

Air pollution - outdoor air quality and health

NICE National Institute for
Health and Care Excellence

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

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

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

We would like to hear your views on these questions:

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

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

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Organisation name – Stakeholder or respondent (if you are responding as an individual rather than a registered stakeholder please leave blank):		London Forum of Amenity and Civic Societies		
Disclosure Please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry.		None		
Name of commentator person completing form:		Daniel Instone		
Type		[office use only]		
Comment number	Document (full version, short version or the appendices)	Page number Or 'general' for comments on the whole document	Line number Or 'general' for comments on the whole document	Comments Insert each comment in a new row. Do not paste other tables into this table, because your comments could get lost – type directly into this table.
1	Full	General	General	The comments below take your nine questions above in order. On 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.
2	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.
3	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

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				<p>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.</p> <p>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.</p>
4	Full	General	General	<p>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 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>
5				No comments on Question 5.
6	Full	General	General	<p>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.</p>
7				Question 7. Not applicable to this organisation
8	Full	General	General	<p>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 considering alternatives to mechanised road travel. But for the reasons given in comments to Question 4 above, NICE</p>

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				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.
9	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.

Insert extra rows as needed

Checklist for submitting comments

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

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

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

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

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