

22 June 2010

Mayor's Air Quality Strategy Consultation
Post Point 19B FREEPOST LON15799
City Hall The Queen's Walk
London SE1 2BR
Attn Isabel Dedring

Dear Isabel

Clearing the air The Mayor's draft air quality strategy for public consultation March 2010

General comments from the Institute for Air Quality Management on the main Strategy document and Appendix B

This Strategy should be an example of the application of the air quality management process, the process of reviewing and assessing air quality, and then managing air quality through an action plan to ensure air quality in London meets air quality limit values. This is a technical process, but the Strategy does not explain in detail how the process has been carried out. Accepting that the Strategy is not written for a technical audience, it should still contain references to the methods used and where they have been tested (preferably citing peer reviewed scientific articles.) Appendix B does refer to the KCL model, but this is not cited in the Appendix itself. Appendix B is incomplete and may possibly be regarded as misleading.

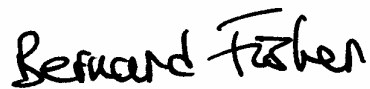
In the present state of science a variety of air quality models are available for undertaking regional reviews and assessments. Given the importance of London's air quality, the Strategy should show that the method adopted is equivalent to other approaches especially those adopted in other parts of Europe. One might reasonably ask whether, if a different model including possibly some of the advanced meso-scale models currently available, had been applied, the same conclusions would be reached. Specifically one should be able to demonstrate that the actions proposed in the strategy using a different model would also lead to the same conclusions.

Figures 2.8 and 2.11 on pages 31 and 35 illustrate the PM₁₀ and NO₂ concentrations in 2011 and 2015 when the corresponding limit values should be met. It is not really possible from a map to judge where a limit value is exceeded. It would be preferable to identify regions in numerical form e.g. xx persons or yy length of road exposed to concentrations above limit values. In addition the results from alternative, widely accepted, models should be presented, hopefully giving the same conclusions and demonstrating that the

conclusions are robust with respect to uncertainties in the input data and the assessment method.

It is accepted that comprehensive air quality models are computer intensive, require detailed data sets and take time to set up, but there has been a long period of consultation on the Strategy and therefore time available to prepare and implement a programme of scientific study in order to ensure that the air quality management assessment is equivalent to the best international standards.

Yours sincerely

A handwritten signature in black ink that reads "Bernard Fisher". The signature is written in a cursive, slightly slanted style.

Professor Bernard Fisher
Chairman Institute for Air Quality Management