Inquiry: Unlocking Land for Housing[1]

Community Planning Alliance Response

We would urge the Public Accounts Committee to request genuine evidence of the government's claim that a shortage of land underpins the housing crisis. As can be seen from the data within our recent report[2], there are around 1 million unbuilt homes with planning permission and sufficient brownfield sites to build a further over 1 million homes. There are over a million empty homes, including some 70,000 that are unoccupied council/social housing properties. There are also an estimated 165,000 privately-owned commercial and business premises that remain empty across Great Britain.

In relation to the availability of brownfield sites, the figure could be higher because brownfield registers are not always comprehensive or up to date. Residents must be involved when brownfield registers are reviewed, as Council staff often do not live in the area and are unaware of available land unless a developer already has an interest. Local communities are incentivised to see dilapidated land regenerated and such sites are often within easy reach of public transport services and other amenities.

Each of the figures above is underpinned by evidence. All in all, there is no shortage of land, just an unwillingness from developers to built out land with planning permission or to make use of the other solutions that they could deploy. Greenfield land typically gives developers higher profit margins due to low initial acquisition costs and the lack of construction complexities associated with brownfield land.

We believe there should be tax incentives for developing brownfield and disincentives for developing greenfield. Land should also be used wisely by considering density and with a focus on public transport rather than building new or widened road schemes.

Any publicly owned land that is made available to developers should be used to provide social housing, as this is the real housing crisis, exacerbated by decades of undersupply[3].

It is essential that land suitable for the provision of nature-based solutions (peat mosses, woodlands, wetlands), to address climate mitigation and nature's recovery, should be vigorously protected. According to the Environment Audit Committee report[4], "*the annual value of UK ecosystem services was £87 billion—equivalent to 3.5% of GDP*". Delivering on nature's recovery would increase these figures, demonstrating the importance of such sites.

It should be noted that Recent More in Common research[5] revealed that politicians are seen as being out of touch with the public's values on nature, demonstrated by the 67% who think developers should have to accommodate and look after the natural environment in new developments and the 64% who said that important places for nature should be given even more protections from development than they currently have. Proposed government policy changes are not aligned with those views.

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[1] https://committees.parliament.uk/work/9517/unlocking-land-for-housing/
[2] https://homesforeveryone.org/Homes-For-Everyone-Report.pdf
[3] https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2025/12/231219-social-housing-1993-2023.jpg
[4] https://publications.parliament.uk/pa/cm5901/cmselect/cmenvaud/501/report.html
[5] https://www.rspb.org.uk/whats-happening/news/new-report-shows-people-dont-want-new-homes-to-be-built-at-natures-expense

As an example of inappropriate land use, the Greater Manchester spatial plan acknowledged that there was sufficient brownfield land to build the equivalent of two new boroughs[6]. Yet, 2,400 hectares of environmentally and ecologically rich Green Belt land, including irreplaceable habitats, has been released for development. Despite taking 10 years to complete and only being adopted in March 2024, the policies in the spatial plan are already being ignored, with development being approved that does not comply with those policies (making the plan a complete waste of public money and effort). As set out in this blog[7], it seems that the word 'requires' in a planning context is not an obligation, it is merely a suggestion that can be cherry-picked by Councils and developers.

With the above in mind, the Committee should request a more definitive definition of the term 'sustainable development' be provided. It is not sustainable to build on irreplaceable habitats, for example, to place solar on productive agricultural land (solar should be on roof tops) or to build on land that floods regularly, but there is no mandate preventing these scenarios prevailing within the planning system.

Government data shows that there are already over 6 million properties in England that are at risk of flooding today[8], yet Parliament wishes to also reduce the regulatory function of the Environment Agency, which, among other responsibilities, plays an essential role in ensuring that new developments do not increase flood risk or environmental harm.

Given the number of homes already affected, flooding is an issue that significantly impacts many communities today and the government's own data[9] states that it "*is one of the most important climate change challenges facing the UK, and people affected by flooding are more likely to experience adverse health outcomes including long-term impacts on mental health and wellbeing*".

With both mental and physical health implications, deregulation (and addressing the lack of regulation[10] in some areas) must consider the wider strategic implications, including the impact on the public purse and the capacity of public bodies to cope with the resulting increased need.

We are concerned that the government's proposals to condense regulation inappropriately places the burden of increased risk and costs on citizens, including the most vulnerable in our society, who will be the hardest hit by the cumulative impact of the government's plans to put growth before safety or the health of the nation.

Kind regards

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Vice Chair

Community Planning Alliance

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[6] https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2025/12/231120-pfe-housing-jobs.jpg

[7] https://friendsofcarringtonmoss.com/2025/08/22/what-is-the-point-of-local-development-plans/

[8] https://publications.parliament.uk/pa/cm5901/cmselect/cmenvaud/550/report.html

[9] https://assets.publishing.service.gov.uk/media/657086ad746930000d488919/HECC-report-2023-chapter-3-flooding.pdf

[10] https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf

About the Community Planning Alliance

The Community Planning Alliance is a national umbrella group for over 700 communities, all are campaigning against inappropriate development in their areas, and all disagree that decisions are being made in the 'public interest'. We have extensive knowledge and experience of the planning system, and our aims include seeking increased community participation, better environmental protections and the right homes and infrastructure in the right places.