

**SUBMISSION TO RT HON
DAMIAN HINDS MP
2025/05/30**

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Rt Hon Damian Hinds MP

Member of Parliament for East Hampshire

House of Commons

London SW1A 0AA

Date: 29 May 2025

Dear Rt Hon Damian Hinds,

This is a formal request for political leadership on what may be the most dangerously overlooked national threat in modern Britain.

The UK housing crisis is no longer merely a matter of affordability. It is a structural failure with far-reaching consequences for **sovereignty, public trust, national resilience**, and the long-term viability of our **land, ecosystems, and democratic institutions**.

The six legislative proposals enclosed are not isolated reforms. Together, they form a coherent legal framework to address what is now a uniquely British emergency — one enabled by **policy gaps, regulatory capture, and exploitative financial models** that our current system not only tolerates, but in some cases rewards.

We face a system marked by:

- **Legalised extraction** of value from land without reinvestment into the communities that generated it,
- **Systematic degradation** of infrastructure and public services through speculative, uncoordinated delivery,
- **Erosion of democratic oversight**, as land is acquired, banked, or promoted by entities operating through **offshore holding structures** or limited-liability SPVs,
- And **generational displacement**, as land and housing are treated not as civic infrastructure, but as speculative instruments — indifferent to long-term livability or environmental impact.

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Why This Threat Is Uniquely Dangerous in the UK

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Unlike many European democracies, the UK currently has:

- No national framework to regulate **developer profitability**,
- No statutory obligation to align housing delivery with **infrastructure readiness** or **environmental thresholds**,
- No enforceable rules requiring **ownership transparency** during the planning process,
- And no **licensing regime** to prevent repeated abuse by known bad actors.

At the same time, many of the UK's largest developers — including publicly listed firms — operate through **offshore holding structures** or tax-efficient arrangements. These structures fragment liability, conceal profit flows, and sever **ownership** from **delivery responsibility**.

This creates a planning environment where:

- **Permissions are hoarded**, not delivered,
- **Land is commodified**, not planned,
- **Profit is extracted invisibly**, not reinvested,
- And **public and environmental costs** are offloaded onto future generations.

This is not market failure. It is **state-enabled legal extraction** — on a scale and with a level of impunity few other democracies would accept.

What's at Stake

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If this trajectory continues unchecked, Britain risks:

- **National security exposure**, as development land is controlled by offshore or unaccountable entities,
- **Civic fragmentation**, as communities lose faith in fair process and infrastructure collapses under speculative growth,
- **Environmental exhaustion**, as poor development patterns overwhelm local ecosystems,
- And **irreversible loss of sovereignty**, not by conflict, but by legal inaction and regulatory decay.

*The land is still ours — but only if we act now, with law,
clarity, and structural accountability.*

Purpose of This Submission

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The six strategic interventions are outlined in full at the links below. Each page presents:

- The problem it addresses,
- Proposed national and local actions,
- Legislative mechanisms, and
- Precedents or implementation paths.

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These are not abstract proposals. They are:

- **Evidence-based**,
- **Structurally proportionate**,
- And **entirely achievable** within existing legislative frameworks.

They are grounded in the principles of:

- **Transparency** — Know who owns, who profits, who is responsible.
- **Sustainability** — Align planning with infrastructure and environmental limits.
- **Accountability** — License those who operate; exclude those who abuse.
- **Fairness** — Reinvest what is extracted; stop value leakage from public land.

These reforms aim to:

- Recognise **housing and land control** as strategic infrastructure and security matters,
- Reverse legalised value extraction through **profit caps**, **clawback tools**, and **ownership transparency**,

- Equip local authorities and Parliament with the tools to **block abuse, deliver sustainably,** and **restore trust,**
- And protect the right of future generations to live in communities that are viable, just, and built for the public good.

The British public rightly expects that land granted development value should serve the **national interest** — not be diverted into **private offshore gain** or speculative asset cycles.

With urgency,

Sophia Davenport

INTERVENTION POINT 1:

ADD HOUSING TO

NATIONAL RISK

REGISTER

What are we trying to do?

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We want the UK Government to treat housing instability as a national security risk — just like cyberattacks or energy shortages. Right now, speculative development, land hoarding, and foreign ownership are creating vulnerabilities in our housing system. These must be formally recognised.

What will this achieve?

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- Forces government departments to treat housing as a resilience issue, not just a market problem.
- Unlocks national-level oversight, emergency powers, and policy coordination.
- Opens the door to protective measures like ownership audits, delivery controls, and investment restrictions.

NATIONAL LEVEL – What should our MP do?

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1. Submit Written Parliamentary Questions

Ask the Cabinet Office if it will include “housing fragility” in the next update of the National Risk Register (NRR) — under:

- Economic Resilience
- Infrastructure Dependency
- Foreign Asset Exposure

2. Request a Ministerial Meeting

Arrange a meeting with:

- The Minister for the Cabinet Office
- The Deputy Prime Minister
- To discuss how speculative land control and housing underdelivery are harming UK resilience.

3. Push for a Parliamentary Debate

Call for a debate — ideally a Westminster Hall debate — to demand:

- Public recognition of housing fragility as a strategic risk
- Cross-party review of the National Security and Investment Act to cover land

4. Engage Oversight Committees

Approach the Joint Committee on the National Security Strategy to:

- Submit housing evidence
- Ask them to formally assess the link between speculative land control and national security threats

5. Build a Public Argument

Use your position to:

- Sponsor or support media articles or briefings
- Frame housing policy as a matter of resilience and national sovereignty

LOCAL LEVEL (EHDC) – What can be done right now?

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1. Flag housing fragility in official reports

EHDC can highlight speculative behaviour and stalled delivery in:

- Authority Monitoring Reports (AMRs)
- Local Plan evidence base

2. Issue Planning Position Statements (PPS)

Declare through a PPS that:

- The council sees speculative landholding as a threat to planned delivery
- Future allocations will be filtered based on risk

3. Use delivery data to justify policy changes

Where developer behaviour is slowing down delivery:

- Include these risks in site scoring, phasing, and allocation
- Adjust policy weighting and de-prioritise risky actors

4. Back legal reforms in local consultation responses

EHDC can write in support of:

- Adding housing fragility to the NRR
- Reforming the National Planning Policy Framework (NPPF) to require delivery risk analysis

What should our MP do locally?

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- Write formally to EHDC asking them to update their AMRs and Local Plan with housing risk language
- Publicly back the council if it takes protective measures (e.g., against land banking)
- Include EHDC's actions in ministerial briefings and use them as an example of proactive local leadership

INTERVENTION POINT 2:

STRATEGIC LAND USE

SECURITY BILL

What are we trying to do?

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We want Parliament to pass a new law — the Strategic Land Use Security Bill — to protect the UK’s long-term control over critical land assets. This means making sure land needed for homes, food, infrastructure, and environmental protection can’t be locked away by speculators or foreign entities.

What will this achieve?

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- Blocks harmful land banking and foreign monopolies
- Protects land needed for community needs and future generations
- Establishes a new legal framework to intervene in misuse or withholding of land

NATIONAL LEVEL – What should our MP do?

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1. Support or sponsor a draft bill

Push for the introduction of the Strategic Land Use Security Bill. This should include powers to:

- Audit land ownership and identify strategic sites
- Apply use-it-or-lose-it rules to land hoarding
- Limit speculative or hostile foreign control of land

2. Raise the issue in Parliament

Call for a statement from the Department for Levelling Up, Housing and Communities about:

- How the Government will secure strategic land assets
- Whether new powers will be introduced to prevent misuse of key land

3. Demand data transparency

Request the publication of data on:

- Who owns strategic land near infrastructure or settlements
- How much land is stalled or banked for speculative value

LOCAL LEVEL (EHDC) – What can be done right now?

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1. Map strategic land locally

Identify sites vital to housing, climate adaptation, energy, or food security and flag them in planning documents.

2. Use planning tools to challenge hoarding

- Refuse or delay permissions where applicants are known to stall delivery
- Use Local Plan policies and phasing to prioritise trustworthy, active developers

3. Declare strategic protection zones

Use Planning Position Statements (PPS) or guidance notes to:

- Declare land near key infrastructure or settlements as “strategic”
- Signal that the council will resist land speculation in these zones

What should our MP do locally?

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- Ask EHDC to publish a public register of stalled land
- Convene a public meeting on land control and community needs
- Include EHDC's local strategy in briefings with ministers and select committees

INTERVENTION POINT 3:

RESILIENCE &

SOVEREIGNTY TEST IN

PLANNING

What are we trying to do?

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We want planning decisions to pass a new test: does this development protect or harm the community's long-term resilience and sovereignty? This means considering not just houses, but whether infrastructure, services, and social cohesion are keeping pace.

What will this achieve?

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- Stops approvals that undermine local capacity or control
- Requires national and local planners to assess long-term consequences
- Encourages joined-up planning that supports sustainable, self-reliant communities

NATIONAL LEVEL – What should our MP do?

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1. Propose a national planning test

Push for an amendment to the National Planning Policy Framework (NPPF) to introduce a “Resilience & Sovereignty Test” for developments that asks:

- Will this create excessive infrastructure or service pressure?
- Will it support or undermine local self-sufficiency?
- Is the community resilient enough to absorb it?

2. Lobby for joined-up assessments

Ask DLUHC and DEFRA to issue joint guidance that:

- Combines housing, health, climate, food, and infrastructure metrics
- Requires developers to show resilience benefits, not just housing numbers

3. Call for a Commons briefing or select committee review

- Raise awareness of recent planning failures that eroded resilience and control in local communities
- Demand a systematic response

LOCAL LEVEL (EHDC) – What can be done right now?

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1. Apply the test in planning reports

Planning officers should comment on how each application affects community resilience, infrastructure balance, and capacity.

2. Introduce local policy wording

Use the Local Plan and Design Codes to insert principles like:

- Social cohesion
- Infrastructure balance
- Environmental and food system resilience

3. Refuse or amend risky applications

Where a development would breach the resilience of local schools, GP surgeries, water systems, or community fabric, refuse or negotiate terms.

What should our MP do locally?

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- Back EHDC in applying a resilience test
- Promote EHDC's approach as a pilot for national reform
- Include local data in national debates on resilience and planning

INTERVENTION POINT 4: NATIONAL PUBLIC LAND & DEVELOPMENT REGISTER

What are we trying to do?

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We want the UK to publish a full, transparent register of public land — including where it is, who owns it, and how it's being used or disposed of. This includes land held by councils, central government, NHS trusts, and arms-length bodies.

What will this achieve?

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- Makes it harder for public land to be sold off quietly or used inefficiently
- Allows communities to push for public interest uses like housing, parks, or schools
- Provides a foundation for strategic land use planning and democratic oversight

NATIONAL LEVEL – What should our MP do?

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1. Push for legislation or guidance

Back a new requirement that:

- All public landholdings be registered and regularly updated
- Sale intentions be flagged early and made contestable

2. Submit Written Questions

Ask departments like DLUHC and the Cabinet Office to disclose:

- What data they hold on public land
- Whether disposal plans are subject to transparency and scrutiny tests

3. Request a Select Committee Review

Ask the Public Accounts Committee or Levelling Up Committee to:

- Investigate past public land disposals
- Recommend controls and disclosure rules

LOCAL LEVEL (EHDC) – What can be done right now?

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1. Publish a local register of public land

List all land held by EHDC, Hampshire County Council, and NHS trusts in the district, with use status.

2. Update asset strategy

Declare how each parcel of public land will be retained, reused, or offered for community-led development.

3. Consult on future land use

Where disposal is proposed, hold open consultation and allow bids from local housing associations, co-ops, or community trusts.

What should our MP do locally?

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- Ask EHDC to adopt the register and publish land maps
- Promote best use of public land through events and newsletters
- Raise concerns in Parliament where public land is misused or sold below value

INTERVENTION POINT 5: REDEFINE HOUSING AS NATIONAL INFRASTRUCTURE

What are we trying to do?

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We want the UK Government to legally classify housing as part of the nation's infrastructure — just like roads, railways, and energy networks. This would force every level of government to treat housing delivery, quality, and location as critical to national wellbeing.

What will this achieve?

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- Prioritises housing in public investment and national budgeting
- Enables joined-up planning between homes, transport, and public services
- Protects affordable and social housing from short-term market pressures

NATIONAL LEVEL – What should our MP do?

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1. Propose an Infrastructure Status Bill Push for legislation that:

- Adds housing to the statutory definition of infrastructure
- Requires national and local infrastructure strategies to include housing targets

2. Submit Written Questions Ask HM Treasury and DLUHC:

- Why housing is not yet treated as critical infrastructure
- What steps would be needed to change this

3. Push for funding and delivery guarantees Back reforms that:

- Tie infrastructure funding to housing affordability and need
- Enforce obligations on Homes England and local authorities to prioritise resilient housing delivery

LOCAL LEVEL (EHDC) – What can be done right now?

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1. Use local planning to join up infrastructure and housing

Ensure new developments are:

- Planned alongside schools, roads, and energy networks
- Prioritised based on need and delivery likelihood

2. Declare housing as essential infrastructure in EHDC policy

Update Local Plan vision statements and SPD (Supplementary Planning Documents) to reflect housing's central role.

3. Track infrastructure alignment in site assessments

Score sites not just on availability, but also how well they connect to services and deliver long-term community benefit.

What should our MP do locally?

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- Support EHDC in using infrastructure scoring for housing
- Publicly promote EHDC's efforts to align housing with long-term infrastructure
- Recommend EHDC as a case study in government consultations

INTERVENTION POINT 6:

LICENSING & CRIMINALISATION

OF PLANNING ABUSE

What are we trying to do?

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We want the UK to introduce formal licensing for developers — with clear standards of conduct — and to criminalise serious forms of planning abuse, such as deception during consultation, land banking to manipulate housing targets, or coordinated lobbying to undermine policy.

What will this achieve?

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- Stops dishonest or exploitative actors from operating unchecked in the planning system
- Creates real consequences for abuse — including financial penalties and prosecution
- Builds public trust and levels the playing field for ethical developers

NATIONAL LEVEL – What should our MP do?

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1. Propose a Developer Licensing & Misconduct Bill

Push for legislation that would:

- Require developers and major land promoters to be licensed by a national body
- Set standards for transparency, consultation, and delivery track record
- Create criminal penalties for deliberate deception, coordinated planning manipulation, or abuse of local process

2. Request a ministerial response on misconduct

Ask DLUHC to:

- Investigate current loopholes allowing repeat planning abuse
- Commit to publishing guidance and legal options for reform

3. Call for a select committee inquiry

Encourage scrutiny of cases where planning decisions were:

- Secured through misinformation
- Repeatedly manipulated by known actors
- Associated with ghost consultations or tampering with evidence

LOCAL LEVEL (EHDC) – What can be done right now?

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1. Create a local developer conduct register

Keep records of developer behaviour during and after planning:

- Missed delivery timelines
- Misleading consultation materials
- Pattern of speculative applications not followed by delivery

2. Prioritise planning applications based on conduct history

- Reward reliable developers in site selection, delivery phasing, or conditions enforcement.
- Flag repeated abusers in reports.

3. Support community evidence gathering

Work with residents and parish councils to:

- Document misleading leaflets, false engagement claims, or delay tactics
- Submit this to EHDC and include it in planning decisions

What should our MP do locally?

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- Publicly support a zero-tolerance stance on planning fraud and abuse
- Encourage EHDC to trial a local licensing or vetting scheme
- Share local cases of abuse in Parliament to demand reform