

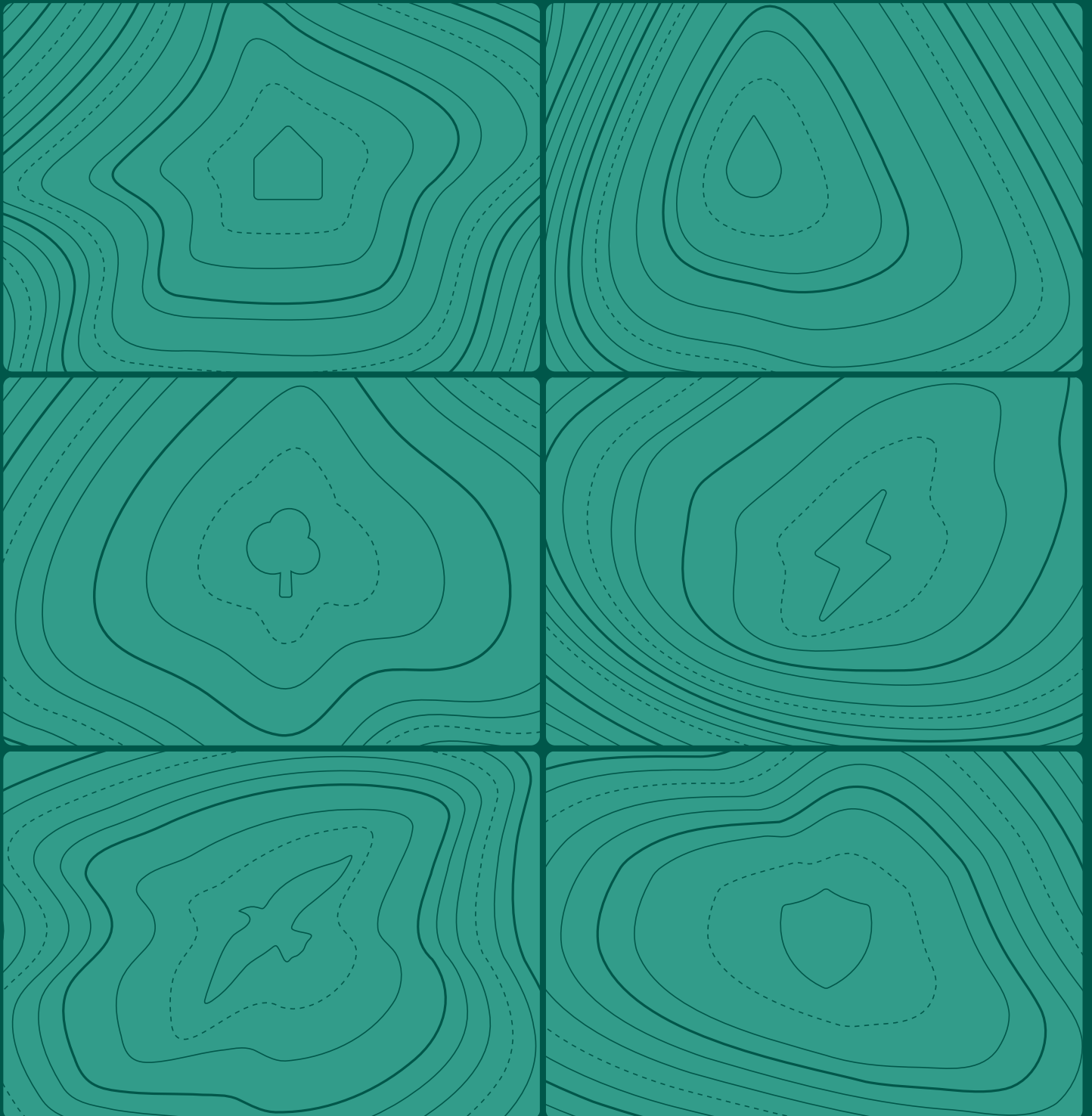
Understanding the tools for integrating land use decision-making

A report for CPRE
Ellie Brodie, Grounded Insight
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YEARS



Campaign
to Protect
Rural England



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Glossary

ADEPT	Association of Directors of Environment, Economy, Planning & Transport	MCA	Mayoral Combined Authority
AGMA	Association of Greater Manchester Authorities	MCCA	Mayoral Combined County Authority
ALC	Agricultural Land Classification system	MHCLG	Ministry of Housing, Communities and Local Government
AMP	Asset Management Period	MSA	Mayoral Strategic Authority
ARP	Adaptation Reporting Power	MtCO²	Metric tonne of carbon dioxide
BMV	Best and Most Versatile	NECA	North East Combined Authority
BNG	Biodiversity Net Gain	NESO	National Energy Systems Operator
CA	Combined Authority	NFM	Natural Flood Management
CCA	Combined County Authority	NPA	National Park Authority
CCC	Climate Change Committee	NPPF	National Planning Policy Framework
Defra	Department for Environment, Food and Rural Affairs	OEP	Office for Environmental Protection
DESNZ	Department for Energy Security and Net Zero	Ofwat	Water sector regulator for England and Wales
DLUMG	Dartmoor Land Use Management Group	RA	Responsible Authority
DTCCA	Devon and Torbay Combined County Authority	RESP	Regional Energy Strategic Plans
EA	Environment Agency	RLUF	Regional Land Use Framework
EIP	Environmental Improvement Plan	SA	Strategic Authority
ELMS	Environmental Land Management Schemes	SDS	Spatial Development Strategy
EMSA	Established Mayoral Strategic Authority	SSEP	Strategic Spatial Energy Plan
FSA	Foundation Strategic Authority	SSSI	Site of Special Scientific Interest
GMCA	Greater Manchester Combined Authority	SWW	South West Water
IWM	Integrated Water Management	TCFD	Taskforce on Climate-related Financial Disclosures
LAEP	Local Area Energy Plan	TNFD	Taskforce on Nature-related Financial Disclosures
LEIP	Local Environmental Improvement Plan	WECA	West of England Combined Authority
LGP	Local Growth Plan	WMCA	West Midlands Combined Authority
LGR	Local Government Reorganisation		
LNRS	Local Nature Recovery Strategy		
LRF	Local Resilience Forum		
LUF	Land Use Framework		
MBA	Mission Based Approach		

Foreword



In 2017 CPRE published *Landlines*, a way-ahead-of-its-time pamphlet arguing for a strategic approach to land and proposing a Land Use Commission to develop it. We make much the same plea again in this report almost 10 years later, but with more force and more urgency. We are running out of land, and we are running out of time to think differently. We need to make different, smarter choices. Mark Twain famously quipped ‘buy land, they’re not making it anymore’. We now need to lead and legislate like land is finite.

CPRE’s interest in an integrated approach to land use didn’t start in 2017; it’s part of our DNA. In our centenary year, it’s worth celebrating the rise in environmental awareness among the public but also acknowledging a century of decline in land quality and the huge loss of land to development, often needlessly. Debates about land use and ownership dominated politics for much of the first half of the 20th century, but a misplaced faith in the idea that the same footprint of land can continue to deliver evermore sidelined the political importance of land. The ‘great acceleration’ in post-war Britain intensified the use of land and natural resources in the name of, among other things, cheap food and energy on demand. We are living with the consequences: nature in freefall, rivers in decline and an ever-diminishing countryside – all arguably by-products of not taking land use seriously.

Thankfully, interest in land stewardship is growing, with a recent House of Lords inquiry, sterling work from the Food, Farming and Countryside Commission, and a report on multifunctional landscapes from the Royal Society highlighting that while we recognise the interconnectedness of the threats, we think about the solutions in isolation. Even current attempts to think strategically about land risk considering land use in silos. One plan for housing, one plan for energy and one plan for nature – as if they weren’t all dependent on the same plot of land. Yet, the shift to think strategically is welcome and as this report demonstrates, there is innovation to be scaled and new thinking to embrace. The government is progressing a Land Use Framework, we are anticipating Regional Energy Spatial Plans, and a consultation has been launched on Spatial Development Strategies – to name three of the spatially driven strategies launched by this

administration. The trick is to think about how we sew these ambitions together and deliver them on the ground.

That was the starting point for this report. Not to question the need for joined-up land use as that case has been made brilliantly elsewhere and is irrefutable. But to think about how we can make it happen. What are the tools that exist already to help make better decisions about land, and what’s missing? We are interested in governance and scale: what is the responsibility of national government to drive this, who is accountable and how do we mobilise the energy of farmers, landowners, planners and citizens who are hungry for change. This report is not a one-off, but a commitment to work on solutions.

We have a window of opportunity for leadership and action. The return of regional planning through the new Strategic Authorities, the Land Use Framework, and other spatial strategies from government all need to break down the silos we’ve become so used to. Making better decisions about land needs a plan, but it’s also about choices. Germany has chosen for 80% of its solar power to come from roofs. Denmark has chosen to underground all power cables by 2030 to preserve landscape value. And the City of Malmö in Sweden has chosen to serve 60,000 free, climate-friendly meals a day to schools, nurseries and care homes. There are plenty of examples closer to home in this report that demonstrate change is possible when it comes to rethinking land use, but isolated examples are not enough faced with the scale of the challenge. A More in Common poll we launched at the start of our centenary year revealed overwhelming support for the countryside and our landscapes. This report is a clarion call not only to think differently about land, but to act on it.

A handwritten signature in blue ink that reads "Roger Mortlock". The signature is fluid and cursive, written in a professional but personal style.

Roger Mortlock
Chief Executive, CPRE

Summary

Demand has never been higher on England's finite land, with 1.5 million new homes planned during this parliament alone, in the context of a changing climate. Yet decisions on land are not integrated, creating ever-more pressure on this finite resource. The current policy context in which land use decisions are being made is undergoing change at pace with major implications for England's cities, towns and countryside. This research speaks to the challenge and considers the tools that enable integration of land use decision-making across sectors and scales.

With a keen eye on the English devolution agenda, the research looks through the lens of three Combined Authority (CA) case studies and selects six land use decision-making tools which can operate at this, and the future Strategic Authority (SA), level.

CASE STUDIES

Greater Manchester Combined Authority (GMCA) is the most established CA of the case studies. Key enabling tools include a history of joint working, access to deeper devolution funds and powers, mayoral leadership and the adoption of a mission-based approach to growth. Pioneering data and spatial mapping tools and an ecology unit within GMCA with capacity for research and policy development have further supported integration.

As a rural innovation trailblazer and as part of its deeper devolution deal, the North East Combined Authority (NECA) commissioned a Rural Taskforce and an Environment, Coastal and Rural Investment Plan. The potential for integrating land use decision-making is significant: most of NECA's constituent local authority local plans are being developed at the same time as the three Local Nature Recovery Strategies (LNRS) and its Spatial Development Strategy (SDS).

The composition of Devon and Torbay Combined County Authority (DTCCA) may change as the region is undergoing local government reorganisation (LGR). Within the region, Dartmoor is a test bed for integrated land use decision-making through the Dartmoor Land Use Management Group, which is tasked with creating a regional Land Use Framework.

TOOLS FOR INTEGRATING LAND USE DECISION-MAKING

Six tools for making and integrating decisions about land use were the focus of analysis, all of which are operable at, or have potential to be operable at, the CA and future SA level.

TOOL 1 **Spatial Development Strategies**

SDS will reintroduce regional spatial planning and are central to the government's commitment to delivering 1.5 million new homes. SDS could integrate land use decisions across numerous policies, but the links and delivery mechanisms need to be made clearer. Uneven potential across places to use the power of SDS as an integrative tool for land use decision-making means their ambition will be subject to local circumstances. This raises questions around uneven distribution of power, resources, experience and maturity across SAs.

TOOL 2 **Regional Land Use Frameworks**

In England, there are limited examples of multifunctional regional land use frameworks. Dartmoor Land Use Management Group (DLUMG) is tasked by the government to create a multifunctional land use framework. Cornwall Council commissioned a land use study to respond to local political concerns about the loss of productive agricultural land to solar farms, and of the visual impact of solar farms. In both cases, a strong mandate, clear scope and solid leadership have enabled the development of regional land use studies which are intended to lead to land use decision-making frameworks. Issues were identified with data and spatial mapping, how regional and the national land use framework align, and with delivery mechanisms.

TOOL 3 **Local Nature Recovery Strategy**

Local Nature Recovery Strategies (LNRS) are statutory, spatial strategies for England. LNRS could be a powerful integrative tool for land use decision-making because they are a statutory requirement, based on consultation, include an evidence base, link to national legal targets and will cover the whole of England. Barriers to realising their potential include legislative gaps, missing connections between LNRS and other spatial plans and priorities, variability between LNRS and the absence of a delivery mechanism.

TOOL 4 **Integrated Water Management**

While there is currently no mandated role for CAs in the water environment, several are taking action and showing their potential role in integrating water into land use decision-making. Greater Manchester has been leading the way in integrating the management of water at a regional level through its Integrated Water Management (IWM) approach. NECA plans to develop an Integrated Water Management Plan and is looking to ensure that its SDS covers water and flooding. SDS could overlay flood data with local nature recovery data to see where simultaneous benefits could be delivered and where land could be allocated flood mitigation or water attenuation through nature-based solutions such as wetland creation.

TOOL 5 **Regional Energy Spatial Plan**

There is a lack of join up and clarity between local plans and the roles and methods of integration of spatial planning and energy planning, with the local plan system having failed to meet large-scale infrastructure needs. SDS have potential to aid strategic spatial energy planning but energy is missing from the responsibilities of SAs in the Devolution Bill. Some CAs including the West Midlands and North East are nonetheless taking action to integrate spatial energy planning in their SDS development.

TOOL 6 **Climate Adaptation Reporting Power**

The Climate Change Act 2008 allows the government to invite infrastructure providers and public bodies to report on climate risk management, i.e. the Adaptation Reporting Power (ARP). Under an ARP pilot scheme, the West of England Combined Authority proposes a funded statutory responsibility for MCAs to monitor, evaluate and have strategic overview of climate resilience within the region. NECA intends to produce a North East Climate Adaptation Plan. The Devolution Bill includes no duty, powers or responsibilities for SAs on climate.

RECOMMENDATIONS

The countryside is loved across generations and across political party lines. All political parties should commit to achieving these recommendations so momentum on integrating land use decision-making is maintained.

Our recommendations focus on how England can move toward genuinely integrated land use, both in policy and in practice. At the heart of the problem is the lack of a long-term, coherent, overarching plan for land, which is demonstrated by the proliferation of strategies and targets that rely on land use change and have spatial impacts but which are developed and implemented in isolation. In the absence of this plan, we recommend that the relationships between existing strategies and plans be made clearer and more coherent.

The Devolution Bill must be strengthened to unlock the potential of rural areas, safeguard environmental resilience and support balanced and democratic development across the whole of the country. In tandem, the delivery mechanisms that make integrated land use possible, from funding arrangements to workforce capacity, must be developed and aligned.

RECOMMENDATION 1

Land use taskforce and plan

- England needs a long-term, coherent, overarching plan for its land. This should be developed through a national conversation, convened and overseen by a time-limited cross-departmental taskforce, and implemented through aligned statutory delivery mechanisms. This land use plan should direct all other sectoral and geographically specific plans and include clear delivery mechanisms. Responsibility for overseeing delivery should sit as an ongoing responsibility within the Cabinet Office.

RECOMMENDATION 2

Achieving universal coverage

- In the absence of a national land use taskforce and plan, a national spatial framework should be created by the Cabinet Office which articulates how all national sectoral spatial plans connect.
- SAs should be given responsibility in the Devolution Bill for overseeing spatial strategy coordination in their area.



Image credit: Lightworks Media / Alamy

RECOMMENDATION 3

Environment as first infrastructure and enabler to growth

A resilient and naturally functioning environment is a key enabler to economic growth and the bedrock of economic growth for future generations, yet biodiversity and ecosystem services are in steep decline.

- The Devolution Bill should include a ‘Duty to contribute to delivery of nature, clean air and climate targets’ in the Environment Act, Climate Change Act and Air Quality Regulations. Local Environment Improvement Plans should be a requirement of SAs and linked to delivering the national Environment Improvement Plan and this Duty.
- Local growth plans, as the guiding star for the SDS, should be mandated in the Devolution Bill and in any accompanying guidance to include priorities and projects for economic growth which secure environmental resilience.

RECOMMENDATION 4

Address gaps in legislation and guidance

- The Duty to Collaborate in the Devolution Bill is vague and will apply only to MSAs. This risks many gaps in spatial planning and should be addressed, for example, by extending the Duty to all Strategic and other Local Authorities.
- The relationship between the Land Use Framework, NPPF and SDS also needs clarifying, through changes in the NPPF.
- LNRS should identify wider environmental benefits alongside nature recovery so that the existing legal duty for public authorities to have regard to LNRS, and new requirements for LNRS in the revised NPPF, can be used to best effect.
- The importance of rural areas in providing the natural resources to mitigate and adapt to climate change is a gap in the Devolution Bill and existing provisions such as the community right to buy and neighbourhood governance structures should be strengthened.

RECOMMENDATION 5

Balance risks of uneven place-based development

Combined Authorities have different levels of maturity, capacity, power and resource; some of which will be formalised and will deepen with the passage of the Devolution Bill. An uneven pattern of regional power and development is emerging in England, which risks further empowering some areas and widening regional inequality, including of peripheral and rural areas.

- Government should undertake and make public its assessments of the risks and unintended consequences of developing different spatial and functional geographies and mitigate these risks.

RECOMMENDATION 6

Adapt powers in Devolution Bill to widen impacts

Powers in the Devolution Bill could be expanded and adapted to make them more applicable and impactful beyond urban areas, for example:

- SAs could use the powers of compulsory purchase and/or set up a natural asset company to purchase land for nature recovery and climate resilience.
- EMSAs’ convening powers could be used to create more integration on land use, alongside powers to appoint commissioners, one of which could be dedicated to integrating spatial policies and achieving multifunctional land use.
- The Duty to Collaborate is poorly defined and could be amended in the Devolution Bill to more effectively leverage collaboration on land use decision-making across boundaries.

RECOMMENDATION 7

Create a shared, accessible and interoperable evidence base

Issues of siloed decision-making on land use are mirrored in sector-specific evidence and data sources and platforms.

- The government, including MHCLG and Defra, should provide SAs with better access to open data and citizen science through a framework which links data sets and enables sectoral data, and data at different scales, to be used in creating SDS.

RECOMMENDATION 8

Create and align delivery mechanisms for a more system- and place-based approach

Delivery mechanisms for land use change and integration need to be developed and aligned.

- SAs should pool resources and funds to enable greater potential to spatially target finance (e.g. ELM, BNG), match private finance and deliver strategies, i.e. the Local Environment Improvement Plan (see Recommendation 3), SDS, LNRS, climate adaptation strategies and rural development strategies.
- Funding should be provided to SAs to deliver a particular duty or requirement, such as for the Adaptation Reporting Power and the proposed Duty to contribute to delivery of nature, clean air and climate targets (see Recommendation 3).
- Issues of capacity and capability across all levels of the workforce in all institutions charged with the responsibility to deliver land use change and integration need addressing.

Background

England is running out of land. Demand has never been higher, with 1.5 million new homes planned for this parliament alone: homes that need supporting with water and energy supplies, access to green space, and digital and transport infrastructure. The changing climate is forcing us to rethink how and where we grow food and timber, how we manage drought and flooding, and how we protect and restore nature. Ensuring England's finite land resource is resilient, productive and secure for future generations has never been more urgent.

Although the demands on land are deeply interlinked, government responses remain fragmented. The systems, tools and institutions needed to connect priorities and actors – across developers, landowners and managers, researchers, practitioners and policymakers – are either absent, underused or poorly aligned. Policies with spatial implications – from energy and housing to major infrastructure and water resources – are being developed at pace and out of sync.

This research speaks to the challenge, and asks whether there are enablers, or tools, that support integration: horizontally across sectors and policy objectives, and vertically across local, regional and national levels of government. It finds that existing land use decision-making tools are not fit for this challenge. They fail to support joined-up decision-making, provide no clear mechanisms for managing trade-offs, and offer limited incentives for delivery. It shows that most decisions about land use reflect and reinforce siloed policy priorities and a binary view of land, particularly the separation of town and country embedded in the planning system.

But, despite these challenges, the research also shows encouraging signs of change. The policy environment is busy, ambitious and evolving, with emerging opportunities to support more integrated and multifunctional land use in spatially explicit policymaking. The reintroduction of regional spatial planning through Spatial Development Strategies, for example, has the potential to reshape how land use decisions are made across wider geographies. The Land Use Framework, due to be published at the time of writing, aims to improve understanding of where land is best suited for different uses and how this aligns with land use change scenarios. Together, these developments are opportunities to start to do and think differently – if their potential is fully realised.

This report builds on our sister publication, *Delivering better integrated land use decision-making: evidence review*,¹ which highlighted how siloed working, conflicting priorities, policy uncertainty, and poor coordination between national, regional and local government undermine effective land use decisions. That review showed how fragmented governance across housing, infrastructure, agriculture and the environment – operating at different spatial scales and along mismatched administrative and ecological boundaries – threatens productive farmland, dearly-loved landscapes, and environmental outcomes. It also identified how a wider centralisation of power and policy limits the ability of governance structures to prioritise environmental outcomes, manage competing land demands, and deliver coherent land use change. The result is opaque decision-making, reduced accountability, and a failure to address trade-offs transparently and strategically.

This report responds by adopting a place-based lens, focusing on how land use decision-making could be better integrated at the regional level to reflect and deliver priorities, from housing delivery and nature recovery to reaching net zero and adapting to climate change. It examines land use decision-making both horizontally across sectors and vertically across levels of governance, with a particular focus on the regional, Combined Authority (CA) level. It asks whether the tools to enable integration and multifunctionality exist and showcases a set of emerging and existing tools that have potential to support integrated land use decision-making at the regional scale.

The risks of maintaining the status quo are unequivocal and our research underscores the urgent need for a step change in land use decision-making across the board – one that recognises and prioritises the natural systems and finite resources that underpin communities, livelihoods and the economy. Our recommendations chart a course to drive action – by improving how existing and emerging policies are introduced and implemented now, and by laying the foundations for more fundamental systems change in the future.

About the research

This research focuses on issues around the governance of land use decision-making at the regional level, looking through the lens of the Combined Authority to highlight potential opportunities for leveraging change.

The research aims to:

- highlight and connect national, regional and local land use requirements, opportunities and threats
- identify national, regional and local governance and accountability mechanisms for land use decision-making
- identify land use decision-making tools in use and those needed by CAs to integrate land use decision-making
- identify and share best practice on integrated land use decision-making
- identify gaps and challenges, and make recommendations on overcoming these

Three areas – Greater Manchester, the North East and Devon – were selected for in-depth qualitative research, to understand differences between CAs, including mayoral and non-mayoral (see Table 1); new and well-established CAs; with areas which reflect varied land use opportunities and threats. In total, 35 people were engaged in interviews for this research report (see Acknowledgements).

Interviews were conducted with people working and/or volunteering in the areas which form the three case studies of Greater Manchester Combined Authority (GMCA), North East Combined Authority (NECA), and Devon and Torbay Combined County Authority (DTCCA). Interviews also took place with national and local area experts to explore issues such as the potential integrating role of Spatial Development Strategies, and of local land use studies and initiatives.

The report considers six land use decision-making tools:

- Spatial Development Strategy
- Regional Land Use Framework
- Local Nature Recovery Strategy
- Integrated Water Management
- Regional Energy Spatial Plan
- Climate Change Adaptation Reporting Power

These tools were selected by analysing interviews to create a longlist of ‘tools’ which were then categorised and shortlisted according to the following criteria:

- operability at the CA and future SA level
- potential to integrate land use decision-making and affect change
- sector (i.e. to illustrate tools across different sectors)
- potential for lessons to be learned in other contexts (e.g. areas and/or sectors)
- how the tools were mentioned in interviews (e.g. frequency and level of reflexivity)
- are strategies, plans or frameworks
- can draw on or encompass several tools

Conducting research of this breadth of scope, across organisational, geographical, sectoral and professional boundaries, brought challenges. Many interviewees initially felt that they were not experts or had little to offer because they ‘only’ knew about their local area or sector. This speaks to the fact that the operating context for land use decisions is both sectorally and geographically siloed – and why it demands greater focus, especially from decision-makers and policymakers.

The challenges and recommendations in the report show the art of the possible, both in future and right now, with the tools we have on the table. There is still time – just – to make changes, be ambitious and do things differently. Our recommendations are both practical and aspirational and underscore the risk of inaction and further delay.

Land use decision-making in context

The current policy context in which land use decisions are being made is undergoing considerable change at pace and across sectors and levels of government, with major implications for England's cities, towns and countryside.

Shifting power and boundaries: devolution and local government reorganisation

The policy environment affecting land use decision-making is extremely active at the time of writing. The **English Devolution and Community Empowerment Bill** ('Devolution Bill')² is making its way through Parliament, setting the expectations for **Spatial Development Strategies** (SDS) which mark the reintroduction of regional spatial planning since it was abolished in 2011.

Under the Bill, a new category of authority, the **Strategic Authority** (SA) will be created in law and will fall under three types:

- **Foundation Strategic Authority (FSA):** Available to those areas without an elected mayor, Foundation Strategic Authorities will have limited devolution. Combined Authorities and Combined County Authorities will automatically be designated as this, for example, Devon and Torbay Combined County Authority.
- **Mayoral Strategic Authority (MSA):** Mayoral Combined Authorities (MCA) and Mayoral Combined County Authorities (MCCA) will automatically begin as this unless they have been designated as Established. For those with an elected mayor, a range of powers will be devolved.
- **Established Mayoral Strategic Authority (EMSA):** for MSAs which satisfy additional governance requirements, unlocking access to further devolution, notably the Integrated Settlement.

The passing of the **Planning and Infrastructure Act** in December 2025 and changes underway to the National Planning Policy Framework (NPPF) and Planning Practice Guidance include scope, content and process for preparing SDS, as well as changes to Biodiversity Net Gain (BNG).

Local Government Reorganisation (LGR) is underway, bringing changes to boundaries and responsibilities for land use planning decisions and the expansion of SAs which will be responsible for SDS creation. The government has stated its ultimate ambition to have all areas of England covered by MSAs, comprising several unitary authorities.

Economic growth alongside rural and environmental challenges

The Government's top priority is economic growth, with the national **Industrial Strategy** being a critical part of delivering the growth mission. The UK Government published a **Critical Minerals Strategy**³ in November 2025, highlighting critical minerals as foundational inputs to sectors driving the Industrial Strategy. The South West and the North East, two areas of focus in this research, are noted as regions with critical mineral strengths which could see an 'industrial renaissance' through the mining, processing and recycling of critical minerals. The Devolution Bill includes a requirement on MSAs to produce a **Local Growth Plan** – a 10-year strategic framework for growth in their region which helps to deliver the Industrial Strategy.

A resilient and naturally functioning environment is a key enabler to economic growth and the bedrock of economic growth for future generations, yet biodiversity and ecosystem services are in steep decline.⁴ The independent regulator, the Office for Environmental Protection (OEP), has recently warned that economic growth cannot be pursued at all costs, with nature's recovery a prerequisite for prosperity, health and wellbeing.⁵ This is in the context of the government remaining largely off-track to meet its environmental targets, including legally binding targets set in the Environment Act 2021. At regional level, some **Local Nature Recovery Strategies** (LNRS) have been created, and the government has stated its expectation that SAs will become responsible for overseeing LNRS.

At regional level, there are key omissions from the **Devolution Bill** on the environment – with no duty on SAs to contribute to delivering net zero and biodiversity obligations, as per the national **Environment Improvement Plan (EIP)**, **Climate Change Act (CCA)** or the forthcoming **Strategic Spatial Energy Plan (SSEP)**⁶ and associated Regional Energy Strategic Plans (RESPs). With the **Water White Paper**, a new model of regional water governance is expected which will have further spatial implications.

The model for English devolution in the Devolution Bill has raised concerns from **countryside and rural interests** for being modelled on the Greater London Act.⁷ This inherently favours a view of economic development which is urban-centric and which misses the unique and specific needs and economic potential of market towns, rural areas and rural communities. The importance of rural areas in providing the natural resources to mitigate and adapt to climate change is a related gap in the draft legislation.

The **Land Use Framework (LUF)** is expected to incorporate and link policies and strategies including the EIP, the forthcoming 25 Year Farming Roadmap and the Planning and Infrastructure Act, and release data and analysis on land use change scenarios. While there are no anticipated implementation mechanisms, the LUF should form a core part of the data and evidence base for other spatial policies, notably Spatial Development Strategies.

Environmental Land Management Schemes (ELMS) are a key financial tool for farmers and land managers to deliver environmental outcomes, but have been delayed and subject to funding restrictions. At the same time, prime farmland is increasingly being developed with renewable energy.⁸

It is increasingly clear that there is an urgent need for tools to effectively protect, manage and integrate land use decisions.

Sequencing and delivery issues

There are many opportunities for making coherent land use decisions in the current policy context, some of which are highlighted above. The sequencing and delivery of these different sectoral and spatial plans at present, however, is confused and disjointed. Some more established CAs, for example, have started development work on their SDS before the publication of the Land Use Framework. Some areas have released their LNRS while others are lagging, creating uneven coverage across England.⁹ Some areas are undergoing upheaval through Local Government Reorganisation, delayed mayoral elections and unknown boundaries and powers of their future SA.

Case Studies

Strategic Authorities will have a range of statutory functions and enablers available to them under the Devolution Bill of relevance to land use and management. Some of these powers, such as planning and housing, have a spatial element and implications for land use decision-making. Others, such as adult skills provision, could be a potential enabler for land use integration, through upskilling the workforce in holistic land use thinking. The duty for SAs to reduce health inequalities in their area is a consideration cutting across land use policy, for example, through the provision of accessible green space and through improving air and water quality.

Table 1: Powers available to SAs, MSAs & EMSAs

Policy area	Statutory function	Type of SA
Housing & strategic planning	Duty to produce a Spatial Development Strategy	All SAs
	Housing & land powers, concurrent with Homes England	All SAs
	Housing & land powers, concurrent with local authorities	All SAs
	Mayoral Development Corporations: statutory corporate bodies which can take broad planning and land assembly powers, can attract inward investment, and are well placed to harness private sector expertise to drive forward development	MSA & EMSA only
	Strategic development management powers: enables Mayors to intervene in planning applications of potential strategic importance and the ability to call in these applications	MSA & EMSA only
	Mayoral Development Orders: allow mayors to grant pre-emptive planning permission for a particular development	MSA & EMSA only
Economic development & regeneration	Duty to produce a local growth plan	MSA & EMSA only
	Mayoral Council Tax Precept: allows Mayors to issue a precept to generate revenue across all Mayoral and CA/CCA functions	MSA & EMSA only
Transport	Local Transport Authority functions, including preparing a local transport plan	All SAs
Health	Duty to have regard to the need to improve the health of people in the area and to reduce health inequalities in area	All SAs
Adult skills and education	Powers to shape local skills provision including devolution of the Adult Skills Fund	All SAs

The case studies represent different stages of devolution, varied geographies, histories, socioeconomics and land use challenges and opportunities. Table 1 outlines the powers available to SAs, MSAs and EMSAs. The tools for integrated land use decision-making that each area has utilised to date reflect their unique and shared circumstances, histories, and, naturally, their distinct land use challenges and opportunities. Nonetheless, there are lessons learned from each and cross-cutting themes.

In addition to the powers in Table 1, MSAs will have additional general powers and enablers made available to them through the Devolution Bill including:

- a Power to Convene and a Duty to Respond, enabling Mayors to convene local partners to address local challenges, and place a duty on local partners to respond to a Mayor’s request when they make use of the power to convene.

- a Duty to Collaborate, ensuring that Mayors of neighbouring SAs have a formal process by which they can enter into collaboration with one another.
- the Bill provides for a mayor to appoint up to seven commissioners, with each one working in a different area of competence. These will not be members of the authorities. Mayors will be responsible for determining the portfolios of commissioners and will be able to delegate functions to a commissioner.
- Established Mayoral Authorities are further enabled to ask for further devolved powers from Government to deliver within their areas of competence through the Right to Request.

CASE STUDY 1

Greater Manchester Combined Authority

The ten councils of Greater Manchester Combined Authority (GMCA) – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan – have a long history of working together. Starting in 1986 with the creation of the Association of Greater Manchester Authorities (AGMA), in 2011, GMCA, the UK’s first CA, was created – and since 2017 the city region has been led by an elected Mayor. It is an EMSA with long history of joint working, strong leadership and institutional capacity. In 2022, GMCA was crowned “the undisputed pioneers of English devolution” by a Local Government Association (LGA) Peer Review panel.

In April 2025, GMCA received its first Integrated Settlement from the Government as part of its latest devolution deal, giving it greater flexibility over how it spends £630m of its £3bn budget in areas including housing, transport and skills.

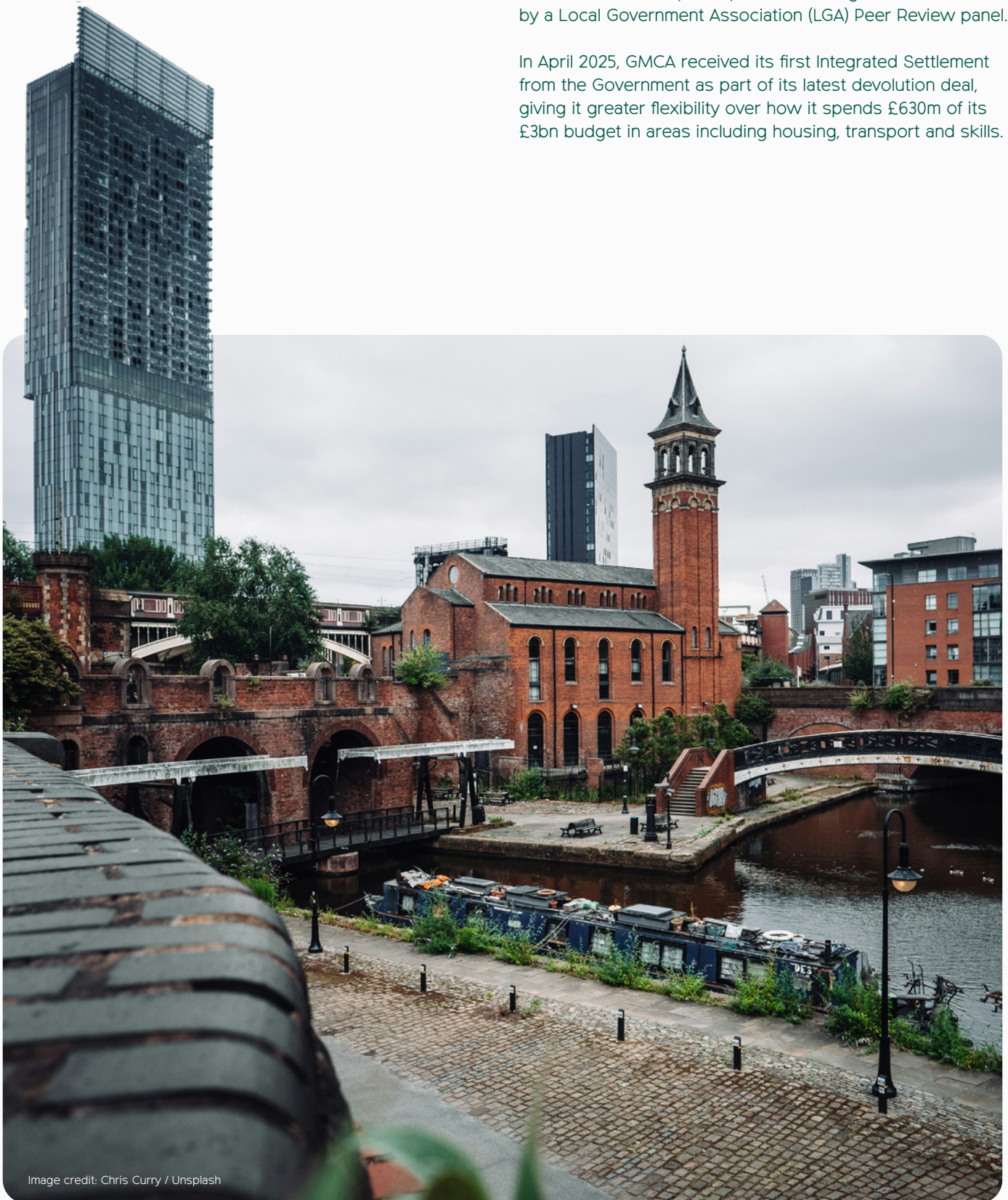


Image credit: Chris Curry / Unsplash

Economy and housing

Greater Manchester's economy is thriving – with productivity growth outpacing the national average and more foreign direct investment than any region outside London. An international centre for business finance and professional services, it has a strong digital, low carbon, advanced materials and manufacturing sectors and has the largest tech cluster outside London. It is a top visitor economy, has five universities and is internationally known as a sporting capital and for its creative, digital and media industries.¹⁰

Land for 170,000 new homes by 2039 is needed,¹¹ with 75,000 new homes in this parliament.¹² CPRE's State of Brownfield 2025 report found that local planning authorities such as Trafford in Greater Manchester have strong potential to meet housing delivery targets on brownfield land, but much of this land currently lacks planning permission.¹³ Since 2020, Greater Manchester has invested £135.4m from the Brownfield Housing Fund (BHF) to redevelop brownfield land – with an extension to its "Trailblazer" deeper devolution deal in 2023 extending the BHF to accelerate building new homes.¹⁴ 250 potential sites have been identified for ground mounted solar PV installations, covering nearly 5,500 hectares (ha).¹⁵

Greater Manchester's rural hinterland

The city region also has a significant rural hinterland, with around 32% of its land used for agriculture. It includes part of the Peak District National Park, and the North Pennines National Landscape. Greater Manchester has 15,000ha of upland peatlands, 90% of which are in poor condition and emitting around 60,000 tonnes of carbon dioxide per year; and 5,000ha of lowland peatlands, over half of which (55%) are intensively farmed. Wildfires are an increasingly pressing concern, with the region experiencing over 30,000ha of burnt land (compared to 11,000ha in Lancashire).¹⁶

The region's waterways and water bodies have been heavily modified, built over and buried or piped through its urban areas, with high levels of discharge from sewage overflows and much of the region highly susceptible to flooding. A reduction of 20% per person in water consumption is needed by 2038 to achieve sustainable water abstraction levels. In Greater Manchester, 11% of land is protected for nature and while two new sites have recently been designated, areas of protected sites are highly fragmented and are being lost with just 5% of Sites of Special Scientific Interest (SSSI) in 'favourable' condition.¹⁷

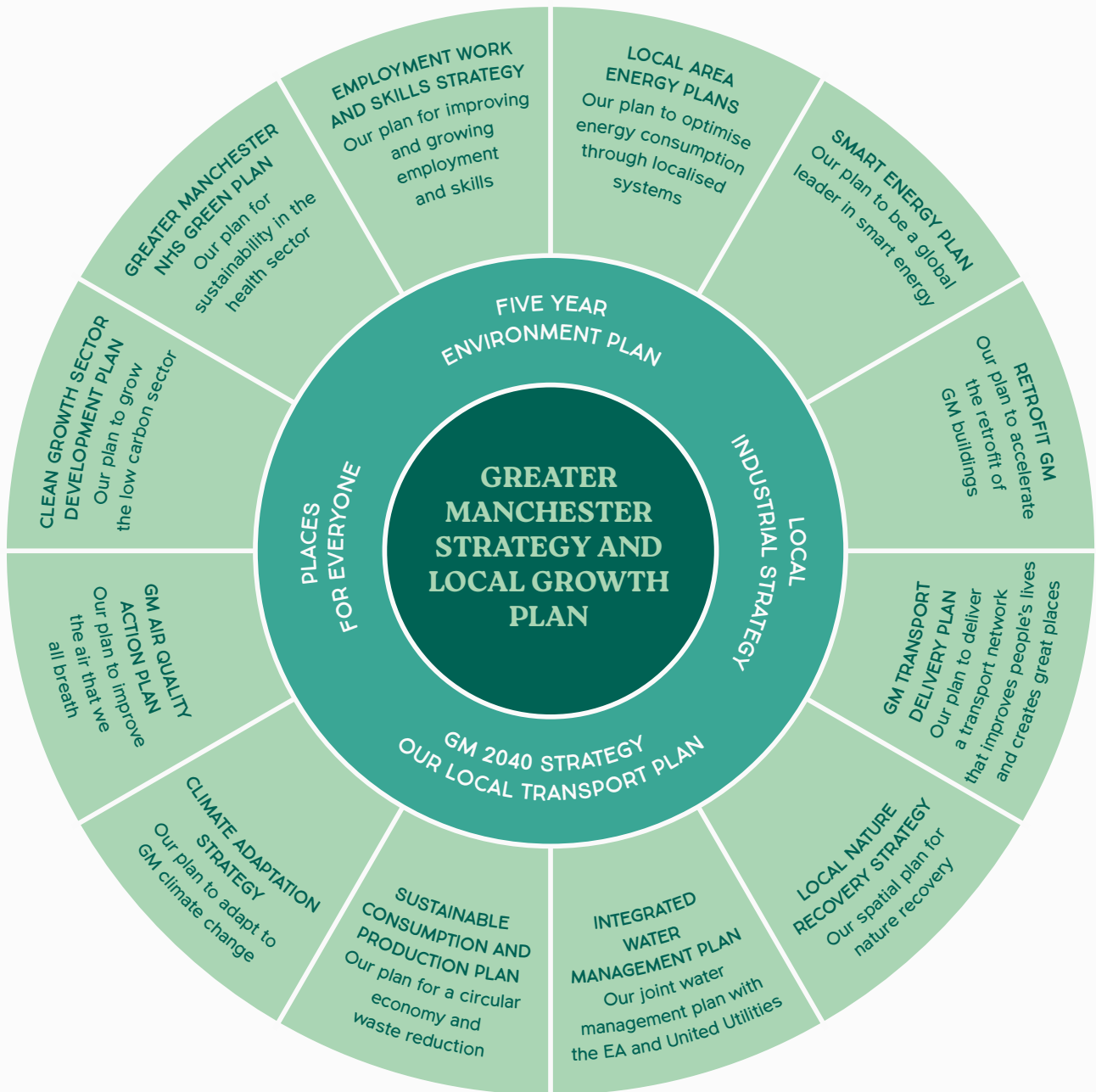
Integrated, mission-led strategic approach

Since 2018, GMCA has collaborated with UCL's Institute for Innovation and Public Purpose (IIPP) to embed a mission-based approach (MBA) into the city-region's clean growth strategy – driven by the GMCA goal to be carbon-neutral (net zero) by 2038.¹⁸ The MBA has meant developing long-term, high-level missions to enable a stable long-term policy landscape and aligning thematic strategies.

The IIPP informed GMCA's first 5-Year Environment Plan (2019 – 2024) and Local Industrial Strategy. These two plans sit alongside Places for Everyone (PfE) and the Local Transport Plan, beneath the Greater Manchester Strategy (GMS) which sets out the economic plan for the city-region, with a headline of delivering 'greener, fairer, and more prosperous city region' (see Figure 1). GMCA's access to the funding from the Integrated Settlement may act as a further boost for delivering the mission-based approach to growth.

'[Previously] it's been quite piecemeal. So you get to access pots of funding from central government and it's also on a business case-by-business case basis and... it feels a little bit hand to mouth. Whereas now in Greater Manchester... they have got an Integrated Settlement [which] enables them to develop their pipeline and understand actually where to get the best bang for their buck because they can plan more effectively [and which] probably brings in investment by default.'

Figure 1 – Redrawn from GMCA Five Year Environment Plan 2025-2030.¹⁹



Environmental policies and initiatives in Greater Manchester

The second Greater Manchester Five Year Environment Plan 2025–2030 (5YEP)²⁰ delivers on the greener element of the GMS and is overseen by the Green City Region Board and Partnership (GCRP), chaired by a councillor and including cross-sector representation. Four ‘challenge groups’ – Low Carbon, Sustainable Consumption and Production, Natural Capital, and Communications – are overseen by GCRP and report into GMCA on their targets. Many sectors and organisations attend the challenge groups – from the NHS and Transport for Great Manchester to United Utilities and a range of NGOs. This means cross-sector conversations are happening at city region level, and the mayor has sight of them. The Natural Capital Group is the Local Nature Partnership (LNP) for Greater Manchester – in this sense it ‘rides two horses’ as the LNP and being part of the CA.

‘We’ve got a brilliant track record of delivering the last five year [environment] plan because Manchester’s really got this mission-led approach and, you know, we delivered. But this raises the game and we’ve got to up our game if we’re going to deliver it and we can’t do that without resources.’

The GMCA provides resource to the Greater Manchester Environment Trust – the UK’s first regional environmental impact fund – which funds environmental community projects through the Green Spaces Fund and is funded by a Mayoral precept. Greater Manchester has a Natural Capital Investment Plan, the creation of which was funded by a 10-year EU LIFE Project called Natural Course. Greater Manchester Ecology Unit (GMEU) provides shared services to all 10 councils, providing ecological advice and support on planning applications. GMEU also has some policy and

strategic capacity, for example in creating the Greater Manchester State of Nature Report²¹, leading on the Greater Manchester LNRS, and doing strategic work on Biodiversity Net Gain through Greater Manchester councils pooling their additional burdens funding for biodiversity net gain to provide this capacity.

Joint Development Plan: Places for Everyone

Nine of the ten GMCA councils produced a single long-term plan in place of their individual local plans to determine the kind of development that takes place in the region. Called the Places for Everyone (PfE) plan, it is a Joint Development Plan Document (JDP) – not a Spatial Development Strategy (although GMCA had the power to create an SDS), nor a Mayoral Plan. Adopted in 2024 and running until 2039, PfE allocates sites for 175,000 houses, commercial and industrial uses. It also releases approximately 2,210ha of Green Belt, a reduction of 4.1%.²² The initial proposal for Green Belt release was 5,000ha, which CPRE was instrumental in evidencing to be unnecessary with the Save Greater Manchester Green Belt Group (over 40 local groups) and which resulted in the reduction of Green Belt loss to the 2,210ha figure.

PfE took around a decade to be adopted from when the original concept, the Greater Manchester Spatial Framework, was initiated. Factors affecting the timescale included the release of Green Belt which was met with considerable opposition²³ and the ultimate withdrawal of Stockport from the Plan, and the requirement to have sign-on for all the local planning authorities. It is perhaps remarkable that nine of the ten councils did reach agreement on PfE given it is a JDP and allocates sites for development, unlike the more high-level SDS.

Several enablers for the passing of PfE include the long history of joint working in Greater Manchester, the structures of regular meetings across all levels and

between officers and councillors and, critically, strong data and mapping tools. Mapping GM houses several maps alongside its core map, including a PfE policy map (including allocations and Green Belt), the Integrated Pipeline (which underpins the Local Growth Plan with information on transport, water, energy, growth locations, planning and development and more), Climate Risk and Vulnerability (including flood risk and heat risk, social vulnerability and assets) and Nature Network.²⁴

'The MappingGM tool was key and useful... If you have access [to a computer], it is a relatively easy tool to use. You can toggle layers on and off and can see before and after – a member of the public can use it. We were pioneering in Greater Manchester for that.'

'In my view, GMCA carried out a thorough consultation [on PfE] on the evidence base and started with a mapping layer of the blue/green infrastructure assets to guide opportunities and threats from future land uses. I liked the GM open data mapping – lots of useful layers for brownfield sites and planning policy protection, akin to a mix of Defra Magic and gov.uk planning map. I have since recommended that MHCLG copy this example.'

GMCA: summary of key enablers for integration

Key enabling tools for integration in GMCA include a history of joint working, access to deeper devolution funds and powers, and mayoral leadership. These have enabled integration across sectors and the adoption of a mission-based approach to growth which is reflected in two key strategies with land use implications – its Five-Year Environment Plan and its Places for Everyone Joint Development Plan. Pioneering data and spatial mapping tools and an ecology unit within the CA with some research and policy development capacity have been key enablers to integrating land use planning and decision-making.



Image credit: Anthony Devin Photography / Alamy

CASE STUDY 2

North East Combined Authority

The North East Combined Authority (NECA) formed in 2024 with a devolution deal that included transport investment, new powers in housing and transport and an elected mayor. It is an EMSA with seven constituent councils: City of Newcastle, Durham, Gateshead, Northumberland, North Tyneside, South Tyneside and Sunderland. Its first mayoral elections were in May 2024.

Economic potential

NECA is currently the second largest mayoral authority by area with around 2 million residents. It has four universities, three deep-water ports and an international airport, with a large manufacturing sector including automotive, centred around Nissan, and rail, centred around Hitachi. Key growth sectors include offshore wind and energy transition; advanced manufacturing including electric vehicles, creative industries and content; life sciences, pharmaceuticals and process industries; tech, digital and AI; and defence, security and space. It is an increasingly important region for green energy and tech, for example Sage, Atom Bank, and a £10bn hyperscale data centre under development in Northumberland.²⁵



Image credit: David Ward / Dreamstime.com



Image credit: Ian Ward / Unsplash

Socioeconomic challenges

The region has the lowest Gross Disposable House Income in England and the lowest Gross Domestic Product per head by UK region. It has a relatively low number of businesses per head compared to other regions of the UK, although the share of high growth firms is in line with national averages. Much of the North East economy relies on lower productivity sectors including manufacturing and public sector, the NHS being the largest employer in the region. Educational attainment and adult skills are below the national average, economic inactivity is the highest in the country, more children live in low income families than nationally, and deprivation is relatively high compared to the rest of the country, with life expectancy the lowest in England.

Natural resources

The North East is home to nationally significant farming, food, forestry and timber services. The North East accounts for around 5.9% of England's total land area and contains more than 20% of England's natural land, 16% of rough grassland, and 8% of forested areas.²⁶ The region includes vast tracts of rural and semi-natural land, with 90% of the region classified as rural – including 97% of Northumberland and 89% of County Durham and parts of Gateshead – and 28% classified as remote rural. The coast runs from the border between Northumberland and Scotland to the boundary between the East Durham coast and Tees Valley in the south and is over 500km.

Approximately 25% of the land area in County Durham and 15% of Northumberland is natural land.²⁷ There is 230,000ha of peatland – around 17% of the England total, mostly located in the North Pennines National Landscape and the Northumberland National Park – which together account for a third of the land in the North East. There are over 30m visitors a year to the NECA region, most of which (28m) are day visitors. The visitor economy contributed over £2.6bn to the North East economy, and rural and coastal areas contribute nearly one-third of the North East's regional GVA.²⁸

Landscapes and habitats have been altered by the region's unique industrial and mining heritage, as well as agricultural drainage, presenting unique challenges to nature recovery in the area. The region faces major challenges from the impacts of climate change, including more severe and frequent storms, flooding, coastal erosion, droughts, and wildfires. The EA estimates that 8% of the region's population is at risk from flooding from rivers, seas and surface water. However, climate modelling suggests the North East is likely to be less affected than most parts of the UK. Together with abundant water assets, this creates a competitive advantage.²⁹

NECA: Environment, Rural and Coastal

The distinctive geography and economy of the North East are recognised in NECA's deeper devolution deal as a rural innovation trailblazer³⁰ which includes developing an Environmental Stewardship, Coastal and Rural Growth Investment Plan with an indicative budget of £17m³¹ and establishing the North East Coastal and Rural Taskforce with the UK Government.

Other environmental measures NECA is progressing include:

- preparing LNRs
- creating the North East Nature and Carbon Marketplace – a Defra and EA Local Investment in Natural Capital programme pilot³²
- promoting collaboration with Scotland along the North East Coast Corridor³³
- being a Local Authority Climate Service Pilot with UK government and the Met Office, providing evidence on climate risks to support planning and prioritisation

Housing development

Under the revised NPPF and standard method calculation, the North East has an annual housing target of almost 11,000 – an 80% increase on the previous target.³⁴ EMSAs have the ability to set the strategic direction of the Social and Affordable Homes Programme (SAHP) 2026 to 2036 in their area, including shaping the tenure mix and identifying priority sites for development.³⁵ NECA's deeper devolution deal includes setting the strategic direction of the Affordable Housing Programme, in partnership with Homes England through the North East Strategic Place Partnership which has six spatial priorities, one of which is supporting coastal and rural growth ambitions.

There is a high proportion of brownfield land in the North East, but little with planning permission due to complex remediation needs of former factory sites or mining areas. NECA states it will take a brownfield-first approach to development. As of May 2024, NECA spent £44m of £49m of the Brownfield Housing Fund across 18 projects. Across these, 21% of units are classified as affordable housing – but affordable housing obligations have been met unevenly across projects.³⁶

NECA's vision and guiding document is its Local Growth Plan.³⁷ It aims to be one of the first CAs to develop its Spatial Development Strategy – the spatial expression of its Local Growth Plan. All local plans in the North East apart from one are being developed at the same time as the SDS.

'So they've got this magical moment... with all the Local Planning Authorities [in the North East] and the Combined Authority [NECA]... in this magical moment where everything is happening at the same time so they can share evidence, they can have a genuinely top down, bottom up approach in terms of sequencing. Most other places are not in that position.'

NECA: summary of key enablers for integration

As part of its deeper devolution deal and rural trailblazer status, NECA commissioned a Rural Taskforce and an Environment, Coastal and Rural Investment Plan. The potential for integrating land use decision-making is significant, particularly given NECA is at a 'magical' moment in time of developing its SDS and all but one of its constituent local authority local plans alongside consultation on its three LNRs. Combined with its forthcoming Integrated Settlement, these could be conduits for integration.

CASE STUDY 3

Devon and Torbay Combined County Authority

Devon and Torbay Combined County Authority (DTCCA) was created in February 2025. Its constituent councils are Devon County Council which includes Exeter City Council and seven other districts and Torbay Council, but not Plymouth City Council. It is an FSA and, as such it does not have access to the power, functions and funding of mayoral authorities (see Table 1).



Image credit: Terry Montague / Unsplash

Regional economy

DTCCA's Local Growth Plan identifies regional strengths in advanced manufacturing which employs 12,000 people, creative and cultural industries which add £480m to the regional economy, professional business services and digital technologies – with Exeter a key hub and enabler of growth. The Plymouth and South Devon Freeport is a government-backed free trade zone to boost investment in advanced manufacturing, marine and logistics industries.³⁸

Devon is a major agricultural county, accounting for around three-quarters of land use in the county, mainly in dairy, beef and sheep. Agriculture and food production account for 13% of Devon's economy, with farming's economic output valued at over £1.3bn, supporting over 20,000 jobs.³⁹ Major private landowners include Clinton Devon Estates and the Duchy of Cornwall, who owns much of Dartmoor and the High Moor. Farming is integral to the economy of Devon's rural communities and to its landscapes.

Over a third (35%) of Devon is covered by a landscape designation, with two National Parks – Dartmoor and Exmoor – and five Areas of Outstanding Natural Beauty. It is home to six Landscape Recovery Scheme projects and has more hedgerows than anywhere else in the UK. Its natural landscapes and coastline bring around 30m visitors and employ around 33,000 people in the visitor economy.⁴⁰ Devon is a highly desirable place to live,⁴¹ but its ageing population and limited supply of housing stock in the region are key constraints.

Land use challenges

Mandatory housing targets across Devon have increased significantly since 2024. Plymouth is to be one of 12 New Towns,⁴² aiming for around 10,000 new houses in the city through a partnership between Plymouth City Council and Homes England; while Marcombe, East Devon, another of the Government's recommended New Towns, has plans for 8,000 homes. Elsewhere in the county, major housing developments are planned or underway, including:

- Sherford Housing Development – 5,500 houses across three district neighbourhoods in South Hams
- Newton Abbot & Kingsteignton Garden Community – approximately 3,600 homes plus link roads and a new local centre
- Culm Garden Village – up to 5,000 new homes in a country park landscape, integrated with Cullompton and supported by Cullompton transport upgrades with £33.3m funding from Homes England for a relief road

Current and future population growth were of concern to some interviewees, some of whom queried whether there would be sufficient infrastructure in place to support the level of housing growth ambition. In relation to National Parks there were concerns that National Park Authorities, which are also the Local Planning Authority, are trying to manage the growth that is needed in a condensed and protected space. This can exacerbate tensions around land use decisions between improving nature recovery and considering the landscape character while thousands of new houses are being built across the region and more people are entering National Parks since the COVID-19 pandemic.

Creating country parks to take the pressure away from some more rural areas and protected landscapes such as Dartmoor is one approach, as is working on a whole catchment scale by restoring the peatland uplands of Dartmoor to manage water quality and quantity for the wider region, as with South West Water's Upstream Thinking project. The potential loss of farm pasture, which is often not rated as 'Best and Most Versatile' and so is vulnerable to development, was a further concern.

Pressures in Protected Landscapes

Dartmoor is home to around 35,000 people, and is a place of work for around 10,000 people. Increasing visitor numbers, driven by new housing and development in surrounding areas, are leading to increased erosion; anti-social behaviour; traffic congestion; disturbance to wildlife and livestock; and resulting in conflicts with farmers and local communities.⁴³ Conflict about land management on Dartmoor culminated with an independent government review, which led to the establishment of the Dartmoor Land Use Management Group (DLUMG). One objective of the DLUMG is to develop a Multi-Functional Land Use Framework.⁴⁴ Defra is currently working with social entrepreneur, Dr Hilary Cottam, on a long-term partnership with communities in Dartmoor to develop a place-based approach, co-design solutions to specific problems and develop a common understanding of how land can be best used for food production and the public good.⁴⁵

Falling funding for National Parks, threats to legally protected sites and landscapes including in the Planning and Infrastructure Bill and the Nuclear Regulatory Review^{46,47} and much uncertainty about the future of ELMS were raised as further concerns by interviewees.

Local Government Reorganisation

Local Government Reorganisation (LGR) is the process of restructuring all two-tier areas, i.e. those with both district and county councils, into one unitary council. This process aims to bring financial savings and more consistency in local government powers, for example by bringing local plan-making and development and development management powers of district councils together with county council powers of minerals and waste planning, transport, flood risk and net zero. Devon and Torbay Councils are currently subject to LGR with various proposals including a single unitary authority to replace Devon County Council and its eight district councils, with Plymouth City and Torbay Council remaining as they are.

Housing and economic development has generally been focused in and around Exeter but without this being the express strategy of the three Councils, creating pressure on neighbouring protected sites through a piecemeal approach to managing species disturbance. The focus of energy, attention and time on LGR is stalling decision-making and policy implementation.

'And that's why I don't think anything's going to happen now. So the Combined County Authority is likely to disappear because we will be going to unitary authorities. They will look very different. I don't know what they can look like. I don't know what the government's going to decide, but they will look very different. Frankly, everybody's focus is on local government organisation.'

However, while LGR should streamline governance structures, it may still result in several unitary authorities rather than a single strategic body for the whole area which will hinder strategic and integrated land use decision-making.

'I think local LGR will take us to a better place... but I don't think it'll go quite far enough in meeting this need of really strategic land use planning... there might be three authorities rather than one, so you're still going to have quite small-scale thinking and in other parts of the country, they'll be even geographically smaller [where there is] tighter population density... It's about geographical area [which] really matters in this context.'

LGR will not lead to the creation of an SA with an elected mayor in Devon so certain strategic planning powers and funding including the Integrated Settlement will be unavailable. While some want to see a whole peninsula approach, including Cornwall, to maximise integration and impact of land use decisions, there is seemingly no political appetite for closer regional working.

DTCCA: summary of enablers for integration

While Devon forms part of the peninsula with Cornwall, the lack of local political will for working at a larger regional scale combined with inertia created by LGR means there is significant risk of missing opportunities that devolution brings. Dartmoor is a test bed for integrated land use decision-making through its nationally appointed Dartmoor Land Use Management Group, tasked with creating a multifunctional land use framework for Dartmoor.

Tools for Integrating Land Use Decision Making

Over the course of the research, over 100 tools for making and integrating decisions about land use were highlighted. ‘Tools’ are understood in broad terms as a means to make or implement a land use decision or intervention. Interviewees identified a wide range of tools depending on their operating environment, professional lens and expertise. They included tools from national to local, from strategic to practical, and from the past to the present, to illustrate their points.

Tools are categorised with statute and strategies listed first, supported by data and mapping. The means to implement decisions through an organisation or body of people, funding and the people with the requisite skills to deliver is next. Lastly are softer but no less important enablers – starting with a clear vision with the leadership to deliver it, and the practical approaches to delivering holistic land use decision-making such as whole catchment management. Table 2 gives categorised examples of the range of tools highlighted by interviewees.

Table 2: Types of tool for integrating land use decision-making

Type of tool	Examples
Statute	Housing targets & allocations, NPPF, protected sites and landscapes, Planning & Infrastructure Bill/Act, Duty to Collaborate, Duty to Cooperate, nature recovery targets (30by30), Devolution Bill & White Paper, NERC Act, Net Zero, Water Industry Act, Climate Adaptation Plans and Reporting Power (ARP)
Strategy/plan	Local Nature Recovery Strategy, Spatial Development Strategy, Land Use Framework Local Growth Plan, Local Plan, GMCA Places for Everyone, Coastal and Flood Risk Management Strategies, National Industrial Strategy, AMP, GMCA Environment Plan, Local Environment Improvement Plan, Minerals and Waste Plan, Cunliffe Review, Regional Development Strategies, Regional Energy Strategic Plan
Data/mapping	GMCA Mapping & Integrated Pipeline, Dartmoor Regional Observatory, Agricultural Land Classification system, National Character Areas
Organisation/group/body	Local Government Reorganisation, Regional Development Agencies, NECA Advisory Groups, Local Nature Partnership, Dartmoor Land Management Group, Strategic Planning Authority, Combined Authority, Local Economic Partnership, Local Environment Record Centres, National Park Authority, Regional Observatories, Scott Commission, Government Offices, NECA Rural and Coastal Taskforce
Funding	Integrated Funding Settlement, ELMS [including Landscape Recovery, Sustainable Farming Incentive and other Agri-Environment Schemes], BNG, Nature Restoration Fund, Rural Shared Prosperity Fund, Rural Housing Enabler, Brownfield Housing Fund
Skills/delivery capacity	Planning and planners, partnership skills (for regional spatial strategies), farm advice
Practical land management/ approach	Catchment management, Nature-based solutions, Natural Flood Management, Sustainable Drainage Solutions (SuDS), forestry creation
Culture/leadership/history	Integrated Water Management, convening powers [of mayors] Commissioner [e.g. rural, environment]
Vision/world view/principle	Vision and shared outcomes, Environment as First Infrastructure Foundation Economy Mission Based Approach

Six land use decision-making tools were shortlisted based on the following criteria:

- operability at the CA and future SA level
 - potential to integrate land use decision-making and affect change
 - sector (i.e. to illustrate tools across different sectors)
 - potential for lessons to be learned in other contexts (e.g. areas and/or sectors)
 - how the tools were mentioned in interviews (e.g. frequency and level of reflexivity)
 - are strategies, plans or frameworks
 - can draw on or encompass several tools – the SDS, for example, includes statute (Devolution Bill/Act), a target (housing allocation), data/mapping requirement and funding (via the Integrated Settlement for EMSAs)
-

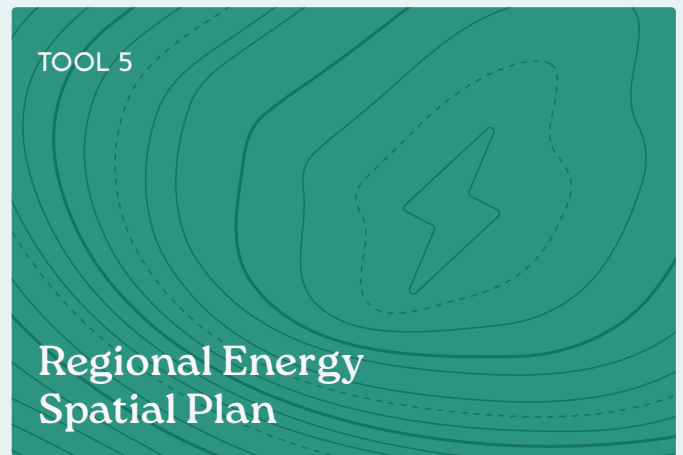




Image credit: Mark Waugh / Alamy

TOOL 1

Spatial Development Strategy

Policy theme: Housing and Strategic Spatial Planning



Spatial Development Strategies (SDS) are set to be introduced through the English Devolution and Community Empowerment Bill in 2026 with the legislation required to underpin SDS set out in the Planning and Infrastructure Act. The Ministry of Housing, Communities and Local Government (MHCLG) is the departmental body responsible for overseeing the legislation and guidance for SDS. Reintroducing regional spatial planning through SDS, abolished through the Localism Act of 2011, is central to the Government's commitment to delivering 1.5 million new homes by the end of this parliament.

The Government has stated its intention for SDS to play a vital role in delivering sustainable growth and address key spatial issues, including meeting housing needs, delivering strategic infrastructure, growing the economy, and improving climate resilience.⁴⁸ SDS will be high-level strategies with a long-term time horizon of over 20 years. They will apportion and distribute housing and employment need to the most appropriate locations based on the standard methodology^{49,50} with the ability to redistribute the need between Local Planning Authorities in their patch. SDS are anticipated to enable more efficient and timely production of local plans which will provide the detail and site allocations to support the spatial strategy set out in the SDS.

SDS will identify key infrastructure requirements to enable the spatial strategy to be implemented, strategic locations for and scale of development, and areas where protection or restoration of the natural environment is required. In this sense, the SDS will provide an evidence-based framework for strategic investment.

SDS interactions with national, local & regional policy

National policy requirements including scope, content and process for preparing SDS, are included in an update to the National Planning Policy Framework (NPPF) and related Planning Policy Guidance (PPG). The revised NPPF, being consulted on at the time of writing, maintains guidance on strategic plan making, and will include new 'national decision-making policies' intended to guide development management decisions. The NPPF will therefore likely be the governing text regarding strategic spatial matters in the absence of an SDS. Housing number allocations will be set centrally which will form the basis of decisions for spatial plans and development decisions. SDS will have to take into account the NPPF which covers all types of land, both rural and urban.

Local plans are maintained as the bedrock of the local planning system and will need to be in 'general conformity' with the SDS, as with the London Plan, the model for the new SDS. Local plans are shorter-term, five-year plans, in contrast to the 20-plus year SDS timeframe. The government is introducing a 30-month timeline for creating and adopting local plans⁵¹ and has a goal for achieving universal coverage of local plans by 2028 and for SDS by 2029. Both aims are ambitious given currently around only 30% of local plans are up-to-date⁵² and the shape of many SAs is not yet known. One interviewee reflected on the interaction between the SDS and local plans in their area:

'The content of SDS is intended to be kept deliberately high-level, with the dual purpose of preserving detailed policy and site allocations for our local plans to focus on. Even in the interim before local plans are updated, the SDS will carry legal weight. The SDS will form an equal part of the development plan to local plans. Where developers need to apply for planning permission, the application is decided against this development plan.'

At regional level, all MSAs will be required to produce a 10-year local growth plan: locally owned, long-term strategic plans to support the national growth mission and deliver the National Industrial Strategy. Local growth plans will provide a framework that helps inform priorities for public and private investment, and guide intervention to drive sustained and inclusive growth. The SDS will be the spatial expression of the local growth plan. In this sense, it is closely connected to the government's economic growth agenda but lacks corresponding links through to the environment agenda, through the Environmental Improvement Plan, for example. Additionally, while SDS will have to consider the NPPF which covers all types of land, both rural and urban, their department home of MHCLG and link to economic growth and housing delivery, means that rural hinterlands, economies and communities may get overlooked.

The West of England Combined Authority (WECA) is an example of how nature and climate can be embedded in a local growth plan; the 'guiding star' for the SDS and other plans and strategies, which will build on the work of the local plans within its boundary.⁵³ WECA was the first CA to produce a Local Nature Recovery Strategy (LNRS), and it is woven into its local growth plan. Nature-based solutions and green infrastructure are cited as crucial to green growth ambitions which, alongside nature recovery, will be integrated with energy, housing and transport to drive sustainable growth.

Some MCAs have started development work on their SDS including NECA, WECA and West Yorkshire, with some early signs that the SDS could be a tool for integrating land use decisions. The West Midlands Combined Authority (WMCA), for example, has developed a set of guiding principles for the development of its SDS, one of which states that the SDS must be fully integrated with, and support the delivery of key national, regional and local priorities and programmes, most significantly in relation to the: Local Transport Plan; Regional Energy Strategy; LNRS and Local Growth Plan – which is described as WMCA's 'regional industrial strategy'.⁵⁴

NECA has approved its local growth plan and begun work on its SDS, aiming to be an 'early adopter' to signal to investors and government that the region is ready and focused on growth and keen to leverage funding and investment to bolster infrastructure. In July 2025, NECA allocated up to £1.5m for SDS development.⁵⁵ Its SDS will cover strategic energy planning, with the North East Strategic Energy Board established as part of its deeper devolution deal and a study on energy barriers to economic growth forming part of the SDS development process. There is also an intention for the SDS to include some aspects of water and flooding. In the NECA region, all local plans except one are starting at the same time as the SDS, creating a significant opportunity for integrating land use priorities.

In Greater Manchester, work has not begun on the SDS. Given the Places for Everyone Joint Development Plan (PfE) was only adopted in 2024, it is awaiting clarity on new housing targets and allocations, given the standard methodology is higher than it was when PfE was created. It is also waiting for the Devolution Bill and changes to the NPPF to be finalised. Interviewees felt that PfE was a good starting point for the SDS and that although PfE did not include Stockport, it did sign up to the Duty to Cooperate statement about the whole spatial strategy within PfE. A Joint Minerals and Waste Plan is also starting for the ten Greater Manchester local authorities including Stockport, which could further sharpen land use collaboration and integrated decision-making.

POTENTIAL OF SDS FOR INTEGRATING LAND USE DECISION-MAKING

Absence of a national, unifying spatial strategy

A key concern of interviewees was that regional spatial plans including the SDS will not add up to a national spatial strategy, which was identified as a key gap in the policy landscape. There are too many different strategies, with no unifying vision, shared outcomes or mechanisms to deliver multifunctionality and manage trade-offs.

'And all these different frameworks... Have we defined the outcomes we want from an area beyond the local authority wanting 10,000 homes and us wanting to treat those homes? No. We haven't got a shared set of outcomes... maybe government think we have in the Environment Act in the Environmental Improvement Plan, but it doesn't seem to have much traction.'

'There is a lack of coordinated land use policy or planning. We have planning frameworks but no overall plan to say, "you have this land, how much is needed for growing food, for biodiversity." We try and achieve desirable outcomes but are only attacking bits and pieces in a piecemeal way.'

Missing pieces: horizontal and vertical connections

SDS could act as the conduit for a raft of strategies and policies, both vertically and horizontally across different sectors – but the links need to be made clearer between different types of land use and land ownership. Wider land use and management is not currently flowing into regional spatial planning – if there were a major land use change outside an urban area, from agriculture to forestry or to renewables, for example, it would not be connected into the strategic level area planning approach of the SA.

This points to the unevenness of the relationships governing land use, of the planning system flowing between local to regional and national, and that of the wider land use system. The role of large landowners, for example, is much more significant to country-wide land use than that of built development, apart from in the roughly 8% of urban land area. But there remains a clear divide in central government between MHCLG leading on SDS and Defra leading on the Land Use Framework (LUF).

The scope of the LUF is wider than the planning system and, considering the content of the LUF consultation document,⁵⁶ will give insufficient weight to the importance of a properly functioning planning system in determining land use changes. Although there is currently no mention of the LUF in the current nor the draft new NPPF, it could be a policy framework to make changes to achieve more integrated land use decision-making because SDS will have to take into account the NPPF and the NPPF covers all types of issue, rural and urban. There is therefore more scope to consider changes to the NPPF than to target one level of plan or another.

'The LUF should be part of the planning process – it is about spatial planning and the long-term change in the use of land. Beyond a threshold, planning applications should be subject to a land use framework guidance.'

The LUF is anticipated to propose land use change scenarios but not apportion the land use change regionally; nor include accountability or delivery mechanisms.

'LUF has potential to be valuable – a form of central democratically controlled view as to how we should be using our land to achieve particular objectives.'

'Defra's LUF has modelling for land use change but there is still no notion of planning beyond this – there's a notion that change will happen through a bunch of signals, incentives – but no one is coordinating this... there is no notion of forward planning... just that there will be change and we will need to prepare for it... No one will say, despite the fact that this framework is there and 20% of land will disappear through agricultural change, what might happen.'

The SDS is intended to be the spatial expression of the local growth plan, yet the links between the two are not explicit. Nor are the links clear between the SDS and other policies such as the forthcoming Strategic Spatial Energy Plan (SSEP), in terms of how shared priorities are decided, how plans inform each other, and how they relate to other geographic areas.

'The LUF could form part of the evidence base for SDSs and [the] SSEP – but how the mechanics occur is a difficult question. SDS will be high-level and light-touch. What would be the appropriate amount of spatial information you could deduce from a LUF that would be appropriate in developing an SDS? What would be more appropriately dealt with in a local plan? If an SDS were to take into account the LUF, this could be how local plans provide colour and detail... I don't know how this would be impacted on prime agricultural land... Fundamentally you need the spatial information in the first place.'

There is a further key issue around how neighbouring strategic planning authorities collaborate to address common issues and opportunities and ensure that the sum of all SDS add up to a national spatial picture. The provision for this in the Devolution Bill is not clearly articulated, with the Duty to Collaborate cited as one mechanism, but this applies only to MSAs.

Sequencing issues between SDS and local plans

There are also issues with sequencing and timing with local plans and SDS. One scenario, made more likely with the 30-month process expediting local plan making, is that an emerging local plan and finalised SDS could conflict, with a local plan being examined and unable to be passed because the SDS says something different. This could work the other way too, with the way in which the SDS expresses spatial connections across the region being undermined by drawing on out-of-date and unadopted local plan(s).

‘So if the local plan is out of date, that does kind of undermine any of that [SDS] system, essentially because that connection hasn’t been made because you don’t have that spatial connection anyway, because you don’t have an up-to-date adopted local plan.’

‘What if an SDS has to do something but there isn’t a requirement for a local plan to do it?’

Uneven potential of SDS to integrate across place

Despite the challenges around integration across sectors, across SAs, and between different levels of government, there were mixed views on the potential of SDS. Some interviewees felt SDS would be little more than a mechanism to help the government distribute its ambitious housebuilding targets based on the lowest common denominator. Others saw the SDS as a very high-level strategy, with no Ordnance Survey (OS) map base or identification of different land uses and no plan base to it, unlike individual local plans. For several, though, SDSs hold the potential to be the main tool for SAs to integrate land use decision-making:

‘the [SDS is the] only bit within the whole governance structure where it is a genuine place-based approach. They’re taking all these different powers, funding regimes – a lot of funding, integrated funding settlements and everything else – all of that goes into the mix and there’s the ability to then look at that on an integrated place basis. So that’s why it’s incredibly important that the SDS is not just seen as a big local plan. It genuinely is the most powerful integration tool they’ve got to be able to deliver a lot of the ambitions, and that’s as much about making sure that the environmental side is taken into account as much as the economic side.’

The differing views on the potential of SDS may also be connected to different histories of collaborating on spatial planning, different ambitions of mayors and capacity of SAs, including in the workforce. SAs will have uneven capacity and skills in strategic planning, and there are likely to be differing views within them as to what the SDS could and should include.

‘Outside of GMCA and Liverpool City Region there are virtually no planners, and they will be very reliant on constituent LAs and will want to do a stitch together of local plans and put a housing number on top of it. The other teams probably have broader ambitions for what SDSs could be.’

There are clear questions around the uneven distribution of power, resources, experience and maturity across future SAs – reflected in that some are progressing their SDS, while others are not. Given the SDS is being positioned as a spatial investment framework, this inequality between regions and neighbouring SAs is of real concern.

TOOL 2

Regional Land Use Framework

Policy themes:
Farming, forestry,
protected landscapes



Dartmoor Land Use Framework

Dartmoor National Park covers 954 km², the largest area of open country in the south of England and a significant portion of the county of Devon. Heightened conflict between stakeholders on Dartmoor triggered an independent review⁵⁷ and a government response with 25 recommendations to be implemented by a new, time-limited Dartmoor Land Use Management Group (DLUMG).⁵⁸ The recommendations include repairing the relationship between Natural England and commoners, developing a plan to improve SSSI condition, creating methodologies to monitor a wider range of outcomes, finding ways to improve stock management and grazing strategies, working closely with emerging Landscape Recovery Groups, identifying data collection needs, and developing a multifunctional land use framework for Dartmoor as a national test bed for the national Land Use Framework.

The DLUMG is time-limited to two years and accountable to the Defra Minister for Food Security and Rural Affairs. The DLUMG has four main workstreams, each with a working group: creating a multifunctional land use framework for Dartmoor supported by an evidence base located in a 'Dartmoor Observatory'; nature restoration and heritage protection; grazing and farm viability; and communications and engagement.

Its vision is that of the Dartmoor National Park Authority (NPA) Partnership Plan to 'make Dartmoor better for future generations: climate resilient, nature rich, beautiful, connected to the past and looking to the future; a place where people of all ages and backgrounds can live, work or visit. A place that is loved, cherished and cared for.'⁵⁹ Flowing from the agreed vision and principles will be the development of a framework that translates the vision into spatial priorities for land use. This framework will identify opportunities, what can be delivered and where, including land suitable for agriculture, peat re-wetting, woodland creation and other uses.

Spatial mapping is central to this process, and interviewees identified opportunities and challenges in relation to data availability, quality and integration. Through the creation of the Observatory, the DLUMG is engaging with existing

mapping work undertaken by Devon County Council for the LNRS and by the National Park Authority (NPA), which is prioritising datasets to support delivery of its vision. Alongside DLUMG's technical work, a parallel process is happening with local stakeholders and communities to build shared understanding and agree priorities. Interviewees noted that a mapping viewer with multiple layers will be needed to support the work of the DLUMG, highlight potential conflicts, such as between nature recovery, rewilding and archaeological interests.

Cornwall Land Use Study

Cornwall is a large unitary authority. Public consultation resulted in the rejection of a Level 3 devolution deal and associated elected mayor; as such, Cornwall is expected to become an FSA.

Cornwall Council commissioned a land use study⁶⁰ to respond to a motion put forward by some of its councillors to restrict the development of large-scale ground-mounted solar energy generation infrastructure, i.e. solar farms. The motion was prompted by concerns about the loss of productive agricultural land to solar farms, and of the visual impact of solar farms.

The Council wanted to link this concern with wider issues and strategies, for example, it has a Climate Emergency Development Plan Document⁶¹ dealing with similar land uses and was at the same time developing its local plan. Work on a land use study was seen as a stepping stone into the wider work the Council would want to do for its local plan to help provide the evidence and start of a conversation around how to prioritise land uses and manage trade-offs.

The land use study evidences how land is currently used in the county, particularly for agriculture and solar farms; the outcomes being delivered for food production, carbon sequestration, biodiversity and local economic value; and the potential for multifunctionality. It found that solar farms occupy a small proportion of Cornwall's land use (0.3%) and are clustered around grid distribution networks and therefore visible from major transport routes, implying greater land use than is the case. It found that



Image credit: John Worrall / Alamy

solar farm growth has not significantly reduced arable land and that land datasets, including the ALC system, have limitations which affect decision-making. Further, it found that meeting Cornwall's renewable energy scenarios would require just over 2% of its land and that there are significant opportunities for nature recovery on agricultural land in Cornwall.

The Cornwall Land Use Study is intended to lead to a Land Use Framework for Cornwall with a shared evidence base and spatial expression within its new local plan. Cornwall's Land Use Framework will aim to apportion land use for key sectors, with acceptable envelopes of land use across Cornwall to create the parameters in which the Council can plan. This could, for example, illustrate that housing development is in the margin of just 1% of land use. The Council hopes to use a decision-making tool such as a doughnut economic decision wheel or a balanced score card to quantify economic, social and environmental factors.

'The Council hopes to be able to say, on the balance of issues in that framework, and in those margins of land use, we are comfortable we can deliver the sites we need for the houses we need, alongside all the other uses that have to be balanced.'

POTENTIAL OF RLUF FOR INTEGRATING LAND USE DECISION-MAKING

Clear mandate, scope and authority

In both the Dartmoor and Cornwall examples, a strong mandate, clear scope and solid leadership have enabled the development of regional land use studies which are intended to lead to land use decision-making frameworks.

Dartmoor Land Use Management Group, for example, is driven from central government, receiving its Terms of Reference, a budget to deliver its objectives (£500,000) and a two-year time limit for delivery. It is being seen as a test bed for how regional land use frameworks could operate in practice, and in the context of the national Land Use Framework, it has considerable visibility and profile. It has a clear governance structure, with an independent Chair, core group and advisory groups. While these are all supportive structures for integrating land use decision-making, they are also currently unique to Dartmoor.

While at the time of writing, Cornwall's land use study has yet to lead to a framework, there is much of interest to learn from. The Council lead for housing and planning policy, responsible for developing the local plan and commissioner of the land use study, understood the need for, and benefits of, integrating land use decisions. A trigger for the study was local political concern about unplanned and unchecked solar farm development on agricultural land. The timing was opportune, aligning with the start of local plan development and enabling the principles of the national LUF to be applied locally. As an established unitary authority, Cornwall Council has the scope to make and integrate land use decisions. Cornwall Council is not undergoing local government reorganisation and is expected to become an FSA, so its land use work, including its future SDS development, should integrate and dovetail with relative ease.

Data and spatial mapping challenges

A key challenge in the Dartmoor example is the volume and fragmentation of data. Interviewees noted an overabundance of datasets at national (e.g. Natural England) level, while some locally held data are inaccessible or poorly aligned. The lack of a Defra Service Level Agreement with Local Environment Record Centres, for example, limits the national use of local species data in the national Land Use Framework, other national spatial policies and in targeting incentives such as Environmental Land Management Scheme (ELMS) and Biodiversity Net Gain (BNG).

There is no mapping tool covering the relevant sectors and levels of governance that can be drilled down into, which several interviewees noted was an obstacle to integrating land use decisions with each other and with delivery. The national LUF could address this by providing a consistent core dataset with scope for local variation, provided limitations are clearly understood and the framework is based on a reliable dataset which can be used long term (i.e. 25–30 years).

‘Locally and regionally you need your stakeholders, infrastructure and culture amongst them, such that you can thrash through different and contested decisions in a mature way. The Dartmoor Land Management Group is trying to do this. You will always have contested decisions. The big missing thing that will have us spinning in circles is a clear top-down national framework... Your nirvana is that your LUF is linked to your public incentives scheme – if an area needs new reservoirs, there are incentives for this... all linked to the greater strategic need that your land [can provide].’

Part of the abolishment of regional spatial planning in 2011 included the loss of regional observatories. The Dartmoor Land Use Management Group is creating a regional observatory which speaks to the data and mapping needs of creating a multifunctional land use framework.

Limitations with the Agricultural Land Classification (ALC) system as a key tool informing land use decision-making was identified by several interviewees, including in the Cornwall land use study. The ALC system was the subject of an earlier Grounded Insight report for CPRE.⁶²

Issues we identified in that report include:

- the use of old climate data for ALC grading; using more up-to-date data drastically reduces the amount of predicted BMV⁶³ land, the nation’s best land for food production
- the impact of intensive farming practices degrading prime agricultural land in lowland peatlands and potentially impacting on its ALC grading
- ALC survey data use in planning decisions, which has allowed over 14,000ha of BMV land to be lost to development
- legacy system issues relating to the age of the ALC system and its evolution over time, creating conditions for it to be misinterpreted and misused by decision-makers

These issues raise questions about the accuracy and reliability of the ALC system and whether, if it isn’t updated and used alongside other reliable data, it is an appropriate tool in land use research and decision-making.

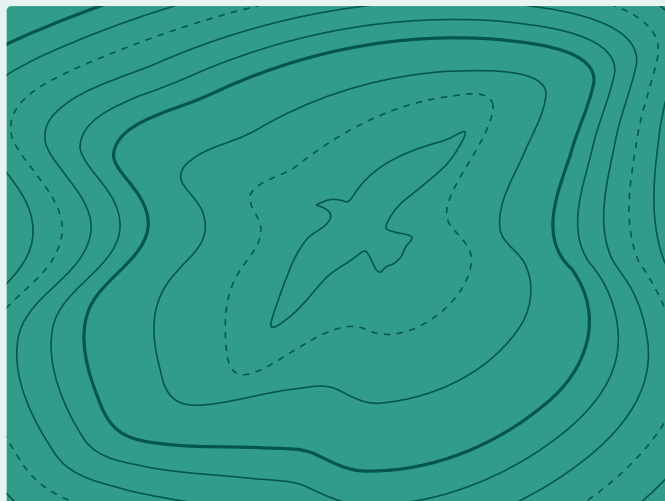
Delivery challenges

Interviewees reflected that to deliver a Dartmoor LUF, besides robust, integrated data and mapping, and a process for managing trade-offs, it will also need the right skills – including farm advice, ongoing communications and stakeholder engagement work, plus funding for land management delivery, regulation and enforcement. Its relationship with the national LUF and other spatial strategies and policies will also need to be articulated – including with the respective housing targets and allocation.

TOOL 3

Local Nature Recovery Strategy

Policy theme:
Biodiversity



Local Nature Recovery Strategies (LNRS) are statutory, spatial strategies for England. They were introduced by the Environment Act 2021 to set out local priorities for nature by showing where important wildlife exists now and identify areas that have potential to become important for wildlife in the future. Under the departmental remit of Defra, LNRS are intended to support delivery of the Environment Improvement Plan (EIP) goal ‘thriving plants and wildlife’ and its associated legal nature recovery targets, including the 2030 and 2042 species abundance targets. If implemented promptly and effectively, LNRS should make a material difference to government’s prospects of meeting nature recovery targets and goals.⁶⁴

There are 48 LNRS areas covering the whole of England with no overlaps, each with a ‘Responsible Authority’ (RA) to lead the preparation of the strategy. Some RAs are CAs, including GMCA, Cambridgeshire and Peterborough, West of England, West Midlands, Tees Valley, Liverpool City Region, South Yorkshire and Greater London Authority. NECA is the RA for one of the three in its patch, the North of Tyne LNRS. WECA published the first LNRS in November 2024, with GMCA, WMCA, Cambridgeshire and Peterborough having published theirs since.

POTENTIAL OF LNRS FOR INTEGRATING LAND USE DECISION-MAKING

Several core attributes of LNRS could enable integration

LNRS have certain attributes which could make them a powerful potential integrative tool for land use decision-making. They are a statutory requirement of Responsible Authorities, based on consultation with citizens, include an evidence base and spatial mapping, have funding for creation and a line of sight to national legal targets in the Environment Act via the EIP delivery plans. Once all LNRS are completed, they will cover the whole of England.

There are, however, several factors currently hindering the potential of LNRS as an integrative land use decision-making tool.

Legislative gaps hindering power of LNRS

There is a gap in the Devolution Bill on nature and climate, with key elements of the initial Devolution White Paper absent from the Bill, including a leadership role for SAs in developing and implementing LNRS. There are no explicit powers for SAs on the environment, no connections between LNRS and local growth plans or SDS. There is a major gap in the Bill on aligning economic growth and strategic spatial planning with nature recovery and wider environmental goals, and with considering the environment as first infrastructure.

The Office for Environmental Protection (OEP) called for strengthening how LNRS are considered in plan-making and decision-taking, pointing to insufficient information and weight for them in the NPPF.⁶⁵ The draft new NPPF which at the time of writing is being consulted on,⁶⁶ is an improvement, but will need bringing into force as proposed.

Connections missing between LNRS and other spatial plans and priorities

Actions to support nature recovery often have wider benefits, for water quality and climate change mitigation for example, but LNRS are not expressly designed to factor in these wider environmental benefits. They are not, for example, local land use frameworks, nor are they Local Environmental Improvement Plans (LEIP) which could expand the scope of LNRS by bringing together local environmental priorities, including those from the EIP and net zero including local energy planning and climate adaptation, under one framework.⁶⁷ GMCA's 5 Year Environment Plan, for example, covers a wide range of topics, and articulates how different Greater Manchester plans relate to each other and to the environment (see GMCA case study, Figure 1).

Variability between LNRS affecting join up and universal coverage

There is considerable variation *between* LNRS in terms of the extent and nature of stakeholder engagement and approach to spatial mapping with different techniques, tools and scales. This makes Defra's task of joining up LNRS to achieve universal coverage across England challenging.

'The concern with the LNRS is the variability in how they've done their mapping and the quality of the engagement... so they've used different techniques, different tools, different scales... But somehow Defra has got to patch all these LNRSs together at some point and they're probably going to change with devolution as well, so there's going to be some change in the boundaries of LNRS. So I think that some of them will need to get redone or patched together somehow. I'm not quite sure how that's going to work.'

No delivery mechanism

There is much uncertainty about how LNRS will transition into delivering nature recovery on the ground. Interviewees identified the greatest limitation of LNRS as their lack of funding mechanism for delivering land use change.

'Let's just actually use [Local] Nature Recovery Strategies as a spatial framework for ELMS. That would be really powerful because the biggest problem with nature recovery strategies is they don't have a delivery mechanism. That's the problem. And there is a problem with not being able to double count stuff, so you can't use the same land for BNG that they're using for farm payments. Local Authorities are trying to do their own habitat bank so they have a bit of control over where BNG goes [but] we need something a bit more strategic here.'

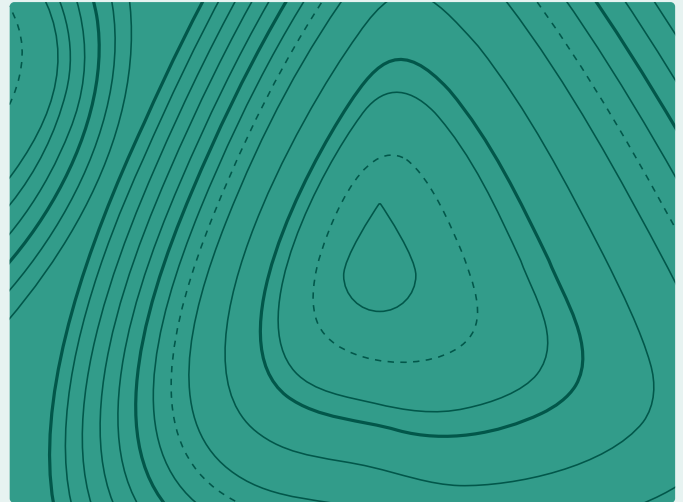


Image credit: David Dorey / Alamy

TOOL 4

Integrated Water Management Plan

Policy theme: Water



Climate change is increasing the risk of both flooding and drought, with the EA saying that 6.3 million, or 1 in 6 properties are at risk from flooding in England, with the north of England being particularly affected.⁶⁸ Governance and regulation of the water environment is fragmented yet many actors impact on water quality and availability, and everyone is impacted by it. The Cunliffe Review, or Independent Water Commission, highlighted how the management of competing demands and pressures on water has developed piecemeal over many years, often in sectoral or policy silos and lacks an enduring vision with long-term focus from government.⁶⁹ The Water White Paper responds to and builds on the recommendations in the Cunliffe Review.

Interviewees highlighted issues with legal responsibilities and associated funding spread across water companies, the EA, Ofwat and local authorities. The Independent Water Commission proposes an increased regional planning role across the whole water system. This speaks to a current governance gap and lack of coordination of activity between national and local actors at the regional scale – which looks across landscapes, river basins and between catchments. It recommends the introduction of ‘systems planners’ to integrate planning across the whole water system at a regional level in England through eight new regional water authorities.⁷⁰

While there is currently no mandated role for CAs in the water environment, nor a proposed one for SAs in the Devolution Bill, several CAs are taking action and showing their potential role in integrating water into land use decision-making.

POTENTIAL OF IWM FOR INTEGRATING LAND USE DECISION-MAKING

Integrated Water Management in Greater Manchester

Greater Manchester has been leading the way in integrating the management of water at a regional level through its Integrated Water Management (IWM) approach – a partnership between GMCA, United Utilities and the EA. A key driver is climate change, with rainfall expected to increase by 59% in the North West by 2050. A governance structure was established for IWM in 2021, and the Integrated Water Management Plan⁷¹ was published in 2023 with accompanying annual business plans.⁷²

The IWM partnership aims to improve management of the region’s water resources, including reducing home water usage by 25% and industry and elsewhere by 15%; reduce the risk of flooding; increase climate resilience and improve the quality of its lakes and rivers. Combined investment among the three partners to reduce flood risk and improve water quality is over £1bn and an additional £200m has been leveraged from the investment in Transport, Regeneration and other infrastructure investment programmes.⁷³

The IWM approach is voluntary and key to its success is the history of working between its three partner organisations. Previous joint initiatives include the ‘Natural Course’ European Union-funded project across the North West (2015), being the urban Defra Pioneer for the 25-Year Environment Plan (2016), and the Ignition project to identify ways to finance urban SuDS retrofit (2019).

The maturity of GMCA and the leadership and political mandate from the mayor, with three mayoral round tables about IWM taking place over 2022–23, were critical factors in IWM gaining traction. There was senior staff buy-in, mandating data sharing from the outset supported by teams with collaborative ‘soft’ skills. Further enablers include a limited one-year timeframe, a core delivery group with progress reporting driven by a programme manager, a collaborative team charter setting out the values and expected behaviours of the collaborative team and collaborative shared working space on Microsoft Teams.

NECA’s nascent approach to Integrated Water Management

NECA is collaborating with councils and the EA at local level around flooding funding and local levy funding and NECA may become part of the Northumbria Regional Flood and Coastal Committee. Actions included in NECA’s Rural Investment Plan are developing a North East Plan for Water, i.e. an Integrated Water Management Plan. NECA are also looking to ensure that the SDS covers water and flooding.

‘The other area that we’re going to ensure that the SDS covers are water and floods. So, you know, that’s a biggie. And I think that’s a really interesting area where we need to follow the devolution journey... The arrangement at the moment is that the Combined Authority has no role in flooding and flood funding but actually how we work is that we’re becoming increasingly collaborative with councils and with the Environment Agency at a local level around some of that flooding funding that comes through... flooding is typically a catchment-based problem... and you actually need a landscape-scale solution quite often – and that’s what a Combined Authority brings to the party.’

Potential role of SDS in Integrated Water Management

Several interviewees reflected that integrating water into the SDS and the work of the CA, including by aligning funding mechanisms, could be beneficial. The Independent Water Commission stated that regional water planning should be aligned with flood funding – of which £4.2 billion will be invested in flood and coastal erosion resilience in the first three years of the UK government’s 10-year investment programme launching in April 2026.⁷⁴ The government has committed to investing a minimum of 3% of flood and coastal erosion risk management funding to natural flood management (NFM) over the next 3 years – and over £300m in NFM over 10 years – the highest figure to date.⁷⁵

‘Flooding is a potential opportunity of devolution because flooding obviously crosses these smaller political boundaries. Then [if there was] a way of allocating land for flood mitigation or water, you know, water attenuation, that would be really, really helpful.’

SDS could overlay flood data with local nature recovery data to see where simultaneous benefits could be delivered, including amenity value, and where land could be allocated for flood mitigation or water attenuation through nature-based solutions such as wetland creation.

‘So we’re looking at whether we can allocate some land, that we can turn into a wetland, that will then absorb that heavy rain and make it less likely to over-flood the railway line or the housing... the challenge of that is that there isn’t really a mechanism to allocate land for flood mitigation.’

This issue highlights how water operates on a catchment scale, but without a regional scale of operation. The Water White Paper’s proposed new regional water authorities speak to this challenge of the ‘missing middle’ of governance in the water environment,⁷⁶ but will follow a different boundary to SAs and therefore SDS.

Integrating water into SDS may also help overcome challenges water companies face around the government’s house building ambitions. This includes water availability and treatment capacity, which water companies plan for through the five-year regulatory cycle set by Ofwat — the Asset Management Period, or AMP cycle — which is already planned for based on the previous housing growth targets. This means there may not be capacity for Water Companies to deliver the necessary infrastructure and services to new housing development for three to four years as they are out of sync with new housebuilding targets.

Regional Energy Strategic Plan

Policy theme:
Energy and net zero



Energy is key to government's net zero and economic growth ambitions. At national level, the National Energy Systems Operator (NESO) reports to the Department for Energy Security and Net Zero (DESNZ) and is responsible for producing both the UK-wide Strategic Spatial Energy Plan (SSEP) and corresponding Regional Energy Strategic Plans (RESP). These plans aim to join up national, regional and local levels across all energy sectors (electricity, gas and hydrogen). This strategic planning work is underway, with the SSEP delayed to Autumn 2027. In England there will be nine RESP.

At the local level are Local Area Energy Plans (LAEP) which are instigated and overseen by a lead local authority and, where they exist, will provide input into RESPs. LAEPs are not a mandatory requirement of Local Authorities or CAs, and there is uneven, albeit increasing, coverage across England. The Energy Systems Catapult, funded by UKRI, promotes and supports LAEPs. GMCA was the first city region to develop a LAEP which provides a geospatial plan for where energy generation, retrofit, low carbon heat and electric vehicle infrastructure should be installed; it also includes a rooftop solar target.⁷⁷

Research highlights the lack of join up and clarity between local plans and the roles and methods of integration of spatial planning and energy planning.⁷⁸ While local plans must follow a statutory duty to include policies to mitigate and adapt to climate change, research illustrates that the duty is weak.⁷⁹ The NPPF does expect local authorities to have policies for climate change and renewable energy generation, but at a larger-than-local scale there is a gap. Concerns are mounting about the location of large-scale solar farms on high quality agricultural land, with evidence that 59% of England's largest operational solar farms are located on productive farmland.⁸⁰ Indeed, a report about the new era of strategic spatial planning in England asserts that the local plan system has not been able to address large-scale infrastructure needs, especially in relation to strategic transport, water and energy supply, which has led to a failure in meeting development needs in large parts of the country.⁸¹

POTENTIAL OF RESPs TO INTEGRATE LAND USE DECISION-MAKING

The SDS, rather than the RESP or the LAEP, was identified by interviewees as playing an important role in doing the join up and 'heavy lifting' between energy and water infrastructure, including the increasing demand of both for data centres. However, the 'how' is unclear. The Devolution White Paper included a role for SAs in clean energy, including with their plans taken into account in the NESO Regional Energy Strategic Plans, and in delivering the transition to net zero – though energy planning, as with the environment, is omitted from the responsibilities of SA in the Devolution Bill.⁸²

Some CAs are factoring strategic and spatial energy planning to their SDS development. WMCA principles for SDS development, for example, makes connections to regional energy planning. The North East is an important generator of offshore wind energy and has potential for geothermal mine water heat and high potential for hydrogen production.⁸³ As part of its deeper devolution deal, NECA has established a North East Strategic Energy Board to coordinate energy supply and demand and promote growth in the offshore wind sector and to think strategically about opportunities and barriers to economic growth in the region. NECA is also commissioning a major study on energy barriers to growth as part of the SDS development process.

Climate Adaptation Reporting Power

Policy theme:
Climate change adaptation



2025 broke historical climate records, being both the warmest and sunniest year on record for the UK. Four of the UK's last five years are now in the top five warmest years since 1884 with climate change bringing more extremes of droughts, floods and temperatures.

The Climate Change Committee (CCC) is coordinating the Independent Assessment of UK Climate Risk that will underpin the UK's Fourth Climate Change Risk Assessment (CCRA4), due to be laid in Parliament in January 2027, and inform UK and devolved governments' National Adaptation Plans and Programmes.⁸⁴ Alongside its assessment, the CCC will publish advice to governments around the UK on improving climate resilience. The Climate Change Act 2008 allows the Government to invite infrastructure providers and bodies with functions 'of a public nature' to provide reports on how they are managing climate risk – known as the Adaptation Reporting Power, or ARP.

POTENTIAL OF ARP FOR INTEGRATING LAND USE DECISION-MAKING

WECA voluntarily reporting against ARP4

Certain organisations were invited by Defra to voluntarily participate in ARP4 under a pilot scheme including two CAs, WECA and WMCA.⁸⁵ WECA's Climate Adaptation Report unpicks the interface between climate risk and its role as a MCA in making decisions affecting residents and businesses. This includes considering its delivery of infrastructure, strategic planning, transport, place-making, homes, jobs and skills, research and innovation. To support its work on climate resilience, WECA recommends that the government should provide MCAs with a funded statutory responsibility to monitor, evaluate and have a strategic overview of climate resilience within the region. WECA proposes that an adaptation reporting duty should be a statutory responsibility and allow regions to evaluate and act if climate resilience is not being adequately taken into account across the region.⁸⁶

Climate is missing from Devolution Bill

The Devolution Bill, however, includes no duty, powers or responsibilities for SAs on climate. Stakeholders are calling for this to be rectified through inclusion of a duty which would hardwire the targets of the Environment Act, Climate Change Act and Air Quality Regulations into SAs through amending the Devolution Bill with a Duty to contribute to delivery of nature, clean air and climate targets.⁸⁷ One way to realise this Duty in practice would be through mandated climate adaptation reporting which aligns with other priorities of SAs including through their SDS. This would strengthen the requirement in the Planning and Infrastructure Act that SDS 'must be designed to secure that the

use and development of land in the strategy area contribute to the mitigation of, and adaption to, climate change.⁸⁸

South West Water's ARP4

Under the ARP, South West Water (SWW), whose footprint includes Devon and Torbay CCA, Cornwall and parts of WECA, produces a climate adaptation report. Its report underscores SWW's 'Green First' and 'Nature First' approach to planned investment to prioritise nature-based solutions that have wider environmental and social benefits. Highlights from its adaptation report include the role of cross-sector solutions in flood prevention, coastal protection and improved water quality through initiatives such as Upstream Thinking which improves water quality at source by working with farmers and land managers, and SWW's natural catchment management approach to flood risk including through peatland restoration.⁸⁹

Aside from its mandatory ARP reporting, SWW voluntarily reports against the Taskforce on Nature-related Financial Disclosures (TNFD) framework and is integrating this into its Taskforce on Climate-related Financial Disclosures (TCFD), recognising the substantial overlap and synergies between action on climate change and the nature crisis.

NECA's Rural Investment Plan

NECA published a Rural Investment Plan⁹⁰ for the region with actions including developing a regional register of climate risks, identifying and prioritising specific sites and communities most in need of investment, and developing a North East Climate Adaptation Plan. The plan also highlights the importance of investing in a range of climate resilience measures including coastal and estuary defences, flood mitigation, natural flood management, integrated water management, wildfire mitigation, and other measures including tackling the issue of coastal landfill sites.

The background evidence for the Rural Investment Plan notes that while agriculture in the North East currently contributes a significant share of the region's emissions, grasslands and woodlands are also the region's largest carbon sink and there is significant potential to expand this through activities such as agroforestry and changing the composition of pastures. It notes agroforestry could be used on 10% of arable land and grassland by 2050 to meet Net Zero, delivering 6MtCO₂ savings across the UK. It further suggests that understanding climate adaptation plans of owners, managers and developers of land and infrastructure will support resilient land use change and delivery of the National Adaptation Programme.⁹¹

UK Government Resilience Action Plan: Local Resilience Forum Trailblazers

The UK Government Resilience Action Plan states that it 'will work with local leaders to clarify and enhance the role of SAs and mayors in local resilience, including through guidance and legislation as required, with the aim of putting a more resilient and accountable system in place.'⁹² Through five Stronger Local Resilience Forum (LRF) Trailblazers, including Greater Manchester, Northumberland, Cumbria, Suffolk and London, the UK government aims to clarify methods to strengthen accountability to local democratically elected leaders and consider how resilience can be more integrated into wider local policy and planning, in tandem with wider work on English devolution and local government transformation.

Appraising tools for integrating land use decision-making

Most tools as they currently exist or are applied are not designed to integrate land use decisions. This reflects the siloed sectoral approach to policy and delivery of land use change, and lack of consideration of how to integrate across sectors and geographies. This relates to the methodological challenge of this research in that integration on land use decision-making does not yet meaningfully exist. Most of the tools exist to respond to an often narrow and sector-specific question, such as ‘How can 1.5 million new homes be built in four years?’ Nonetheless, each of the tools explored in the research offer insight about the key challenge of how we might achieve more integration in land use decision-making.

Spatial Development Strategy

SDS could act as the conduit for a raft of strategies and policies both vertically across levels of governance and horizontally across different sectors, but the links and delivery mechanisms need to be clearer between different types of land use and landownership, including between SDS and the Land Use Framework.

The SDS is closely connected to the government’s economic growth agenda but without corresponding links through to the Environmental Improvement Plan. While SDSs will have to consider the NPPF which covers all types of land, their departmental home of MHCLG and link to economic growth and housing delivery, may mean the deprioritisation of rural hinterlands, economies and communities.

There are sequencing issues between local plans and SDS development and uneven potential across places to use the power of SDS as an integrative tool for land use decision-making. For some areas, the SDS may just be a mechanistic tool to deliver housebuilding requirements; for others, the SDS will be a truly ambitious and integrative spatial strategy.

There are clear questions around uneven distribution of power, resources, experience and maturity across CAs, and future SAs. This is reflected in that some are progressing their SDS, while others are not. Given the SDS is being positioned as a spatial investment framework, this inequality between regions and neighbouring SAs is of deep concern. For areas which develop an SDS later, the NPPF, which includes no mention of the Land Use Framework, will be the governing text regarding strategic spatial matters in the absence of an SDS.

Regional Land Use Framework

In both the Dartmoor and Cornwall examples, a strong mandate, clear scope and solid leadership have enabled the development of regional land use studies which are intended to lead to land use decision-making frameworks. In Cornwall, the framework is intended to support multifunctional land use and be part of a transparent approach to managing trade-offs between different land uses.

Regional land use frameworks will need to be able to articulate their relationship with the national LUF and other spatial strategies, which are currently being developed. The volume, fragmentation, inconsistency and variable quality of data, combined with no universal mapping tool to integrate land use data are key challenges to creating regional land use frameworks. Challenges in existing data and systems such as the Agricultural Land Classification system and availability of data held in Local Environment Record Centres are just two examples.

Even with a working regional land use framework, delivery challenges exist, from a process for managing trade-offs, to workforce availability and skills (e.g. in farm advice and spatial planning), ongoing communications and stakeholder engagement work, plus funding for delivering, regulating and enforcing land management.

Local Nature Recovery Strategies

LNRS are a powerful potential integrative tool for land use decision-making because they have certain key attributes. They are a statutory requirement of Responsible Authorities, based on consultation with citizens, include an evidence base and spatial mapping, have funding for creation and link directly to national legal targets in the Environment Act via the EIP delivery plans. Once all LNRS are completed, they will cover the whole of England.

There are, however, some important factors currently holding back the potential of LNRS as an integrative land use decision-making tool. There is a major gap in the Devolution Bill on aligning economic growth and strategic spatial planning with nature recovery and wider environmental goals; and with considering the environment as first infrastructure. LNRS are more limited in scope than GMCA's Environment Plan, for example, which aligns closely with the concept of a Local Environmental Improvement Plan by encompassing the full range of environmental actions rather than focusing on nature recovery. There are also legislative gaps hindering the power of LNRS and unclear connections between LNRS, local growth plans and SDS.

There is variability between LNRS as they are based on different approaches to stakeholder and citizen engagement and evidence base creation. Boundaries for LNRS are likely to change with local government reorganisation and further devolution, with the ambition of the government to have the boundaries for LNRS coterminous with SAs. These factors, combined with some areas not yet having prepared their LNRS, will impact on how LNRS are patched together to achieve universal coverage.

Integrated Water Management

The IWM approach in Greater Manchester is enabled by a history of partnership working; the leadership and political mandate from the mayor; senior staff buy in mandating data sharing from the outset; and people who were keen to collaborate and share information with the right 'soft' skills to maintain energy and momentum. The IWM approach has pooled and leveraged in significant investment for the region. It is a coalition of the willing – a voluntary partnership, rather than any requirement in statute.

Regional Energy Spatial Planning

There is a lack of join up and clarity between local plans and the roles and methods of integration of spatial planning and energy planning, with the local plan system having failed to meet large-scale infrastructure needs. While SDS have potential to aid strategic regional energy planning, energy is missing from the responsibilities of SAs in the Devolution Bill. Nonetheless, some CAs including the West Midlands and North East are taking action to integrate spatial energy planning in their SDS development.

Adaptation Reporting Power

The Devolution Bill includes no duty, powers or responsibilities on SAs for climate adaptation. Stakeholders are calling for an amendment to the Devolution Bill which would include a duty for SAs to contribute to delivery of statutory nature, clean air and climate targets. Specifically on climate, the ARP4 could be a mandated responsibility, which WECA is calling for in its report of reporting under ARP4 as a Defra pilot. NECA's Rural Investment Plan includes climate resilience and adaptation as a key priority for the region and the production of a North East Climate Adaptation Plan.

Key ingredients for enabling integrated land use decision-making

Looking across the six tools explored in this research there are some common ingredients which aid integration, which are listed and appraised in Table 3. This analysis underscores the issue that there is currently no single tool enabling the integration of land use decision-making at a CA or future SA level. Many interviewees reflected on this overarching challenge in the context of the absence of a vision and plan for land use in England, with no shared set of outcomes, multiple sector-specific frameworks and a piecemeal approach to land use decisions. They reflected that there are too many different strategies, with no unifying vision, shared outcomes or mechanisms, including funding and workforce challenges, to deliver multifunctionality and manage trade-offs.

Even SDS, which hold much promise and power as a tool for integration, will not add up to a national spatial strategy when in place across the whole of England.

'We need something like the Scott Commission in the 1940s – an overall commission across departmental boundaries. Here's this non-renewable resource, here's what we want to do, how do we utilise the resource to deliver everything we want. Where's best to produce food, housing, etc, rather than in an unplanned way with everything going off through its own route.'

'A national approach would help... I would set up a taskforce to turn these challenges in a really smart and simple map... then we could have a conversation as a country – we have capacity to build x many windfarms, we need three new reservoirs, what about food? Do we want to import food? All of a sudden, there's not enough land... the critical point – land is finite.'

Table 3: Assessment of enablers across the tools for integrating land use decision-making

Enablers	SDS	RLUF	LNRS	IWMP	RESP	ARP4
Production required by statute	Y	N	Y	N	Y	Y
Body/organisation mandated for plan creation	Y	N	Y	N	Y	Y
Universal geographic coverage	Y	N	Y	N	Y	N
Scope limited to one government department and/or regulator	Y	Y	Y	N/A	Y	Y
Scope limited to one sector	Y	N	Y	Y	Y	N
Includes long-term vision (20+ yrs)	Y	Y	N	Y	N	Y
Funding for creation of plan	Y	N	Y	Y	Y	N
Governance: accountability and oversight for implementation	Y	N	Y	Y	Y	Y
Clear/mandated geographic boundary	Y	N	Y	Y	Y	N
Plan based on robust / agreed / mandated / national dataset(s)	Y	N	Partial	-	-	Y
Includes method to assess and manage land use trade-offs	N	N	N	N	N	N
Subject to citizen engagement and consultation	Y	N	Y	N	Partial	Partial
Funding delivery mechanism(s)	Y	N	N	Y	-	N

Recommendations

Our recommendations focus on how England can move toward genuinely integrated land use, both in policy and in practice. At the heart of the problem is the lack of a long-term, coherent, overarching plan for land, which is demonstrated by the proliferation of strategies and targets that rely on land use change and have spatial impacts, but which are developed in isolation. In the absence of this plan, we recommend that the relationships between existing strategies and plans are made clearer and more coherent.

We recommend raising the ambition of the Devolution Bill to recognise the environment as first infrastructure, to unlock the potential of rural areas, and to put in place mechanisms that support effective, balanced and democratic development across the whole country, whether or not areas have an elected mayor. The delivery mechanisms that make integrated land use possible, from funding arrangements to workforce capacity, must be developed and aligned.

The countryside is loved across generations and across political party lines. All political parties should commit to achieving these recommendations so that progress and momentum on integrating land use decision-making, including on regional spatial planning through SDS, is maintained.

RECOMMENDATION 1

Land use taskforce and plan

There are positive developments in strategic spatial policymaking, including the reintroduction of sub-regional spatial planning through Spatial Development Strategies and the forthcoming national Land Use Framework. These do not add up to a national plan for England's finite land resource.

- England needs a long-term, coherent, overarching plan for its land. This should be developed through a national conversation, convened and overseen by a time-limited cross-departmental taskforce, and implemented through aligned statutory delivery mechanisms. This land use plan should direct all other sectoral and geographically specific plans and include clear delivery mechanisms. Responsibility for overseeing delivery should sit as an ongoing responsibility within the Cabinet Office.

RECOMMENDATION 2

Achieving universal coverage

- In the absence of a national land use taskforce and plan, a national spatial framework should be created by the Cabinet Office⁹³ which includes all national sectoral spatial plans (including energy, housing, infrastructure, environment, farming, water) and articulates:
 - How they connect – horizontally, across sectors and vertically, across levels of local, regional and national governance.
 - How universal coverage of all sectoral spatial plans will be achieved.
- SAs should be given responsibility in the Devolution Bill for overseeing spatial strategy coordination in their area and be encouraged by central government to achieve integration and co-ordination across all sectoral policies which impact on land use decision-making.

RECOMMENDATION 3

Environment as first infrastructure and enabler to growth

A resilient and naturally functioning environment is a key enabler to economic growth and the bedrock of economic growth for future generations, yet biodiversity and ecosystem services are in steep decline. The role of the environment as first infrastructure therefore needs to be integrated into national and local strategies. There are several ways to achieve this:

- The Devolution Bill should include a 'Duty to contribute to delivery of nature, clean air and climate targets' in the Environment Act, Climate Change Act and Air Quality Regulations.⁹⁴ Local Environment Improvement Plans should be a requirement of SAs and linked to delivering the national Environment Improvement Plan and this Duty.
- An evidence-based SDS which integrates data on: the resource needs of growth; health (e.g. clear air, green space); the role of natural capital in achieving climate- and biodiversity-resilient growth; the potential for traditional infrastructure providing nature and climate benefits (e.g. through Building with Nature Standards⁹⁵). Regional Land Use Frameworks could play a key role here.
- Local growth plans, as the guiding star for the SDS, should be mandated in the Devolution Bill and in any accompanying guidance to include priorities and projects for economic growth which secure environmental resilience.
- The Climate Change Act's Adaptation Reporting Power should be extended as a duty for SAs in the Devolution Bill with commensurate funding.

RECOMMENDATION 4

Address gaps in legislation and guidance

- The Duty to Collaborate in the Devolution Bill is vague and will apply only to MSAs. This risks many gaps in spatial planning and should be addressed, for example, by extending the Duty to all Strategic and other Local Authorities.
- The relationship between the Land Use Framework, NPPF and SDS also needs clarifying, through changes in the NPPF.
- LNRS should identify wider environmental benefits alongside nature recovery so that the existing legal duty for public authorities to have regard to LNRS, and new requirements for LNRS in the revised NPPF, can be used to best effect.⁹⁶
- The importance of rural areas in providing the natural resources to mitigate and adapt to climate change is a gap in the Devolution Bill and existing provisions such as the community right to buy and neighbourhood governance structures, which could benefit rural communities, should be strengthened. NECA's Rural Trailblazer should provide learning for others on the rural aspects of devolution.

RECOMMENDATION 5

Balance risks of uneven place-based development

Combined Authorities have different levels of maturity, capacity, power and resource; some of these will be formalised and deepen with the passage of the Devolution Bill. An uneven pattern of regional power and development is emerging in England, which risks further empowering some areas and widening regional inequality, including of peripheral and rural areas. Local Government Reorganisation is an important factor for some areas and is consuming much political and administrative resource, with the opportunities afforded by administrative stability, agglomeration and devolution being missed.

- Government should undertake and make public its assessments of the risks and unintended consequences of developing different spatial and functional geographies and mitigate these risks.

RECOMMENDATION 6

Adapt powers in Devolution Bill to widen impacts

There are also opportunities which should be seized for areas progressing with devolution. The Devolution Bill sets out additional powers for SAs with an elected mayor including strategic development management and convening powers and access to funds. These powers could be expanded and adapted to make them more applicable and impactful beyond urban centres, for example:

- SAs could use the powers of compulsory purchase and/or set up a natural asset company to purchase land for nature recovery and climate resilience through nature-based solutions such as wetland creation.
- Local Government Reorganisation provides an opportunity for SAs to consider land ownership across an SA (and even wider) area. Publicly owned land (e.g. farms), for example, could be linked to regional initiatives such as Nature North⁹⁷ and opportunities for leveraging green finance.
- EMSAs' convening powers could be used to create more integration on land use, alongside powers to appoint commissioners, one of which could be dedicated to integrating spatial policies and achieving multifunctional land use.
- The Duty to Collaborate is poorly defined and could be amended in the Devolution Bill to more effectively leverage collaboration on (a) the topic of land use decision-making and (b) across boundaries between *all* SAs – not just mayoral SAs and (c) on SDSs to achieve national coverage.

RECOMMENDATION 7

Create a shared, accessible and interoperable evidence base

Issues of siloed decision-making on land use are mirrored in sector-specific evidence and data sources and platforms.

- In creating their SDS, SAs will need to draw on an evidence base and a digital spatial mapping tool. Local plans will also need to develop evidence bases. The government, including MHCLG and Defra, should provide SAs with better access to open data and citizen science through a framework which links data sets and enables sectoral data, and data at different scales, to be used. There are many initiatives which could support this including:
 - ARUP and the Open Data Institute are working on an initiative to unlock a “Whole Society” approach to blue/green infrastructure provision through open data infrastructure.
 - GMCA’s platform, GM Mapping.
 - The National Infrastructure Spatial Tool, a new digital spatial planning tool, run by the National Infrastructure and Service Transformation Authority (NISTA), layering environmental, infrastructure, industrial growth and housing needs.⁹⁸
- We support the Environmental Audit Committee recommendation that government should establish a shared geospatial and environmental data platform, integrated with a case working system and maintained by a cross-departmental team to facilitate cross-government working on nature, planning and housebuilding decisions.⁹⁹

RECOMMENDATION 8

Create and align delivery mechanisms for a more system- and place-based approach

Delivery mechanisms for land use change and integration need to be developed and aligned. Funding for environmental improvements and climate resilience is often fragmented and short-term, with weak or absent statutory responsibilities for delivery. There is a shortage of capacity and capability in the institutions charged with the responsibility of strategic land use change including in Local Authorities, SAs, central government and its executive agencies. We recommend:

- Pooling resources and funds at SA level to enable greater potential to spatially target finance (e.g. ELM, BNG), match private finance and deliver strategies, i.e. the Local Environment Improvement Plan (see Recommendation 3), SDS, LNRS, climate adaptation strategies and rural development strategies.
- Attaching funding to deliver a particular duty or requirement, such as for the Adaptation Reporting Power and the proposed Duty to contribute to delivery of nature, clean air and climate targets (see Recommendation 3).
- Address issues of capacity and capability across all levels of the workforce in all institutions charged with the responsibility to deliver land use change and integration, from strategic and senior levels (e.g. leadership, mediation) to delivery (e.g. land advice).

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