

Air pollution - outdoor air quality and health

Consultation on draft scope Stakeholder comments table

16/07/15 – 13/08/15

ID	Type	Stakeholder	Page no.	Line no.	Comments Please insert each new comment in a new row	Developer's response Please respond to each comment
1	[for office use only]	Bosch UK	2	26 and 27	We believe regarding interventions such as charging zones including low emission zones, parking restrictions and charges, the scope should ask specifically whether the interventions undertaken by local authorities affect all vehicles or if they encourage those that meet the latest European emissions standards, such as Euro 6/VI standard compliant vehicles.	Thank you. This information may be reported in the evidence considered by the committee.
2	[for office use only]	Bosch UK	3	6	We agree that local authorities should also play their part in educating the public on cleaner forms of transportation. We feel this should include information on whether local authorities promote vehicles that comply with the latest European emissions standards, such as the Euro 6/VI standard.	Thank you. This may be an issue that the committee will want to discuss.
3	[for office use only]	Bosch UK	3	26	In looking at the parking charges or traffic zoning schemes imposed by local authorities, we believe the scope should distinguish whether the incentives and disincentives affect for example (as is being proposed by some authorities) all diesel vehicles, or if these incentives/disincentives discern between older vehicles and those that comply with the latest European emissions standards, such as Euro 6 for diesel vehicles.	Thank you. This information may be reported in the evidence considered by the committee.
4	[for office use only]	Bosch UK	4	5	We believe the consultation's scope should seek more in-depth information on whether local authorities promote cleaner vehicles, such as vehicles that comply with the latest Euro 6/VI European emissions standards. This will allow a greater understanding of whether this in particular has a significant impact on reducing exposure to air pollution, than other factors.	Thank you. This may be an issue that the committee will want to discuss.
5	[for office use only]	Bosch UK	4	24 and 25	We agree with the draft scope's approach of identifying the types of vehicles used in England. However, we believe it should seek more detailed information on vehicle choice, and identify a breakdown of vehicles by their European emissions standards. This would allow a greater understanding of the types of vehicles that do, and do not, contribute to reducing air pollution.	Thank you. Reference to European emission standards has been added to clarify this point.
6	[for office use]	Brighton & Hove City Council,	2	14	Reductions in mileage or emissions need to tackle the vehicle type that is causing the pollution. Source apportionment evidence is crucial to determine the % of NOx (Oxides of Nitrogen) that is from bus, HGV (Heavy Good Vehicles), taxi, van or diesel cars. A policy to reduce private petrol and electric cars frees up	Thank you. This point has been clarified.

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	only]	Environmental Protection			road space for other highways users but is unlikely to reduce emissions or ambient levels substantially except where the flow of heavy vehicles is improved.	
7	[for office use only]	Brighton & Hove City Council, Environmental Protection	2	18	Developing public transport services – an increase stop start diesel bus movements could be worse for nitrogen dioxide. If buses carry many people this more efficient for fuel consumption and much better for CO ₂ (Carbon Dioxide) per passenger. Despite these advantages it is illegal if buses are the main cause of NO ₂ exceedence at the residential façade.	Thank you. It is likely that the committee developing this guideline will want to consider these issues.
8	[for office use only]	Brighton & Hove City Council, Environmental Protection	2	22	Dust may be a nuisance but not prejudicial to human health when inhaled like fine particles PM _{2.5} .or nitrogen dioxide NO ₂	Thank you.
9	[for office use only]	Brighton & Hove City Council, Environmental Protection	3	6	Fuel choice requires funding and infrastructure taxi trade say methane is not reliable after 130,000 miles. Vegetable oils can invalidate the warrantees of some original manufacture equipment. Bus operations require refuelling for 300 double decker buses operating >21 hours a day. The right economy of scale is required to avoid delays with alternative refuelling. This would require either overhead lines or a new depot for scaled up rapid electric charging. Land and depot space in the urban area for hydrogen cell or electric infrastructure is likely to be costly. A new metro system would deliver much more.	Thank you. It is likely that the committee developing this guideline will want to consider these issues.
10	[for office use only]	Brighton & Hove City Council, Environmental Protection	3	10	There is a good chance that a new 21 st century transport system could pay for itself in the high density urban area where many journeys are <7km. A new centrally powered metro system could help with air pollution compliance and would increase the economic rent of land. If the economic rent of land was collected instead of taxing enterprise, work and purchases, income could be re-invested into infrastructure with the aim of improving transport, the economy, the urban realm and the quality of the environment where many people live. Such a vision is likely to have substantial benefits for mental and physical health across the majority of the population. The city currently has very high bill in caring for those with past drug use, poor respiratory-circulatory health and mental illness. Thousands of residential dwellings are at roadside in the Air Quality Management Area (AQMA).	Thank you. This is an interesting suggestion, However national fiscal policy is beyond the remit of this guideline.
11	[for office use only]	Brighton & Hove City Council, Environmental Protection	3	12	Since current policies have not been effective. Economic modelling may require some lateral thought.	Thank you. The NICE methods for evaluating interventions allows for a range

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						of outcomes and perspectives to be considered.
12	[for office use only]	Brighton & Hove City Council, Environmental Protection	3	20	Keep clear zones may help for some hotspots where the building line is especially close to the road carriageway or a junction.	Thank you.
13	[for office use only]	Brighton & Hove City Council, Environmental Protection	3	26	Parking charges are very high in Central Brighton	Thank you.
14	[for office use only]	Brighton & Hove City Council, Environmental Protection	4	1	Yes	Thank you.
15	[for office use only]	Brighton & Hove City Council, Environmental Protection	6	2	Highly misleading to state 31% of general NOx emissions come from road transport because roadside ambient contribution where there is AQMA exposure is often >90% from road transport.	Thank you. This has been clarified.
16	[for office use only]	Brighton & Hove City Council, Environmental Protection	6	6	Reference should be updated to include health effects of nitrogen dioxide (NO ₂) that are recently available for London and other places. In 2015 NO ₂ is by far the most plentiful pollutant in the roadside environment and can often be several times more concentrated than fine particles PM _{2.5} .	Thank you. References to studies published after the finalisation of the draft scope have been added.
17	[for office use]	Brighton & Hove City Council,	6	21	This references reports to the commission and provides a broad brush overview of UK air quality. This largely ignores the high resolution work carried out by local authorities. It tends to miss detail in high density areas; this can be misleading because many air quality issues are localised.	Thank you. This section is intended to

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	only]	Environmental Protection				provide a very brief overview. Local data is clearly important but it is not possible to go into that level of detail in this document.
18	[for office use only]	Brighton & Hove City Council, Environmental Protection	8	22	We are trying to move away from the perception or assumption that poor air quality predominately happens in deprived areas. It does happen at roadside where housing, fenestration, diet can be poor and smoking common, but many AQMA (village and urban) have very high property and rent values. Affluent people are exposed to high levels of pollution in their cars and homes. This is a very important point if we want to achieve cross party support for improvement. The clean air act was conceived by parliament in the 1950s on the back of the London smogs when an eclectic cross section of the population died.	Thank you. This point has been clarified.
19	[for office use only]	Brighton & Hove City Council, Environmental Protection	6	26	Young children, infants and babies are most vulnerable to pollution. The neonatal group surviving to later life can be an especially susceptible to airborne pollution if they have reduced respiratory tissue development and lower lung capacity.	Thank you.
20	[for office use only]	Brighton & Hove City Council, Environmental Protection	8	4	This is likely to be updated and some pollutants such could be dropped.	Thank you.
21	[for office use only]	British Heart Foundation	5	4-6	We also believe that Public Health Guidance 25: Prevention of Cardiovascular Disease should be taken into consideration when developing this guidance.	Thank you. Air pollution has an impact on CVD however this guideline does not update PH25. Links to relevant guidelines will be provided.
22	[for office	Chartered Institute of	1	10	In the light of line 9, line 10 might better read '...traffic-related air pollution.' or alternatively, if the proposed quality standard will cover other sources of air pollution, '...develop a <i>broader</i> NICE quality standard...'.	Thank you. The content of the

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	use only]	Environmental Health				quality standard is yet to be determined.
23	[for office use only]	Chartered Institute of Environmental Health	1	13 and 16	The text divorces environmental health from public health while the former is, of course, a sub-set of the latter. That would be better shown by combining the two as ' public (including environmental) health'	Thank you. This has been amended
24	[for office use only]	Chartered Institute of Environmental Health	1	12 to 23	These lists omit explicit mention of transport operators ie the mainly private companies providing bus fleets, taxi companies and private hauliers and delivery companies.	This group is covered by 'employers' however a specific mention has been added.
25	[for office use only]	Chartered Institute of Environmental Health	2	9, 10	This section suggests that all towns and cities are 'hot spots'; whereas many towns and all cities will have hot spots, air quality will vary considerably from street-to-street and it is not the case that air quality will be particularly poor throughout them. The point is about frequenting hot spots, not about urban living.	Thank you. This has been amended.
26	[for office use only]	Chartered Institute of Environmental Health	2	9, 10	Because of their particular exposure, perhaps road-users, whether cyclists or indeed drivers, deserve particular mention here.	Thank you. These groups are included and it is likely that the committee will discuss particular forms of exposure.
27	[for office use only]	Chartered Institute of Environmental Health	2	17 to 22	This section might consider any evidence that street design either tends to concentrate pollutants (canyon effect?) or disperse them.	Thank you. This would be of interest if evidence of interventions relating to this were found.
28	[for office use	Chartered Institute of Environmental	2	18	'Services' might consider barriers to the take-up of public transport, eg cost	Thank you. Cost is likely to be a barrier for some,

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	only]	Health				factors that may hinder uptake of interventions will be considered by the committee
29	[for office use only]	Chartered Institute of Environmental Health	2	25	Possible disadvantages of 'Traffic management', in particular additional noise, need to be considered	Thank you. Where other impacts such as noise are identified in the evidence they will be considered.
30	[for office use only]	Chartered Institute of Environmental Health	3	2	Why not '...aimed at <i>travellers</i> ..?'	Thank you. The impact of changes in travel mode may extend beyond the person travelling, assuming the changes are widespread.
31	[for office use only]	Chartered Institute of Environmental Health	3	22 and 27	Line 22 reads '..people's exposure..' while line 27 reads '..the public's exposure..' Is there supposed to be a difference?	Thank you. No difference is intended.
32	[for office use only]	Chartered Institute of Environmental Health	4	17	Dose-response relationships for even the principal pollutants are subject to considerable uncertainty and it will be difficult to assess the efficacy of interventions by health outcome	Thank you. This will be taken into account in developing the guideline.
33	[for office use only]	Chartered Institute of Environmental Health	6	5	It would be better to say '..illness <i>and contributes to many premature deaths</i> .'	Thank you. This has been amended.
34	[for office	Chartered Institute of	6	22	The point about deprivation isn't clear; many rural areas are deprived yet don't suffer equally whereas, clearly, many urban areas are privileged and do.	Thank you. This has been clarified.

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	use only]	Environmental Health				
35	[for office use only]	Chartered Institute of Environmental Health	6	27	The comparator should, surely, be 'working age adults'	Thank you.
36	[for office use only]	Chartered Institute of Environmental Health	7	14	It would be more accurate to say '...an action plan to <i>work towards tackling</i> the problems.'	Thank you.
37	[for office use only]	Chartered Institute of Environmental Health	7	18	The Highways Agency is, of course, now Highways England	Thank you. This has been amended.
38	[for office use only]	Chartered Institute of Environmental Health	7	Sections 3.2 and 3.3	The emphasis in these sections is heavily on the Environment Act. In the first place, the text might be clearer if the paragraphs on Policy and Legislation preceded those about Current Practice (hence, the Why? would more logically precede the How?) but, in the second place, there needs to be mention of the planning process eg Local Transport Plans and the National Planning Policy Framework and powers in the Town & Country Planning Act to refuse development proposals where air quality would be jeopardised, whether by attracting/encouraging traffic near existing receptors or <i>vice versa</i> , eg by building new housing close to major roads.	Thank you. Reference to Local Transport Plans and planning frameworks has been added.
39	[for office use only]	Chichester District Council			We welcome the NICE initiative to produce and adopt the proposed guidance. The audience for the proposed guidance seems in the main ('who is the guideline for') to be local authority staff. There is a plethora of similar guidance already available and as such the guidance is in danger of being 'more of the same'. Whilst having the 'NICE' badge on the document will increase it's appeal to local authority public health staff it is suggested that aiming the guidance at GP's and respiratory health specialists is also important to increasing the momentum in tackling air pollution. The guidance ought to have some key points of difference to existing guidance such that its use and impact is maximised.	The guideline notes that it will be of interest to primary and secondary healthcare professionals. However, it is likely that the recommendations will be mainly targeted at other

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						groups.
40	[for office use only]	Chichester District Council	1.2	16	Interrelated policy & areas and practitioners that can form the basis of partnerships to tackle and potentially co-fund interventions and initiatives.	Thank you.
41	[for office use only]	Chichester District Council	1.2	16	Provision of air pollution prediction information to empower individuals who are vulnerable to the impacts of pollution to self-manage their condition better (eg AirAlert https://www.airalert.info/Splash.aspx).	Thank you. Provision of information for individuals has been added to this section.
42	[for office use only]	Chichester District Council	1.2	19	Change the word 'facilities' to 'infrastructure'.	Thank you. This has been changed.
43	[for office use only]	Chichester District Council	1.2	27	Add: 'Parking policy to foster and encourage the uptake of low and zero emission vehicles.'	Thank you. Parking policies are included in this section.
44	[for office use only]	Chichester District Council	1.4		Add something about organisations showing leadership through integrating zero/low emission vehicles, encouraging active travel etc.	Thank you. This may arise from the evidence considered and may be addressed by the committee.
45	[for office use only]	Chichester District Council	1.5		Summer and winter exposure to pollution can be significantly different and ought to be covered (ditto urban and rural pollution).	Thank you. This may arise from the evidence considered and may be addressed by the committee.
46	[for office use]	Chichester District Council	3.2		Where an AQMA is declared then local authorities are statutorily required to produce an Air Quality Action Plan detailing what measures and interventions they intend to tackle local air pollution. Such measures are likely to include.....etc	Thank you.

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	only]					
47	[for office use only]	Chichester District Council			General: air pollution is a significant public health issue and giving some metrics as to years of life lost vs other significant public health issues might help to provide a stronger context for decision makers in public health to allocate resources. Likewise strong working partnerships between highways departments, public health, environmental health and wellbeing services might bring the best resource to bear on delivering interventions with adequate scope and reach to make meaningful in-roads into this difficult to tackle issue.	Thank you. Section 3.1 includes a brief overview of the health impacts. Links to key documents are provided for those who are interested in further reading.
48	[for office use only]	City of Bradford Metropolitan District Council	general	general	The focus on road traffic is a mistake that will scope out other areas which have large influence on outdoor air quality, transport is responsible for 30% of NOx and only 18% of PM. To focus on transport alone risks missing other areas which may have huge influence and be cost effective interventions. For example; i) tightening up regulations on industry and power generation (especially in areas where exposure is of concern) may be a more cost effective intervention. ii) There are moves towards wood burning and combined heat and power (CHP) in cities (even those with air quality problems) if we move away from gas and heat buildings with wood/biomass this will increase both NOx and PM markedly (they emit 20 times more) and if we generate electric locally using gas rather than relying on the electric grid this will also increase NOx emissions in places where exposure is high.	Thank you. While other areas may be significant it is important to restrict the scope to an achievable limit. Other areas such as those you suggest may be addressed in subsequent guidelines if appropriate.
49	[for office use only]	Clean Air in London			Clean Air in London has only two comments on the draft guidance at this stage. First, please highlight and address fully the implications of the Kings College London research about the health impacts of nitrogen dioxide. See: https://www.london.gov.uk/sites/default/files/HIAinLondon_KingsReport_14072015_final_0.pdf	Thank you. Reference to this report has been added in section 3.1
50	[for office use only]	Clean Air in London			Second, please recognise that 75% of PM2.5 comes from outside cities whereas over 80% of NO2 is generated within cities. See: http://cleanair.london/solutions/mayor-gets-c-minus-in-new-ranking-of-air-quality-in-23-european-cities/	Thank you. Further detail has been added to this section. However, please note that this is intended as a brief

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						background to the issue. References for those who would like to pursue the matter further are provided.
51	[for office use only]	Colchester Borough Council		General	<p>In recognition of the health effects of poor air quality, Part IV Environment Act 1995 places a statutory duty on borough and district councils to periodically assess and review the air quality within its area and, where necessary, to take steps to improve air quality.</p> <p>However in certain situations, district and borough councils do not possess all the powers they might need to effect improvements in air quality for example, the County Council is the Highways Authority and as such, it possesses many of the powers necessary for implementing alterations and improvements to the public highway which in turn influence the weight and speed of traffic, vehicle emissions and consequently levels of NO₂.</p> <p>The term - local authority needs to be defined as including the County Council as well as the boroughs & districts.</p>	Thank you. This is an important point that the committee may want to address.
52	[for office use only]	Colchester Borough Council	2	17	This should be separated into what requires intervention by the borough & district councils and those which require support from county council(highway authority) . i.e. borough & district local authorities cannot implement a Low Emission Zone.	Thank you. This will be important in considering who should take specific actions in the final guideline.
53	[for office use only]	Colchester Borough Council	2	18	Consider bus emission standards for buses entering air quality management areas.	Thank you. This may arise from the evidence considered and may be addressed by the committee.
54	[for office use only]	Colchester Borough Council	2	13	Ensure that future development in pollution hotspots does not worsen air quality by the formation of a 'canyon' .	Thank you. Recommendations will be developed by the committee following

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						discussion of the available evidence.
55	[for office use only]	Colchester Borough Council	2	13	Planning & Air Quality electric car charging points to be fitted in all new properties	Thank you. Recommendations will be developed by the committee following discussion of the available evidence.
56	[for office use only]	Colchester Borough Council	3	9	Sat Navs designed so roads with an air quality problem are avoided where possible,	Thank you. Recommendations will be developed by the committee following discussion of the available evidence..
57	[for office use only]	Department of Health	General	General	This proforma asks: <i>Are there any other air pollution issues that you think NICE should consider addressing?</i> Producing guidance to reduce traffic-related emissions within urban areas is supported given the significant public health impact of air pollution.	Thank you.
58	[for office use only]	Department of Health	General	General	NICE should obtain expert advice from organisations and experts in this area. Such as - Public Health England (PHE), the Department for Environment, Food and Rural Affairs (Defra), Department for Transport (DfT) and Highways England. DH's expert advisory Committee on the Medical Effects of Air Pollutants (COMEAP) and Defra's Air Quality Expert Group (AQEG).	Thank you. Engagement with NICE on development of guidelines requires an organisation to be registered as a stakeholder. Public Health

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						England and the Department for Transport are registered as stakeholders for this work. Others, including DEFRA and members of COMEAP and AQEG, were invited to register. We will ask them to register again.
59	[for office use only]	Department of Health	General	General	The Government's plans to comply with the European air quality Directive for nitrogen dioxide limit values will be published before the end of the year and NICE should take account of these, to make use of the work undertaken in their development.	Thank you. Please note that the guideline will focus on local actions. The committee will want to ensure that the guideline is informed by the current policy frameworks.
60	[for office use only]	Department of Health	General	General	The guidance should include consideration of wider public health co-benefits eg measures with health co-benefits, such as increasing active travel, reducing carbon emission and adapting to climate change.	Thank you. This may be included in the modelling. The outcomes section has been clarified to include health related co-benefits.
61	[for office use only]	Department of Health	3	2/3	Given the health impact the focus should be on reducing long-term exposure to pollutants, but it would also be useful to include provision of information to vulnerable individuals when pollutant levels are elevated.	Provision of advice and warnings has been added.

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62	[for office use only]	Department of Health	4	15	It would also be valuable to assess the evidence for likely health co-benefits of the measures under consideration. In particular the added health benefits of active travel and its impact in reducing air pollution and the win-win that this represents.	Thank you. The outcomes section has been clarified to include health related co-benefits.
63	[for office use only]	Department of Health	6	5-14	The wording reflecting COMEAPs statement should be checked with PHE COMEAP secretariat.	Thank you.
64	[for office use only]	Department of Health	6	15	Suggest mention is also made of the Public Health Outcomes Framework indicator for air pollution. Estimates of the fraction of mortality in English local authority areas and regions attributable to long-term exposure to particulate air pollution arising from human activities are published by PHE as one of the indicators in the Department of Health's Public Health Outcomes Framework (PHOF). This indicator is expressed as a percentage of annual all-cause adult mortality. http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000043/par/E1200004 In addition PHE has published estimates of mortality associated with long-term exposure to anthropogenic particulate air pollution for 2010 for all local authority areas in the UK as fraction of mortality, attributable deaths and associated years of life lost in April 2014. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf	Thank you. The PHOF indicator has been added. Please note that this section is intended only as a brief introduction to the topic. Links are included to important documents for further reading.
65	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	1	11	Should include Local Authority councillors, Local Enterprise Partnerships (LEPs) members, and local businesses / developers, in recognition of the high level of political and business input and decision making that goes into transport schemes and other major developments at local and county level	Thank you. The bullet referring to employers has been amended to include other groups and elected members have been added.
66	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	2	12	A criticism of the Local Authority Air Pollution regime, often referred to as LAQM, has been the effectiveness of the relationship between two tier authorities with County Council level highways and District Council air pollution polices, given the importance of traffic controls to improve local air pollution. With Directors of public health now at the county council, the NICE guidelines should address how local level policies to reduce air pollution can be more effectively implemented at county.	Thank you. This is an important issue that the committee may want to discuss.

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67	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	2	14	Should be specific reference here to active travel ie walking and cycling rather than rolling them up with EVs etc as generic “low emission transport” category. These modes need some “coverage” of their own due to their direct health benefits through physical activity , in addition to indirect air quality benefits.	Thank you. Active travel is included in the generic ‘low emission’ category. Please note that NICE has produced guidelines on walking and cycling (see PH41) that will be incorporated as appropriate into this guideline.
68	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	2	14	Should include Local Authority strategic planning policies and land allocations, and development control (planning) decisions	Thank you. This has been clarified.
69	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	2	17	To assist with the assessment of sustainable development in planning decisions it would be helpful to have a tool or accessible data in a format that allow district councils to quickly assess the financial and health costs of new traffic generating development, or air pollution sensitive development exposed to air pollution, to feed into the decision making process when the local planning authority, LPA, is balancing the costs and benefits of a scheme and assessing if development is sustainable. Currently planning authorities make decisions where they are balancing the benefits of development in terms of new housing, jobs and facilities and the positive impact on the health and welfare of people, with noise and air pollution impact on new residents or as result of traffic generated by new schemes, however there is no tool to allow this to be carried out for local schemes in a transparent and robust manner.[see item 9 below ref WEBTAG]	Thank you. We hope that the guideline and supporting tools will help local decision makers.
70	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	2	17	Include reference to; strategic policies to promote improvements in air quality, road realignment to increase separation, incentives for modal shift, installation of green vehicle infrastructure through development (eg electric car charging infrastructure) use of CIP and section 106 contributions to promote schemes / change	Thank you. We hope that the included evidence will address these types of approaches.
71	[for	[Environmental	2	21	Is there robust peer reviewed evidence that trees are effective, and if so are there effects quantified in a	The aim of the

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	office use only]	Health Team at Eastleigh Borough Council]			way that measures to increase trees in urban areas can be effectively introduced?	evidence reviews is to identify this sort of evidence if it exists.
72	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	3	2	Initiatives should apply to private sector and other public sector bodies, need to encourage uptake of less polluting vehicles as designing out pollution better than relying on drivers self control / enforcement. Subsidised travel tickets / passes for public transport to make model shift affordable for those on lower wages.	Thank you. The guideline is likely to be of interest to the private sector. It is likely that recommendation will include actions that can be taken by public sector bodies. Recommendations will be developed following examination of the available evidence.
73	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	3	10	DfT already have a well developed and rigorous economic evaluation structure for major transport schemes (WEBTAG) and its use is compulsory as part of the major scheme business case for transport schemes. How will the NICE guidance economic evaluation relate to that of WEBTAG? Some criticisms of webtag from within the transport field include that it does not value health benefits as well as it could do, and that it has an excessive focus on the value of often minor journey time reductions for motorised modes. Maybe the NICE guidance could include a look at whether WEBTAG needs some revision with regards to air quality benefits of schemes?	Thank you. Cost utility analysis is the main method used by NICE for assessing the cost effectiveness of interventions. This approach considers both the quality and quantity of life gained as a result of an intervention. In addition, the method for

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						assessing public health interventions allows non-health benefits and a range of perspectives to be taken into account. Revisions to WEBTAG are beyond the remit of NICE.
74	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	3	20	Also consider layout and design of residential development in affected areas, particularly in areas with acoustic glazing requirements and the need for effective ventilation to control overheating.	Thank you. Noise and overheating are outside the scope of this guideline.
75	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	3	20	NICE to investigate how effective Noxer blocks/ surfacing (and other similar products) are in reducing (and sustaining reductions in) gaseous vehicle pollution	Thank you. Reference to technologies such as these has been added.
76	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	3	24	The measures mentioned need to be considered synergistically and will vary in effectiveness from location to location. Include safe cycle routes, improved public transport. Include incentives to encourage HDV / bus operators to move to Euro 6 or better	Thank you. These issues will need to be considered by the committee in developing recommendation.
77	[for office use only]	[Environmental Health Team at Eastleigh Borough Council]	General	Section 1.4	more funding into active travel schemes	Thank you. Please note that this guideline will focus on local actions. National funding decisions

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						are beyond the remit of this work.
78	[for office use only]	Environmental Protection UK	General	General	<p>Environmental Protection UK is a national charity that provides expert policy analysis and advice on air quality, land quality, waste and noise and their effects on people and communities in terms of a wide range of issues including public health, planning, transport, energy and climate.</p> <p>We offer clear and critical analysis of UK government and European Union policy proposals through a range of high-quality publications and expert-led events, as well as up-to-date regulatory information through our comprehensive guide to UK and EU environment legislation.</p> <p>Environmental Protection UK works with UK national and devolved governments, local authorities, business, academics and the general public, and with relevant EU institutions and NGOs.</p> <p>The Air Quality Committee of Environmental Protection UK has considered the consultation documents and welcomes the opportunity to comment. These comments represent an overview of the Committee, but do not necessarily reflect the views and opinions of individual Environmental Protection UK members.</p>	Noted.
79	[for office use only]	Environmental Protection UK	General	General	<p>Air pollution is an important health issue, as 29,000 premature deaths were estimated to be caused by particulate air pollution in the UK in 2008, with a similar number likely to be caused by oxides of nitrogen.</p> <p>We therefore support the development of a Guideline on Outdoor Air Pollution, to inform and support health professionals and provide additional support for local authorities in tackling this issue.</p> <p>It is important to recognise that there are already extensive documentation available for some of these groups, ranging from government policy and guidance on Local Air Quality Management to Best Practice studies from local authorities. This NICE guidance has an opportunity to complement existing work, rather than duplicating it, by strengthening the public health aspects and bring together environmental and health professionals, and transport and planning officers who control many of the sources of pollution. A well-defined scope and clear aims are vital to this.</p> <p>We would be happy to provide additional information and advice during the development of this Guideline.</p>	Thank you. We hope this guideline will complement other work. It will be informed by the existing policy framework.
80	[for office use only]	Environmental Protection UK	1	9	<p>We are very concerned that a Guideline on Outdoor Air Quality focuses exclusively on road transport. While this is a major source of local air pollution, it is not the only one. Other key sources include boilers, biomass (such as urban wood burning) and non-road mobile machinery (NRMM), which can cause very high levels of local air pollution. It is vital that a Guideline on Outdoor Air Quality also addresses these other sources. This is particularly important for this Guideline which brings together both local authorities</p>	Thank you. The role of the scope is to restrict the topic to a manageable size

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					and health professionals.	that can be achieved in the timescale set. Other sources of pollutants are clearly important and may be considered in other guidelines. However, it was felt that a focus on road transport initially was appropriate and achievable as actions on other sources of air pollution would be different to those on road transport and would need to be based on a different evidence base.
81	[for office use only]	Environmental Protection UK	3	20	We consider that the proposed scope covers the main types of intervention for the road transport that have been tried already. It is noted that the effectiveness of these measures is largely driven by the manner and extent of their implementation and promotion. It would be very useful to consider the challenges facing implementation. For each measure, what are the barriers for uptake? Are these technological, behavioural, etc.? It would also be useful to consider new approaches to addressing road transport, such as options available through the new Directors of Public Health or other health professionals.	Thank you. We hope that these issues will be considered by the committee during development of the guideline.
82	[for office use]	Environmental Protection UK	1	12	The list should include also transport planners, including those in DfT, TfL and transport authorities.	Thank you. The list includes transport planners

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	only]					working in local authorities. Transport operators have been added to those for whom the guideline may be relevant. NICE does not make recommendation on national policy.
83	[for office use only]	Environmental Protection UK	4	8	We welcome the aim to consider whether the impacts vary for different population groups, which is a key environmental justice issue.	Thank you.
84	[for office use only]	Environmental Protection UK	4	9	<p>We note that the scope proposes to investigate whether there is evidence of any adverse effects such as road injuries as a result of the interventions. It is essential to note whether there are likely to be any positive effects as well as negative ones, due to these interventions, in order for an informed decision to be made. For example, smoothing the traffic flow may result in less traffic collisions.</p> <p>There needs to be more emphasis on other possible positive end points such as an assessment of the public health gains from increased active travel. The existing NICE guidelines on walking and cycling could usefully be linked to this document.</p>	Thank you. Where evidence of positive outcomes other than on air pollution are found this will be noted. However the main focus for this work is on the health impacts of air pollution. Other relevant NICE guidelines (such as on walking and cycling) will be linked to the final guideline.
85	[for office	Environmental Protection UK	4	23	It is important to note that most road vehicles have higher emissions under real world urban driving conditions than under their official manufactured Emission Standard. This must be taken into account when	Thank you. This is an issue that the

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	use only]				assessing the emissions performance of vehicles, which must be based on real-world emissions.	committee may want to take into account when developing the guideline.
86	[for office use only]	Environmental Protection UK	4	23	Driving style also has a major impact on emissions, with fast acceleration giving rise to much higher emissions than a smoother driving style.	Thank you. This is included in the scope.
87	[for office use only]	Environmental Protection UK	6	4	c) It is important to note that there are further benefits from reduced emissions of air pollution precursors. For example, much of the NO _x emitted by traffic and a significant proportion of organic particulate matter will go on to form secondary pollutants in the atmosphere, and contribute to what we currently view as regional particulate matter.	Thank you. This is an issue that the committee may want to take into account when developing the guideline.
88	[for office use only]	Environmental Protection UK	7	5	Some 'local' air pollutants can also contribute directly to climate change, including black carbon particulate matter (a large proportion of diesel particulate matter from diesel engines is black carbon) and ozone.	Thank you. This is an issue that the committee may want to take into account when developing the guideline.
89	[for office use only]	Environmental Protection UK	7	10	The Local Air Quality Management System is currently under review by the UK Government. We have provided detailed responses to their consultations, which can be seen at http://www.environmental-protection.org.uk/committees/air-quality/air-pollution-law-and-policy/air-pollution-laws/ .	Thank you. The guideline will take into account any changes to national policy during its development.
90	[for office use only]	Faculty of Public Health	2	9-10	The focus should explicitly include reference to the specific risks for vulnerable groups including pregnant women, children and the deprived. There is clear and mounting evidence that these groups are disproportionately exposed and/or susceptible to air pollutants	Differential impacts are included in the key questions set out in section 1.4.
91	[for	Faculty of	2	15-16	While agreeing that 'altering personal behaviour to reduce exposure' is important, we feel that the onus to	Thank you. This is

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	office use only]	Public Health			reduce exposure should be on the polluter not the exposed person	an issue that the committee may want to take into account when developing the guideline.
92	[for office use only]	Faculty of Public Health	2	17	Local authorities should also be maximising the utility of improved access to safe cycling and walking through development planning	Thank you. The guideline will link to existing NICE guidelines on walking and cycling (PH41).
93	[for office use only]	Faculty of Public Health	2	18	Local authorities should also be considering the performance of their own vehicle fleets and their powers to influence others through their contracted services	Thank you. This is an issue that the committee may want to take into account when developing the guideline.
94	[for office use only]	Faculty of Public Health	3	20-21	Examples of planning control interventions should include the siting of residential areas in the proximity of heavily trafficked roads	Thank you.
95	[for office use only]	Faculty of Public Health	4	17	Health outcomes considered should be across the life course as there is clear evidence that air pollution affects health at every stage of life including prenatally	Thank you.
96	[for office use only]	Gateshead Council	2		Section 1.2 makes no reference to spatial planning, particularly the siting of development to reduce the need to travel. Also it doesn't seem to cover creating environments which encourage active travel which in turns reduces emissions.	Thank you. The inclusion of spatial planning has been clarified. Environments which support low emission travel (which includes

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						active travel) are included in 1.2. Please note that the guideline will link as appropriate to other NICE guidelines including 'walking and cycling' (PH 41).
97	[for office use only]	Gateshead Council	3		<p>The key issues and questions section at 1.4 could/should also look at:</p> <p>The lessons learnt from partnership working with bus operators on recent grant schemes for cleaner buses (Clean Bus Technology Fund, Clean Vehicle Technology Fund, OLEV Bus Fund) and the potential impact of extending/expanding programmes such as this.</p> <p>The impact of increased investment in walking and cycling; extending the 'Cycle City Ambition Fund' approach to other authorities.</p> <p>Is the development management/spatial planning process taking enough account of air quality issues? Could regulations provide more support to LA's?</p>	Thank you. We believe that the evidence assessed during the development of the guideline will address these issues if the evidence is available. Please note NICE may issue a call for evidence during the development of the guideline and may consider whether expert testimony is required to fill any gaps in the evidence.
98	[for office use only]	Global Action Plan	2	9-10	The draft scope currently plans on focusing on everyone with attention given to those who live in towns and cities. We feel that at risk groups (such as people who suffer from cardiovascular and respiratory ill health, the young and the elderly) should be given extra focus because poor air quality effects the health of those groups more significantly.	Thank you. The impacts on at risk groups will be considered, for instance through the modelling

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						carried out.
99	[for office use only]	Global Action Plan	3`	general	<p>The aspects that will be covered within this guide under initiatives aimed at local authority employees and members of the public are primarily information based. Raising awareness and providing information, or training, does not necessarily lead to a change in behaviour. Behaviour is determined by a complex matrix of inherited, environmentally influenced and emotionally influenced factors. In stimulating pro-environmental behaviour change over the last 22 years, Global Action Plan has come to understand that the adoption of new behaviours depends on our ability to act and our motivation to act. For example, if someone is really motivated to lose weight and cut carbon emissions, they may really want to cycle to work. But if they cannot ride a bike, or cannot afford a bike, no matter how motivated they are, they cannot cycle to work. They have an ability barrier. To solve the second barrier, they do not need more information on obesity, air pollution, carbon emissions or bike riding skills. They need financial support (perhaps a loan to pay back in savings on public transport/ car costs of their commute) to afford a bike.</p> <p>There are too many techniques to changing behaviour (such as social norming, boosting self-efficacy, nudging and habit breaking and forming) to list in full here. The main suggested amendment to the guidance is to move beyond information provision, awareness raising and training to include other behavioural influences.</p>	Thank you. The guideline will not be confined to information provision, awareness raising and training.
100	[for office use only]	Global Action Plan	4	1-7	<p>The guide currently questions the effectiveness of information based initiatives and travel planning initiatives as measures to reduce people's exposure to air pollution and does not recognise the potential power of community action. Community groups with an interest in the health of their local area are in prime position to mobilise local action to reduce local air pollution. We are aware of 80 community groups asking for support last year to address local air quality and to help people avoid the worst air pollution. Due to limited funds, this groups remain unsupported. This highlights that there are proactive community groups within schools, housing associations, hospitals and large workplaces who want to tackle air pollution but have no support. There should be some recognition of the potential for these initiatives in the guide and support offered to these groups. In particular guidance on how local authorities and other bodies can work with them to prioritise the action of the community groups towards initiatives that will have the most impact on reducing emissions and protecting the vulnerable. The existence and nature of these groups means that they can potentially have a greater and swifter impact within their communities than other national engagement methods.</p>	Thank you. This is an important area that the committee may want to discuss in developing recommendation.
101	[for office use only]	Global Action Plan	4	4-8	<p>We have evidence on the effectiveness of initiatives to provide information and training on driving styles. Global Action Plan conducted a pilot project with office workers which provided eco-driver training and ongoing measurement and verification. With this programme drivers took part in a group training day, used a driving simulator and measured their own fuel consumption and mileage for one month either side of the training intervention. Measurement and evaluation showed that through drivers could improve their fuel efficiency by up to 30% following the eco-driving training. The average was 16% improvement. This is from a small sample size of ten participants, and so further studies of this nature would be of use. This</p>	Thank you. Please note that NICE may issue a call for evidence during the production of this guideline to

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					evidence further supports the aforementioned comment that effective behaviour change initiatives with the right support and measurement can be successful in protecting people from air pollution and play a part in their efforts to reduce road traffic emissions. We believe that part of the reason for the success of this intervention was that the people involved were colleagues, sharing an existing identity and belonging to the same 'in-group'. This made it easier to ask questions and have discussions about sensitive topics like driving habits. The group discussion element also allowed the vocalisation of myths and the possibility for people to express their expectations of what makes good driving to each other. All of this would not be possible with simple in-car one-on-one driver training, or individual online training scenario.	ensure that evidence such as this is appropriately captured.
102	[for office use only]	Global Action Plan	4	27	When searching for and accessing the evidence for factors that contribute to road traffic related air pollution levels- the volume of vehicles should be considered. The number of vehicles in operation on England's roads does play significant role in the levels of air pollution and on the quality of the air. Looking at them independently ignores the crucial relationship and could potentially lead to instances where solutions for reducing the number of vehicles on the roads are not considered.	Thank you. Volume of traffic is one issue that will be included in developing the guideline.
103	[for office use only]	Healthy Air Campaign	General	General	<p>The Healthy Air Campaign is a national coalition of health, transport and environmental organisations advocating for all levels of government to take stronger action so that the UK complies fully with air quality law.</p> <p>We are therefore delighted to engage with the development of the first NICE guidance on outdoor air pollution. We welcome the focus on air pollution from road traffic as one of the major sources in our towns and cities. However, it is important to note that it is not the only source of air pollution that can be influenced by local authorities and so would also welcome further work to widen the scope to include emissions from industry, domestic and commercial boilers and construction and demolition.</p> <p>For any further information relating to this consultation response please contact Andrea Lee, Healthy Air campaigner alee@clientearth.org</p>	Thank you. It is important to restrict the scope so that the work can be carried out to the stated timelines. It was felt that a focus on road transport was appropriate as a starting point and that future work on other aspects of air pollution could be considered subsequently.
104	[for office use only]	Healthy Air Campaign	1	12	<p>We welcome the fact that the guidelines are aimed to inform local authority officers across the environmental, transport, planning and public health professions.</p> <p>However, we think it is also useful to include officers focused on children and families, education, community, housing and social care services as well as leisure and sports. This is because these departments will be directly concerned with the welfare of members of the community who are the most</p>	Thank you. The groups identified are those who are most likely to be involved in implementing

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					<p>vulnerable to the impacts of air pollution: children, pregnant women, older people, and people from socioeconomic disadvantaged backgrounds.</p> <p>In its latest report on air quality Parliament's Environmental Audit Committee raised concerns about the exposure to air pollution by children whilst at school and for older people or people with health conditions at care homes or health clinics. It recommended that schools, care homes and health clinics should not be built near pollution hot spots and that redevelopment of existing buildings should only be approved if they reduce air pollution exposure to their users.</p> <p>It also highlighted the need for local authorities to have better access to information to provide air pollution advice and alerts, in particular to schools and care homes.</p> <p>http://www.publications.parliament.uk/pa/cm201415/cmselect/cmenvaud/212/21209.htm</p> <p>There is also a case for specific groups of workers to be targeted, such as taxi, bus, coach and freight drivers, who by nature of their work are exposed to road traffic emissions.</p>	<p>recommendation made by the committee. As you indicate, there will be other groups that have an interest in the guideline and its recommendation. Employers, including those in the areas you identify, are listed as groups for whom the guideline will be relevant.</p>
105	[for office use only]	Healthy Air Campaign	2	2	<p>In addition to the groups identified by the equality impacts assessment we would add the need to give special consideration to:</p> <ul style="list-style-type: none"> • people with pre-existing health conditions, in particular cardiovascular and respiratory illnesses. The review of evidence on the health aspects of air pollution by the World health Organisation's REVIHAAP project found there is now strong enough evidence to link short and long term exposure to air pollution to the exacerbation of these conditions leading to hospitalisation and death (http://www.euro.who.int/_data/assets/pdf_file/0004/193108/REVIHAAP-Final-technical-report-final-version.pdf). • young children and not only infants. The Exhale project by King's College London is finding how exposure to air pollution is decreasing the lung functionality of primary school children (http://www.kcl.ac.uk/lsm/research/divisions/aalb/newsevents/newsarchive/featured/exhale.aspx). <p>The REVIHAAP project and a study from the ESCAPE project (http://www.thelancet.com/journals/lanres/article/PIIS2213-2600%2813%2970192-9/abstract) also links exposure to air pollution to low birth weight and premature birth.</p>	<p>Thank you. People with pre-existing health conditions have been added.</p>
106	[for office use only]	Healthy Air Campaign	2	12	<p>Reducing overall mileage will be key to tackling emissions from road traffic and by encouraging alternative forms of transport can also create health opportunities. The guideline scope refers to a number of measures that can help contribute to this in the short-medium term but it is also important to consider the long-term need for better spatial planning to reduce the need to travel overall and facilitate healthier</p>	<p>Thank you. Spatial planning has been added to clarify this.</p>

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					transport choices and lifestyles.	
107	[for office use only]	Healthy Air Campaign	2	26	We think that it is important for measures such as low emission zones to be part of a national framework to help facilitate their uptake by local authorities and provide national standards that will help private and commercial road users adapt and comply more efficiently. This is one of our national policy calls which can be downloaded here http://documents.clientearth.org/download/3763/	Thank you. National policy is outside the remit of this guideline.
108	[for office use only]	Healthy Air Campaign	3	6	Fuel choice is very important, in particular with diesel vehicles having greater emissions of particulate matter and nitrogen dioxide. However, it is also important to note that zero-emission vehicles are only zero-emission at tailpipe so will still contribute to emissions of air pollution where the energy source is produced. In addition zero-emission vehicles can still contribute significantly to local air pollution through tyre and brake wear. The latest London Atmospheric Emissions Inventory (LAEI2010) shows that tyre and brake wear are responsible for 35% of particulate matter (PM10) pollution.	Thank you. The role of tyre and brake wear as a source of emissions has been clarified.
109	[for office use only]	Healthy Air Campaign	4	24	It is important to note that most road vehicles have higher emissions under real world urban driving conditions than under their official manufactured Emission Standard. This must be taken into account when assessing the emissions performance of vehicles.	Thank you. This is an issue that the committee may want to take into account when developing the guideline.
110	[for office use only]	Healthy Air Campaign	7	19	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland has not been updated since 2007 and we would argue is due a review. Following ClientEarth's legal victory in the Supreme Court the UK Government will be consulting on new action plans to tackle nitrogen dioxide emissions by the end of 2015. These action plans are likely to contain new responsibilities and measures for local authorities to take into consideration. More information can be found here http://healthyair.org.uk/victory-for-clean-air/ .	Thank you. This guideline is aimed at local actions. National policy is outside the remit of this work.
111	[for office use only]	Insall & Coe	Page 1	Lines 8-9	<p>We understand the constraints on NICE's ability to recommend action for national government(s). However, a number of aspects of national policy influence the local situation with regard to air quality.</p> <p>For example, the disinclination of UKG to comply with European air quality standards, and this year's Supreme Court ruling that it must, are critical background factors against which local action will be played out.</p> <p>Equally, national policy on matters such as fuel duty or local parking regimes, often driven by quite superficial party political concerns, clearly impact on the ability of local authorities to take effective action on vehicular pollution.</p> <p>If the NICE guidance can to some extent address this, perhaps just by assisting informed debate, it will be</p>	Thank you. As you note, there are many national policy influences on air pollution. However, these are outside the remit of this guideline.

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					helpful.	
112	[for office use only]	Insall & Coe	Page 1	Lines 12-16	<p>We agree with the list of local authority disciplines for which this guidance is most relevant.</p> <p>However, some of the most productive actions on local air quality will have multiple co-benefits in other areas. For example, restraint of the most polluting motor vehicles also benefits physical activity (through increased active travel), road safety, climate emissions and local quality of life.</p> <p>It will be helpful therefore if you can target also the upper echelons of local government, responsible for cross-disciplinary strategies, such as elected Leaders, Chief Executives and strategy teams.</p> <p>For example, it may be possible to develop a recommendation on how local authorities can develop communications and media strategies aimed at winning widespread public support for the necessary interventions, such as restraint of polluting vehicles.</p>	Thank you. We hope to be able to take account of the major co-benefits as part of the modelling to be carried out to support the development of the guideline.
113	[for office use only]	Insall & Coe	Page 1	Lines 18-23	<p>This list of the wider potential market is good. We are particularly pleased that you have included the general public here. We believe that if the scale of the air quality issue were better presented (as is beginning to happen, with recent interventions from Public Health England and the Mayor of London) and the public better understood how much impact a few simple measures could have, a shift in thinking could be brought about, as profound as that relating to smoking in public places.</p>	Thank you.
114	[for office use only]	Insall & Coe	Page 2	Line 5	<p>Could you clarify the meaning of this line?</p> <p>There are some very obvious equality issues about the distribution of the worst air pollution and the risk that in many cases those who suffer the worst may also be those who pollute the least (see for example Mitchell and Dorling in Environment and Planning, 2003, An environmental justice analysis of British air quality).</p> <p>But presumably this project will not be including or excluding 'groups' at all, as it is primarily about how policies and practice influence the environment.</p>	This is standard wording for NICE guideline scopes. As noted, no groups are excluded from this guideline.
115	[for office use only]	Insall & Coe	Page 2	Lines 13-16	<p>We endorse this list of key areas but suggest a couple of slight clarifications:</p> <ul style="list-style-type: none"> • 'reducing overall mileage' <i>by motor vehicles, especially the most polluting per passenger mile</i> • and possibly acknowledge that a large proportion of particulate emissions from motor vehicles is not associated with fuel combustion, nor emitted from the tailpipe (tyre and brake dust, for example). This is significant, as it means authorities cannot just wish the problem away by hoping for a switch to electric or other 'cleaner' vehicles. 	Thank you. The first bullet has been amended. The role of tyre and brake wear has been added

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ID	Type	Stakeholder	Page no.	Line no.	Comments	Developer's response
					Please insert each new comment in a new row	Please respond to each comment
						to the context section.
116	[for office use only]	Insall & Coe	Page 2	Line 22	How significant an opportunity is CMA? It will be important to give the audience a good, clear set of achievable and high-impact measures for implementation, without distracting innovations.	Thank you. We hope this will be clarified during the consideration of the evidence.
117	[for office use only]	Insall & Coe	Page 4	Lines 1-3	This question might be clarified, along the lines of: Is PTP effective and cost effective at reducing exposure to road traffic related air pollution <i>by creating large scale travel behaviour change from polluting to non-motorised modes of transport, or at least to those with lower emissions per passenger mile?</i> It should be clear that PTP is primarily a form of intervention which can reduce overall levels of local air pollution by driving large-scale travel behaviour change from motorised, polluting modes to healthy, active travel (see PH41), rather than a way to encourage individuals to hide from pollution.	Thank you. It is not necessary to set out the means by which individual or population exposure is reduced in this question.
118	[for office use only]	Insall & Coe	Page 5	Lines 4-6	Have you considered also including PH42, as an illustration of the kind of whole system approach which would also be desirable in tackling air pollution? Many of the general strategic recommendations there seem highly relevant here.	Thank you. The committee may want to consider linkage to other guidelines during the development process.
119	[for office use only]	Insall & Coe	Page 7	Lines 3-8	We are very pleased to see this clear statement of co-benefits to be secured by measures to tackle air pollution from motor vehicles. It is an important issue, seemingly still overlooked in much policy and practice.	Thank you.
120	[for office use only]	Insall & Coe	Page number or 'general' for	Line number or 'general' for	Comments Insert each comment in a new row. Do not paste other tables into this table, as your comments could get lost – type directly into this table.	

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			comments on the whole document	comments on the whole document		
121	[for office use only]	Kent & Medway Air Quality Partnership	2-3	general	Great care/consideration needs to be given to the areas to be covered by the guidance. For example dust suppressants are typically used in hot spot areas, and not on a city/town wide basis, so the health benefits are likely to be very limited. Using barriers, for example trees and foliage could actually result in ambient pollutant concentrations rising locally as they may create unfavourable dispersion characteristics. No mention has been made of providing information to vulnerable groups (such as forecasts/alerts) to help them manage their conditions. Ultra Low Emission Zones should be added to the list of measures.	Thank you. The committee will consider the evidence carefully. Ultra low emission zones have been added for clarity. Provision of information to the public has been added.
122	[for office use only]	Kent & Medway Air Quality Partnership	3	10	What economic aspects will be taken into account?	The economic work will be put out to tender shortly. However it is anticipated that it will include areas with major economic impacts and will include approaches that include disaggregated costs and benefits and the time horizons over which they accrue.
123	[for office use only]	Kent & Medway Air Quality Partnership	3	17	Another question should be added relating to how public exposure can be reduced (see comments above regarding forecasts/alerts).	Advice and information for the public has been added.

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124	[for office use only]	Kent & Medway Air Quality Partnership	4	14	Is sufficient monitoring in place to be able to assess the likely health outcomes of interventions?	Thank you. Effectiveness of monitoring may come up as an issue in the evidence gathered.
125	[for office use only]	Kent & Medway Air Quality Partnership	4	23	Are primary pollutant emissions to be considered? Consideration should be given to secondary pollutant emissions, such as brake and tyre wear. There is no mention of engine technology or emissions abatement.	Thank you. A note has been added to clarify the role of brake and tyre wear. Technology specified by the Euro programme is outside the remit of this guideline, however actions to achieve changes in the vehicle fleet
126	[for office use only]	Kent & Medway Air Quality Partnership	5	16	Health data and evidence on the health effects and impact of air pollution is continuing to evolve. The latest studies are seeking to understand the impact of nitrogen dioxide on health. COMEAP will be releasing a statement later this year on the quantification of the impacts of nitrogen dioxide for England. The latest evidence/researched should be reviewed prior to the drawing up guidance.	Thank you. The guideline will use the most up to date evidence available during its development.
127	[for office use only]	Kent & Medway Air Quality Partnership	6	26-27	There is no mention of other vulnerable groups for example people with certain medical conditions (COPD etc).	Thank you. This has been clarified.
128	[for office use only]	Kent & Medway Air Quality Partnership	7	general	The LAQM regime, and regulated pollutants, are currently under review by Defra, and changes are likely to be made to the statutory guidance provided for local authorities to assist with complying with its duties (see LAQM.TG(09)).	Thank you. This is an issue that the committee may want to take into

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						account when developing the guideline.
129	[for office use only]	[Living Streets]	1	7-9	It should be noted that in addition to reducing the ill-effects of poor air quality, this guidance also offers the opportunity to promote the health co-benefits of a mode shift away from motorised vehicles towards more walking and cycling. In other words by reducing and replacing journeys made by polluting vehicles and encouraging pollution free active travel.	Thank you. Please note that NICE has produced guidelines on walking and cycling and these will be incorporated as appropriate into this work.
130	[for office use only]	[Living Streets]	1	22-23	It is not clear whether this guidance is also aimed at local activists and campaigners. These are people who do not 'work' in the sector and who are more engaged than the 'general public'. Community groups and key individuals have been instrumental in getting air quality issues on local political agendas and encouraging local action to improve air quality.	It is likely that the recommendations will be of interest to these people.
131	[for office use only]	[Living Streets]	2	2-5	The equality impact assessment does not take into consideration the health inequality of exposure. A person who chooses to drive is exposed to pollution that they help to produce. People who walk or cycle do not contribute to poor air quality but are unfairly exposed to it. When considering groups affected, we note that infants and young children are particularly at risk because of the height at which they travel (e.g. in pushchairs). Similarly people with asthma and other health conditions may be affected by high levels of air pollution.	Thank you. This has been clarified.
132	[for office use only]	[Living Streets]	2	7-10	As noted on page 6, many deprived urban areas have high concentrations of nitrogen dioxide and PM ₁₀ . However, people who drive for a living (e.g. taxi drivers, paramedics, delivery drivers) will also be exposed to the ill-effects of poor equality without the mitigating benefit of physical exercise.	Thank you. These groups are included in the scope, however they have been added here for clarity.
133	[for office use only]	[Living Streets]	2	13-16	The list of interventions is not endless, but 'reducing overall mileage' could be amended to 'reducing overall mileage of motorised traffic' (for example, through the current trialling of cycle freight in London).	This has been amended for clarity

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	only]				The draft scope also needs to define more clearly what it means by 'altering personal behaviour to reduce exposure to pollutants'. For example, warnings 'don't jog in smog' discourage people from undertaking healthy activities because of the health risk of exposure to particulate matter. The key areas identified cover the appropriate points – encouraging alternatives to the car and providing more information on route choice.	
134	[for office use only]	[Living Streets]	2	17	Instead of 'environmental change and development planning' it would be more useful to refer to 'changes to transport infrastructure and the built environment'. This section also needs an additional bullet point on land use planning and its role in reducing the need to travel.	This has been amended for clarity.
135	[for office use only]	[Living Streets]	2	18	Developing public transport routes and services should take into account the door to door journey, in particular measures to facilitate walking (and cycling) as part of longer multi-modal journeys. Measures should also include switching to low-emission buses and trains (and/or electrification of remaining lines).	Thank you. This is an issue that the committee may want to take into account when developing the guideline.
136	[for office use only]	[Living Streets]	2	19-20	Active travel emits zero emissions. Therefore, the guidance should consider public realm improvements to promote walking and cycling. Electric vehicles are low emission in use, however, the production of electricity is itself a polluting activity (e.g. coal fired power stations).	Thank you. Active travel is included in this bullet, however please note that NICE has produced guidelines on walking and cycling that will be incorporated into this work as appropriate.
137	[for office use only]	[Living Streets]	2	27	'parking charges and restrictions' the scoping guidelines should consider differentiating parking charges based on emissions.	Thank you. If this were identified in the evidence it would be included.
138	[for office	[Living Streets]	3	1	This should read as 'vehicle idling'.	Thank you. This has been

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	use only]					amended.
139	[for office use only]	[Living Streets]	3	2	Include initiatives aimed employers. For example, the Nottingham parking levy includes a complementary package of measures for employers (and their employees), such as personal travel planning and a fleet of electric buses (for businesses not on the tram route).	Thank you. This is implied by the 3 rd bullet.
140	[for office use only]	[Living Streets]	3	9	“Route choice” needs further elaboration, such as planning less busy and low pollution walking routes (options available e.g. on walkit.com). To reiterate the point above, the scope needs cover advice to people not in vehicles on how to avoid pollutants and still travel actively. However, this is only part of solution. There are situations where people, for instance, need to do their shopping on a busy high street and have to walk there, will be forcibly exposed to air pollution.	Thank you. This is implied by the bullet.
141	[for office use only]	[Living Streets]	3	10-16	The economic aspects of the guidance should take into account the economic cost to high streets and town centres of busy, noisy and polluted roads. People are less likely to spend their time and money in an unpleasant pedestrian environment.	Thank you. Please note that the economic work to support this guideline will be tendered separately.
142	[for office use only]	[Living Streets]	3	20-21	Add 'streetscape design and configuration'. Planning decisions tend to focus on individual buildings and their immediate vicinity. However, the layout of a street can help to trap air pollution (the canyon effect) and should be considered in planning decisions. Similarly, design considerations such as filter permeability not only allow air pollution to disperse, but also creates a better pedestrian environment (also a low emission facility) which encourages more people to walk.	Thank you. We hope the evidence will elucidate some of these points.
143	[for office use only]	[Living Streets]	3	21	We suggest elaboration of 'barriers and 'dust suppressant' to include reference to green infrastructure or street trees. For more information see for example research by Maher B. <i>et al</i> (2010). 'Rates of particulate pollution deposition onto leaf surfaces: Temporal and inter-species magnetic analyses' http://www.researchgate.net/publication/41189238_Rates_of_particulate_pollution_deposition_onto_leaf_surfaces_Temporal_and_inter-species_magnetic_analyses	Thank you. Trees are included in the scope.
144	[for office use only]	[Living Streets]	3	24-28	Such as 20mph speed limits and restrictions on loading times of vehicles. In line 25 'impose' should be replaced with 'introduce' – this is not a war on the motorist. In line 26, We suggest the addition of congestion charging and road pricing to the list of incentives/disincentives used to change behaviour. The Nottingham Parking Levy would be well worth a look. To date there has been no recorded impact on	Thank you. The examples given are not intended to be a

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					business (start ups, closures and relocations are about the same) and there is 100% compliance. Contact Sue Flack, Director for Planning and Transport (Sue.Flack@nottinghamcity.gov.uk) for more information.	comprehensive list. 'Impose' has been changed as suggested.
145	[for office use only]	[Living Streets]	4	1-7	Personalised travel planning can be effective via mode choice (changing to a healthier mode of transport) and via route choice. Question 4 discusses route choice in the sense of adapting driver behaviour, but we would also like to see consideration of measures to promote more walking (and cycling).	Thank you. Please note that NICE has produced guidelines on walking and cycling that will be incorporated into this guideline as appropriate.
146	[for office use only]	[Living Streets]	4	8-11	Adverse effects could also include discouraging people from walking e.g. on low pollution quiet routes at night, and into their cars instead. The context in which interventions are considered should be local authority wide, given that local authorities are liable for fines for non-compliance with the European Union ambient Air Quality Directive.	Thank you.
147	[for office use only]	[Living Streets]	4	21	Should this be personal exposure by modal choice? High levels are probably shared by people walking alongside busy roads as well as those behind the wheel.	Thank you. There are many factors which will influence personal exposure. It would be unhelpful to identify one alone.
148	[for office use only]	[Living Streets]	4	23-27	Factors included should extend beyond the type of vehicle used and 'tailpipe' emissions. For instance recent research has found that refrigerated vehicles (run on diesel engines) emit up to 29 times more potentially carcinogenic particulate matter than a modern Euro 6 diesel truck engine (see: http://www.airqualitynews.com/2015/07/06/lorry-refrigeration-is-hidden-polluter/). Also add 'mode share' – the percentage of journeys undertaken by different modes of transport (motor vehicle / pedal cycle / walking).	Thank you. Clarification that other road sources may be significant has been added. These bullets cover modal share.
149	[for office use only]	[Living Streets]	6	3-4	The scoping guidelines need to be clear that 'encouraging' people to walk and cycle goes beyond promotion alone. The quality of walking infrastructure should be addressed in parallel. Achieving mode	Thank you. Please note that

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	use only]				shift from driving to walking and cycling will also reduce noise, which benefits public health.	NICE has produced guidelines on walking and cycling. This covers infrastructure issues and will be incorporated as appropriate. Noise is beyond the scope of this work.
150	[for office use only]	[Living Streets]	6	21	Given the recent ruling by the High Court on the UK's failure to meet limits set in the EU Ambient Air Quality Directive (requiring the Government to deliver new plans to cut illegal levels of air pollution in Britain by the end of the year), should the scope of the guidance seek to address/identify necessary timescales for action?	Thank you. This is beyond the scope for the work. Timescales for action may be discussed by the committee if appropriate.
151	[for office use only]	NHS England	2	17	In the context of this sentence, perhaps 'environmental change and development planning' could be replaced by 'behavioural change' since the management of air pollution is more to do with behavioural change within a population and the retrofitting of technological fixes or measures and interventions to reduce or displace air pollutant emissions. If 'environmental change' is retained, it may require more clarity	Thank you. This indicates the nature of the interventions that may help support or produce the necessary behavioural change.
152	[for office use only]	NHS England	5	15	Perhaps the legal context of compliance could be made a little more strongly here by mentioning this year's Supreme Court Ruling on air quality and compliance with the Ambient Air Quality Directive 208/50EC	Thank you.
153	[for office	NHS England	6	1	Reference is made to ozone but this could be clarified in the context of the focus of the Guidance note on road transport emissions. The way it is written at present infers that ozone is a pollutant directly emitted	Thank you. While ozone is not a

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	use only]				from road traffic. It is a secondary pollutant formed in the atmosphere and is referred to as a "regional" pollutant. There are few local interventions that can manage ozone and this is recognised in the UK Air Quality Strategy and the duties put down on local authorities. The management of ozone is closely aligned with the Government obligations on the National Emissions Ceiling Directive under the Gothenburg Protocols.	primary pollutant its formation involves a number of pollutants emitted by vehicles. This paragraph has been amended for clarity.
154	[for office use only]	NHS England	6	4	The reference to road transport, as it is written, could be interpreted as it being the sole cause of respiratory and cardiovascular illness and death, however, it may be more accurate to say that it 'contributes'. Road traffic remains a key component of air pollution levels in the UK but industrial and domestic emissions also contribute. These additional sources should be recognised and the Guidance will be better aligned for ensuring that a statement is made to this effect, A more balanced context may recognise the contribution of other sources	Thank you. This has been amended.
155	[for office use only]	NHS England	6	4-18	Nitrogen oxides (and particularly nitrogen dioxide (NO ₂)) are key pollutants from road transport. The Guidance scope only focuses on particulate matter in respect of mortality metrics - and this is because the COMEAP analysis shows a much clearer outcome from epidemiology studies for this pollutant. However, a recent study from King College (London) has made the first (cautionary) link with NO ₂ and mortality which has attributed further deaths to air pollution. http://www.kcl.ac.uk/lsm/research/divisions/aes/research/ERG/research-projects/HIAinLondonKingsReport14072015final.pdf Again, this should be recognised for completeness around the context of the Guide.	Thank you. Reference to this report has been added.
156	[for office use only]	NHS England	8	7	Ammonia is of relevance primarily regarding its direct impact on habitats rather than health. However, it does have a role to play in the formation of secondary aerosol and contributions to PM _{2.5} levels (fine particulates) which affect health. This should be recognised in relation to the requirements of the Guideline	Thank you. This has been amended.
157	[for office use only]	Nottingham City Council			The comments 1 -17 are from 'Transport Planning' colleagues	Noted.
158	[for office use only]	Nottingham City Council	General	General	It is not clear by what is meant by air pollution (until page 6). NCC would welcome the broader inclusion of all road-traffic-related emissions which have detrimental impacts to health and economy. And an indication of what those impacts are hence demonstrating the need to invest in solutions.	Thank you. The scope is limited in the extent to which it can

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						discuss these issues. However, links are included to direct the reader to more extensive sources.
159	[for office use only]	Nottingham City Council	General	General	Notwithstanding the focus on road traffic related emissions, it should also be acknowledged that that air pollution can come from other sources other than road traffic, although the majority of air quality issues within the UK are generally traffic related.	Thank you. This is addressed in brief in section 3.1
160	[for office use only]	Nottingham City Council	2	8	States the guidance will particularly focus on people who live in towns, cities and other road-traffic related air pollution 'hot spots'. Could the guidance showcase examples of best practice for reference within the guidance? Doing so would provide a more practical toolkit for LA's to implement proven measures for change.	Thank you. This sentence has been amended. NICE guidelines can link to examples where actions have been taken. This will be considered during the development of the guideline.
161	[for office use only]	Nottingham City Council	2	12	Further detail needs to be given with reference to types of solutions (ties in with suggestion of best practice examples). Reference may also be wanted to be given to the Office for Low Emission Vehicles (OLEV) funding streams including for taxis, buses and city bids.	Thank you. Recommendations in the guideline will identify who they are aimed at where appropriate
162	[for office use only]	Nottingham City Council	2	21 / 22	Suggest removal of explicit references to unproven methods of air quality mitigation.	Thank you. We are interested in evidence of effectiveness including where this shows no effect.
163	[for	Nottingham	2	23	What could be some of the financial incentives around traffic management schemes? We assume things	Thank you. There

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	office use only]	City Council			like no charges for low emission vehicles but it isn't clear in here.	may be a variety of financial incentives and we would be interested in evidence relating to those that have been tried.
164	[for office use only]	Nottingham City Council	2	23	Could include 20mph schemes to reduce speeds, particularly in residential streets.	Thank you. This list is not intended to be comprehensive. If there is evidence linking this to air pollution outcomes then it would be of interest.
165	[for office use only]	Nottingham City Council	2	25	<p>Signal coordination can help alleviate air quality from traffic, but not eliminate air quality issues. The use of SCOOT (Split Cycle Offset Optimisation Technique) or MOVA (Microprocessor Optimised Vehicle Actuation) based linked signalling systems allows for traffic signals to be linked and work together along a corridor to prevent a "stop-start" traffic flow which can increase local air quality issues. However, such measures do not eliminate the total traffic levels along the corridor, and if undertaken in isolation from public transport priority measures, can result in a reduction in air quality issues at junctions, but a net increase along a traffic corridor if traffic levels increase as a result on unblocking "pinch points".</p> <p>Such techniques do not prevent air quality issues occurring due to "canyoning" effects in built up urban areas, or from uphill gradients (vehicles produce more emissions as engines have to work harder going uphill). Therefore such techniques should be considered in alongside other circumstances. However, we are aware of technology that can link signals with air quality monitoring points, which will alter signalling priorities dependent on air quality, but unaware of any examples of where this has been put into place.</p>	Thank you. If evidence is available it will be considered during the development of this guideline. Please note NICE may issue a call for evidence during the development phase and may consider whether invited expert testimony is needed to supplement identified gaps in the evidence.

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166	[for office use only]	Nottingham City Council	3	3	The initiatives supplied here are broadly welcomed. However, it should be raised that continuation of these forms of activity are dependent on consistent levels of revenue funding, with some of these schemes requiring long-term investment in order to achieve a significant effect. This can be undermined by businesses wanting a "quick fix" relating to transport issues or providing alternative employee incentives that could undermine these actions, such as car mileage initiatives for business use.	Thank you. National financing is beyond the remit of this guideline.
167	[for office use only]	Nottingham City Council	3	7	The City Council have funded an ECO Stars eco-driving and fleet management scheme locally and there are other schemes available nationally focused around environmental efficiency or cyclist awareness for drivers. However, such measures have not historically been provided for HGV or logistics sectors. This could be considered directly i.e. greater driving efficiency for HGV drivers, but also more widely in terms of the changing logistics market with localised "click and collect" and home delivery services.	Thank you. If evidence is available it will be considered during the development of this guideline. Please note NICE may issue a call for evidence during the development phase and may consider whether invited expert testimony is needed to supplement identified gaps in the evidence.
168	[for office use only]	Nottingham City Council	3	20	See comment 4, page 2, Lines 21/22 comments regarding scoping comments	Noted.
169	[for office use only]	Nottingham City Council	3	24	See Comment 5 and 6, page 2, Line 23 comments regarding scoping comments	Noted.
170	[for office use]	Nottingham City Council	4	1	It is felt that it is restrictive to focus on just personalised travel planning for this question, opposed to wider travel plan measures, including workplace travel planning, school travel planning and associated initiatives. Wider employment travel planning can raise awareness of alternatives and provide incentives in	Thank you. This has been amended to

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	only]				encouraging alternatives to the car.	include other travel planning options.
171	[for office use only]	Nottingham City Council	4	4	Why just training, information and info on fuel, driving and routes? That's the minimum that could directly be done. But what about other behaviour change measures such as discounted travel for PT, cycling, events etc. Would be useful to understand what the optimum measures or interventions are impactful, and why. Also consideration of integrated measures needs to be made. Our whole LTP could be argued to be helping to tackle air quality; one measure in isolation won't do it.	Thank you. Issues such as these are included within the scope of this work.
172	[for office use only]	Nottingham City Council	4	23	Driver styles are also a factor in contributing to air pollution levels. E.g. evidence to suggest those driving further, drives a car in a more economical manner than for shorter distances. Also age of vehicles is also relevant to types of vehicle, along with type/size of engine.	Thank you. These issues are included in the scope of this work.
173	[for office use only]	Nottingham City Council	7	10	It is not sufficient to consider AQ mitigation in areas just with declared AQMAs – a broader view needs to be taken utilising data from monitoring across other areas regarding the spread/ distribution of the pollutants.	Thank you. The guideline is not restricted to declared AQMAs.
174	[for office use only]	Nottingham City Council	7	15	What is the connection with this guidance and statutory Local Transport Plans which are often the mechanisms through which transport improvements are planned and implemented in local areas?	Thank you. As noted, LTPs are key in planning action to address air pollution.
175	[for office use only]	Nottingham City Council	1	11-23	Who the guideline is for It is becoming increasingly clear that improved air quality (when the pollution arises from road traffic and other diffuse generic sources e.g. space heating) will only be delivered by partnership working across a range of Local Authority functions, not only in environmental health, transport, planning and public health but also those services that utilise vehicles as a key element to their service delivery e.g. waste collection service (HGVs& LDVs), housing services (LDVs) and social care services (LDVs). Furthermore the last 15 years have proven that action by Local Authorities alone have not been sufficient to improve air quality by the margins necessary to revoke a significant number of air quality management areas, or sufficiently limit vehicle emissions and their contribution to local and regional pollution episodes. It is increasingly evident from experience and research commissioned by DEFRA in 2013/4 into exactly this issue that it is vital to engage both the private sector, public (or society as a whole, whose behavioural change is required), and politicians as policy champions to support and enable the infrastructure changes necessary to encourage and assist society to transition to low carbon alternative technologies and behaviour (e.g. active travel).	Thank you. These audiences are given as the key professionals that are likely to be asked to take action by the recommendations. This is likely to involve working with a range of other groups and supporting change, as you

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					<p>We therefore suggest that rather than 'It MAY also be relevant for:' Healthcare professionals... The General public...</p> <p>that it is reworded to Who the guideline is for Local Authority staff working in: environmental health transport planning public health healthcare professionals employers and the general public</p>	<p>indicate.</p>
176	[for office use only]	Nottingham City Council	2	9-27	<p>The draft states that the focus is Everyone... or other road traffic-related air pollution 'hot spots'. The guideline scope doesn't appear to define 'hotspots' or their relationship to exposure, as is the case for an Air Quality Management Area. If it is presumed that 'hotspot' means locations predicted or measured to exceed Air Quality Objectives and designated Air Quality Management Areas it also means its scope does not extend to, or recognise and address studies that demonstrate NO2 and particles are harmful to health at concentrations significantly lower than those specified in the Air Quality Objectives or EU limit values. Furthermore the UK's AQMAs have been designated with respect to 'sensitive locations' and not the full range of locations and activities where people are exposed to levels above the AQOs (and significantly above levels being recommended by the WHO and the levels at which the latest studies are confirming adverse health impacts). Most of the original historical solutions targeting 'hotspots' caused by traffic have, we believe, been generally unsuccessful as the hotspot simply moved from the originally congested/polluted area to the area carrying the (usually) re-routed traffic. Furthermore, historical attempts to move business and the public to use alternative transport solutions were frustrated possibly due to the negative perception of public transport during the late 1990's and 2000's, availability and affordability of practicable alternative vehicle technologies and possibly the perception that technologies to control emissions from petrol and diesel fuelled vehicles would eventually solve the problem . The wording as proposed also excludes hotspots (urban and rural) that may arise due to fixed industrial processes, and where changes to the process or retro-fitting of abatement technology could prevent the 'hotspot', or reduce the process' contribution to an AQMA and pollution episodes, nor does it offer scope to reduce emissions that contribute to AQMAs and increase the impact of weather related the pollution episodes. We therefore suggests that the wording of Groups that will be covered is amended to</p>	<p>Thank you. This definition has been added. However, please note that the guideline includes the whole population, not just those living or working in 'hot spots'.</p>

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					Everyone, but with a particular focus on people who live in towns, cities and those in Air Quality Management Areas or locations where air pollution is at levels close to the Air Quality Objectives or forms 'hotspots'.	
177	[for office use only]	Nottingham City Council	2		<p>Specifying measures, such as barriers and dust suppressants, could lead to an expectation of their use, even if inappropriate or ineffective for a given scenario, or give rise to unrealistic expectations of the measures effectiveness and, importantly, unintended consequences:-</p> <ul style="list-style-type: none"> - barriers, including trees provide only limited mitigation from some gaseous pollutants and fine/ultrafine particles, and may not be cost effective with respect to manufacture and maintenance, however, in the case of trees and the natural environment, these have other health and wellbeing benefits. - Calcium magnesium acetate (identified as a dust suppressant and used as an alternative to road salt) once applied to the road and subject to subsequent chemical reaction/degradation, sunlight and physical abrasion, may generate ultrafine particles that are subsequently entrained by air-currents, dispersed and inhaled and also adversely impact upon health (its hazard data cites: possible irritant to skin, eyes and respiratory tract). - Titanium oxide paint treatment was also promoted as a solution to urban NO2 issues, and following a couple of years of study found to be ineffective, after a short period of exposure. Furthermore, its manufacture has significant environmental impacts. <p>We note other techniques and technologies that may be effective at reducing emissions that contribute to local air pollution have not been mentioned e.g. increased energy efficiency and thermal insulation reduces energy/heat demand and therefore reduced emissions, particularly from gas fired boiler/central heating systems. These in turn reduce contributions to 'background' NOx/NO2 and particle levels, particularly in urban areas. Reduced ambient concentrations of NOx and particles should not only reduce the likelihood of 'hotspots' but also the incidence, extent and duration of pollution episodes.</p> <p>Key area 3: Initiatives, aimed at local authority employees or members of the public,... unnecessarily constrains the scope of the guideline, apparently excluding the largest groups (i.e. the private sector and business) responsible for the commuter and business mileage that significantly contributes to air pollution on primary/arterial routes and the reason for the majority of AQMAs.</p> <p>Another key area that we believe should be included in the Scope of the guidelines before 1,2 & 3 are local Environmental and Health strategies which can then support measures and influence 1,2 and 3. Thus the development and implementation of an Air Quality Improvement Strategy in addition to a mandatory Air Quality Action Plan and the identification via the JSNA of the health impacts and solution synergies should be a fundamental element of a holistic approach to reducing emissions delivering improved air quality.</p>	Thank you. Please note that inclusion of an intervention in a scope does not indicate that it is effective. The evidence reviews aim to identify relevant evidence which will be discussed by the committee and appropriate recommendations developed.

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178	[for office use only]	Nottingham City Council	2		<p>We therefore suggest the following</p> <p>'Key areas that will be covered Strategic plans, policies and interventions delivered by local authorities and... .. This includes: '1 Environmental change and development planning: ' developing public transport routes and services developing routes, infrastructure and facilities to support low emission modes of transport using existing and novel natural and technological measures to reduce levels of airborne pollution or exposure e.g. absorption, adsorption/impingement deposition, catalytic action etc. such as natural and artificial barriers, surface treatment, urban space and building design energy reduction/efficiency measures in residential and commercial building design</p> <p>2 (no suggested amendments)</p> <p>3 Initiatives, aimed at public sector and private sector, employees, members of the public and business and industry, providing information, advice, education or developing skills for: personalised travel planning, including awareness raising and education to encourage people to use alternatives to a car fuel choice, including zero-emission vehicles driver training, for example how to avoid heavy acceleration or braking and excessive speed route choice.</p>	Thank you. Changes have been made to this section to capture the additional detail suggested.
179	[for office use only]	Nottingham City Council	3	20-28	DEFRA commissioned a study into the issues that appear to have reduced the effectiveness of Air Quality Action Plans and the take-up of alternative transport initiatives and 'active travel', and the NICE guideline would benefit from access and reference to this currently unpublished study.	Thank you.
180	[for office use only]	Nottingham City Council	4	14-27 and General	<p>The guideline scope is titled 'Air pollution: outdoor air quality and health'. Outdoor air pollution arises from many sources and the contribution from each (main group) to health outcomes should be considered if the guidelines are to help drive the changes in perception and behaviour necessary by society as a whole to deliver improved air quality.</p> <p>To help establish the proportional impact of road traffic pollution may we suggest that an overview of health outcomes from air pollution precedes 'Health outcomes from road-traffic-related air pollution'?</p>	Thank you. The scope is limited to allow the guideline to be developed in the time available. Contribution from other sources is noted, however the scope can only provide a

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						brief outline of the main issues. Links to further information are provided for those wishing to read more.
181	[for office use only]	Public Health England	General	General	<p>This proforma asks: <i>Are there any other air pollution issues that you think NICE should consider addressing?</i> There are a large number of sources of emissions of air pollutants. Action to address these is needed at national and international, as well as local, level. However, producing guidance to address traffic-related emissions within urban areas seems a sensible initial focus for NICE, given their important contribution to population exposure to air pollution.</p> <p>We understand that NICE is already committed to developing a separate guideline on indoor air pollution.</p>	Thank you.
182	[for office use only]	Public Health England	General	General	<p>The proposed scope of the guidance is ambitious, given the complexities involved in assessing the effectiveness of potential interventions in reducing ambient pollutant concentrations and/or population/individual exposure to pollution, and in quantifying the resultant health benefits.</p> <p>Therefore, when developing its guidance, NICE should seek to use and/or complement the advice and expertise of other organisations and expert groups, and other professionals and academics, working in the field of air pollution. These would include Public Health England (PHE), the Department for Environment, Food and Rural Affairs (Defra), Department for Transport (DfT) and Highways England as well as DH's expert advisory Committee on the Medical Effects of Air Pollutants (COMEAP) and Defra's Air Quality Expert Group (AQEG) Others such as local authorities, regional air quality networks/forums and the Institute of Air Quality Management (IAQM) would also be able to make valuable contributions.</p>	Thank you. We hope that groups such as these will engage with the process as stakeholders. Please note that the committee developing the guideline will have a number of topic experts and will be in a position to ask for expert testimony to support the evidence reviews carried out for the development of the guideline.
183	[for office use only]	Public Health England	General	General	Defra have recently consulted on proposed changes to Local Air Quality Management (LAQM) and are currently developing technical guidance intended to assist Local Authorities in identifying and implementing appropriate measures to improve air quality. It is possible that NICE guidance could complement this by	Thank you. The guideline will take into account the

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	only]				<p>providing economic analysis of the predicted benefits of available measures.</p> <p>Both this revised LAQM technical guidance, and the Government's plans to comply with European Limit Values for NO₂, will be published during the timescale for developing the NICE guidelines. NICE should take account of these, to make use of the work undertaken in their development and to avoid inconsistency of approaches and advice.</p>	<p>current policy framework when published. NICE economic analysis is limited to examining aspects of the guideline, however this may be of interest to other parties.</p>
184	[for office use only]	Public Health England	1	9	<p>The extent to which the guidance will focus on measures to be undertaken by local authorities to reduce emissions/concentrations (e.g. by regulation or fiscal incentives) or to provide information to individuals to allow them to reduce their exposure to pollution is not clear. Public Health England would particularly welcome a focus on measures with other health co-benefits, such as increasing physical activity (e.g. active travel) or reducing emissions of greenhouse gases (e.g. modal shift, rather than purely reliance on abatement).</p>	<p>The major focus is intended to be on actions undertaken by local authorities and others. However this may include the provision of information among other actions.</p>
185	[for office use only]	Public Health England	1	12	<p>The guideline is also likely to be helpful to local authority air quality specialists and those working in LAQM.</p>	<p>Thank you. This has been added.</p>
186	[for office use only]	Public Health England	2	14	<p>Interventions considered should include altering the technology (e.g. abatement technology) used, as well as the type of fuel.</p>	<p>Thank you. Abatement technologies (i.e. the technologies underlying for instance Euro 6 standards) are outside the remit of this guideline.</p>

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						Interventions aimed at increasing the uptake of abatement technology is included – this has been clarified.
187	[for office use only]	Public Health England	2	17	Another aspect that c/should be considered might include strategic local planning to reduce the need to travel.	Thank you. This has been clarified.
188	[for office use only]	Public Health England	2	21	The guidance should include consideration of wider public health co-benefits and unintended trade-offs of measures, e.g. trees and foliage might create green space which could lead to mental health benefits and/or greater physical activity, but could also result in increased pollen and release of biogenic volatile organic compounds.	Co-benefits and unintended consequences are included in the section on key questions (section 1.4)
189	[for office use only]	Public Health England	2	26	Also include Ultra-Low Emissions Zones (ULEZ).	Thank you. This has been amended.
190	[for office use only]	Public Health England	3	2/3	Although we think that the focus should be on reducing long-term exposure to pollutants, it might also be useful to include consideration of provision of information to allow susceptible individuals to change their behaviour/activities when pollutant levels are elevated.	Thank you. Information for the public and those at risk has been added.
191	[for office use only]	Public Health England	3	10	Some information on the types of economic aspects that will be taken into account would be useful. For example, is the intention to include possible effects on local businesses or services (e.g. community healthcare provision) of implementing the measures under consideration? Or wider public health benefits from initiatives to reduce air pollution e.g. active travel measures?	Thank you. We cannot anticipate the data that will be available for the economic analysis . However, the

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						NICE method for public health interventions allows health and non-health benefits to be considered as well as a range of perspectives as appropriate.
192	[for office use only]	Public Health England	3	17	Another question for consideration might be whether provision of targeted information on air pollution levels is effective/cost effective in reducing the effects of episodes of elevated pollution on public health.	Thank you. Information for the public and those at risk has been added.
193	[for office use only]	Public Health England	3	22	Assessing reduction in exposure is likely to be difficult. For example, CMA would be applied to 'hot spot' areas or on key routes rather than universally across an urban area. So, whilst various possible measures would all be expected to contribute to local reductions in emissions, exposure will depend upon how individuals use/interact with their environment. Also it is not clear whether individual measures within each of these subsections will be assessed separately or assessed as a whole collection of measures. It would be more useful to see analysis of individual measures, so that local authorities can choose to adopt those which are likely to be most effective in their situation(s).	Thank you. The extent to which these issues can be answered will depend on the available evidence.
194	[for office use only]	Public Health England	4	15	It would also be valuable to assess the evidence for likely health co-benefits of the measures under consideration	Where evidence allows, impact on health through other mechanisms may be considered.
195	[for office use only]	Public Health England	4	18	The guidance appears focussed on "Road traffic-related air pollution", and it would be helpful to specify this.	Thank you. This has been clarified.
196	[for office use only]	Public Health England	4	19	It is unclear what is meant by "background" in this context. It would be helpful to specify whether this means "at background locations" and whether regional/national and international contributions to	The aim of the guideline is to

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	use only]				background concentrations will be taken into account in this assessment, or whether the focus is entirely on the effects associated with local traffic.	assess the effectiveness of local interventions. However if the evidence allows the cumulative impact of regional or national air pollution could be included.
197	[for office use only]	Public Health England	4	23	Will the focus be on primary tailpipe emissions, or will the effects of secondary pollutants and non-tail pipe pollutants also be considered?	The focus is not limited to tailpipe emissions. This has been clarified in section 3.
198	[for office use only]	Public Health England	4	24	Other factors considered should include aspects such as the engine technology and emissions abatement used	While the technologies required to achieve a set standard (such as Euro 6/VI) are outside the scope the impact of changes to meet such standards would be within the scope.
199	[for office use only]	Public Health England	6	5-14	We would suggest the following edits to the reporting of COMEAP's mortality burden calculations: The effect of particulate air pollution on mortality in the UK in 2008 was estimated as being equivalent to nearly 29,000 deaths at typical ages of death, associated with a total of 340,000 life-years lost. It is not clear how this mortality burden is distributed across the population. If air pollution had contributed to all deaths in 2008, this would be equivalent to an average loss of 6 months of life; if it had been the sole cause of death of only 29,000 people, the average loss of life would have been approximately 11½ years. The Committee on the Medical Effects of Air Pollutants (COMEAP) has suggested that it is more reasonable to assume that air pollution may have made some contribution to the deaths of all of those who died of cardiovascular causes. If this were the case, the average loss of life would have been about two years for each death	Thank you. These alterations to reflect COMEAP's original statement have been included. AMEND.

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					affected. See <i>The mortality effects of long-term exposure to particulate air pollution in the United Kingdom (COMEAP)</i> for an explanation of the mortality estimates.	
200	[for office use only]	Public Health England	6	26	This comment on susceptibility seems to be based on associations used in the European Commission's previous health impact assessment methodology (CAFE) to quantify effects of, mostly, short term exposure. We would suggest replacing by something along the lines of "Some groups are understood to be more susceptible to the effects of short-term exposures to elevated concentrations than others. However, current evidence suggests that long-term exposure exerts the biggest public health burden".	Thank you. This text has been amended.
201	[for office use only]	Public Health England	6	23/24	Mention is made here of ozone concentrations. We would be interested to understand the extent to which it is intended to include consideration of ozone within these guidelines on traffic-related air pollution. For example: it is intended to consider the contribution of (urban) road traffic emissions to (rural) ozone concentrations, or the effect that reducing NO _x emissions may have in increasing exposure to ozone.	This text has been clarified. The primary focus of the guideline is on emissions from road vehicles (including non-tailpipe emissions). However, as noted this will have an effect on secondary pollutants and this will be considered as far as the evidence allows.
202	[for office use only]	Public Health England	7	12	Note that this reporting schedule/structure may change as a result of the Defra LAQM review and specific proposals by the Greater London Authority for LAQM within London.	Thank you
203	[for office use only]	Public Health England	7	23	Here and elsewhere: polycyclic (or polynuclear) aromatic hydrocarbons	Thank you. This has been corrected.
204	[for office use only]	Public Health England	8	7	The Air Quality Strategy does not set objectives for ammonia (although the strategy does acknowledge	Thank you. This

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	ffice use only]	England			that as Sox and Nox reduce ammonia becoming more important.)	has been amended.
205	[for ffice use only]	Royal College of Physicians (London)			If it is human health that is being the focus, why is not indoor air pollution being targeted as well. Human health does not live in compartments of outdoor and indoor. Why isn't the total exposure being examined?	Thank you. The aim of the scope is to specify a piece of work that can be carried out within the timescales. A separate quality standard on indoor air quality has been referred to NICE.
206	[for ffice use only]	Royal College of Physicians (London)			The intrauterine and early life dimensions are crucial to understanding how pollution affects disease across the lifecourse. This must be included in your enquiry.	Thank you. These issues are within the scope of this work.
207	[for ffice use only]	Royal College of Physicians (London)			Much of the emphasis will be on the acute effects of pollutants, but it is the lifelong chronic exposure that is increasingly important.	Thank you. These issues are within the scope of the work.
208	[for office use only]	Royal College of Physicians (London)			The problem with legislated limits is that they are single pollutant focused. However, the individual is exposed to chemical mixtures not just one pollutant at a time. How will this be taken account of?	The committee will want to consider the impact of interventions using a current understanding of the epidemiology

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						of air pollution and health.
209	[for office use only]	Royal College of Physicians (London)			Socioeconomic gradients do not favour those living in the most polluted areas. Very great attention needs to focus on this aspect.	Thank you. All NICE guidelines take issues relating to equality into account.
210	[for office use only]	Royal College of Physicians (London)			In planning local developments, little or no account is taken of local air pollution monitoring in planning. This seems an opportunity to help shape the future pollution exposure profile of communities.	Thank you.
211	[for office use only]	Royal College of Physicians (London)			The government intends to cut back its monitoring of air pollutants in communities; if this happens it will be very retrogressive.	Thank you.
212	[for office use only]	Royal College of Physicians (London)			Greater emphasis needs to be made of mobile technologies for personal decision making relating to air pollution exposures.	Thank you.
213	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<p>It is important to recognise that the EU institutions have a strategy of "Euro standards" for reducing emissions from road vehicles, which has been implemented in stages over the past 25 years, and that has recently demonstrated great success.</p> <p>For instance new trucks and buses adopted Euro VI (January 2014) and evidence for Transport for London shows Euro VI buses emitting 95% less NOx than at Euro V using its cross-London 159 test. See http://www.smmt.co.uk/industry-topics/air-quality/#responsiveTabs3 and Table 6 at https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/user_uploads/ulez-supplementary-information---final-291014.pdf-1</p> <p>Since Euro 5, all diesel cars and vans feature filters that capture over 99% of particulate emissions, making them the cleanest ever produced. Compared to 2000, nitrogen oxides (NOx) are down 64%, particulates (PM10) are down 90% and carbon monoxide (CO) levels are down 22%.</p> <p>The introduction of Euro 6 for cars in September 2015 will see an 84% drop in NOx emissions in diesel</p>	Thank you. While the technologies underpinning Euro standards are not within the remit of this guideline actions which may change the make-up of the vehicle fleet are.

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					<p>cars since 2000 (vans a year later).</p> <p>The European Commission's clean air policy package, published in December 2013, highlighted that developments through Euro 6/VI, including additional elements around real driving emissions (RDE), would deliver key air quality objectives by 2020.</p> <p>It is therefore critical to recognise the step change between new and old technologies.</p> <p>The inherent advantages of diesel engines are recognised in the recitals to the Euro 5/6 Regulation (EC) No 715/2007, which states that "a considerable reduction in nitrogen oxide emissions from diesel vehicles is necessary to improve air quality and comply with limit values for pollution. This requires reaching ambitious limit values at the Euro 6 stage without being obliged to forego the advantages of diesel engines in terms of fuel consumption and hydrocarbon and carbon monoxide emissions."</p>	
214	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<p>The step change between new and old technology diesel is also recognised in the January 2015 study by the Health Effects Institute (funded by the US Environmental Protection Agency), showing that modern diesel exhaust is not carcinogenic, contrary to their own previous studies on traditional technology diesel. This is evidence that the step change in emission reductions from modern standards have made a real difference. http://pubs.healtheffects.org/view.php?id=430</p> <p>Euro VI is at least equivalent to the US standard, more stringent in many ways.</p> <ul style="list-style-type: none"> ○ This is the first study to conduct a comprehensive evaluation of lifetime inhalation exposure to emissions from heavy-duty 2007-compliant engines (referred to as "new technology diesel exhaust," or NTDE). ○ The study evaluated the long-term effects of multiple concentrations of inhaled NTDE, which has greatly reduced particle emissions compared with "traditional-technology diesel exhaust" (TDE) in male and female rats on more than 100 different biologic endpoints, including tumor development, and compared the results with biologic effects seen in earlier studies in rats after exposure to TDE. ○ Lifetime inhalation exposure of rats exposed to one of three levels of NTDE from a 2007-compliant engine, for 16 hours per day, 5 days a week, with use of a strenuous operating cycle that more accurately reflected the real-world operation of a modern engine than cycles used in previous studies, did not induce tumors or pre-cancerous changes in the lung and did not increase tumors that were considered to be related to NTDE in any other tissue. A few mild changes were seen in the lungs, consistent with long-term exposure to NO₂, a major component of NTDE, which is being further substantially reduced in 2010-compliant engines. 	Thank you

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215	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	Bullet point four in the abstract of "Representativeness of air quality monitoring networks" (Jan Duyzer et al. Atmospheric Environment 104 (2015) 88e101) states that assumptions can only be made for people who live relatively close to the street measuring stations. "Street stations, representing only a small urban area, are not suitable for characterising the exposure of the general population." Hence there is a risk of systematic errors by extrapolating to exposure of the wider public. See http://www.sciencedirect.com/science/article/pii/S1352231014010152	Thank you.
216	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	If making policy recommendations, they should be based on an assessment of the air quality improvements expected from them.	The guideline is aimed at local actions, not national policy.
217	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	SMMT's briefing on the key air quality issues is below and SMMT would welcome the opportunity to provide further evidence if that would help.	Thank you. Please note that NICE may issue a call for evidence during the development of this guideline and may consider whether expert testimony is required.
218	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	Introduction: SMMT recognises the challenge of air pollution and the efforts by government and local authorities to improve air quality in the UK. The automotive industry in the UK and across Europe has invested billions of pounds in technology to reduce both carbon emissions and other pollutants. Consistent and coordinated actions on air quality are crucial in ensuring that the automotive sector has certainty in policy direction. This paper outlines the automotive industry's policy priorities for improving air quality in the UK.	Thank you.
219	[for office use only]	SMMT - The Society of Motor Manufacturers	General	General	Summary SMMT calls on UK government and local authorities to consider the following policy proposals to address air quality issues:	Thank you.

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		and Traders Limited			<ul style="list-style-type: none"> Government should engage with industry at an early stage to inform its national air quality strategy to outline the package of measures being taken forward to improve air quality. Government should provide national guidance for Low Emission Zones to ensure consistency of application by local authorities on key criteria such as vehicle standards. A policy framework should be established to encourage a faster replacement of older vehicles and accelerate the introduction of Euro 6/VI and ultra-low emission vehicles. Reducing congestion and increasing traffic flow are integral to local air quality management. Policy options such as out-of-hours deliveries, anti-idling advice and investment in road capacity are key in improving local air quality. 	
220	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<p>Background</p> <p>Emission reductions The automotive industry has invested significantly to develop a portfolio of technologies that will address the challenges of reducing carbon and pollutant emissions from vehicles. Average new car CO₂ emissions for 2014 were 124.6 g/km and have fallen 31% since 2000. Vehicles being produced today feature filters that capture over 99% of particulate emissions, making them the cleanest ever produced. Compared to 2000, nitrogen oxides (NOx) are down 64%, particulates (PM10) are down 90% and carbon monoxide (CO) levels are down 22%. The introduction of Euro 6 sees an 84% drop in NOx emissions in diesel cars since 2000. Evidence from bus testing on the London-specific test cycle demonstrates that there has been up to a 95% reduction in NOx emissions from Euro V to Euro VI.</p>	Thank you.
221	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<p>Investment in technology A technology neutral approach to air quality policy is essential to supporting investments being made across the automotive industry in various technologies that will achieve emission reductions. A consensus technology roadmap developed by government and industry through the Automotive Council has outlined a number of technologies needed to reduce CO₂ emissions. It is important to note that increased uptake of hybrid vehicles, plug-in hybrid vehicles, electric vehicles and fuel cell vehicles is critical to achieve objectives on CO₂ and air quality; however the internal combustion engine (both petrol and diesel) will continue to be the most widely available technology in the near term.</p>	Thank you.
222	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<p>Euro 6/VI The impact of regulated emission limits in real world conditions has led to a change in approach with more robust Euro standard development underway. Emissions test limit values and changes to the way tests are conducted under the Euro standard regime have seen and will continue to see significant reductions with the introduction of Euro 6 (light duty, 2014/15)/VI (heavy duty 2013/14). The European Commission's clean air policy package, published in December 2013, highlighted that developments through Euro 6/VI, including additional elements around real driving emissions (RDE), would deliver key air quality objectives by 2020.</p>	Thank you.
223	[for	SMMT - The	General	General	Policy response	Thank you.

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	office use only]	Society of Motor Manufacturers and Traders Limited			<ul style="list-style-type: none"> • National strategy on air quality – SMMT calls on government to publish a comprehensive national strategy on air quality to outline policy and actions to reduce air pollution across all sectors. SMMT calls for early engagement with the automotive industry on policies that affect the sector. The strategy should outline government’s ambitions to meet European limit values for pollutant emissions, which will provide certainty and clarity to sectors and industries, stakeholders and local authorities. The statement should outline the package of options being actively considered by government and timelines for implementation. The strategy should have cross-government scope and align CO₂ and air quality policy under industrial strategy. 	
224	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<ul style="list-style-type: none"> • National guidance for Low Emission Zones – Government should provide national guidance for Low Emission Zones in cases where local authorities decide to implement such a policy. Guidance from national government would enable local impacts of air quality to be appropriately managed while maintaining consistency nationally under key criteria. Guidance would complement Defra’s air quality grant programme which supports local authority assessment of air quality policy measures, SMMT believes this funding should continue. Where local authorities are assessing suitability of Low Emission Zones, it is important that parameters such as vehicle emission criteria, based on the Euro standard regime, are set at a national level to avoid a “patchwork” of different standards across the UK. SMMT would support the latest emission standards (Euro 6/VI) as a basis for such criteria, subject to suitable lead times. 	Thank you.
225	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<ul style="list-style-type: none"> • Accelerated uptake of latest low emission vehicle technologies has a key role in reducing emissions as faster replacement of older vehicles will have an immediate positive impact on air quality. A technology neutral policy framework that encourages greater uptake of new vehicles across all vehicle categories, and accelerates the introduction of Euro 6/VI and ultra-low emission vehicles in the UK is important to achieve a greater pace of emission reductions. This approach also strengthens the opportunities to take advantage of additional technological developments, such as on safety, as well as investment in lower CO₂ innovations in the UK that will deliver industrial benefits. 	Thank you.
226	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<ul style="list-style-type: none"> • Integrated transport policy – Impacts of vehicle emissions in the real world can be mitigated through a number of measures under an integrated transport policy. Air pollution is most concentrated in urban areas with specific air quality hot spots, therefore priority must be given to reducing these concentrations and eliminating the localised impacts. Increasing traffic flow and reducing congestion are critical policy objectives in overcoming local issues. SMMT considers the following policies to be an important part of an integrated and comprehensive transport policy to improve air quality: <ul style="list-style-type: none"> ○ Out-of-hours deliveries ○ Improved traffic sequencing ○ Anti-idling information campaigns ○ City and spatial planning ○ Encouraging inter-modal journeys ○ Encouraging more efficient driving and behavioural change 	Thank you.

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227	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<ul style="list-style-type: none"> Continued support for Ultra Low Emission Vehicles (ULEVs) – Government’s £500 million funding for ULEVs from 2015 to 2020 is critical for the future of the UK industry as the global shift to low and ultra low carbon vehicles and technologies provides strategic opportunities for growth and jobs across the whole automotive value chain. The increased uptake of ULEVs will have direct local air quality benefits alongside reductions in CO₂ emissions. The ULEV market is in an early stage of development and should be continued to be supported through incentivisation. ULEV policy should be strongly embedded into government’s national air quality strategy. 	Thank you.
228	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<ul style="list-style-type: none"> Investment in roads and road design – Investment in roads and improvements to road design is a key policy lever to increase capacity and improve traffic flow. There are significant demands on where road funding should be prioritised at both national and local levels, and the Roads Investment Strategy outlines air quality as one of government’s strategic areas for investment in the road network with £100 million of funding. SMMT believes that this funding should be prioritised to relieve congestion, particularly on motorways and major roads through urban areas. Intelligent road design should also be considered to reduce stop-start nature of traffic in congested areas. 	Thank you.
229	[for office use only]	SMMT - The Society of Motor Manufacturers and Traders Limited	General	General	<ul style="list-style-type: none"> Vehicle taxation – Motoring taxation and Vehicle Excise Duty (VED) have been important mechanisms in driving down CO₂ emissions. SMMT recognises the challenge that the improved CO₂ performance and fuel efficiency of vehicles will have on the tax take through VED and other motoring taxation. Industry is keen for government to consult on any changes to the motoring taxation regime at an early stage so that any reform provides industry and the consumer with clarity and certainty. Where air quality concerns are a localised issue, motoring tax is a national policy and applied to all vehicles. Changes to VED or motoring taxation to address air quality is a blunt instrument that would not guarantee a specific and effective remedy to air pollution. 	Thank you.
230	[for office use only]	Sustrans	Page 1	Lines 12-16	<p>We agree with the list of local authority targets for this guidance.</p> <p>However, action on local air quality such as restraint of the most polluting motor vehicles also benefits physical activity (through increased active travel), road safety, climate emissions and local quality of life.</p> <p>Therefore the guidance should also be relevant for Council Leaders, Chief Executives and strategy teams, who need to take a cross-cutting view of local policies.</p>	Thank you. We hope to be able to take account of the major co-benefits as part of the modelling to be carried out to support the development of the guideline
231	[for office use only]	Sustrans	Page 1	Lines 18-23	<p>This list of the wider potential market is good. We are particularly pleased that you have included the general public here. If the public understood how much impact a few simple measures could have, a shift in thinking could be brought about, as profound as that relating to smoking in public places.</p>	Thank you.
232	[for	Sustrans	Page 2	Lines 13-	We suggest a couple of slight clarifications:	Thank you. The

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	office use only]			16	<ul style="list-style-type: none"> 'reducing overall mileage' <i>by motor vehicles</i> note that a large proportion of particulate emissions from motor vehicles is not from the tailpipe (tyre and brake dust, for example). 	first bullet has been amended. The role of tyre and brake wear has been added to the context section.
233	[for office use only]	Sustrans	Page 4	Lines 1-3	<p>This question might be clarified, so that it cannot be understood to address a potential role for PTP in helping individuals avoid the most polluted areas:</p> <p>Is PTP effective and cost effective at reducing exposure to road traffic related air pollution <i>by creating large scale travel behaviour change from polluting to non-motorised modes of transport, or at least to those with lower emissions per passenger mile?</i></p>	Thank you. It is not necessary to set out the means by which individual or population exposure is reduced in this question.
234	[for office use only]	Sustrans	Page 5	Lines 4-6	Have you considered also including PH42, as an illustration of the kind of whole system approach which would also be desirable in tackling air pollution?	Thank you. The committee may want to consider linkage to other guidelines during the development process.
235	[for office use only]	Sustrans	Page 7	Lines 3-8	We welcome this clear statement of co-benefits to be secured by measures to tackle air pollution from motor vehicles. It is an important issue, seemingly still overlooked in much policy and practice.	Thank you.
236	[for office use only]	The Greater London Authority	general	general	The GLA welcomes this guidance, we feel it will be a very useful document, and are in agreement with the proposed scope.	Thank you.
237	[for office use only]	The Greater London Authority	general	general	The GLA is currently developing a new system for the way that London boroughs manage local air quality, tailored to the specific opportunities and challenges in London. This framework is out for consultation until 25 th September.	Thank you. Please note that NICE may issue a call for evidence

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					As part of this new framework we have developed an Air Quality Action Matrix, which assesses and ranks 39 actions that London boroughs can take to address pollution locally, ranging from public health to planning to freight and fleet. This action matrix is likely to provide a useful point of reference for the NICE guidance document, as it covers many of the actions that the guidance seeks to explore. The matrix and other documents can be found here: https://www.london.gov.uk/priorities/environment/consultations/consultation-on-proposals-for-a-new-london-local-air-quality-0	during the development of this guideline and may consider whether expert testimony is required
238	[for office use only]	The Greater London Authority	general	general	When developing the action matrix outlined above we needed to categorise which actions were more suitable for central, inner and outer London, as the pollution sources and solutions vary considerably according to the borough-type. This issue is likely to be magnified when developing guidance on a national scale so we would suggest that some categorising of actions based on location type would be helpful.	Thank you. This is an issue that the committee may want to consider during the development of the guideline.
239	[for office use only]	The Greater London Authority	general	general	You may also wish to consider likely health (and health inequality reduction) co-benefits of measures to tackle the health impacts of air quality. For example measures which serve to reduce the speed and volume of motorised traffic may also reduce the health inequalities associated with road traffic injuries of pedestrians; the barriers to cycling (see NICE PH guidance 8) and physical inactivity among those using cars.	Thank you. Co-benefits have been added and will be taken into account as far as the available evidence allows. Links will also be made to other NICE guidelines, which may include PH8 on physical activity and environment and PH41 on walking and cycling.
240	[for office use only]	The Greater London Authority	1	17	Suggest "environmental sustainability" should be added as another category of local authority staff that this guidance would be relevant for.	Thank you. While these groups may have an interest in the guideline the groups listed are more likely to be charged with

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						taking action to implement recommendations.
241	[for office use only]	The Greater London Authority	2	9	Suggest that groups that this guidance should be focused on should include not only those who live in polluted locations, but also those who work in polluted locations.	Thank you. This has been amended.
242	[for office use only]	The Greater London Authority	2	23	Suggest that this section, which will look at interventions boroughs can take, should include Planning (reducing emissions from construction and new developments).	Thank you. This has been clarified.
243	[for office use only]	The Greater London Authority	3	1	Suggest that this section, which will look at interventions boroughs can take, should include measures to reduce the impact of freight and fleet (service delivery plans, consolidation centres, etc.). It could also look at Low Emission Neighbourhoods (please see the TERM document for more details: https://tfl.gov.uk/cdn/static/cms/documents/transport-emissions-roadmap.pdf)	Thank you. This section has been amended to clarify the inclusion of interventions of these sorts.
244	[for office use only]	The Greater London Authority	6	4	This section may wish to reference the new research into air pollution and mortality published by the GLA in July 2015. https://www.london.gov.uk/priorities/environment/clearing-londons-air/understanding-the-health-impacts-of-air-pollution-in-london	Thank you. References have been updated.
245	[for office use only]	The Greater London Authority	7	9	This section refers to the current statutory system for Local Air Quality Management. Both the GLA and Defra plan to change this system from early 2016. Details of the GLA's proposals can be found here: https://www.london.gov.uk/priorities/environment/consultations/consultation-on-proposals-for-a-new-london-local-air-quality-0	Thank you. This will be taken into account in the guideline.
246	[for office use only]	The Greater London Authority	general	general	NICE may also wish to consider the following relevant GLA/TFL initiatives within the evidence base for the guidance: The clean air fund idling and taxi marshalling campaign : https://tfl.gov.uk/travel-information/improvements-and-projects/clean-air-fund The Breathe Better Together awareness campaign: http://www.london.gov.uk/priorities/environment/breathe-better-together?source=vanityurl	Thank you. Please note that NICE may issue a call for evidence as part of the process of developing this guideline.

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					<p>The Ultra Low Emission Zone (ULEZ): https://tfl.gov.uk/modes/driving/ultra-low-emission-zone?intcmp=26434</p> <p>The Sustainable Design and Construction SPG: https://www.london.gov.uk/priorities/planning/consultations/draft-sustainable-design-and-construction</p> <p>Borough air quality projects funded by the Mayor's Air Quality Fund (MAQF): https://www.london.gov.uk/priorities/environment/clearing-londons-air/mayors-air-quality-fund-maqf</p> <p>The Transport Emissions Road Map: https://tfl.gov.uk/cdn/static/cms/documents/transport-emissions-roadmap.pdf</p> <p>The Ultra Low Emission Vehicle Plan: https://tfl.gov.uk/cdn/static/cms/documents/ulev-delivery-plan.pdf</p>	
247	[for office use only]	The Royal College of General Practitioners	General	General	<p>This draft scope covers the key problem areas and main pollutants. The solutions consist in a mixture of: changing behaviour on use of cars, a social environment which makes alternative travel easier and attractive, fiscal policy in determining tax on fuels/road tax, zoning areas and charging for car etc. entry, changes in the pricing, subsidy and availability of public transport, statutory action e.g. enforced switch from petrol to gas in Delhi, and technology of cleaner fuels, filters, electric cars.</p> <p>The change to unleaded petrol was made quickly and without much protest. There is some doubt whether indeed it affected lead levels in children exposed.</p> <p>The advent of almost universal Sunday opening in towns and cities, the lifting of zones and reduced parking restrictions means that conurbations now lose the one day a week which allowed some environmental recovery.</p>	Thank you. The committee will consider available evidence relating to these approaches at local level. Please note that national fiscal policy is outside the remit of this work.
248	[for office use only]	UK Health Forum	3	1-9	<p>To the list of local initiatives to examine for the guidance UKHF would suggest adding the following:</p> <ul style="list-style-type: none"> - Specific measures to encourage active travel and physical activity outside of the daily commute (ie making short journeys without a car). While these activities will not reduce an individual's exposure to air pollution they will help to reduce pollution in a given area. - Initiatives which will tackle sustainability/sustainable development and/or climate change mitigation along with improving health and exposure to outside air pollution. - Joined-up, cross-sector initiatives that will have co-benefits across risk factors and diseases. 	Thank you. Active travel would be included under 'low emission transport'. Please note that NICE has produced guidelines on walking and

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						cycling which may be linked in this guideline. Initiatives to tackle sustainability or climate change that rely on reducing motor travel similarly would be included. The importance of co-benefits has been clarified in this scope.
249	[for office use only]	UK Health Forum	5	5	Important to note that the NICE guideline PH8 on physical activity and the environment will be quite out-of-date by the time this guideline is published.	Thank you. Updating PH8 has been considered. Please see http://www.nice.org.uk/guidance/ph8 for further information.
250	[for office use only]	UK Health Forum	General	General	UKHF suggests that the guideline scope take into account more seriously and in more detail: - The role that EU level regulations and legislation play on what can and should be happening within England (noting that these competencies have the potential to change drastically while the guidelines are being developed). - The impact the forthcoming UN Sustainable Development Goals will have on national and local decision making regarding the environment, climate change, air pollution, health, etc.	Thank you. While these issues play an important part the guideline will focus on local actions.
251	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	General	General	The Air Quality Management Resource Centre at the University of the West of England (referred to herein as AQMRC) has many years of experience working directly with and for local government in assisting them with their statutory Local Air Quality Management (LAQM) duties, appraising Review and Assessment reports and Further Assessments, and also in disseminating Continuing Professional Development training on LAQM to local authorities and environmental consultancies. AQMRC has been involved in the development of LAQM since its inception and played a central role in the	Noted.

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					development of statutory and non-statutory guidance, both directly and through consultation responses, including against the repeal of Further Assessments. Over the last 15 years, AQMRC has undertaken extensive primary research and published widely on the LAQM process, its strengths and weaknesses and in particular interactions with the transport sector. AQMRC has recently assisted the European Commission with services related to the review of the Thematic Strategy on Air Pollution, which has been used to support the development of the EU Clean Air Policy Package 2030, and so is well-placed to recognise the importance of LAQM to national air quality policy in achieving the EU Limit Values.	
252	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	General	General	A common theme that should run through this guideline would be the identification of each barrier hampering the implementation of each intervention. . We know how air pollution can be drastically reduced/removed, but most of the time these necessary changes can't be implemented for economic, social and political reasons. These need to be highlighted. The AQMRC have identified many of these barriers at both a local and national scale; these can be found in our research repository http://www1.uwe.ac.uk/et/research/aqmrc/publications.aspx	Thank you. Please note that NICE may issue a call for evidence as part of the process of developing this guideline.
253	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	General	General	There is too much focus in the document on air pollution being the result of individual actions. Traffic, and consequently traffic pollution, is a result of people undertaking a wide range of societal activities that often take driving as a 'given' for participating in them, and often profit from the externalisation of the impacts of this transport. AQMRC have been involved in a 3.5 year research project looking at how the structuring of these activities often leaves people feeling that they have no alternative but to drive (even where they would rather not), and we are working up ideas and guidelines around how these societal actors (the employers, service providers etc.) could be encouraged to play a greater role in addressing the transport problems that they generate. A short description of our research findings can be found here: http://www.fleximobility.solutions/wp-content/uploads/2015/08/Fleximobility-Pamphlet-DRAFT-June-2015.pdf and here: http://www.fleximobility.solutions/wp-content/uploads/2014/11/Green-Paper-fleximobility-draft-public-November.pdf	Thank you. As you indicate there are many factors involved in the decisions that ultimately result in air pollution. We hope that the evidence to be considered will allow examination of these issues. Please note that NICE may issue a call for evidence as part of the process of developing this guideline and may consider whether expert testimony

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254	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	General	General	We consider that it is inappropriate to focus solely on emissions from road traffic considering significant air pollution emissions are from other established sources (e.g. power stations) and re-emergent sources such as domestic biomass burning.	is needed. Thank you. The intention of the scope is to set out a guideline that can be produced to the allotted timescale. Other issues such as those you highlight would require consideration of a different evidence base and require a different set of actions. However NICE may consider the need for an additional piece of work to address these issues.
255	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	Page 6	Line 6	The 29,000 deaths a year quoted here is an underestimate. An updated 'deaths per year' figure derived from PM _{2.5} and NO ₂ health impacts in London can be found here: http://www.london.gov.uk/priorities/environment/publications/understanding-health-impacts-of-air-pollution-in-london It is expected that national figures will be updated by COMEAP to include NO ₂ in the near future.	Thank you. Figures will be updated if further information is available during the process of producing the guideline.
256	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	Page 6	Lines 22-23	There is evidence to suggest that high concentrations of traffic pollutants within deprived areas are not produced by those living within those areas (Mitchell and Dorling, 2003). Our own recent research confirms this situation remains.	Thank you. This is an important issue that the committee may want to consider when developing the

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		England]				guideline.
257	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	Page 6	Lines 26-27	There is evidence to suggest that areas with high proportions of children under 5 also have higher concentrations of NO ₂ and road NO _x emissions (Mitchell and Dorling, 2003). Our own recent research confirms this situation remains.	Thank you.
258	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	Page 7	Lines 10-14	LAQM is currently under review a restructuring of local authorities' reporting requirements and a removal of some pollutants from the statutory instrument.	Thank you. The guideline will be set in the context of the latest policy framework. Any changes will be considered if time allows in the guideline development phase.
259	[for office use only]	[Air Quality Management Resource Centre, University of the West of England]	Page 8	Lines 1-3	Research conducted by the AQMRC indicates that this interdepartmental responsibility for air quality, both nationally and locally, is lacking.	Thank you. Please note that the focus for this guideline is on actions that can be taken locally.
260	[for office use only]	Waverley Borough Council	2	10	Definition of 'hot spots' will be useful – worth noting that under LAQM fewer than 18 incidents per annum of the higher, 1hour limit values do not require the identification of an AQMA	Thank you. A definition of hot spots has been added. Please note that the guideline is not restricted to those affected by hot

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						spot pollution.
261	[for office use only]	Waverley Borough Council	2	19	Would be useful to specifically consider the provision of electric vehicle charging points; currently a Catch 22 when trying to argue for provision in Planning consultations when demand not present and where demand won't grow where EVCPs are not available	Thank you. Charging point provision would fall within the remit of this guideline.
262	[for office use only]	Waverley Borough Council	2	26	Given improving technology the use of short-life low emission zones using ANPR may be economically viable for small AQMAs but current research isn't available. Waverley has tried to scope this but too expensive for a small LA to fund alone	Thank you. This is an issue the committee may want to discuss during the development of the guideline.
263	[for office use only]	Waverley Borough Council	3	1	Anything that promotes awareness nationally of no-idling zones and related powers might help fuel demand on LAs to make provision	Thank you.
264	[for office use only]	Waverley Borough Council	3	14	Waverley has recently modelled the economic and health impacts of traffic management changes to an AQMA and results imply that combined health benefits are outweighed by engineering costs by a considerable margin	Thank you.
265	[for office use only]	Waverley Borough Council	3	24	May be worth noting that measuring effectiveness of incentives / disincentives in terms of AQ improvements is very difficult and identifying an agreed process for doing so would be valuable?	Thank you.
266	[for office use only]	Waverley Borough Council	4	24	Waverley modelled traffic contributions in an AQMA in 2012-13 and found private diesel cars air pollution contribution was higher than all other sources combined. If this is reflected nationally it will accentuate that a low carbon approach may not mirror low NO ₂	Thank you.
267	[for office use]	The Canal & River Trust	1	9	The draft scope currently excludes pollution from boats on inland waterways, which can have a significant impact on air quality.	Thank you. The aim of the scope is to set out a

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	only]					guideline that can be addressed in the time available. Pollution from boats would require consideration of a separate evidence base and result in different actions. However NICE may consider the need for an additional piece of work to address these issues.
268	[for office use only]	The Canal & River Trust	1 2	14 19	<p>Local authority transport staff can reduce the impacts of air pollution through capitalising on active routes away from trafficked areas e.g. redundant railways, canal towpaths and across open space including parks. The document "Positively Affecting Lives - The Health Benefits of the Forth & Clyde and Union Canals" - Final Report for British Waterways Scotland and The Waterways Trust Scotland June 2011 MVA Consultancy. "The canals generally represent areas of good air quality and provide a corridor of clean air into the heart of Scotland's two largest cities. Table S3 below summarises the reduction in the number of hours spent walking, running or cycling in the poor air quality in the road corridors parallel to the urban sections of the two canals." Table S3 showed 85,000 Person Hours per annum reduction in exposure to poor air quality. The two sections of urban canal towpath in Scotland reduced exposure to the poor air quality in the parallel road corridors by over 48,000 hours of walking time and almost 36,000 of cyclist-hours. This is a significant saving and clearly demonstrates the benefit of the canals as part of the wider urban path network.</p> <p>These principles would apply equally to populations adjacent to canals elsewhere and particularly in urban or peri – urban areas.</p> <p>There were also monetary benefits arising from a reduction in traffic accidents and absenteeism.</p> <p>Canal towpaths are often overlooked as transport routes or connecting links by relevant officers and specific mention (as in PH8) will encourage consideration of these level, flat and easy to access routes.</p>	Thank you. As indicated the use of transport routes such as towpaths to promote active transport may be important and if there is evidence relating to this it would be within the scope of this guideline. Please note that the guideline will make links to other NICE guidelines such as the one mentioned and PH41 on walking and cycling.

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269	[for office use only]	The Canal & River Trust	2	13	<p>Case study of air pollution mitigation: We recognise that air and noise pollution are important concerns for canal-side residents and boaters alike. The operation of boats on the waterways will inevitably lead to some noise and smoke being generated (from engines and stoves – the level of pollution is generally low but can accumulate where a large number of boats are moored together and using solid fuel stoves), but the Trust's terms and conditions (within a boat licence) require that boaters avoid causing a nuisance through their boating operations or activities. Where boating activities outside the Trust's terms and conditions results in nuisance, the Trust takes action to warn offenders and pursues stronger action through licence revocation procedures where persistent breaches occur, though this is a long process. However, the relevant powers to act on environmental pollution and statutory nuisance sit with local authorities: The Clean Air Act 1993 section 44 indicates that bans on dark smoke apply on the waterways and can be enforced by local authorities on boat owners just as on householders'.</p> <p>The Boat Safety Scheme has no requirements on emissions, and to introduce them would prove problematic especially for boats with underwater exhaust terminations. The navigation authorities (CRT, Environment Agency, Broads Authority and others) have taken the view that with ever-more onerous exhaust and noise emission standards being enforced through EU Recreational Craft Directive revisions on new craft, this will ensure improvements over time.</p> <p>We are developing partnerships with local authorities to ensure effective systems are in place to monitor, record and assess the impact of noise and smoke pollution from use of waterways. Our own monitoring indicates that, in many cases where there has been concern about pollution, boats have actually been operating within established terms and conditions and accepted boating protocols. While there are cases where some boats have been responsible for excessive pollution, the number of cases that have been actionable under statutory nuisance powers is limited. We have nevertheless worked with the boating community to highlight environmental issues and encourage behaviour change, and this is starting to have some success.</p> <p>In Islington, we are partners with the local authority on an environmental project ('Clean Air Islington') to improve air quality through engagement with the boating community and provision of advice and guidance on higher environmental performance, and encouraging the replacement of older, more polluting energy sources in boats. London Borough of Islington has provided Trust staff with a training session on environmental protection legislation and procedures, while the Trust has enabled Council staff to explore boating operations. We hope that this initiative will continue.</p> <p>We will continue to work with local authorities and the boating community to explore the effective management of environmental pollution issues. If they consider a boat, or boats in a particular location to be causing a nuisance in any way, they will do it on a case-by-case basis.</p>	Thank you.

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270	[for office use only]	The Canal & River Trust	2	22	Our current safeguard to minimise dust pollution during construction works: 1. The Site Manager is to identify possible and probable construction trades and activities which will result in the generation of dust and air pollution when reviewing works packages and sub-contractors method statements prior to them commencing on site. 2. Areas identified as being dust or air pollution generators are to be risk assessed with the sub-contractor involved, the assessment is to be carried out in sufficient time to allow the arrangement and implementation of preventative measures. 3. Haul and access roads are to be kept clean at all times as construction activities allow, damping down of roads and access ways to prevent site traffic generating dust should be considered on an as required basis. This is especially important during periods of sustained dry weather. 4. Suppliers carting off waste or delivering dust based materials to site should do so in covered vehicles. 5. Fully enclosed hoardings should be considered where dust is proposed to be an issue to minimise dust travelling off site. 6. Trades will be encouraged to use tools with dust extraction systems fitted. This is to be discussed at the Site Induction and to be monitored on site by the Site Manager	Thank you.
271	[for office use only]	The Canal & River Trust	3	7	Driver training also reduces fuel consumption – DTp will have evidence.	Thank you.
272	[for office use only]	The Canal & River Trust	3	11	Economic benefits of the intervention in Scotland referred to above amounted to £6.7m p.a.	Thank you,
273	[for office use only]	The Canal & River Trust	3	20	Route design making the most of traffic free routes such as canal towpaths can reduce exposure to air pollution.	Thank you.
274	[for office use only]	The Canal & River Trust	4	1	Sustrans have evidence of the impact of travel planning and education	Thank you.
275	[for office use only]	The Canal & River Trust	4	17	See reference to evidence from Scottish Canals in comment 2 (above) for impact on health outcomes	Thank you.

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276	[for office use only]	The Canal & River Trust	5	5	As in existing guidance PH8 specific mention of canal towpaths encourages relevant officers to consider them as active travel routes reducing exposure to traffic and its air pollution. Off road active travel also improves health and well-being through physical activity and inter action with the environment (PH8 and PH41)	Thank you.
277	[for office use only]	The Canal & River Trust	8	12	<p>Managing air pollution locally</p> <p>At the Canal & River Trust we own and manage over 2,000 miles of inland waterways across England and Wales. We are the custodians of our riparian heritage, and we take this responsibility very seriously. This responsibility includes caring and improving the local environment. Cleaner rivers and canals are important in terms of improving the environment in industrial areas. Our network sustains wildlife which makes the waterways more attractive for recreational use as well as promoting new developments.</p> <p>However, whilst our network does improve air quality, we also acknowledge that canal boats can have a negative impact on pollution levels, primarily due to the burning of fuel. In order to manage and reduce this, we consider our own guidance, byelaws and incentives relating to boat licensing and boat engines (engine fuel types) and solid fuel heating. We have been working with Islington Council at the canal cutting visitor moorings where we have had particularly bad air pollution resulting from narrow boats. The Clean Air Act 1993 provides guidance and bylaws however it doesn't apply to boats.</p> <p>As a responsible and forward thinking Trust we see this as an opportunity to improve our environmental credentials, and work with relevant agencies to mitigate any negative impact at a local level. Air quality is an interesting area for us as we have experience at either end of the issue, and we hope that this means we can be at the forefront of improving air quality in canal communities.</p> <p>Whilst in many areas e.g. rural areas, we can promote the clean air and environmental quality of our canals and rivers, this is sometimes not the case in urban areas due to the sheer number of boats with 'old' diesel engines, which is occasionally the subject of complaints from members of the public. However, when we do receive complains we respond via our local team and attempt to make improvements via our local waterway team.</p>	Thank you.

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