

4 February 2025

Dear .....MP

### **Giving big developers everything they want is a plan for failure**

We write with the very greatest of concern regarding the succession of policy announcements on planning and nature in recent weeks, including the Chancellor's recent speech.

We share the government's stated ambitions to tackle the housing affordability crisis, decarbonise our economy, and improve health and economic outcomes, especially for rural communities – all while protecting and enhancing wildlife and our natural environment.

It is with absolute dismay that we see this government pursuing policies that run counter to these aspirations.

### **Delivering affordable housing**

On housing, Sussex is at crisis point. Private sector rents are officially unaffordable in almost every district and borough, according to the ONS. House prices in Sussex make property ownership an increasingly distant dream for all but the wealthiest families.

The government's prescription is to force councils to award ever greater numbers of planning permissions, to a sector dominated by a handful of housebuilding companies. These businesses' interests are best served by building homes for private sale to the wealthy on greenfield sites, delivered at a rate that will have little impact on price.

If the government were serious about housing affordability, homelessness and council house waiting lists, its focus on the supply side would be on the construction of homes for social and affordable rent in line with locally-identified need. The definition of 'affordable' would be tied to local incomes.

We cannot simply build our way out of this crisis. Studies show that housebuilding over the last 40 years has largely resulted in second and third spare bedrooms, rather than addressing homelessness or affordability – and that “the English housing stock is large enough, by a significant margin, to meet the housing needs of England's population.”<sup>1</sup> The government should be looking again at the Right to Buy, cracking down on second homes, holiday lets and investment properties, and supporting people who wish to downsize.

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<sup>1</sup> <https://medium.com/iipp-blog/meeting-housing-needs-within-planetary-boundaries-requires-opening-the-black-box-of-housing-9990be55cc1e>

In addition, brownfield land offers space for 1.2m new homes, and there are huge numbers of existing planning consents that might be built out before we simply give in to the wishes of developers and land agents aiming to extract the maximum ‘hope value’ from new permissions.

The government’s current approach will not only fail in its own terms to address the housing affordability problem. It will make the problems of climate breakdown and nature collapse so much worse.

### **The need to restore nature and prevent climate breakdown**

Developers – many already failing to meet the biodiversity requirements of their planning permissions<sup>2</sup> – are being told they will be able to simply ignore site ecology if they hand over some cash for ‘strategic’ environmental improvements elsewhere.<sup>3</sup> We support the idea that developers should contribute to wider environmental gains – but not at the expense of the sites that they are directly profiting from. There is a real risk that local areas – in one of the world’s most nature-deprived countries - will be denuded of wildlife and nature will be something we visit at weekends in drive-to biodiversity parks. It would be a recipe for runaway urbanisation which would rob rural populations of any semblance of the local natural environment they value so much and practically work hard to enhance.

The climate impacts of trying to build our way out of the housing crisis could be dramatic. Even building at a rate lower than the government’s new annual target, housing alone (new and existing stock) could consume the entire carbon budget available, if the UK is to contribute to Paris Agreement climate targets.<sup>4</sup> The focus *should* be on decarbonising existing homes, but instead the government appears to be watering down the low-carbon requirements of the Future Homes Standard.

On airports, including the de facto creation of a second runway at Gatwick, it is sadly the same story. Airport expansion will fail to deliver economic growth,<sup>5</sup> but will bust our carbon budgets (scalable Sustainable Aviation Fuels and electric aircraft being a fantasy) contrary to the advice of the Committee on Climate Change, and affect the health and wellbeing of thousands of local residents through air and noise pollution. Any benefits will largely accrue to a tiny number of very frequent fliers and countries overseas.

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<sup>2</sup> <https://wildjustice.org.uk/general/lost-nature-report/>

<sup>3</sup> <https://www.gov.uk/government/publications/planning-reform-working-paper-development-and-nature-recovery>

<sup>4</sup> <https://www.sciencedirect.com/science/article/pii/S0921800922002245>

<sup>5</sup> <https://neweconomics.org/2025/01/expanding-uk-airports-wont-deliver-economic-growth>

## **Balancing the private interests of developers and public goods**

The major developers are not impoverished charities. Recent research found that “UK housebuilders’ pre-tax profit margins currently range from between about 12% and 30%.”<sup>6</sup> The government should dismiss the deregulatory special pleading, support new small and medium-sized entrants in the marketplace and give the public and non-profit sectors a greater role in delivering public goods, like affordable housing, climate protection and homes for nature.

## **Defending the planning system**

The planning system, for all its faults, was intended to help manage and balance the competing needs for land – so that we can give people homes, produce food, store carbon, support thriving local businesses, protect ourselves from floods, make space for nature, enjoy vibrant communities, and protect beautiful countryside from sprawl. Even the last of these principles - enshrined in the idea of green belt – is now under assault, while local democratic oversight, and space for local people’s voices, are to be stripped away with the curtailing of the role of local planning committees.

The government appears hellbent on tearing up these safeguards and tipping the planning balance firmly on the side of special interests. They will put English communities, nature and landscapes at risk, and undermine the natural systems that support the air we breathe, the food we eat and the water we drink.

As we move towards the new Planning and Infrastructure Bill, we would urge you to resist these backward steps, through all means available to you. CPRE in Sussex, and nationally, stands ready to support you in doing so.

Yours sincerely,

Paul Steedman

Director, CPRE Sussex

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<sup>6</sup> <https://www.brunel.ac.uk/news-and-events/news/articles/Builders-are-making-thumping-profits-by-over-charging-for-new-homes-%E2%80%93-new-findings>