

Ministry of Housing, Communities and Local Government,
Third Floor,
Fry Building,
2 Marsham Street,
London,
SW1P 4DF

25th March 2026

Response submitted by email only to: strategicplanning@communities.gov.uk

Dear Sir / Madam,

Re: Areas for producing Spatial Development Strategies

Introduction

The Land, Planning and Development Federation (LPDF) welcomes the opportunity to respond to the consultation on 'Areas for producing Spatial Development Strategies (SDSs)'.

As a membership organisation representing those with interests active across a wide range of geographies, the LPDF does not take a position on the specific boundaries proposed. Instead, our response focuses on the key principles that should underpin the definition of SDS areas to ensure their effectiveness in practice.

The LPDF strongly supports the move back to strategic planning and recognises the importance of longer-term strategic plans in setting the context for growth across areas that are wider than individual local planning authorities.

This response reiterates and builds upon key points raised in the LPDF's submission to the recent draft National Planning Policy Framework (NPPF) consultation. In particular, we emphasise the importance of ensuring that the strategic planning framework is capable of addressing unmet need, taking difficult decisions, and supporting delivery at scale.

About the LPDF

The LPDF seeks to represent the UK's leading land promoters, home builders and commercial developers. LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing "shovel ready" land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidenced based approach.

The LPDF encourages its members to deliver well designed, high quality, sustainable places which deliver a mix of housing types and tenures, commercial spaces and community uses that have a positive social, environmental, and economic impact.

Our key values include:



- Working in a positive and cooperative way with central and local government and key stakeholders, to deliver a planning system capable of supplying the homes and employment space we need.
- Promoting research and an evidence-led approach to policy development.
- Increasing the supply of new homes to meet demand and make home ownership a realistic possibility for all those who aspire to it.
- Ensuring that we build the affordable homes of all types and tenures that this country so desperately needs.
- Delivering new employment space to meet demand from businesses and support economic growth.
- Championing the impact of increased housing delivery on reducing intergenerational unfairness.
- Creating well designed, high quality and sustainable places to live and work.
- Educating and informing about the social, environmental and economic benefits of development.
- Supporting diversity of delivery in the market and championing SME developers.
- Promoting diversity and inclusivity within the sector.

General comments of Spatial Development Strategies

Alignment of SDS Geographies and Governance Mechanisms

The LPDF considers that the effectiveness of SDSs will depend on how closely SDS geographies align with functional housing and economic market areas. Where boundaries do not reflect these geographies, there is a significant risk that unmet housing and employment needs will not be addressed across the wider market area, replicating the shortcomings of previous strategic planning arrangements.

This issue is evident in areas such as the West Midlands, where SDS boundaries do not correspond with the functional housing and economic geography. In these cases, Strategic Planning Boards (SPBs) must have mechanisms in place to ensure that unmet need can be effectively redistributed across the relevant geography. Without such mechanisms, there is a risk that shortfalls will remain unresolved, undermining the purpose of strategic planning.

Currently, the legislative framework restricts each SPB to preparing a single SDS. The LPDF considers that this limitation could constrain the ability of strategic planning to respond effectively in areas with overlapping or misaligned geographies. We therefore urge that consideration be given to allowing SPBs to prepare multiple SDSs or to establish alternative governance arrangements capable of coordinating unmet need across boundaries.

With regards to the West Midlands specifically, we believe there to be three options which MHCLG should consider:

- Amend the West Midlands Combined Authority (WMCA) boundary – While the consultation notes that existing mayoral devolution arrangements will form the basis for SDSs, the WMCA has already begun SDS preparation (CA Board approval July 2025) and has cross-boundary arrangements with adjoining authorities through previous HMA groups. This option may not be favoured immediately but could be considered longer term.



- Establish a Strategic Planning Board (SPB) – Under the Planning & Infrastructure Act 2025, an SPB could cover WMCA plus adjoining authorities in Group 3 and 4 areas. The SPB would act as the Strategic Planning Authority for the SDS, building on WMCA’s existing cross-boundary work without slowing progress.
- Bespoke West Midlands solution – Given the sub-region’s unique circumstances, SPAs could be established around WMCA’s edges with a Government-mandated joint working arrangement to ensure effective strategic planning. This could involve a variation of the SPB model coordinating multiple SDSs rather than a single SDS, addressing gaps in the draft NPPF (Dec 2025, PM10–PM11) for large-scale cross-boundary growth. The WMCA would continue preparing its SDS, while new SPAs work collaboratively to apportion development and infrastructure, providing clarity for examinations and ensuring needs are met across the wider geography.

Ensuring that clear, binding mechanisms are in place to address these geographic and governance challenges is critical. This will help guarantee that SDSs fulfil their intended role: taking difficult strategic decisions, fully addressing housing and employment needs, and supporting coordinated, deliverable growth across wider functional areas.

Learning lessons from the past

A central test of the new SDS system will be whether it successfully addresses the longstanding shortcomings of the Duty to Cooperate. Too often, the Duty to Cooperate resulted in:

- Unmet housing and employment needs being identified but not resolved.
- Strategic issues being deferred or displaced rather than addressed.
- A lack of effective mechanisms to ensure delivery across boundaries.

SDSs must not replicate these outcomes under a different structure. Objectively assessed needs for housing and other uses, including strategic employment uses, must be fully assessed and apportioned at the strategic scale. This is essential to ensure that needs which cannot be accommodated within individual authority boundaries are delivered elsewhere across the wider geography.

SDSs must therefore provide clear and binding frameworks for the redistribution of unmet need, certainty on where development will be accommodated and a mechanism to ensure delivery, rather than deferring these important decisions to a later point in time.

Tackling Strategic Issues

As noted above SDSs must be empowered and required to address the most significant and often most challenging strategic issues. There is a clear risk that, without strong national expectations, strategic plans could avoid politically sensitive decisions or defer them to local plans. The LPDF strongly considers that this would fundamentally undermine the purpose of SDSs and the effectiveness of this new strategic tier of plan making.

Strategic plans must take clear decisions on the distribution of growth and address constraints (including the Green Belt) and trade-offs transparently. It is critical that they ensure that development needs are met in full across the geography. Fundamentally, strategic planning must be the mechanism through which difficult decisions are made, not avoided.



The Importance of Strategic Employment Needs

The LPDF strongly supports the role of SDSs in planning for employment uses that operate at a scale beyond individual authority areas, particularly the storage and distribution sector. The LPDF believe that it is critical that sub regional planning addresses employment issues and needs to the same extent that it does housing needs. These sectors operate across functional economic geographies, require large, well-connected sites and are critical to national and regional economic performance.

Strategic plans will be required to robustly assess and distribute these needs, ensuring that sufficient land is identified in appropriate locations. As noted in our response to the draft NPPF, the LPDF has evidence of many authorities failing to adequately identify and accommodate such needs. Even where robust strategic evidence exists, it is not always reflected in plan-making. For example, the West Midlands Strategic Employment Sites Study (2024) identifies a clear need for additional strategic employment sites and proposes suitable locations. However, this evidence has not been consistently taken into account by local authorities. Through a Statement of Common Ground, 14 authorities across the Black Country FEMA and surrounding areas agreed that plans already at an advanced stage would only consider this evidence at a future review. The effect is to delay site allocation by at least five years, with significant impacts on the cost and efficiency of the logistics sector, lost investment opportunities and reduced economic competitiveness. This illustrates the consequences of a system that lacks effective strategic coordination, which is a gap that SDSs must address.

Plan Timeframes, Monitoring and Review

The LPDF agrees that SDSs should cover a minimum 20-year timeframe, providing a long-term framework for growth and investment. We also support the principle that SDSs should be reviewed and replaced within a maximum of 10 years and that Local Plans should be reviewed and replaced within a maximum of 5 years. This approach strikes an appropriate balance between long-term vision and responsiveness to changing circumstances.

However, the LPDF considers that there should be flexibility in how and when SDSs are updated. Rather than a rigid mandatory alteration cycle, strategic authorities should be able to undertake reviews after a minimum of five years and trigger alterations where there is a significant change in housing requirements, employment land needs or other material factors.

Infrastructure Alignment and Delivery

The effectiveness of SDSs will depend heavily on their ability to align planned growth with infrastructure provision. It is therefore essential that infrastructure providers are fully engaged in the preparation of SDSs from the outset, rather than consulted at a later stage.

Strategic authorities should ensure that infrastructure investment plans are developed in parallel with the spatial strategy, so that the scale and distribution of growth is supported by timely and adequate provision of transport, utilities and social infrastructure. Without this alignment, there is a clear risk that development will be delayed or constrained by insufficient capacity, undermining both delivery and confidence in the plan-led system.

A genuinely plan-led system must therefore be underpinned by infrastructure strategies that are realistic, funded where possible, and clearly linked to the development proposed.



Role and Status of Housing Requirements

The LPDF supports the proposed approach to establishing housing requirements through SDSs and considers that this is a critical component of a more effective strategic planning system. In particular, it is important that SDSs establish the overall housing requirement for the area as a minimum, providing a clear and authoritative basis for local plan preparation. This should remove the need for housing requirements to be re-tested at the local level, which has historically led to delay, duplication and uncertainty.

At the same time, local planning authorities should retain the ability to plan for higher levels of growth where this is justified by local circumstances or ambition. The expectation that local plans should provide indicative housing requirements for neighbourhood areas is also supported, as this will help ensure that housing delivery is distributed appropriately and that all parts of an area contribute to meeting identified needs.

Taken together, this approach has the potential to provide greater clarity and consistency across the system, while still allowing for local flexibility where appropriate.

Setting Clear Strategic Priorities

For SDSs to be effective, they must move beyond high-level vision statements and instead provide a clear and focused set of strategic priorities that meaningfully guide both plan-making and investment decisions.

This requires SDSs to articulate, in a direct and unambiguous way, how growth will be distributed across the area, where key locations for development will be, and how different forms of development, including housing, strategic employment uses and infrastructure, will be brought forward in a coordinated manner.

Without this level of clarity, there is a risk that SDSs become overly broad documents that provide limited practical direction. In contrast, a well-defined set of strategic priorities will give confidence to local authorities, infrastructure providers and the development sector, and will play a crucial role in ensuring that development is delivered in the right locations and at the right time.

Conclusions

Drawing these points together, the LPDF considers that the success of SDSs will depend on a number of core principles being embedded in both their design and implementation.

Above all, SDSs must ensure that development needs, including both housing and employment, are fully addressed across the relevant functional geography. Where SDS boundaries do not align with housing or economic market areas, clear and binding mechanisms must exist to redistribute unmet need, ensuring that strategic shortfalls are resolved rather than deferred or displaced.

SDSs must be grounded in a clear understanding of functional economic geographies and supported by governance arrangements that are inclusive, effective, and capable of making timely decisions. The system should provide sufficient certainty to support investment, while retaining the flexibility to respond to significant changes in housing requirements, employment needs, or other material factors.

Alignment with infrastructure planning and investment is critical, so that growth can be delivered in practice rather than simply planned in principle. SDSs must provide a framework through which difficult strategic decisions are taken, including trade-offs across boundaries, rather than leaving them to local plans or later stages.



In conclusion, the LPDF strongly supports the reintroduction of strategic planning through SDSs and recognises their potential to significantly improve the effectiveness of the planning system. This potential will only be realised if SDSs are genuinely used to address strategic challenges, ensure that unmet housing and employment needs are fully met, facilitate coordinated and deliverable growth, and integrate infrastructure provision from the outset.

We therefore urge the Government to ensure that the principles set out in this response, including robust governance and clear mechanisms for managing functional geographies, are embedded in the final SDS framework. This will enable sustainable growth, support investment, and avoid repeating the shortcomings of previous approaches to cross-boundary planning.

