

Air pollution - outdoor air quality and health

NICE National Institute for
Health and Care Excellence

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

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

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

We would like to hear your views on these questions:

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

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

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Organisation name – Stakeholder or respondent (if you are responding as an individual rather than a registered stakeholder please leave blank):		[Insert organisation name]		
Disclosure Please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry.		I have no links with the tobacco industry whatsoever		
Name of commentator person completing form:		Mandi Bissett		
Type		[office use only]		
Comment number	Document (full version, short version or the appendices)	Page number Or 'general' for comments on the whole document	Line number Or 'general' for comments on the whole document	Comments Insert each comment in a new row. Do not paste other tables into this table, because your comments could get lost – type directly into this table.
Example 1	Full	16	45	We are concerned that this recommendation may imply that
Example 2	Full	16	45	Question 1: This recommendation will be a challenging change in practice because
Example 3	Full	16	45	Question 3: Our trust has had experience of implementing this approach and would be willing to submit its experiences to the NICE shared learning database. Contact.....

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1	draft guideline document	general	general	Road traffic-related air pollution is a significant problem in the UK, but it is unclear why this NICE guideline focuses on the contribution of cars, rather than HGVs, LGVs or buses. The emphasis also appears to be on the individual rather than large organisations such as commercial/industrial interests. This is evidenced by recommendations relating to driving style, awareness raising, moving cyclists from major thoroughfares to minor roads, and how vulnerable groups can manage their exposure to air pollution. It does not consider why individuals might not choose to use more sustainable methods of travel and thereby reduce air quality impacts (for example, cost or safety issues), and then make recommendations to tackle these issues.
2	draft guideline document	general	general	The guideline is aimed at local authority staff and elected members but does not take into account the impact of pollution from sources other than personal vehicles, which also fall under the remit of local authorities. For example, Southampton is bounded by motorways, has a port and airport, and has major commercial developments. The port, airport and shopping centres directly produce significant emissions through their activities but are also the cause of considerable emissions through associated road transport.
3	draft guideline document	general	general	Even though the Committee recognises that air pollution is a major health crisis and that action must be taken, the language used in this guideline is very weak - 'consider', 'encourage' and 'could' are used throughout.
4	draft guideline document	general	general	The Committee also does not address the Government's failure to produce an Air Quality Plan which will bring the UK's emissions below recommended EU standards, or the resulting legal challenge. It would be useful to know if the Committee responded to the Clean Air Zone consultation with recommendations.

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5	draft guideline document	4	5 Plannin g	I agree that air quality issues should be taken into account in Local Plans for new developments. However this only tackles part of the problem. A better recommendation would be to have air quality as a specific core council policy which has to be integrated across all strategies and council departments. In addition, if there are conflicting council policies, should air quality take precedence over economic considerations? For example, Southampton City Council does have a Clean Air Strategy but also has a core policy to support the growth of Southampton port, which is a major contributor to air pollution in the city. Local authorities should have an elected member responsible for air quality issues and staff working specifically on this subject.
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6	draft guideline document	4	5 Planning	<p>The plans for ports, airports, highways and other city developments must be developed or revised alongside national and local air quality strategies and policies. Similarly, national plans on air quality should reference large infrastructure projects and take into consideration how these might impact air quality goals.</p> <p>For the Southampton area various consultations relating to transport infrastructure, development and air quality are currently ongoing:</p> <ul style="list-style-type: none">* ABP Masterplan for Southampton Port (2016-2035) - this includes major projections for growth but pays little attention to air quality issues* Highways England Redbridge roundabout improvement scheme* A new cycling strategy for Southampton is presently out for consultation and will form part of the revised Local Transport Plan* The Local Plan will be put out for consultation early in 2017* The Local Transport Plan may be out for consultation in early 2017* Devolution proposals in the Solent area will bring the potential for much larger infrastructure projects* Large housing developments on the northern and eastern fringes of Southampton, where planning has been approved and detailed plans are out for consultation* Biodiesel-fuelled Flexible Generation Facility at Marchwood. <p>Taking all these consultations into account, now is the time when all relevant authorities should be talking to each other, commissioning planning advice, and preparing a vision for how all these proposals can form part of an ambitious vision for the whole area, which solves the tremendous problems experienced with traffic volumes, road accidents and air pollution now and for the next generation, within the city and beyond.</p>
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7	draft guideline document	6	4 Clean Air Zones	<p>The Clean Air Zone (CAZ) framework is fundamentally flawed because:</p> <ul style="list-style-type: none"> * It is based on a plan to tackle only one of the airborne pollutants - nitrogen dioxide (NO₂). It is recognised in the Defra document ‘Tackling nitrogen dioxide in our towns and cities’ that <i>“the combined impact of [NO_x and PM] is a significant challenge to public health”</i> (para 10), but the air quality plan does not address the combined impact of all pollutants which have an effect on air quality, in particular, NO_x, particulate matter and sulphur dioxide (SO₂). * It does not tackle all sources of air pollution as it only focuses on the most polluting road vehicles. It is not just a question of including private vehicles in Clean Air Zone plans, but regulating emissions from ports, airports, industry and homes. For example, in relation to homes, please see the BMJ article ‘<i>2.4 times more PM_{2.5} pollution from domestic wood burning than traffic</i>’ (http://www.bmj.com/content/350/bmj.h2757/rr-1) The impact of Southampton Port will be discussed in detail below. * It only focuses on 5 areas (+ London) rather than all 38 zones in the UK with the highest pollution levels. It is important to deal with air quality across the UK, but especially in the most deprived areas of the UK as: <i>“Air pollution has a disproportionate effect on low-income and ethnic minority groups. The most deprived 10% of areas in England are subject to 41% higher concentrations of nitrogen dioxide from transport and industry than the average.”</i> (http://www.clientearth.org/reports/air-quality-briefing-ADPH.pdf) There is also the risk that fleet operators will assign non-compliant vehicles to non-CAZ areas.
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7	draft guideline document	6	4 Clean Air Zones	<p>* None of the 5 cities which are to have mandatory CAZs are required to include private cars, motorcycles or mopeds. This is despite Department of Transport projections showing a 25% increase in traffic by 2040 (Fig 3.2, Road Traffic Forecasts 2015 (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/411471/road-traffic-forecasts-2015.pdf)). In Southampton, cars + LGVs produce the same amount of air pollution as HGVs. In total, these 3 types of vehicle produce 2/3 of the pollution from road transport in the city. (http://www.southampton.gov.uk/moderngov/documents/s28547/Air%20Quality%20Update.pdf)</p> <p>* Research has shown that Low Emission Zones are not effective in dealing with air quality issues. A 2015 review paper looked at many of the 200 low emission zones (LEZs) across Europe. It found that there is minimal improvement in air quality in such areas, unless passenger vehicles are included. But, even then, German LEZs which ban passenger vehicles have only demonstrated a 4% decrease in NO₂ concentrations and 7% for PM₁₀. (https://www.researchgate.net/publication/275059001_Review_of_the_efficacy_of_low_emission_zones_to_improve_urban_air_quality_in_European_cities) (2015). A separate research paper states: “LEZ has led to a 2.46% to 3.07% reduction in PM emissions in Inner London, but has failed to make any significant impression on NO_x emissions reduction despite an early prediction that LEZ would reduce NO_x emission by 4% by the end of 2008”. Also, “Currently, most of the cities (including LEZ cities) in Europe still regularly exceed the air quality standards for PM and NO_x. This has called into question the effectiveness of the Low Emissions Zones as an air pollution control measure.” (http://www.jmest.org/wp-content/uploads/JMESTN42350921.pdf) (2015)</p>
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7	draft guideline document	6	4 Clean Air Zones	<p>A Clean Air Zone is not a single cure for air quality issues, especially as it is a relatively technical measure. It should be combined with other approaches such as reducing the reliance on motorised transport as a whole, through investment and promotion of sustainable transport systems, including walking and cycling.</p> <p>We welcome the judgment of the High Court requiring the Government to produce a revised air quality plan by July 2017. We hope that as a starting point the Government will include all 38 zones in the UK areas with the highest pollution levels.</p>
8	draft guideline document	6	28 Car-free days	<p>Public awareness through one-off initiatives such as car-free days are insufficient - work on reducing air pollution must happen on a daily basis without a return to vehicle-driven societies. It is not simply down to the individual to make changes - serious investment in zero emission public transport systems (such as electric buses) is required so that residents and commuters have an alternative to private vehicles.</p>
9	draft guideline document	7	16 driver training	<p>This is a very weak measure as it relies on the individual to make changes to driving style in a polluting vehicle rather than putting the emphasis on investment in sustainable forms of transport. The document provides various recommendations (paras 1.3.1 to 1.3.5) relating to driver training but a single paragraph (1.3.6) on procurement.</p>
10	draft guideline document	8	20 reduced speed urban areas	<p>I agree that a 20mph limit in urban areas would produce a reduction in air pollution. A stronger recommendation would include an evidence base of studies where 20mph limits have already been implemented, for example by Brighton & Hove City Council. In addition, psychological traffic calming through urban greening and community-led street design has been shown to reduce traffic speeds without the sharp decelerations & accelerations related to traffic humps.</p>

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11	draft guideline document	9	1 Cycle routes	<p>We need to enable mass cycling, therefore putting cycle routes along back streets does not encourage non-cyclists to get on their bikes. Cycling infrastructure needs to be up front and visible, not hidden away from vehicular traffic. The evidence review showed a 5% difference in mean exposure to pollutants between cyclists and passengers in cars (p10 https://www.nice.org.uk/guidance/GID-PHG92/documents/evidence-review) - whilst this is important, pollution levels are reduced much more significantly by reducing vehicular traffic. For example, the French air quality monitoring network in Paris - Airparif - provides evidence of such reductions through the policy of restricting vehicles through alternating odd and even number plates - http://www.airparif.asso.fr/_pdf/publications/pollution-episode-paris-area_dec2016.pdf. Therefore, there should be a move to a reduction in private vehicular traffic in favour of public transport, and segregated cycleways and footpaths.</p> <p>If you move cycle routes to back roads, cyclists will still have to cross busy main roads. This discourages non-cyclists and does not tackle air pollution at source. There is also the issue of a perception of safety - main roads are meant to be the main routes from A to B which have amenities along route such as shops and public spaces. They are considered to be safer to travel along, especially alone at night, as they are well-lit and busy.</p> <p>Urban cycling should not be treated as a marginal or niche activity, especially as it is a solution to air quality issues.</p>
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12	draft guideline document	9	20 Awareness raising - <i>General public and businesses</i>	<p>Southampton City Council has suggested in its “Streets and spaces framework” document (https://www.southampton.gov.uk/planning/planning-policy/supplementary-planning/streets-and-spaces-framework.aspx) that trade could increase by up to 40% if shopping areas are created with pedestrians and cyclists in mind, and with fewer vehicles.</p> <p>In addition, “The provision of new cycling infrastructure has been shown to have a positive effect on the local economy, in part by increasing footfall in retail and leisure outlets in the areas close to the new infrastructure. (Section 3.2, Expanding the local economy, ‘Evaluating the economic and social impacts of cycling infrastructure: considerations for an evaluation framework’ March 2016) (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509391/evaluating-economic-social-impacts-cycling-infrastructure-evaluation-framework.pdf)</p>
13	draft guideline document	9	26 - engine idling	<p>In Southampton the local authority does not have the funds to deploy sufficient numbers of enforcement officers to tackle issues of excessive engine idling, for example outside schools. The school run is a major issue in terms of congestion and air quality. Whilst some schools in Southampton have signed up to Modeshift projects, it is generally considered unsafe for children to cycle to school due to the levels of traffic and illegal/unsafe parking. A stronger recommendation would be to make the areas around schools ‘Quiet zones’ or ‘Home zones’ and involve the school community in community-led street design http://www.sustrans.org.uk/community-led-street-design so that parents would be discouraged from driving into those areas and also feel more comfortable cycling or walking children to school (and letting older children use these modes by themselves, as is common across Europe).</p>

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14	draft guideline document	15	4 possible causal relationship	<p>The committee notes that there is a 'possible causal relationship between road-traffic-related air pollution and negative health outcomes'.</p> <p>Recent research has in fact shown a definite causal relationship, for example:</p> <ul style="list-style-type: none">- Exposure to traffic-related air pollution and risk of development of childhood asthma: A systematic review and meta-analysis (Nov 2016) http://www.sciencedirect.com/science/article/pii/S0160412016307838- Traffic-related air pollution exposure is associated with allergic sensitization, asthma, and poor lung function in middle age. (May 2016) https://www.ncbi.nlm.nih.gov/pubmed/27372567 <p>Such research highlighting the serious impact of air pollution on health needs to be brought to the attention of policy makers and local and central government level.</p>
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15	draft guideline document	17	1 Monitoring	<p>In Southampton we do not know the true extent of the problem due to a lack of continuous and real-time monitoring. As per Figure 3 in the ‘Air Quality Plan for the achievement of EU air quality limit value for nitrogen dioxide in Southampton Urban Area (UK0019)’, the plan is based on data from a single NO2 monitoring station. (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/485709/aq-plan-2015-southampton-urban-area-uk0019.pdf)</p> <p>There are actually four monitoring stations within Southampton plus 60 NO2 diffusion tubes, but it is unclear whether data from these were included in the methodology. (https://www.southampton.gov.uk/environmental-issues/pollution/air-quality/air-quality-monitoring/)</p> <p>The Government’s air quality plan also uses air quality modelling, but as Client Earth submitted in its skeleton argument to the High Court (http://www.documents.clientearth.org/wp-content/uploads/library/2016-10-18-clientearth-v-ssefra-high-court-case-skeleton-argument-ce-en.pdf) “...it is clear from the materials disclosed that Defra officials, as well as experts whom they have consulted have consistently raised concerns about the limitations of the model used, including its reliance on COPERT emission factors.”</p> <p>Client Earth has won its case in the High Court with Mr Justice Garnham stating that ministers knew that over optimistic pollution modelling was being used. (http://www.clientearth.org/major-victory-health-uk-high-court-government-inaction-air-pollution/)</p>
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15	draft guideline document	17	1 Monitoring	<p>In April 2016, the campaign group Clean Air Southampton commissioned a ‘Smogmobile’ to drive around the city for a day, to monitor roadside emissions of nitrogen dioxide and particulates. Duncan Mounsor of Enviro Technology Services plc which operates the ‘Smogmobile’ said:</p> <p><i>“Our observations show that the average NO2 concentration over the day (between 8am to 3:30pm) of all the routes we drove and during the time we were parked up at West Quay was 63.15 µg/m3, which is over 50% higher than the annual limit value of 40 µg/m3.”</i></p> <p>(https://climateconversations.org.uk/2016/04/27/thinking-outside-the-box-is-a-clean-air-zone-the-way-to-tackle-dirty-air/)</p> <p>Therefore, minimum requirements should include baseline monitoring (real-time and real-world), rather than modelling, and evaluation. There should also be an annual reporting process in order to gauge progress. Defra should also reinstate the legal requirement for monitoring stations (http://cleanair.london/legal/defra-condemned-for-proposals-scrapping-local-air-pollution-monitoring)</p> <p>Personal exposure to air pollution depends on many factors including location, transport use and seasonal variations. It is insufficient to give information on air pollution for an entire city, especially if it is based upon data from a single monitoring point. In addition, information and advice on air pollution is not part of the National Curriculum and should be included as soon as possible.</p>
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16	draft guideline document	56	29 <i>Effectiveness of traffic management and enforcement, and financial incentives and disincentives to reduce road-transport-related air pollution</i>	<p>At present Highways England is consulting on the Redbridge roundabout improvement scheme in Southampton. (https://highwaysengland.citizenspace.com/he/m271-a33-a35-redbridge-roundabout/)</p> <p>The Q&A document for the scheme states: <i>"The modelling undertaken indicates that there would be a slight benefit in air quality, as reduced congestion resulting in a reduction in vehicle emissions."</i> However, we are questioning the methodology used and its outputs; we have requested further clarification from Highways England. This is relevant to current air quality consultations as the scheme directly impacts the proposed Clean Air Zone in Southampton. In this respect, we refer you again to the criticisms given above about air quality modelling carried out by Government departments.</p> <p>We have received some clarification from Highways England via email:</p> <ul style="list-style-type: none"> - The air quality impacts have been assessed at a qualitative basis to date, based on the results of the local traffic model, not specific air quality modelling - Detailed air quality modelling needs to be undertaken at a future stage - Real-time air quality monitoring data has not been collected as part of the work to date. <p>We have asked for further clarification with respect to the above, but it is clear that air quality is not currently a priority for the development of this scheme. It is clear that the main driver for optimising traffic management at this junction is to improve traffic flow to the port. The ABP Master Plan (2016-2035) states that 60% of containers are transported to and from the port by road (para 2.24). In addition, it is stated (para 6.21) that there is an <i>"overall continuing trend of growth in container traffic through the port"</i>. (http://www.southamptonvts.co.uk/Port_Information/Commercial/Southampton_Master_Plan/)</p>
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16	draft guideline document	56	29 <i>Effectiveness of traffic management and enforcement, and financial incentives and disincentives to reduce road-transport-related air pollution</i>	<p>Furthermore, the Master Plan notes that the port has experienced significant growth in cruise passengers, handling of motor vehicles and container traffic (2005-2015) and expects growth to continue over the next 20 years. All of this will have a serious impact on air quality in Southampton.</p> <p>It was stated at the public exhibition on the Redbridge scheme that the project would create around £150million in time-savings. We are also waiting for clarification from Highways England on who would benefit from these savings. Considering that there is a significant flow of HGVs serving the port, the main beneficiary appears to be the port, rather than residents of Southampton, in particular those in the neighbourhood of Redbridge which suffers from multiple deprivation. The residents of this area are disproportionately impacted in health terms by air pollution.</p>
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17	draft guideline document	57	21 Recom mendat ions for researc h	<p><i>Baseline monitoring</i></p> <p>A recommendation for accurate measuring of airborne pollutants, through real-time monitoring and advanced modelling techniques, is lacking from the consultation document. Without a proper baseline, local authorities cannot measure progress in improving air quality and are unable to apportion pollution sources appropriately.</p> <p>Examples of air quality monitoring and modelling through multidisciplinary research being carried out at The University of Southampton are as follows:</p> <ul style="list-style-type: none"> - http://noc.ac.uk/gsnocs/project/multidisciplinary-investigation-urban-air-pollution-port-city “The port is potentially a major contributor to air pollution within Southampton but, to date, this has not been adequately quantified. Studies of other European ports suggest that ports may contribute up to 20% of the airborne PM in their cities, while ship-emitted PM causes 60,000-70,000 deaths per year worldwide. There is little understanding of the relative contributions from other activities related to the port, such as freight movement, metal scrappage, oil refining and motor vehicle movements. Therefore, ports represent a potentially major source of pollution about which relatively little is understood. The aim of this project is to use cutting edge analytical chemistry, environmental monitoring and data mining techniques to (1) apportion particulate matter pollution at a dock-side location to source; (2) understand how air quality at the dockside is contributed to by shipping movements within the Port of Southampton and also other local sources of pollution, in particular road traffic, (3) how this varies with time of year and climate.” - Robin Wilson at the University of Southampton http://cmg.soton.ac.uk/people/rtw1v07/ has developed ‘A novel method for monitoring air pollution from satellites at very high resolution’ http://cmg.soton.ac.uk/research/projects/a-novel-method-for-monitoring-air-pollution-from-satellites-at-very-high-resolution/ - There are also a number of citizen science projects being carried out by local campaign groups, schools and researchers.
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18	draft guideline document	57	21 Recom mendat ions for researc h	<p><i>New developments - ‘car-free versus low car’</i></p> <p>Further research into the difference between car-free and ‘low car’ developments would be very useful. This paper finds that “carfree development is a concept which merits greater attention from planners, transport planners and policymakers.”</p> <p>http://eprints.uwe.ac.uk/23566/12/Melia%20-%20Carfree%20Development%20Chapter%20with%20images.pdf</p>
19	draft guideline document	58	14 Promot ing a shift in travel modes	<p>The guidance states that: ‘Achieving a shift to low- and zero-emission modes of travel is key to reducing air pollution’ for example in providing infrastructure to support this in new developments. We would suggest that the recommendations should go one step further and suggest research should be done on moving away from a car-centric society.</p> <p>The Birmingham Connected white paper (https://www.birmingham.gov.uk/downloads/download/552/birmingham_connected) outlines a transport system which puts the user first. A detailed discussion on moving away from a car-centric society can also be found here: (https://www.theguardian.com/cities/2015/apr/28/end-of-the-car-age-how-cities-outgrew-the-automobile) This suggests measures to take public space away from private vehicles such as mobility service providers, car clubs and well-integrated public transport systems. Car clubs are also a sound investment: https://www.lepnetwork.net/news/2016/car-clubs-are-a-sound-investment-new-research-reveals/</p> <p>We refer again to the need for private vehicles to be excluded from Clean Air Zones. There is however a disproportionate burden on those least able to afford to upgrade to ULEVs, or pay a congestion charge, especially in Southampton which has several neighbourhoods with high levels of deprivation. Transport and planning systems which focus on people rather than cars would remove that problem.</p>

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19	draft guideline document	58	14 Promoting a shift in travel modes	Consideration should be given to reduction of parking spaces in the city centre, except for ULEVs. Southampton is oversupplied with parking spaces which are presently far cheaper to use than public transport. To balance this, bus companies should be helped to offer family tickets which cost less than parking a car. An “Oyster card” system should be introduced to make using public transport a cheaper and more integrated experience than it is now as there are a number of different bus companies in Southampton. In addition, car parks on the periphery of the city could be designated as “park and ride” and existing local bus routes badged as “park and ride” with stops at convenient locations. This could be introduced immediately without the considerable expense of a specially constructed park and ride scheme.
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19	draft guideline document	58	14 Promoting a shift in travel modes	<p>Replacing high polluting diesel vehicles with ULEVs is an important measure in relation to tackling air pollution but the focus here is still on individual vehicles rather than mass transit of people and freight. Cities are currently designed for vehicles rather than for people. The aim should be to remove HGVs, LGVs and private vehicles from cities altogether, through measures such as distribution centres, park & ride, reduction in available parking, expensive parking fees, subsidised public transport, investment in zero emission buses/taxis, e-cargo bikes and proper cycling infrastructure on routes into and across cities, not just in city centres.</p> <p>The Government has stated its plan for all new vehicles to be zero emission by 2040 and nearly all vehicles to be zero emission by 2050. As far as we are aware a lifecycle assessment of ULEVs, particularly with reference to these Government targets, has not been carried out. Greenhouse gas emissions in relation to the production of new vehicles is still a relevant consideration especially as we need to enter a period of negative emissions in order to meet the UK's commitments under the Paris Agreement.</p> <p>There would also need to be serious investment in renewable energy generation in the UK in order for the ULEVs to be truly zero emission. Unfortunately, the UK has slid to 13th in the 'Renewable energy country attractiveness index' in terms of investment: (http://www.ey.com/gl/en/industries/power---utilities/renewable-energy-country-attractiveness-index)</p>
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20	draft guideline document	58	19 Clean Air Zones	<p>As noted above, research has already been carried out on Clean Air Zones/Low Emission Zones, and they have been shown to be ineffective at significantly reducing air pollution.</p> <p>The text above has been reproduced here for your convenience:</p> <p>* Research has shown that Low Emission Zones are not effective in dealing with air quality issues. A 2015 review paper looked at many of the 200 low emission zones (LEZs) across Europe. It found that there is minimal improvement in air quality in such areas, unless passenger vehicles are included. But, even then, German LEZs which ban passenger vehicles have only demonstrated a 4% decrease in NO₂ concentrations and 7% for PM₁₀. (https://www.researchgate.net/publication/275059001_Review_of_the_efficacy_of_low_emission_zones_to_improve_urban_air_quality_in_European_cities) (2015). A separate research paper states: “LEZ has led to a 2.46% to 3.07% reduction in PM emissions in Inner London, but has failed to make any significant impression on NO_x emissions reduction despite an early prediction that LEZ would reduce NO_x emission by 4% by the end of 2008”. Also, “Currently, most of the cities (including LEZ cities) in Europe still regularly exceed the air quality standards for PM and NO_x. This has called into question the effectiveness of the Low Emissions Zones as an air pollution control measure.” (http://www.jmest.org/wp-content/uploads/JMESTN42350921.pdf) (2015)</p>
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21	draft guideline document	general	<p>Specific considerations in relation to Southampton City Council and air quality</p> <p><u>Southampton Port</u> Port development is relevant to air quality recommendations for Southampton City Council as port operations are already a significant contributor to air pollution in Southampton, not only through shipping emissions but from road transport to and from the docks. This is evidenced in 'Western Approach AQMA air quality assessment for Southampton - Baseline study to support LEZ feasibility assessment & development of mitigation measures' which states (p3): <i>"This part of Southampton has a large effect from the port operations ... HGV fleets are significant contributors. In the centre of the AQMA around Millbrook Road, the port is a large NOx contributor, indeed it is as large a source of NOx as road traffic at some locations. [...] There is a significant flow of HGVs serving the port"</i> (https://www.southampton.gov.uk/policies/Low-emission-zone-study-July-14_tcm63-376002.pdf)</p> <p>In addition, smokestack emissions from international shipping kill approximately 50,000 people a year in Europe, at an annual cost to society of more than €58 billion. (http://airclim.org/air-pollution-ships)</p> <p>The UK plan for reduction of nitrogen dioxide mentions shipping, and in particular MARPOL Annex VI, which relates to air pollution. However, this part of the convention only applies to ships of over 400 GT and so there is significant under-reporting of emissions. Whilst particulate matter and NOx are of concern in relation to road transport, sulphur dioxide is the major contributor to air pollution from shipping. Local authorities should be given powers to request data on all emissions from all vessels entering ports. Currently there is no continuous monitoring of shipping emissions whilst in port and powers to carry out checks and enforce penalties only lie with the government of the country where the ship is registered. The UK government together with local authorities should be able to regulate emissions in their own waters.</p>
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21	draft guideline document	general	<p>The Government has already stated that it would support the renewed Dibden Bay scheme to expand Southampton Port, despite serious environmental issues relating to both biodiversity and air quality. This decision has also been taken out of the hands of the local planning authority and is now subject only to approval by the secretary of state. (http://www.bbc.co.uk/news/uk-england-hampshire-37791314)</p> <p>This is supported by the National Policy Statement for Ports (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3931/national-policy-statement-ports.pdf) which states that “3.3.1 <i>The Government seeks to encourage sustainable port development to cater for long-term forecast growth ... thus contributing to long-term economic growth and prosperity.</i>” However, air quality is not mentioned in the list of policies relating sustainable development of ports in paragraph 3.3.3 of that document.</p> <p>Port development has been given the green light despite the statement that “5.7.7 <i>In the event that a project will lead to non-compliance with a statutory limit, the decision-maker should refuse consent.</i>” We refer once more to the Client Earth case in the High Court and submit that the Secretary of State has a legal obligation to refuse consent for expansion of Southampton Port.</p> <p><u>Southampton airport</u> The impact of airports is not included in the list of measures for reducing local emissions but they are a major point source contributor to air pollution. (http://www.nhs.uk/news/2015/10October/Pages/Living-near-an-airport-may-be-bad-for-your-health.aspx) (http://www.airportwatch.org.uk/briefings/air-quality-briefings-and-information/)</p> <p>Southampton airport expects passenger numbers to grow from 1.84 million in 2005 to 6 million per year by 2030. (http://www.southamptonairport.com/about-us/our-vision/) It is unclear what the impacts on air quality will be of such growth.</p>
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22	Evidence review	10		The evidence review showed a 5% difference in mean exposure to pollutants between cyclists and passengers in cars (p10 https://www.nice.org.uk/guidance/GID-PHG92/documents/evidence-review) - whilst this is important, pollution levels are reduced much more significantly by reducing vehicular traffic.
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Insert extra rows as needed

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