

**Response to Operational reforms to the Nationally Significant Infrastructure Project (NSIP)
consenting process consultation**

Wildlife and Countryside Link, Land Use Planning Group, September 2023

About Wildlife and Countryside Link:

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 78 organisations to use their strong joint voice for the protection of nature.

The following members have signed onto this response: Buglife, Bumblebee Conservation Trust, CPRE – The countryside charity, Friends of the Earth, Froglife, Open Spaces Society, The Wildlife Trusts, and the Woodland Trust.

For more information about this response, please contact Emma Clarke at Link (emma.clarke@wcl.org.uk).

Covering letter:

The Government's overriding concern with the NSIP regime appears to be accelerating the speed of the process. However, a number of recent court decisions which have overturned Development Consent Orders have highlighted flaws in the decision-making process, and while we welcome recognition of the need to drive progress towards net zero, a key outcome for the NSIP regime must be considered robust decisions, which clearly takes account of the need for nature-positive developments and truly aids progress towards net zero, not just the speed of decision-making. Only a system which delivers this will be fit for the nature and climate emergency we face.

In addition to our responses to the consultation questions below which are focused on operational reforms, strengthening local community engagement, and improving system-wide capacity and capability, the following reforms are needed to ensure the NSIP regime as a whole is fit-for-purpose:

- Updated National Policy Statements that provide a policy framework that will help to ensure positive outcomes for nature and the climate.
- Spatial plans for infrastructure to steer projects towards the right locations and resolve strategic questions of need and prioritisation of schemes.
- The development of a national land use framework for England and a marine spatial prioritization process.
- Business and commercial developments, such as the London Resort, are not genuinely nationally significant infrastructure and should not be determined through the NSIP process.
- The Biodiversity Net Gain statement to be incorporated into the National Policy Statements must be published. As noted in our previous consultation response, it is important that given the significant scale and duration of NSIPs, the ambition for biodiversity net gain should be at least 20%; the metric must be demonstrated to be fit for purpose to assess large-scale projects; biodiversity gain must be maintained in perpetuity; it must be additional to the

mitigation hierarchy and not conflated with compensation measures; it must exclude irreplaceable habitats; there must be long-term post-implementation monitoring, and there must be no exemptions for any class of NSIPs.

- The Government must publish its review of the implementation of ancient woodland and veteran tree protection and strengthen protection for ancient woodland, ancient trees, and other irreplaceable habitats in National Policy Statements (and the National Planning Policy Framework) to close loopholes, such that National Significant Infrastructure Projects do not automatically override policy protections.
- The improvement of quality, availability and use of environmental data. For example, the ancient woodland inventory produced by Natural England is currently incomplete. Although it is in the process of being reviewed, funding has not yet been made available for its full completion.

Responses to selected questions:

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

Yes. The Planning Inspectorate plays an essential role in the DCO process but requires sufficient resources to assess the quality of submissions.

The new chargeable pre-application service from the Planning Inspectorate must be designed and costed to ensure the Planning Inspectorate is genuinely resourced, even at the 'basic' pre-application service to provide minimum statutory advice, to provide robust and impartial guidance during the pre-application stage.

Even within the new chargeable pre-application service, the Planning Inspectorate must still be prepared to be robust in rejecting those applications which fall below standard or come late in the process, with impacts to all involved including the statutory agencies.

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

No Link response.

Question 2b: If you are an applicant, which of the 3 tiers of service would you be most likely to use and for how many projects? Please explain your reasons for choosing this tier / these tiers.

No Link response.

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

Yes. Having the flexibility to change subscriptions as a project progresses through pre-application is important for applicants, the Planning Inspectorate, and other statutory agencies to be able to deal

with issues as they arise or as they are identified. An increase in the time and expertise needed during pre-application will enable issues to be sufficiently addressed during pre-application.

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?

Agree, we support proposals for the Planning Inspectorate to provide without prejudice pre-application advice to developers during the pre-application stage on the quality of their submissions. This must be supported by sufficient additional funding through the proposed new 'standard' and 'enhanced' chargeable pre-application service.

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

No Link response.

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

Yes.

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

No.

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

Yes, we support the proposed introduction of an early 'adequacy of consultation' milestone. This should include a requirement for NSIP providers to provide feedback on how their plans have evolved following consultation.

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

Yes, in addition to 'assessing the adequacy of proposed consultation arrangements early in the pre-application process,' this milestone and the updated guidance should also consider:

- Best practice for community consultation according to Cabinet Office guidance (2018) and the Gunning Principles.
- Plans for engaging with a wider variety of local communities and interest groups, beyond those who typically engage.

- Specification that gaps in consultation identified during the milestone check are filled.
- Guidance on how to report back to consultees on how feedback was considered and incorporated.

Question 10: Our evidence shows that there is a substantial amount of community consultation that happens during the lifetime of an NSIP. To guide our reforms, and to ensure that reforms support faster consenting, preventing consultation fatigue, more proportionate community consultation, with clearer tests for adequacy, it is important to gather further information about the causes for multiple consultations. What are the main reasons for consulting with communities multiple times during the lifetime of an NSIP application?

Yes to all of the statements.

Are there any other factors that play a part in multiple consultations seen to be required by developers?

Another factor is that NSIP developers fail to provide the relevant information to support effective engagement at the right stages.

However, multiple consultations and conversations are important to enable early views to help shape the project and identify and address issues as early on as possible in the process and to provide opportunity for feedback on the details of the project at a later point in 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 recommend that DLUHC commission detailed research on the experiences of a wide variety of local communities and interest groups with the NSIP regime, including those who might not respond to an online survey. This could include using the Planning Inspectorate's data to assess the involvement of interest groups in the formal NSIP process. It should also seek to elicit the perspectives of a variety of interest groups, not just those who typically engage.

The Government should also introduce requirements to ensure that appropriate environmental information is sought prior to consultation, as this will reduce the likelihood of requiring repeated consultation responses requesting the same information. The Government should take measures to ensure that details such as tree reports, or at least an assessment by the applicant of Irreplaceable Habitats, are submitted prior to DCO stage to inform responses.

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? Please provide your reasons.

If the Government pursues this proposal, addressing the perception of potential bias, including possible legal challenge based on real or perceived bias, will be important.

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? Please provide your reasons.

We agree that more detailed relevant representations would lead to an improvement in the process, for the reasons that the consultation document identifies around the Examining Authority having more detailed information upfront in order to ascertain the substance and/or extent of key issues for examination ahead of preparing the examination timetable. Providing a written representation up front will also reduce the time lag between the response and the applicant's reply.

Also, as the consultation document acknowledges, for stakeholders to provide a detailed relevant representation, they will need access to information at that time about the project and the application in question.

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? Please provide your reasons.

We disagree with the proposal to remove the mandatory minimum period and enable the Examining Authority the discretion to set shorter notification periods.

The current regulations require at least three weeks for the receipt of written representations from interested parties and at least three weeks for interested parties to comment on others' written representations and to comment on any responses to written questions. Given the complexity of issues, the often long length of written representations, that many groups engaging with the NSIP regime already struggle with capacity to engage and respond, three weeks is already a short period.

We disagree with the Government's assertion that this proposal to remove the minimum notification period will not affect the engagement of those impacted by the application. If the Government's aim is to maintain the quality of written evidence during examination, it must not remove the minimum mandatory notification periods - it requires time to ensure the right information is provided to ensure issues are raised and addressed at examination and to support good decision-making.

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 that moving to digital handling of examination materials by default will increase the ability for all parties to be more efficient and responsive to examination deadlines.

Digital handling of examination materials by default must be done well, with good signposting, to be effective.

We also note, as the consultation document acknowledges, that a digital by default approach will also require proactive consideration and sufficient resources for people who do not use digital services or are digitally excluded, which is still a significant proportion of UK households (6% of UK households, according to Ofcom: <https://www.ofcom.org.uk/news-centre/2021/digital-divide-narrowed-but-around-1.5m-homes-offline>).

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? Please provide your reasons.

We strongly agree that the submission of ‘planning data’ will be a valuable addition as a means of submitting documents and information needed to support an application to the Planning Inspectorate and as a means of making documents and information, including survey data, available to stakeholders, including consenting departments, statutory agencies, eNGOs, academics, and local communities.

Lack of availability or quality of environmental information upfront can cause issues and delays for an application down the line. To improve the environmental evidence base, environmental data collected through environmental assessment, other environmental information collected for planning applications, including for those that do not receive planning consent, and post-project implementation data, should be submitted digitally. These data should then be made available and usable for other purposes, in order to improve the existing environmental evidence base and to be used for future environment assessments and the development of planning applications. This data sharing could be made mandatory or its requirements strengthened through legislation or conditions on planning permission, in order to create a level playing field for developers and to improve baseline environmental data.

To improve the quality of applications and upfront environmental information, there should be minimum requirements during the screening process for applicants to check the existing environmental evidence base, in particular to ensure that sensitive areas and protected species records are examined.

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

In addition to ‘planning data,’ environmental data collected through environmental assessment, other environmental information collected for planning applications, including for those that do not receive planning consent, and post-project implementation data, should be submitted digitally. These

data should then be made available and usable for other purposes, in order to improve the existing environmental evidence base and to be used for future environment assessments and the development of planning applications. This data sharing could be made mandatory or its requirements strengthened through legislation or conditions on planning permission, in order to create a level playing field for developers and to improve baseline environmental data.

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? Please provide your reasons.

We are concerned that the lack of clarity on the criteria for the fast-track route, as well as long-standing and unaddressed issues such as the lack of availability and quality of environmental data and the lack of capacity for organisations who are not statutory consultees to provide a good relevant representation, will mean that the proposed NSIP fast-track route undercuts the ability of the NSIP regime to make good decision-making, including for nature, climate and people.

If the Government proceeds with a fast-track consenting route, we agree that projects should be required to use the proposed 'enhanced' pre-application service.

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? Please provide your reasons.

We are concerned that the lack of clarity on the criteria for the fast-track route, as well as long-standing and unaddressed issues such as the lack of availability and quality of environmental data and the lack of capacity for organisations who are not statutory consultees to provide a good relevant representation, will mean that the proposed NSIP fast-track route undercuts the ability of the NSIP regime to make good decision-making, including for nature, climate and people.

There is a lack of clarity on the fast track quality standard - there is insufficient information to determine whether the proposed standard will be effective in identifying applications that are capable of being assessed in a shorter timescale.

The detail of the quality standard, as well as how applicants are required to show they are genuinely meeting the quality criteria and tests, and who and how applies the standard, will also influence whether the standard is effective.

In particular, in Box 4, the language of 'supplementary' test was unclear and misleading. The procedure and regard to advice tests are fundamental (not supplementary) to achieving the main test, as consultation and engagement with statutory consultees and local communities will help identify the existence and scope of principal areas of disagreement.

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 for each in the accompanying text boxes. Please also include any additional criteria that you would propose including within the fast track quality standard?

1. Principal areas of disagreement

Agree.

In addition to the number and scope of principal areas of disagreement, the applicant and Planning Inspectorate should also identify and consider the complexity of the areas of disagreement and risk level associated with any particular areas of disagreement (e.g., there would be a high level of risk associated with disagreements with implications for human health and safety and breaching environmental limits).

2. Procedure

2a Fast track programme document

Agree.

2b(i) include fast track intention in consultation material

Agree.

2b(ii) formal agreement to use enhanced pre-application

Agree.

2b(iii) publicise fast track programme

Agree.

2b(iv) provide evidence at submission of 2a – 2c

Agree.

3. Regard to advice

Neither agree/disagree.

It is unclear what exactly this criterion entails, as the wording in Box 4 was inconsistent with the wording in the main text of the consultation document.

Additional criteria?

There should be an additional criterion around the availability of up to date and high quality environmental data, in addition to the proposed requirement for the appropriate assessment report, as lots of environmental impacts will not be captured in the appropriate assessment process, for example, irreplaceable habitats.

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? Please provide your reasons.

If the Government pursues the proposal for a fast track examination timetable, we agree that the maximum 4 month time period must be provisional, taking into account any advice from the Examining Authority once the relevant representations have been received to assess whether additional time is needed to address: a) changes to the accepted application before the examination has commenced, and b) issues identified in relevant representations that were not contained in the original fast track submission. In addition, the Examining Authority when deciding on the fast track timetable should also consider whether the relevant representations identify an increase in the scope or complexity of issues which were already identified in the original submission (not just whether there are additional issues).

Question 22: To what extent do you agree that there is a need for new guidance on which application route proposed changes should undergo? Please provide your reasons.

No Link response.

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?

No Link response.

Question 24: To what extent do you support the proposal to introduce a statutory timeframe for non-material change applications? What do you consider is a reasonable timeframe for determining non-material applications? Please note, determination is referred to as the time it takes for the relevant department to make a decision on an application once the appropriate consultation has been undertaken. Any timeframe included in legislation would need to provide a specific timescale for determination.

We do not support a statutory timeframe for determining non-material changes, as the time needed will depend on the change and on the evidence required to be collected and the expertise required to be consulted to evaluate that change.

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? Please provide your reasons.

No Link response.

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? Please provide your reasons.

No Link response.

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? Please provide your reasons.

No Link response.

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? Please provide your reasons.

No Link response.

Question 29: To what extent 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? Please provide your reasons. If do not agree, are there any other ways to support the Planning Inspectorate to better resource their statutory work?

No Link response.

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? Please provide your reasons. If do not agree, are there any other mechanisms you would like to see to ensure performance?

If the Government pursues this proposal, additional resources will be required to do the monitoring of key performance measures for already under-resourced local planning authorities and statutory agencies.

We also note that the precautionary principle should be applied when defining key performance indicators, as not every impact will be easy to measure, especially indirect effects.

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 for each in the accompanying text boxes:

Be outcome and not output focussed to ensure better planning outcomes

Neither agree nor disagree.

The effectiveness of this principle for performance monitoring depends on whether the right outcome has been chosen and whether the outcome is being accurately measured. For example, a positive outcome of a planning application should not be whether the application was consented, but whether the statutory agency's outcomes were secured through influencing the location and design of the project, e.g., whether Natural England has secured positive environmental outcomes for species and habitats.

Consider quality of customer service provision

Cover the provision of statutory and non-statutory advice provided by the specific prescribed bodies (outlined in section 7.2.2) through pre-application, pre-examination, Examination and Decision

Monitoring should be tailored to the context of each organisation

Reporting should be timely, transparent, simple to understand, easily accessible and evolved over time

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

No Link response.

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? Please provide your reasons.

Yes, we support this proposal.

Natural England and the Environment Agency also have important roles in the planning system and in the DCO application process.

Unfortunately, years of under-resourcing of these agencies has left them lacking the sufficient resources, capacity, and expertise to fulfil their statutory functions. Between 2009- 2019, Environment Agency funding fell 63%, total staff fell 25%, and prosecutions of businesses fell 88% (<https://www.unchecked.uk/wp-content/uploads/2020/11/The-UKs-Enforcement-Gap-2020.pdf>).

This has resulted in a lack of enforcement: the number of Environment Agency enforcement notices fall 69.5% between 2012 to 2019 (<https://www.rspb.org.uk/globalassets/downloads/our-work/troubled-waters-report>).

Natural England's functions have also suffered from a lack of funding over the last decade: a decline of 72% from 2010 to 2019 (<https://www.unchecked.uk/wp-content/uploads/2020/11/The-UKs-Enforcement-Gap-2020.pdf>). The body has not been able to properly fulfill its statutory duties such as the monitoring of SSSIs (78% of SSSIs have not been monitored in the last 6 years, <https://questions-statements.parliament.uk/written-questions/detail/2021-02-09/151834>).

In addition to increased funding and ecological expertise for Natural England, the Environment Agency and other statutory nature conservation bodies, to properly and confidently apply environmental regulation, and advise and conclude on environmental assessments and decisions, leading to better environmental outcomes and more surety in the planning system, we support the proposal to enable specific statutory consultees to charge for their planning services to applicants.

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 for each in the 'comment' text box.

No Link response.

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

No Link response.

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

Yes.

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

Yes, the proposed principles in guidance should include:

- Best practice for community consultation according to Cabinet Office guidance (2018) and the Gunning Principles, including for engaging with a wider variety of local communities and interest groups, beyond those who typically engage.
- Guidance on how to report back to consultees on how feedback was considered and incorporated.

We recommend that DLUHC commission detailed research on the experiences of a wide variety of local communities and interest groups with the NSIP regime, including those who might not respond to an online survey. This could include using the Planning Inspectorate's data to assess the involvement of interest groups in the formal NSIP process. It should also seek to elicit the perspectives of a variety of interest groups, not just those who typically engage.

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? Please provide your reasons.

In addition to the proposals in this consultation document, local planning authorities should be adequately resourced and funded to support local groups and communities engaging with the process and provide necessary information to elected Members to disseminate information to their constituents. They should also direct people from their website to the PINS project website and publish their Statement of Community Consultation comments and Local Impact Report for transparency with their community. Local Impact Reports should reflect the full range of views within the local community, not just the local planning authority's view, and should be mandatory rather than discretionary.

We also recommend that DLUHC commission detailed research on the experiences of a wide variety of local communities and interest groups with the NSIP regime, including those who might not respond to an online survey. This could include using the Planning Inspectorate's data to assess the involvement of interest groups in the formal NSIP process. It should also seek to elicit the perspectives of a variety of interest groups, not just those who typically engage.

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

No Link response.

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

Yes, ecology and planning are two sectors which also face challenges in recruiting and retaining expertise.

Only 35% of local authorities in England had access to in-house ecological expertise from an ecologist, according to an ALGE survey in 2013:

<https://devoncc.sharepoint.com/sites/PublicDocs/Environment/ALGE/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FEnvironment%2FALGE%2FWebsite%2Ffolders%2FPublications%20and%20documents%2FALGE%20Report%20on%20Impact%20of%20Spending%20Cuts%20%282011%2D12%29%2Epdf&parent=%2Fsites%2FPublicDocs%2FEnvironment%2FALGE%2FWebsite%2Ffolders%2FPublications%20and%20documents&p=true&ga=1>.

A 2022 ALGE/ADEPT survey commissioned by Defra assessing the readiness of local planning authorities for BNG found that 26% of LPAs do not have any access to ecological expertise and that only 5% of respondents reported that their current ecological resource (including in-house and external sources) is adequate to scrutinise all applications that might affect biodiversity, let alone implement new environmental policies and requirements such as BNG (<https://www.alge.org.uk/wp-content/uploads/sites/15/2022/06/ALGE-ADEPT-Report-on-LPAs-and-BNG-2022.pdf>).

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 Link response.

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? Please provide your reasons.

Updated guidance on these matters will support the NSIP reforms, but an additional resources and expertise are needed to ensure the guidance (and the Government's proposed NSIP reforms) are well-implemented. For example, the Planning Inspectorate must be sufficiently resourced, with the expertise, experience and confidence to implement the guidance well, to influence the development of projects, and to push back or reject on applications that do not sufficiently address the considerations in the guidance.

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

No Link response.

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

- Business and commercial developments, such as the London Resort, are not genuinely nationally significant infrastructure and should not be determined through the NSIP process.
- The Biodiversity Net Gain statement to be incorporated into the National Policy Statements must be published. As noted in our previous consultation response, it is important that given the significant scale and duration of NSIPs, the ambition for biodiversity net gain should be at least 20%; the metric must be demonstrated to be fit for purpose to assess large-scale projects; biodiversity gain must be maintained in perpetuity; it must be additional to the mitigation hierarchy and not conflated with compensation measures; it must exclude irreplaceable habitats; there must be long-term post-implementation monitoring, and there must be no exemptions for any class of NSIPs.
- The Government must publish its review of the implementation of ancient woodland and veteran tree protection and strengthen protection for ancient woodland, ancient trees, and other irreplaceable habitats in National Policy Statements (and the National Planning Policy Framework) to close loopholes, such that National Significant Infrastructure Projects do not automatically override policy protections.
- The improvement of quality, availability and use of environmental data. For example, the ancient woodland inventory produced by Natural England is currently incomplete. Although it is in the process of being reviewed, funding has not yet been made available for its full completion.

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

No Link response.