. According to colleagues at Worcestershire County Council public sector transport services are all privately operated in Worcestershire and the LA has no control over these private fleets. Suggest these recommendations are better directed towards Central Government to implement recommendations/influence change via other means.	Thank you for this comment. This recommendation addresses emissions from public sector transport generally. This includes a range of vehicles owned or operated by the public sector. It is anticipated the recommendations would still be applicable to private companies as these would be commissioned by local authorities. It is the decision of local government what to include in service specifications and requirements of companies they contract for delivery of public services. Please note that it is not within the remit of NICE to make recommendations for central Government.
687	[office use only]	[Worcestershire Regulatory Services]	Evidence Review 3	13	ES11.1	Recommendation 1s based on a single study on USA motorways? Noting that motorways are not in LA control and most british roads in LA areas will be very different to USA highways, evidence does not appear to be relevant to LA.	Thank you for this comment. The applicability statement in evidence statement 1.1 acknowledges that the evidence is from a US study and that differences in road management systems and driver behaviour in the UK means that it is partially applicable. The committee took this into account as well as additional evidence from review 3 (ES11.2 to ES11.4) and expert testimony to develop their recommendation on driver training (1.4.1 to 1.4.5 in the final guideline).
688	[office use only]	[Worcestershire Regulatory Services]	Evidence Review 3	16	ES11.2	Driver information and training recommendation is based on 2 studies using in car technology and specifically relates to CO2 rather than air pollutants in respect of LAQM. In car technology is beyond LA resources and therefore would appear to be more relevant to central government to discuss with car manufacturers.	Thank you for this comment. The recommendation on driver training (1.4.1 to 1.4.5 in the final guideline) was based on four evidence statements (ES11.1 to ES11.4) and expert testimony. The committee's discussion section acknowledges that the recommendation was based on uncertain evidence, therefore the committee made these as actions to consider.
689	[office use only]	[Worcestershire Regulatory Services]	Full	8	16	Smooth driving on motorways. Motorways are not in LA control, suggest redirect recommendation to Highways England and Department of Transport.	Thank you for this comment. The wording of 'who this guideline is for' in the overview section of the final guideline has been amended to include 'Staff working in transport

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690	[office use only]	[Worcestershire Regulatory Services]	Full	8	28	No evidence found in Evidence Review supporting this recommendation	Thank you for this comment. The committee felt that this was a reasonable extrapolation from the evidence considered. The evidence taken into consideration when developing recommendation 1.5.1 of the final guideline was extrapolated from evidence from a modelling study (included in evidence review 3 on travel planning and advice) which suggested using wireless technology to identify the optimum speed. The committee's discussion notes that a similar effect might be obtained by the expansion of variable limit speed control using signs outside the vehicle.
691	[office use only]	[Worcestershire Regulatory Services]	Expert Witness 4	General	General	Influencing drivers behaviour - no background/ organisation for witness is presented. Limited studies discussed, mostly refers to CO2 when predominately LAQM is concerned with nitrogen dioxide exceedances in most declared AQMAs.	Thank you. Expert paper 4 presented an 'overview of the evidence relating to influencing driving behaviours for fleet drivers and others'.
692	[office use only]	[Worcestershire Regulatory Services]	Full	General	General	General comments on recommendation 1.5 Cycle Routes – WRS are unable to provide an informed comment as these are responsibility and designed by County Council authority. Recommendations appear reasonable	Thank you for this comment.
693	[office use only]	[Worcestershire Regulatory Services]	Full	9	17	Providing info on Daily AQ Index - agreed through local and social media. No control over national media, direct recommendation to central government	Thank you for this comment.
694	[office use only]	[Worcestershire Regulatory Services]	Full	10	1	1.6.4 Businesses - again misses out on enabling staff to work from home and eliminate journey altogether, improve employee work life balance, boost economy from more efficient delivery times, reduced staff time lost in congestion commuting to/ from work and business travelling, and other social benefits such as improved emergency response times. Potentially the most effective emission reduction of all. However a study is required to look at what support/ advice businesses require to support non frontline staff at home	Thank you for this comment. No evidence was found relating to home working.
695	[office use only]	[Worcestershire Regulatory Services]	Full	10	9	1.6.5 – Make healthcare professional aware of UK Daily Air Quality Index. Suggest Dept of Health could communicate to all healthcare	Thank you for this comment.

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	only]	Services]				professionals, Directors of Public Health offices more effectively than LA district councils can	
696	[office use only]	[Worcestershire Regulatory Services]	Full	General	General	General encouragement of modal shift to walking and cycling - understood but unlikely to have the significant impacts on AQ emissions to revoke AQMAs locally. In order to mitigate poor AQ across UK more direct action is required from central government to convert reliance on diesels in UK vehicle fleet to ULEV technology. LAs can assist with introducing more infrastructure locally via planning or direct action but central government has significant role to play to affect motor industry emissions, LEV production and affordability and encourage public uptake through taxation and financial incentives.	Thank you for this comment. It is not within the remit of NICE to make recommendations for central Government but NICE has worked with Public Health England (PHE) to develop this guideline. PHE advise central Government on national policies.

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Document processed	Organisation name – Stakeholder or respondent	Disclosure on tobacco funding / links	Number of comments extracted	Comments
20's Plenty for Us.doc	20's Plenty for Us	None	7	
Aeris Europe Limited.doc	[Aeris Europe Limited]	Not applicable	5	
Almere Consulting.doc	[Almere Consulting]	[not applicable]	0	
Arun District Council.doc	Arun District Council	Not aware of any	7	
Ashwoods Lightfoot Ltd.doc	Ashwoods Lightfoot Ltd	None	5	
Association of Directors of Public Health.doc	[Association of Directors of Public Health]	[IN/A]	0	
Asthma UK.doc	Asthma UK	Asthma UK does not have any current or past, direct or indirect links to the tobacco industry.	5	
Bradford Metropolitan District Council.doc	Bradford Metropolitan District Council.doc	None	8	
Bristol City Council.doc	Bristol City Council	Nothing to declare	17	
British Lung Foundation.doc	British Lung Foundation	No funding to disclose	13	
British Thoracic Society.doc	British Thoracic Society	None	5	
Building Services Engineering Association.doc	Building Services Engineering Association BESA	None	1	
Cambridgeshire Combined Villages Heavy Commercial Vehicle Group.doc	Cambridgeshire Combined Villages Heavy Commercial Vehicle Group	None	5	
Chartered Institute of Environmental Health.doc	Chartered Institute of Environmental Health	None	13	
Chartered Institution of Highways and Transportation.doc	[Chartered Institution of Highways and Transportation (CIHT)]	[None]	13	
City of York Council.doc	City of York Council	None	8	
Community by Design.doc	Community by Design	n/a	1	
Cycling Embassy of Great Britain.doc	Cycling Embassy of Great Britain	None	5	
Defra and DfT.doc	Defra and DfT.doc		22	

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		None		
Eastleigh Borough Council.doc	Eastleigh Borough Council.doc	None	16	
Faculty of Public Health.docx	Faculty of Public Health	None	26	
Fife Council.doc	Fife Council	None	2	
FirstGroup plc.doc	FirstGroup plc (UK Bus Division)	Nil	15	
FPH_RCP.docx	Faculty of Public Health Royal College of Physicians	None	16	
Greener Jobs Alliance.doc	Greener Jobs Alliance and Furzedown Low Carbon Zone and Battersea and Wandsworth Trades Union Council	None	6	
Hertfordshire County Council.doc	Hertfordshire County Council	n/a	0	
Hydrock Consultants Ltd.doc	Hydrock Consultants Ltd	None	2	
Insall & Coe.doc	Insall & Coe.doc	None	19	
Institute of Air Quality Management.doc	Institute of Air Quality Management	None	33	
Integrated Transport Planning Ltd.doc	Integrated Transport Planning Ltd.	None	9	
King's College London Environmental Research Group.doc	[King's College London Environmental Research Group]		12	
Kirklees Council.doc	Kirklees Council – Public Health		2	
Lambeth Local authority.doc	Lambeth Local authority	none	6	
Landscape Futures CIC.doc	[Landscape Futures CIC on behalf of ParksHerts]	[None]	1	
LANDSCAPE INSTITUTE.doc	LANDSCAPE INSTITUTE – TECHNICAL & RESEARCH COMMITTEE	NO LINKS	4	
Leeds City Council.doc	Leeds City Council The Office of the Director of Public Health	[Nil]	82	
LEICESTER CITY COUNCIL.doc	LEICESTER CITY COUNCIL	None	18	

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Living Streets.doc	Living Streets	None	42	
London Borough of Hackney.doc	London Borough of Hackney	None	23	
London Borough of Hammersmith & Fulham.doc	Elizabeth Fonseca, Environmental Quality Manager London Borough of Hammersmith & Fulham (Officer level response only)		9	
London Cycling Camapign.doc	London Cycling Camapign	None	1	
London Forum of Amenity and Civic Societies.doc	London Forum of Amenity and Civic Societies	None	9	
London Sustainability exchange.doc	London Sustainability exchange	NONE	18	
Medway Council.doc	Medway Council	none	10	
NHS England.doc	NHS England	None	1	
North Hertfordshire District Council.doc	[North Hertfordshire District Council]	[None]	6	
Public Health England.doc	Public Health England	None	2	
Royal Borough of Greenwich.doc	[Public Health and Wellbeing Department, Royal Borough of Greenwich]	[None]	17	
Royal Borough of Kensington & Chelsea.doc	Elizabeth Fonseca, Environmental Quality Manager Royal Borough of Kensington & Chelsea (Officer level response only)		7	
Royal College of General Practitioners.doc	Royal College of General Practitioners	None	2	
Royal College of Physicians and Surgeons of Glasgow.doc	Royal College of Physicians and Surgeons of Glasgow	Nil	2	
Royal Town Planning Institute.doc	Royal Town Planning Institute	No links or funding with the tobacco industry.	8	
Somerset County Council.doc	Somerset County Council Public Health	None	9	
South Gloucestershire Council.doc	South Gloucestershire Council	None	20	
Southwark Council.doc	Southwark Council	[IN/A]	9	
The Dirac Foundation.doc	The Dirac Foundation	There are no associations with the tobacco industry.	6	

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The Forestry and Woodlands Advisory Committee Urban Network.docx	The Forestry and Woodlands Advisory Committee Urban Network (uFWAC)	None	6	
Transport for Greater Manchester.doc	[Transport for Greater Manchester]	None	10	
Transport for London.doc	Transport for London	Not Applicable	7	
Transport Planning Society.doc	Transport Planning Society	None	5	
UK Health Alliance on Climate Change.doc	UK Health Alliance on Climate Change	None	11	
UK Indoor Environments Group.doc	UK Indoor Environments Group (UKIEG)	None	4	
University of Leeds.doc	University of Leeds	None	4	
Woodland Trust.doc	Woodland Trust	None	9	
Worcestershire Regulatory Services.doc	[Worcestershire Regulatory Services]	[Nor applicable]	31	

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