



## STRATEGIC MESSAGE

At a time of constraints on public finances, AIRTO – the Association of Innovation, Research & Technology Organisations – has recently called on HMG to focus existing public support for applied research, development and innovation (RDI) primarily on activities that will achieve immediate short-term benefits through market-led innovation activities. AIRTO further contends that a focus on more immediate innovation support is crucial to help the government fulfil its aims to accelerate and stimulate economic growth and stands ready to play its full part in supporting the new government in achieving its aims. In this context, AIRTO welcomes the consideration by the new government of National Planning Policy Framework and other changes to the planning system, since they will impact directly on the UK's RDI infrastructure, on the business and the wider economy and indirectly on the demand for technological innovation.

## INTRODUCTION

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AIRTO, the Association of Innovation, Research & Technology Organisations, on behalf of its members, has prepared this written response to the Ministry of Housing, Communities & Local Government (MHCLG) in relation to its consultation on [Proposed reforms to the National Planning Policy Framework and other changes to the planning system](#).

AIRTO represents the UK's extensive Innovation, Research and Technology (IRT) sector, which employs 57,000 highly skilled people, has a combined annual turnover of [£6.9Bn and contributes £34Bn to UK GDP](#). Organisations in this critical sector work with industry, government and academia to promote and support the introduction of innovation to the full range of industrial sectors, and to provide technical solutions to new challenges and crises. The IRT sector is a key partner for industry in delivering the support needed for innovation driven economic growth.

## RESPONSES TO RELEVANT QUESTIONS

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### **Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?**

Yes. The proposed changes are crucial to the UK developing its technology footprint and advanced industries to build an advanced economy.

### **Question 63: Are there other sectors you think need particular support via these changes? What are they and why?**

Particular support is needed for research and development facilities, both as stand-alone resources and as clusters in geographical areas and/or science and technology parks. The development of such facilities is essential to the development of the UK as a technology led economy.

The national infrastructure for power generation and transmission (not just wind turbines and solar farms) must be supported under national planning guidelines if net zero and energy security is to be achieved.

Such support requires consultation with all the relevant stakeholders at a local and national level. AIRTO member organisations have a role to play as stakeholders with world-leading expertise in research, development, innovation and industry support across the full range of vital technologies.

**Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?**

Yes. These types of facilities are essential for a modern technology-led economy and require support and co-ordination at a national and local level.

**Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?**

No. Support and co-ordination is important for any size of these developments.

**Question 66: Do you have any other suggestions relating to the proposals in this chapter?**

National planning support and direction should be co-ordinated with national and local industrial and innovation strategies.

**Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?**

Yes. Planning guidelines are essential if this crucial part of the national infrastructure is to be implemented in a correct and timely manner. This is a direct consequence of the government's policy for allowing onshore wind turbine installation.

**Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?**

Yes. It is important that the national planning policy supports the installation of these technologies

**Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?**

The balance between benefit and detriment must play an important role in national planning, but should be assessed efficiently so as to minimise planning delays. This requires expertise and knowledge to be available for planning assessment. AIRTO members organisations can play an important role in further developing and providing this expertise and knowledge. To support efficient planning, a national audit of available and required knowledge must be undertaken.

**Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?**

No. To achieve net zero and energy security, smaller onshore wind projects will be important in significant numbers. Planning support and guidelines will be necessary for an efficient approval process.

**Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?**

No. As in the response to Q75, planning support will be important for the many smaller projects that are needed.

**Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?**

Consideration should be given to lower thresholds, but any changes should be evidence based. This should include the predicted numbers of smaller projects and typical timelines for planning decisions. The development of smaller projects must not be restricted by a lack of national planning support.

**Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?**

National planning policy must be up to date, evolving to accommodate rapidly developing and changing technologies aimed at tackling the consequences of climate change. AIRTO member organisations can provide strategic foresight and horizon-scanning for deployment of current and future technologies and their environmental and societal impacts.

**Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?**

This is a continually developing area of technology. Planning support must have access to the latest technology. AIRTO member organisations have the knowledge and expertise to support planning and should be utilised fully for maximal benefit.

**Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?**

A comprehensive assessment of flood risk must be a part of planning policy. This must be systematic and include the complete geographical area potentially affected. Any changes must be evidence based. AIRTO member organisations working in the areas of water management, weather prediction and climate change can support this by providing the evidence and necessary expertise.

**Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?**

Climate change must become an increasingly important factor in planning policy if net zero is to be achieved and catastrophic effects avoided. This will affect the relative importance of this and other planning considerations.

**Question 82: Do you agree with removal of this text from the footnote?**

No. Food production should be a consideration and is an important part of national planning and security/resilience. However more quantifiable, systematic guidance is needed.

**Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?**

As discussed in Q82, more quantifiable, systematic guidance is needed. AIRTO member organisation operating in the agri-tech sector can provide support to develop such guidance.

**Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?**

Yes. AIRTO member organisations working in water management can provide support for developing improved water infrastructure provisions.

**Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?**

The proposals will have a direct impact on AIRTO member organisations in that the infrastructure for research, development and innovation is recognised as important in national planning policy. This will impact on the future development of individual organisations and also in the planning and development of technology clusters and science parks. These developments are not an end in themselves, but form a crucial part of industrial and R&D national strategy which will result in economic growth and increased productivity and jobs, and thereby will result in societal benefits to the UK.

Net zero and climate change R&D are key areas of activity for AIRTO members, and planning support for national infrastructure is vital if the full benefit of this activity is to be realised.

As discussed in the answers to several of the questions above, AIRTO member organisations have the skills and expertise to develop evidence-based changes to planning guidelines, and are willing to provide this support.

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**For further information, please contact:**

Dr Jane Gate, Executive Director, AIRTO Ltd: [enquiries@airto.co.uk](mailto:enquiries@airto.co.uk)