Air Quality Strategy Consultation

Dear Secretary of State,

We are writing on behalf of the Chartered Institute of Environmental Health (CIEH) to register our significant concerns about the way in which your department has chosen to consult on the draft revised Air Quality Strategy. By setting such a short consultation period of just ten days, and doing so in the local elections pre-election period and during the Easter holiday season, you have severely hampered the ability of key stakeholders that have an interest in supporting the development of this strategy: the general public, local authorities and wider charity stakeholders.

The government’s own Consultation Principles from 2018 advise that the process needs to last for a proportionate amount of time, otherwise it risks reducing the quality of responses. Given that previous versions government policy has suggested twelve weeks as the optimal amount of time for a consultation, in the interest of transparency we would like to understand why this consultation period is so unusually short. Please could you also provide an explanation for the circumstances that have led to you launching this consultation during the local elections pre-election period and the Easter holiday season?

We would be grateful to understand what the timelines are for the government to collate and respond to consultation responses and make any changes to the drafted Air Quality Strategy once the consultation closes, in particular considering the numbers of responses that you are likely to receive from at least the affected statutory bodies.

Air pollution is affecting the health and lives of people across the country, putting a burden on the NHS and the economy, and we need a concerted national effort from central government, local government, charities, businesses, and the public to tackle this issue. But in order to achieve this it is vital that all interested parties can effectively engage with your department to ensure the work in this area is as impactful and effective as possible. As we have set out above, the approach that Defra has taken to setting up the consultation is obstructing this engagement and we would ask that you extend the window for submitting a response to the consultation.

Kind regards,

CIEH Environmental Protection Advisory Panel