



Spatial Strategies Team  
Ministry of Housing, Communities and Local Government  
2 Marsham Street  
London  
SW1P 4DF

Date: 26.03.2026

By email only:

[strategicplanning@communities.gov.uk](mailto:strategicplanning@communities.gov.uk).

To whom it may concern

re: Areas for producing spatial development strategies

Thank you for inviting Historic England to comment on the consultation on 'sensible geographies' for Spatial Development Strategies (SDSs). Historic England is the government's advisor on planning for the historic environment, and as such our comments are limited to matters within our areas of interest. Silence on other matters should not be treated as acceptance or support.

SDSs can affect the historic environment in various ways, in particular through the identification of broad locations for strategic development (including infrastructure) and through other policies that promote growth. The latter may, for example, include the use of heritage assets and historic places as catalysts for regeneration and will affect both economic foundation and growth sectors such as repair and maintenance and visitor economy. As such, setting the 'sensible geographies' for SDSs need to include consideration of the functional economic areas and travel to work areas that support industries in addition to the willingness of Councils to work together. We have for example seen that regeneration of historic places such as Barrow in Furness or the growth of the visitor economy in the Lake District is constrained by need for high quality housing for a locally based workforce.

Account needs to be taken of the impact of policies guiding the location of development, as 'hubs' or 'corridors' that include areas of high historic environment sensitivity or opportunity, or that lie in the setting of important heritage assets, including World Heritage Sites. In Historic England's response to the NPPF consultation<sup>1</sup>, we make explicit the need for SDSs to integrate adequate consideration of heritage issues and opportunities, supported by suitable national policy. We do not assume that growth is limited to economic growth but also see opportunity to encompass social and environmental capital, including the public benefits the historic environment can provide for wellbeing and healthy lifestyles.

Preparation of spatial development strategies will need to include regard for the effects they can have for the historic environment, including addressing potential for harm and securing opportunities for benefits. These should include both delivering growth and successful regeneration and place making in historic places. This requires expertise in planning for heritage and the historic environment, including understanding effects for historic buildings and townscape, landscapes, archaeological remains and the historic marine environment. Strategic planning authorities will need access to historic environment specialists, including the conservation and design teams and archaeological advisors within local

---

**Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA**  
Telephone 020 7973 3700 | [historicengland.org.uk](http://historicengland.org.uk)

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: [historicengland.org.uk/privacy](http://historicengland.org.uk/privacy)



authorities. It is essential that the skill and knowledge of these teams are recognised in the necessary skills and function of existing and newly formed local government units. This is likely to require government funding to prepare spatial development strategies to include provision for specialist heritage officer time to deliver this expert input, supported by relevant advice from Historic England and associated training.

Notwithstanding the guidance in the consultation information that National Parks and Broads Authority are not expected to be significant foci of new housing development, we remain concerned that without the right to participate fully in the preparation of Spatial Development Strategies these areas will not be able to influence decisions with regard to delivery of housing, infrastructure and other strategic growth policies in areas for which they are the Local Planning Authority. Through the current programme of Local Government Reorganisation, National Parks and The Broads, will be the only planning authorities who aren't entitled to join the Strategic Planning Board for their areas. This could result in communities in these areas being under-provided with the infrastructure they need, in places where we know there are already pressures on supply of affordable housing. We feel this needs to be reviewed and that guidance should be updated to ensure that the National Parks and The Broads Authority are included as members of Strategic Planning Boards not merely 'engaged' by them. This should reflect the proposed introduction of the 'general competence' for the National Parks and The Broads Authority within the English Devolution and Community Empowerment Bill.

We support the proposal to introduce Spatial Development Strategies as an important part of the Development Plan, providing a strong strategic architecture to planning that will deliver the government's ambitious targets for growth and house building. Historic England remains committed to ensuring that heritage is an enabler of development in this process.

We hope these comments are of assistance in further considering the geographies for forthcoming spatial strategies but would be pleased to discuss matters of heritage planning expertise and training for strategic planning authorities in accounting for heritage in their plans further.

Yours faithfully

Robert Lloyd-Sweet

Head of Devolution and Local Government Policy