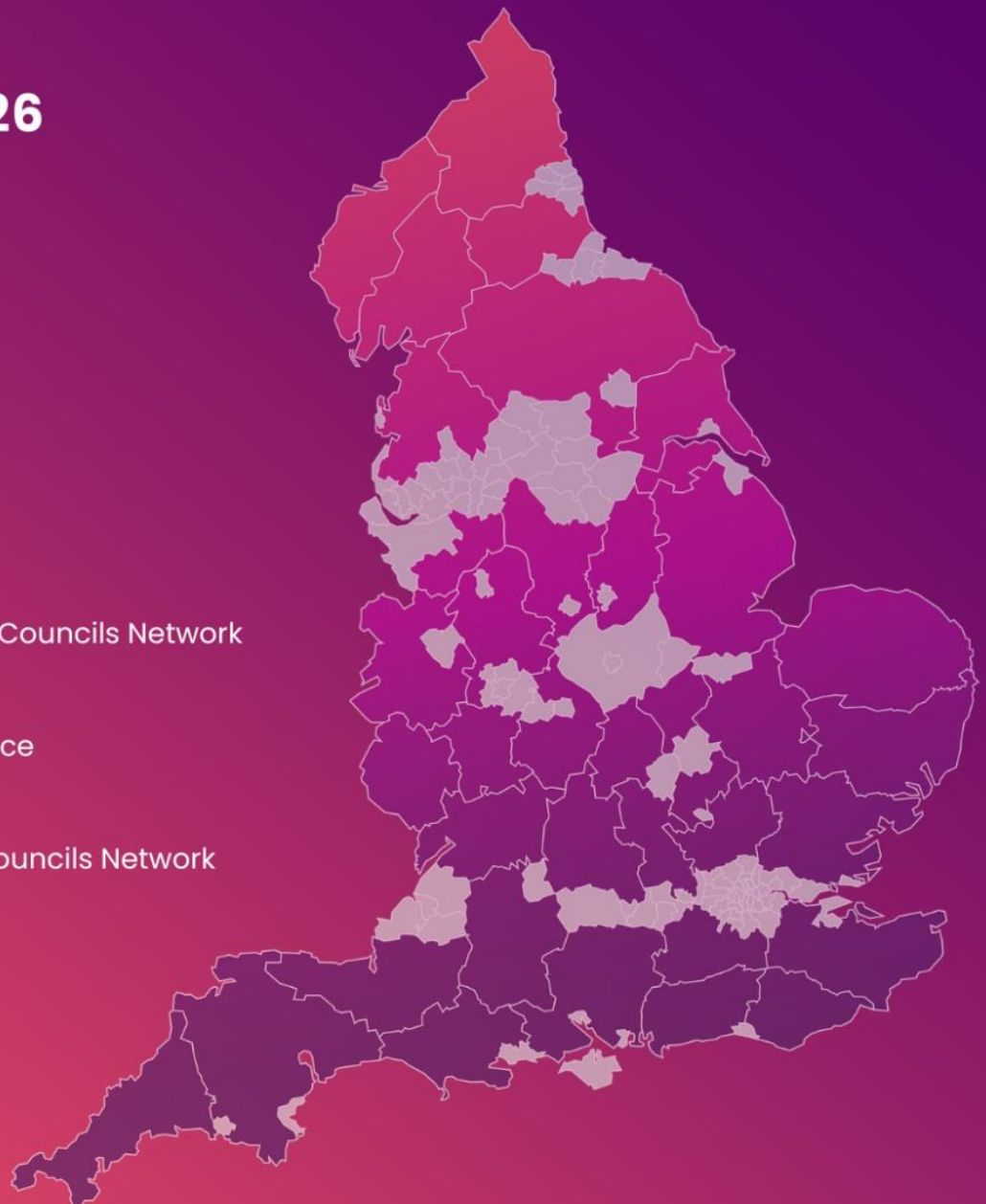


CONSULTATION RESPONSE

AREAS FOR PRODUCING SPATIAL DEVELOPMENT STRATEGIES

MARCH 2026



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Introduction

1. The CCN represents 39 English local authorities that serve counties. The 21 county and 18 county unitary authorities that make up CCN are the largest part of the local government family. They represent all four corners of England, from Cumbria to Cornwall, Durham to Kent, North Yorkshire to Suffolk, Derbyshire to Essex.
2. The essential services our members provide touch on the everyday lives of residents and businesses across 86% of England's landmass and 47% of its population. The areas represented by our members constitute 38% of local government expenditure; 44% of total public expenditure (£201bn); and generate just under half of all tax revenues (£255bn). The economies of our areas contribute 39% of Gross Value Added (GVA) and 42% of all employment.
3. CCN welcomes the opportunity to respond to this consultation on behalf of its member councils. Many of our members will initially lead the preparation of Spatial Development (SDS's) in their areas and have already started preparatory work laying the foundations for work to get underway once the regulations required come into effect. That said, this is a further change the councils are having to deal with, at a time when many of them are already working to deliver new local plans and further changes are coming down the line with the revised NPPF.
4. We understand that the consultation is predominantly seeking views on the proposed geographical areas over which SDSs will be prepared, and our members will be putting forward their individual views on this. CCN is not responding to issues about geography, but we wanted to take the opportunity to put forward some high-level views and principles about SDSs that we hope will help shape emerging legislation as we look forward to implementing the first SDSs that come through the system.
5. CCN wholeheartedly welcomes the introduction of SDSs. We have advocated for the introduction of strategic planning across the country for many years, and very much welcome the emphasis for all areas of England, not just urban areas, to be covered by an SDS.
6. CCN members are rooted in their places, and each has unique challenges and opportunities that they can build on and address. From housing to economic growth, CCN members want to deliver for their communities and for UK PLC. SDSs will allow areas to prepare a spatial framework that helps them to direct growth and development across broader geographies, identify infrastructure that unlocks and supports development and address some of the long-term infrastructure challenges such as water supply, transport and digital connectivity.

Principle and content of SDS

7. We very much welcome the acknowledgement from Government that housing need in England cannot be met without planning for growth on a larger-than-local scale, and that these plans are not 'big local plans'. It is vital that SDS remain strategic and high level and provide long term certainty and direction to communities, developers, the private sector and infrastructure providers.
8. We also welcome that local plans will be required to be in 'general conformity' with SDS. Given the drive to get local plans in place as soon as possible, there will need to be strong guidance that sets out a process to ensure local plans adopted ahead of an SDS

can be updated quickly and easily to ensure that they are in general conformity with the SDS.

9. At present there is uncertainty across councils about what role the SDS will play alongside the Local Plans and how the two will interact. As we outlined in our recent consultation response to the NPPF, it is vital that strong guidance is published that clearly differentiates the role of different tiers of plan.
10. We believe that SDS will provide a forum to break down silos and align decisions across areas such as housing, transport, health, and the environment. This joined-up approach will enable more efficient use of resources and deliver better outcomes, such as improving health and wellbeing through walkable, green communities while strengthening environmental resilience. By considering these priorities together, local authorities can deliver more sustainable and equitable places.

Geographies

11. CCN strongly believes that the geographies over which SDS will operate should be determined locally - this will be the best way to ensure buy-in from the constituent authorities involved in the preparation of the plan. We believe that a 'top-down' approach should only be taken as a very last resort where there is not local agreement, and we would request the government sets out a clear timeline for intervention where local agreement cannot be reached.
12. We believe that, where possible, SDS geographies should match the boundaries that reflect the devolution geographies that are emerging across the country, and we understand that this is the intention of the government, where there is full local consensus.
13. SDS geographies should also take into account the characteristics of the areas that are being brought together through proposals. Many CCN member geographies do not contain cities, but are polycentric - with large towns - and cover significant rural areas. However, CCN members are often next to cities or urban areas – represented by unitary councils – that do not have these same geographic characteristics. In considering geographies, the government should not seek to put together geographies that would bring more poly-centric areas into cities' orbits.
14. As part of this process, the government should be clear that SDS geographies can further support economic growth by bringing together areas that are already working together to support the government's objectives on developing and emerging sectors of the economy and/ or growth.
15. It will also be important to consider the wider context of public service reform and ensure that boundaries align with other public services such as police and crime boards and integrated care boards.

Governance

16. To ensure that SDS provide the long-term certainty and stability that they can offer, it is vital that these plans are progressed as quickly and efficiently as possible. In areas where there are not Foundation Strategic Authorities (FSAs) or Mayoral Strategic Authorities (MSAs), we would urge the Government to establish strategic planning

boards as quickly as possible. Failure to do so will result in a two-tier approach to introducing SDS, when all areas should be given equal opportunity to prepare one regardless of their progress to devolution.

17. We welcome the arrangements for strategic planning boards, including membership of strategic planning boards, as set out in the Planning & Infrastructure Act. While it is important that, where appropriate, all authorities within a strategic planning area are involved in the preparation of an SDS, we support the voting arrangements where upper tier authorities, as members of the strategic planning board, will have voting rights over the plan. This will ensure that they are adopted quickly and do not face the same issues that other strategic plans have been subject to where a unanimous decision was required to adopt a plan.

Longevity of plans

18. As we mention above, it is vital that plans are prepared now and provide the long-term strategic direction and investor confidence that they are designed to provide. Alongside this, it is also vitally important that SDSs that are prepared now are not fundamentally altered when new mayoral authorities and administrations are established.
19. We acknowledge that Section 12T of the Planning & Infrastructure Act provides regulations for the Secretary of State to include transitional provisions within strategic planning board regulations. We would advocate that these provisions are used sensitively and with minimal impact on the emerging or adopted SDS given that it will be grounded in evidence.

Capacity & skills

20. Authorities are already undertaking steps to put the foundations in place to allow formal work on an SDS to start once regulations come forward and strategic planning boards are established. However, it will be important to ensure that authorities are properly resourced and have the capacity and capability to deliver these plans.
21. We note the intention to provide funding to all areas once the geographies have been confirmed and also note that funding to areas that are in a more prepared position to begin work on their SDS is intended to commence shortly. We urge the Government to ensure that all areas receive funding to allow them to kickstart work on their SDS as soon as possible. Failure to do so will leave county areas without devolution deals behind.