Solar Energy UK

Operational reform to Nationally Significant Infrastructure Projects (NSIP) consenting process

Consultation

About us

Since 1978, Solar Energy UK has worked to promote the benefits of solar energy and to make its adoption easy and profitable for domestic and commercial users. A not-for-profit association, we are funded entirely by our membership, which includes installers, manufacturers, distributors, large-scale developers, investors, and law firms.

Our mission is to empower the UK solar transformation. We are catalysing our members to pave the way for 70GW of solar energy capacity by 2035. We represent solar heat, solar power and energy storage, with a proven track record of securing breakthroughs for all three.

- Respondent details (for consultations)
- Respondent Name: Rachel Hayes
- Email Address: rhayes@solarenergyuk.org
- Contact Address: The Conduit, 6 Langley Street, London, WC2H 9JA
- Organisation Name: Solar Energy UK
- Would you like this response to remain confidential? No
- Submission date: 19 September 2023

Introduction

We welcome the opportunity to respond to the Department for Levelling Up, Housing and Communities consultation on 'Operational Reforms to the Nationally Significant Infrastructure Project (NSIP) consenting process'.

Questions:

Question 1: Do you support the proposal for a new and chargeable pre-application service from the Planning Inspectorate?

The proposed changes to create a new and chargeable pre-application service are mostly welcomed. It is anticipated that these changes will provide notable improvements to the advice from the Planning Inspectorate (PINS) and overall engagement from statutory bodies.

It is expected that by placing greater emphasis on the pre-application service, greater emphasis will be given to identifying and resolving any concerns at the very beginning of a project, which should help to improve the speed of consenting. More broadly by introducing a pre-application service, it should be expected that the quality of planning applications will be higher and the process for delivering projects more efficient, reducing administrative burdens and time delays for both the developer and PINS. It is understood that this will come at increased cost.

Solar developers are already familiar with a similar process for Town and Country Planning Act (TCPA) projects where developers pay for pre-application advice from Local Planning Authorities. We ask that any learnings from the process at a TCPA level be considered before introducing the pre-application service from the planning inspectorate.
However, these operational reforms are welcomed only in so far as they improve service delivery – in terms of education and training of inspectors and consultees, greater consistency in decision making, and faster decision times. In order to achieve this, we consider the following reforms to also be essential:

- Encourage institutional learning and knowledge sharing between inspectors (where appropriate). This could be achieved by sharing guidance, resources and materials to promote a higher baseline standard of knowledge and a more consistent approach to reviewing planning applications. Solar Energy UK are currently developing information sheets for Local Planning Authorities (LPAs) and PINS on areas such as archaeology, biodiversity and site selection which we hope to be useful. We will share these in due course.

- Improve basic understanding of solar and storage technologies across the planning regime. Previously, the renewables industry has run workshops and training opportunities for PINS to develop inspector understanding on the solar and storage industry at large. Solar Energy UK stand ready to work with PINS and LPAs to promote greater understanding of solar technologies through whatever platform is most convenient. Additionally, SEUK developer members have individually expressed their willingness to share their expertise with those working in the planning regime.

- ·Ensure that those inspectors allocated to solar projects (or any other form of application) have a high level of education and training in that development type. Allocating inspectors to determine projects for which they are not sufficiently trained is a waste of time and money and will result in more projects being taken to judicial review.

- ·Make PINS a more attractive, and highly regarded place to work. This could be supported by providing appropriate compensation (salaries) that are truly reflective of the level of responsibility that comes with the role. Without this, it will be challenging to attract experienced individuals from the private sector. We have heard anecdotally that ~1/3 of newly trained planning inspectors resign within a year. We ask that this is reflected upon, and new ways of bringing in and retaining talent are implemented. A high turnover of inspectors can increase inconsistencies when reviewing solar planning applications at the pre-application stage or at hearings. High turnover can also significantly slow down the progression of projects due to no fault of the applicant.

- Complementary to the point above, PINS should look to make supportive roles to the inspectorate more attractive as well. Training and upskilling case team officers will allow staff to advise more boldly on issues facing projects. Inspectors should be supported by qualified planning officers, as was the case when the Infrastructure Planning Commission was founded.

- ·Provide greater education and training opportunities to statutory consultees and Local Planning Authorities – as well as to PINS – as without the capacity and competence in these organisations, these reforms will faulter.

Lastly, SEUK would welcome the opportunity to strengthen the relationship between industry and PINS through regular bilateral engagement opportunities and we will be following up on this offer.

Question 2a: Do you agree with the 3 levels of service offered?

Overall, we broadly support the introduction of the three-tiered pre-application service and recognise the potential benefits for PINS and solar developers. The consultation has based the three tiers on the complexity of the project and the level of support that may be required. As drafted, the consultation does not make clear exactly how the levels will be calculated and applied to different types of renewable projects. The methodology should clearly put technologies into tiers, based on their ability to match the criteria. Solar projects should be treated proportionately and not expected to follow a generic formula for all developments.

We are concerned that there is no indication of a further consultation to look at this in more depth. We would strongly recommend that this is clarified and that a secondary consultation is held on the pre-application service fee and methodology.

We agree that PINS should charge a fee (within reason) to recover costs and would recommend that the fees from the pre-application service be ring-fenced to NSIP projects and not used to cross-subsidise other services provided by PINS. This would ensure that PINS is able to deal with applications in a timely manner, improving the quality of the service for the applicant and improving the efficiency of the planning system. However, cost recovery must be achieved with consideration to variations that exist between different renewable projects and alongside an absolute assurance that there will be an improvement to service delivery and the user experience.

The consultation caveats the readiness of the service with the availability of resources in PINS. Whilst we appreciate that this is somewhat cause and effect, if the service is going to be successful, developers will need to have confidence that on selecting a package (basic – enhanced) they will receive the support outlined. We are concerned that if a developer goes through the administrative process of applying for a package and then is not able to access the support due to resource constraints in PINS and wider statutory bodies (e.g., Environment Agency) the delivery of carbon reduction targets may be jeopardised, and developers will lose confidence in the system. Solar developers need reassurance that statutory bodies will have the capacity to respond to requests from PINS in a timely fashion.

In bringing in three levels of pre-application service (as well as a potential fast-track route), the need for greater consistency in training and decision-making could not be more important. In bringing in three levels of pre-application service (as well as a potential fast track route), the need for greater consistency in training and decision making could not be more important.

As stated above, we believe that there is room for significant improvement in this area and offer to work with PINS to help address this. Presently, members report inconsistencies between inspectors and in decisions made by the same inspector on broadly similar projects – e.g. in terms of size, geography and planning considerations. As a result, solar developers have diminishing confidence in PINS and the NSIP planning regime.

Question 2b: if you are an applicant, which of the 3 tiers of service would be most likely to use and for how many projects?

No comment

Question 3: Would having the flexibility to change subscriptions as a project progresses through pre-application be important to you?

No comment.

Question 4: to what extent do you agree that the overall proposals for merits and procedural advice will enable the policy objective to be met?

We agree with the overall proposal set out in the consultation.

More widely we welcome the importance of addressing the resourcing gap within PINS, statutory consultees and local authorities – as stated above - which will be important if the policy objective is to be met.

Question 5: Do you have specific comments on the proposals in the table above?

No comment.

Question 6: Do you agree with the proposed changes to consolidated list of statutory consultees above?

We agree with the list of consolidated statutory consultees as set out in table 2.1. We do ask that the list of consultees be reviewed periodically to ensure that all relevant stakeholders are considered.

Question 7: Are there any other amendments to the current consolidated list outlined in table 2.1 that you think should be made?

We have no further comments.

Question 8: Do you support the proposed introduction of an early 'adequacy of consultation' milestone?

In principle we agree with the proposal to introduce early adequacy of consultation milestones as a mechanism for developers to sense check documentation. We caveat that some solar developers feel this milestone is already met through the preparation of a Statement of Community Consultation where it is reviewed, negotiated, and then agreed by LPAs. The early adequacy of consultation milestone must be supported by clear professional advice from the planning inspectorate that supports consultations that are proportionate, with a focus on ensuring meaningful engagement as well as basic procedural requirements. Lastly, innovation and new approaches should also be supported by the inspectorate.
For this to be useful for applicants, it must be developed in partnership with the developers.

Question 9: Are there any additional factors that you think the early 'adequacy of consultation' milestone should consider?

No comment.

Question 10: What are the main reasons for consulting with communities' multiple times during the lifetime of an NSIP application?

We broadly agree with the reasons for engagement as set out in the consultation. The focus should be to provide meaningful engagement, rather than setting a specific number of consultations for the convention of it. Consultations should be proportionate to the solar project. For solar NSIPs, not all projects will require 2 rounds of public consultation. In some cases, a shorter round or 1 round of consultation is sufficient and doesn't preclude meaningful engagement before or after with the community. Developers should have confidence that if they offer shorter consultation periods or rounds of consultations then they will not be penalised later down the line.

In addition to the formal planning process, the solar industry is committed to engaging openly with communities at all stages of a solar farm's development and operational life span. This engagement provides an opportunity to update communities on any changes to the project and allows communities to feedback into the process.

Question 11: Are there any other measures you think that government could take to ensure consultation requirements are proportionate to the scale and likely impact of a project?

We would welcome a more proportionate approach to consultation. Secondly, we would welcome sight of any draft guidance that may be produced.

Question 12: To what extent do you agree with the proposal to remove the prohibition on an Inspector who has given section 51 advice during the pre-application stage from then being appointed to examine the application, either as part of a panel or a single person?

We strongly agree. We see no reason as to why an inspector should not be able to give advice at the pre-application stage and be appointed to examine the application. This would help to utilise resources within PINS which are already constrained and reduce delays within the consenting process.

Any advice given should be binding to provide certainty for developers. Developers need assurance that if paying for additional services at the pre-application stage and advice given will not be reversed by another consultee further down the line.

Question 13: To what extent do you agree that it would lead to an improvement in the process if more detail was required to be submitted at the relevant representation stage?

We agree. The level of detail must be sufficient for the statutory consultee to form a valid response. However, firstly we would welcome stronger guidance on issues that should not require submissions – e.g. on glint and glare, or other issues which have been addressed in previous planning decisions and which are not materially different. Making representations on such issues wastes time and resource for all parties. Secondly, and related to the previous point, there is a fine balance to be struck between providing detailed material and overloading statutory consultees with reams of information. We would welcome sight of any draft guidance in this area.

Question 14: To what extent do you agree that providing the Examining Authority with the discretion to set shorter notification periods will enable the delivery of examinations that are proportionate to the complexity and nature of the project but maintain the same quality of written evidence during examination?

We broadly agree. The examination timetable should be led by the consideration of important and relevant matters rather than procedural notification periods.

If a matter is able to be resolved, the planning inspector should be facilitated to deliver this.

Question 15: To what extent do you agree that moving to digital handling of examination materials by default will improve the ability for all parties to be more efficient and responsive to examination deadlines?

We agree. Digitising examination materials will streamline the process. We note that whilst agreeing to the digitisation as default, flexibility should remain for applicants to submit written materials where appropriate to keep the process as accessible as possible.

Question 16: To what extent do you agree that the submission of 'planning data' will provide a valuable addition as a means of submitting information to the Planning Inspectorate?

We agree that this could help to create a better understanding of each site. Guidance would need to be created to ensure a uniformed approach to reviewing data. We anticipate that developers and consultants would have slightly different approaches that would need to be accommodated in this type of submission.

Question 17: Are there any other areas in the application process which you consider would benefit from becoming 'digitalised'?

We would welcome a full review and redesign of the PINS website. Whilst there is some functionality, applicants spend a long-time crafting submissions, only for them to be published on the website in a haphazard and unstructured manor.

Question 18: To what extent do you agree that projects wishing to proceed through the fast track route to consent should be required to use the enhanced pre-application service which is designed to support applicants to meet the fast track quality standard?

Some projects which enter the fast-track are likely to be less complicated, less-controversial and potentially smaller and would be likely to progress through the consenting process fairly quickly therefore it may not be justified for them to take the enhanced pre-application service as it could lead to disproportionate costs.

Secondly, there should be no requirement for projects to have to use the enhanced pre-application service in order to be eligible to participate in a fast-track examination process, and this should remain optional.

Projects for the most basic pre-application service which are specified to be 'low complexity' or are 'uncontroversial with no or limited compulsory acquisition and/or where the potential examination issues are frequently considered by Examining Authorities' are, by definition, the type also most suitable for a fast-track examination and applicants far less likely to require the range of services in the enhanced pre-application service. Solar projects, inevitably, are very likely to fall in this category compared to many other types of NSIPs.

Specifically, the solar DCO sector is growing exponentially and the knowledge in our sub-sector for the process is growing rapidly. This means that fewer and fewer developers will need expertise from PINS, having already undergone the process or employing those who have. Adding an unnecessary fee would be burdensome for these developers.

Question 19: To what extent do you consider the proposed fast track quality standard will be effective in identifying applications that are capable of being assessed in a shorter timescale?

We broadly agree.

We ask that a clear list of the types of applications that would not be suitable for the fast-track process is produced and shared. This would be more efficient than sharing a list of projects that are suitable as this is likely to be exhaustive. By producing such lists, this will provide greater clarity for those looking to adopt the fast track standard.

Question 20: On each criteria within the fast track quality standard, please select from the options set out in the table below and give your reasoning and additional comments in the accompanying text boxes. Please also include any additional criteria that you would propose including within the fast track quality standard?

Please see table below

1. Principal areas of disagree ment	X					We agree however we would welcome clarification of what areas of disagreement that are "limited in number and scope" means in practice. Depending on these definitions our response could alter.
Procedure			X			We would welcome further guidance on the commitments of PINs throughout this process.
2a Fast tack programme document		X				We tentatively agree with the proposed contents of the fast track document. However, we would welcome sight on an exemplar document to provide a more detailed response.

2b(i) include fast track intention in consultation material		X				We agree.
2b(ii) formal agreement to use enhanced pre-application		X				We agree
2b(iii) publicise fast track programme			X			Further information as to how the program will look is required before we are able to provide a more definite answer.
2b(iv) provide evidence at submission of 2a – 2c			X			We are unsure what added value this would bring and would welcome any insights from DLUHC/PINS on this in order to answer this question.
3. Regard to advice			X			

3. Regard to advice			X			We agree with the proposal to include an additional form at the front of any documentation which outlines how the applications should apply with the regard to advice test with the caveat that this must not be a burden exercise. Secondly, we note that concerns that this could be too rigid and notallow for the flexibility. We believe this would be too rigid and requires more flexibility. For example, a developer will adhere to section 51 advice as far as possible but there may be instances where they are unable to (providing suitable evidence). In this instance a more flexible approach will need to be considered

Question 21: To what extent do you agree that the proposals for setting the fast track examination timetable strike the right balance between certainty and flexibility to handle a change in circumstance?

We broadly agree with the proposal set out in the consultation. Our main recommendation would be to change the fast-track benchmark timescale for pre application from '3 months' to 'up to 3 months'. By doing so this creates a level of ambition to complete earlier than then timescale.

Secondly, where the examining authority is unable to complete examination within the proposed 4 month period, the applicant should be entitled to compensation (i.e. refund of fees) for failing to deliver within the timeframe.

Lastly, the consultation outlines *'Examining Authority will provide advice on whether additional time might be needed to address specific considerations, e.g. where issues have arisen from relevant representations that were not contained in the fast track submission document for the Planning Inspectorate to assess against the quality standards".* Solar Energy UK does not agree with this proposal and recommends that any late submissions be examined and prioritised accordingly to avoid further delays.

Question 22: To what extent do you agree that there is a need for new guidance on which application route proposed changes should undergo? We agree with the consultations approach to standardise advice and guidance for reviewing processes for changing applications post consent. We recommend that where possible guidance is amalgamated into one document for ease.

Clarity on what is determined as material and non-material changes would be welcomed to reduce ambiguity and improve understanding within the process. Guidance on procedures and timescales would also be welcomed to provide certainty on this process.

Question 23: In addition, what topics should new guidance cover that would help to inform decisions on whether a proposed change should be considered as material or non-material?

As in our response above, we would first welcome clarity as to the determination of whether a change is material or non-material. However, we propose the following additions:

- Information on the type or quality of evidence PINS would require to determine whether the change would be material or not.

- ·Confirmation of whether a project's scale could determine whether a proposed change would be considered material, i.e. the larger the project, the more likely a change is to be determined as material.
- ·Theoretical examples of what would likely be considered as material or non-material changes.
- ·Confirmation of whether the environmental condition of a site influences decisions.
- ·Consistency across PINS on the determination of what are material changes and what are not.

Question 24: To what extent do you support the proposal to introduce a statutory timeframe for non-material change applications?

A statutory timeframe for these types of changes would be welcome, to provide certainty to developers. On the basis that changes are non-material, and therefore would not have an impact on the development itself, the 6-8 week period would more than adequate for them to be determined. This would also be in line with non-material amendment applications for planning applications, which are also short in duration due to their simplicity and limited consultation requirements.

Question 25: Taking account of the description of the services in section 2.2.1 to what extent do you believe a cost-recoverable pre-application service will represent value for money in supporting applicants to deliver higher quality applications with minimal residual issues at submission?

We are supportive of the intention to provide pre-application services to promote the delivery of high quality applications in a shorter period of time and believe this is mutually beneficial to both PINS and the applicant.

We are supportive of charging a fee (within reason) to recover costs for pre-application services but would welcome a methodology that clearly explains how charges would be calculated. As outlined in our response to question 2a, we ask that any methodology produced for pre-application services consider the variations that exist between different renewable technologies.

Secondly, if an applicant is to enter into the pre-application service there must be an assurance that there will be an improvement in the user experience and clear guidance as to what happens if expectations are not met. It should be noted that anything above £50,000 must be contingent and agreed with the planning inspectorate at pre-application otherwise there is no value for money.

Question 26: To what extent do you agree with the proposal to charge an overall fee (appropriate to the tier of service that will cover the provision of the service) for a fixed period?

In principle, we agree as long as the fee is proportionate to the level of service. We would welcome further consultation on the methodology used for calculating pre-application fees.

Question 27: The government has set out an objective to move to full cost recovery for the Planning Act 2008 consenting process. To what extent do you support the proposal to support the Planning Inspectorate to better resource their statutory work on consenting by reviewing and updating existing fees, and introducing additional fee points?

We agree as long as the service is delivered, regularly monitored and improved.

Question 28: To what extent do you support the proposal to review and update existing fees in relation to applications for non-material changes to achieve cost recovery and support consenting departments in handling these applications?

We agree.

Question 29: To what extent to do you agree that the proposed review and update of existing fees and introduction of additional fee points will support the Planning Inspectorate to better resource their statutory work on consenting?

We agree.

Question 30: To what extent do you agree that defining key performance measures will help meet the policy objective of ensuring the delivery of credible cost-recoverable services?

No comment.

Question 31: Do you agree with the principles we expect to base performance monitoring arrangement on? Please select from the options set out in the table below and give your reasoning and additional comments in the accompanying text boxes

Principles	Strongly Agree	Agree	Neither agree/disagree	Disagree	Strongly Disagree	Reasons
Be outcome and not output focused to ensure better planning outcomes		X				We agree.
Consider quality of customer service provision	X					By providing high quality service, applicants are likely to develop greater confidence in the service.
Cover the provision of statutory and non-statutory advice provided by the specific prescribed bodies	X					We agree with this proposal because such advice is fundamental to project design and achieving good outcomes. Some bodies already charge for their non-statutory advice through service agreements, discretionary advice services and/or other means.

Be outcome and not output focused to ensure better planning outcomes		X				We agree.
Consider quality of customer service provision	X					By providing high quality service, applicants are likely to develop greater confidence in the service.
Cover the provision of statutory and non-statutory advice provided by the specific prescribed bodies	X					We agree with this proposal because such advice is fundamental to project design and achieving good outcomes. Some bodies already charge for their non-statutory advice through service agreements, discretionary advice services and/or other means.

						Therefore, the only difference would be to add statutory work to this, which we think could be reasonable. We appreciate a lot of resource is involved in the statutory aspect and full cost recovery could have longer term benefits, such as, improving the ability to recruit and train more staff.
Monitoring should be tailored to the context of each organisation	X					We agree.
Reporting should be timely, transparent, simple to understand, easily accessible and evolved over time	X					We agree and would recommend that reporting should include bi-annual updates.

Question 32: We would like to monitor the quality of customer service provided, and the outcomes of that advice on the applicant's progression through the system where practicable. Do you have any views on the most effective and efficient way to do this?

In addition to standard feedback forms, we would recommend one-to-one check-ins with applicants which is likely to provide a greater breadth of information.

Additionally, Solar Energy UK has an expert planning and land use steering group and NSIP forum which could be used as a vessel for collecting and sharing feedback.

Question 33: To what extent do you support the proposal to enable specific statutory consultees to charge for the planning services they provide to applicants across the Development Consent Order Application Process?

We agree with the proposal for statutory consultees to charge fees for planning services to improve resourcing and quality and speed of service. In most cases, statutory consultees already charge for their services, with varying levels of quality and consistency. There is a greater need for more consistency and assurance of the level of service that will be provided.

As stated in response to Questions 25 and 26, fees must be proportionate to the level of service. We would welcome further consultation on the methodologies used for calculating such fees.

Secondly, there must be an assurance that there will be an improvement in the user experience and clear guidance as to what happens if expectations are not met.

Question 34: To what extent do you agree with the key principles of the proposed charging system? Please select from the options listed in the table below and give reasons in the 'comment' text box.

Principles	Strongly Agree	Agree	Neither agree/disagree	Disagree	Strongly Disagree	Reasons
Initially limit the ability to charge to the organisations listed in table 7.1		X				We agree.
Recover costs for non-statutory and statutory services		X				We agree with the caveat that the cost recovery should be proportionate to the service provided.
Setting charging schemes		X				As above.

Question 35 Do you have comments on the scope and intended effect of the principle charging system?

No comment.

Question 36: Do you support the proposal to set out principles for Planning Performance Agreements in guidance?

Yes, we agree. Guidance clearly outlining the principles for the use of Planning Performance Agreements (PPA) between developer and local authorities would be warmly welcomed.

Question 37: Do you have any further views on what the proposed principles should include?

Whilst in principle there is strong support for PPAs, in practice members have had mixed experiences when recommending PPAs to local authorities.

In some cases, authorities have reported a sense of additionality as they have provided dedicated and expert officers to developers who enter PPAs and provide resourcing for this service. On the other hand, members have reported that despite paying a for a premium service and having clear scope of how the additional resources will be used by the authorities (what the authorities are expected to provide) there is no corresponding uptick in the service. This has resulted in many developers and local authorities losing confidence in PPAs.

Secondly, many Local Authorities do not have the time or resources to engage in the bureaucracy of delivering a PPA, therefore we ask that any guidance produced is concise and promotes as streamlined a process as possible. This could be supported by providing a government approved contractor list which would take away some of the administrative burden. Complementary to this, we recommend producing a template for PPAs that outlines a standard project management framework for handling major/solar applications, this is likely to improve uptake and confidence in delivering PPAs.

One recommendation could be to train a pool of individuals, that move from council to council delivering PPAs, similar to what was previously been done through the Local Authority Network.

There is current guidance available as to how to use PPAs and whilst many do follow the guidelines there is no consequences for those who do not. We recommend that the governments new guidance for PPAs (as alluded to in the consultation) addresses this.

Question 38: To what extent do you agree that these proposals will result in more effective engagement between applicants and local communities for all applications?

We agree that early engagement is key and can be mutually beneficial to both the community and developer. By involving the community from the very beginning, concerns can be addressed early on and feedback as to how to make the solar farm most beneficial for the community taken into consideration. This fosters a positive relationship between both developer and community.
We would welcome further clarity as to the revisions intended for the pre-application guidance but are supportive of encouraging greater community engagement.

Lastly, Solar Energy UK is currently developing guidance to promote engagement with local communities from the design stage to decommissioning. It seeks to ensure high quality solar projects are delivered (across all scales and jurisdictions in the UK) and are supported by all parties involved.

Question 39: Do you face any challenges in recruiting the following professions? Please complete the able below and give reasons.

No comment.

Question 40: Are there any other specific sectors (as identified above) that currently face challenges in recruiting? If so, please stat which ones and give reasons why.

No comment.

Question 41: Do you have any ideas for or examples of successful programmes to develop new skills in a specific sector that the government should consider in developing further interventions?

No comment.

Question 42: To what extent do you agree that updated guidance on the matters outlined in this consultation will support the Nationally Significant Infrastructure Project reforms?

We somewhat agree. The Government's proposals for Operational Reforms outline the introduction of a more robust performance regime of which we approve however the language is unclear and there are question marks about the standard of monitoring and reporting.

We would welcome standardised language across all documentation to promote a planning regime which is clear and accessible for all.

Question 43: Do you support a move towards a format for guidance that has a similar format to the national planning practice guidance?

We agree.

Question 44: Are there any other guidance updates you think are needed to support the Nationally Significant Infrastructure Project reforms?

We would welcome clarification as to how the proposed NSIP reforms outlined in this consultation will interact with wider reforms of environmental and planning policy.

Question 45: Do you have any view on the potential impact of the proposal raise in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

No Comment.