

Planning Policy Cabinet Advisory Group – 24 March 2026

Item 2: Consultation Response – Areas for Producing Spatial Development Strategies

1.0 Introduction

- 1.1 The Ministry of Housing, Communities and Local Government (MHCLG) has published a consultation which seeks views regarding the proposed geographical areas that would apply to Spatial Development Strategies.
- 1.2 The consultation document, which is appended as a link to this report, asks five questions regarding the proposed geographies. It includes Annex A, which identifies the proposed Spatial Development Strategy areas, and Annex B, which provides a map of the proposed areas.
- 1.3 The consultation runs from 12 February to 26 March 2026.

2.0 What Are Spatial Development Strategies?

- 2.1 The Planning and Infrastructure Act 2025 reinstated a sub-regional tier of cross-boundary strategic planning across England. The provisions in the Act will place a duty on Combined Authorities, Combined County Authorities, Unitary Authorities and any other upper tier Councils to prepare a Spatial Development Strategy (SDS) for their area.
- 2.2 SDSs will be high-level, strategic plans that will set the sub-regional context for districts. They are not intended to be site-specific; nor will they formally allocate land (that will remain a function of a district Local Plan). But the SDS will identify broad locations for growth and the necessary supporting infrastructure to enable delivery over a period of 20 years.
- 2.3 The recent draft National Planning Policy Framework (NPPF) consultation provided further clarity regarding Government's intentions. Draft NPPF Policy PM1 expects SDSs to provide a positive vision for "*future growth and change*" and a "*clear spatial framework for investment and growth, including for new housing*". This means that a SDS will apportion objectively assessed needs and establish the housing requirement for local authorities such as Lancaster (and any successor local authority following local government reorganisation). The City Council has already submitted a response to the draft NPPF consultation.

- 2.4 Strategic Planning Boards may be formed to establish a partnership of strategic planning authorities who will work together to produce a SDS. However there is no statutory requirement for district councils to be represented (as constituent members) on the new boards.
- 2.5 The provisions in the Act have yet to be commenced. Secondary legislation is required before the duty to produce a SDS becomes active. This legislation is anticipated prior to parliamentary recess in Summer 2026. Government expects all areas to have prepared a SDS by the end of this parliament.

3.0 The Consultation Proposals

- 3.1 Annex A of the consultation document identifies the Lancashire Combined County Authority (LCCA) as the strategic planning authority that would be responsible for producing a SDS for Lancashire. This proposed arrangement is based on the existing devolution footprint.
- 3.2 Annex B provides a map of the proposed SDS areas in England.

4.0 The Implications for the Lancaster District

- 4.1 The proposals described above are not unexpected. If a sub-regional tier of planning is being introduced, then it is logical that it follows the devolution footprint of Lancashire.
- 4.2 Because secondary legislation has not been enacted, there are some details that are yet to be confirmed. What is clear from recent dialogue between the authorities is that the constituent authorities of Lancashire County Council, Blackpool Council and Blackburn with Darwen Council have formed a joint SDS Officers Working Group. This is to undertake preparation and enabling works only at this stage and will help the LCCA be ready for when the duty (referred to in paragraph 2.5) is enacted.
- 4.3 District Councils, including Lancaster, have started working together to ensure that they are in a position to support the development of the SDS when it happens. This is essential, given that each local planning authority's Local Plan must be in conformity with the "umbrella" SDS.
- 4.4 There is concern that under the proposed arrangements, authorities like Lancaster will not be a constituent member of any Strategic Planning Board. This appears to be counter-productive and would create top-down decision-making that fails to take account of local expertise and knowledge. It is proposed that the Council's response makes the argument for inclusion on any Board.

4.5 Whilst the geographic boundary proposal is sensible, there will inevitably be issues that cross SDS boundaries (i.e. outside Lancashire). A good local example has been the positive collaboration between Lancaster City Council and Westmorland & Furness Council (and other stakeholders) relating to the production of the Arnsdale and Silverdale National Landscape Management Plan. The new system still anticipates that strategic planning authorities will engage and co-operate across these boundaries. However, the SDS boundary will be fixed to the geographical boundary of Lancashire.

5.0 Consultation Questions and Responses

5.1 There are five consultation questions. The Council's draft responses are provided below.

5.2 **Question 1:** Which SDS area(s) are you interested in?

Response: Lancashire.

5.3 **Question 2:** Do you agree with the proposed SDS area (where one is provided)? If so, please explain the strengths of the proposal as you see them.

Response: The geography conforms to the devolution footprint and therefore it is a logical SDS boundary.

There are two caveats to our agreement. The first relates to the need for genuine collaboration between all local authorities when preparing the SDS. All local authorities have an important and positive role to play in making strategic planning a success. Lancaster City Council is of the view that all authorities working together within an SDS area should have equal voting rights as constituent members of any Strategic Planning Board. The absence of any democratic input into the process would have the effect of excluding local expertise and knowledge, to the detriment of positive and visionary strategy-making.

Without constituent membership, there is a risk that the relationship between an SDS and a Local Plan could become fractured, leading to plan preparation delay and a failure to adopt a wider, spatial, integrated approach. The arrangement would represent a democratic deficit for the district.

The second caveat is that the SDS boundary should not preclude the continuation of partnership arrangements that cross county boundaries. In the case of the Lancaster District, our partnership with neighbouring Westmorland and Furness Council in Cumbria (and other stakeholders) during the preparation of a recent National Landscape Management Plan is an example of a successful collaboration that will have a positive effect on the communities and landscape within the Management Plan area.

We would wish to make a couple of further observations (albeit not regarding specific SDS geographies).

The consultation sets out the potential workstreams that can be advanced ahead of the secondary legislation being commenced. Whilst these workstreams are sensible, they fail to appreciate the wider impacts upon the under-resourced planning sector, particularly in districts where the prospects of Local Government Reorganisation (LGR) are already making it difficult to recruit, and where the process and preparation for LGR is already consuming senior leaders' time. Further support, either in terms of resourcing or a revised timetable (i.e. after LGR decisions have been made here in Lancashire) would be welcome.

Similarly, those local authorities (like Lancaster) who wish to be in the first tranche of authorities advancing a Local Plan under the new system cannot make swift progress due to the delay in the publication of the Local Plan Regulations. When combined with the rollout of the SDS tier of planning, this has the potential to continue to frustrate local plan-making efforts.

- 5.4 **Question 3:** If you do not agree with the proposed SDS area, please explain the issues/challenges that it/they would present.

Response: Not applicable.

- 5.5 **Question 4:** If you do not agree with the proposed SDS area, please suggest and explain one or more alternatives that you believe would work better.

Response: Not applicable.

- 5.6 **Question 5:** If there is no proposed SDS area for your area of interest, we would welcome your preferred SDS area with an explanation of your reasoning.

Response: Not applicable.

6.0 Next Steps

- 6.1 This consultation response will be submitted prior to the deadline of 26 March 2026.
- 6.2 Discussion has already taken place with the Chair of Council Business Committee, who (in the absence of a scheduled meeting prior to the consultation expiry) has agreed to the submission of the response following PPCAG consideration.

Appendix A: Consultation Document

[Areas for producing spatial development strategies - GOV.UK](#)