



The
Wildlife
Trusts

Housing Principles Briefing

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Introduction

We live in a time of crisis: we face an urgent nature and climate emergency, an unacceptable increase in housing stress and homelessness, and increasing health inequality.

The situation for the environment is dire, with one in ten species in England on the brink of extinction and the UK amongst the most nature-depleted countries in the world.

A recent report from the Intergovernmental Panel on Climate Change found that global emissions continue to rise, and despite governments and communities around the world taking action, we are still on track for temperatures to increase by more than 1.5°C¹.

We cannot tackle the climate crisis without similar ambition to meet the nature crisis head on – the two are inseparable. The climate crisis is driving nature's decline; the loss of wildlife and habitats leaves us ill-equipped to reduce our emissions and adapt to change. Nature's incredible ability to trap carbon safely and provide other important benefits is proven, but nature in the UK is in a sorry state and important habitats are damaged and declining. Rapid cuts in our emissions must be matched with determined action to fix our broken ecosystems, so they can help stabilise our climate. We must bring nature back across at least 30% of land and sea by 2030.

At the same time, many communities across England today have acute unmet housing needs. In its final report², published in 2020, Lord Best's Affordable Housing

Commission identified 4.8 million households in England in serious housing stress, representing one in five of all households. This figure includes 1 million low-income households living in the private rented sector and spending more than 40% of their income on rent, and a further 1 million households struggling to meet their mortgage payments, as well as others living in overcrowded conditions or in homes unsuited to their needs. There has been little improvement since then. In December 2021, Shelter found there were more than 274,000 homeless people in England, including 126,000 children, most of them living in temporary accommodation.

Even when people do have adequate housing, this may not provide the access to nature that everyone should have, with the benefits this brings to health and wellbeing. Evidence shows that access to natural green space is linked to big improvements in both physical and mental health and reduces health inequality³, yet one in three people in England have no access to greenspace within 15 minutes' walk of home⁴. Furthermore, access to nature in economically deprived areas, and for areas with higher proportions of minority ethnic groups, is deeply unequal⁵. Currently, children who live in deprived areas are nine times less likely to have access to green spaces⁶.

It is time to find a solution that provides the homes people need, where access to nature is standard. Homes should be built in a way that does not make the climate and nature crises worse, but instead actively contributes to reducing climate impacts, helps nature to recover and tackles health inequalities.



Review of housing need

The urgent need to provide homes for millions of people in housing need is beyond doubt. Since 2017, the government has set itself a target of delivering 300,000 net additional homes a year in England by 2025. Not everyone agrees that significant additional house-building, of whatever tenure, is the most important response to unmet housing need. Evidence shows a growing housing surplus in many places, with new housing outpacing household formation for most regions in England⁷. The problem is one of affordability and how this is defined and understood.

A blanket target of 300,000 new homes per year does not address the mixture of housing type and tenure needed. Nor does it address the needs of low-income renters. In 2019, Shelter identified 3.1 million households in England in need of social housing and called for a 20-year programme averaging 155,000 new social rent homes each year⁸.

Housing projections don't accurately forecast future changes – such as areas returning to growth after economic decline. Nor do they account for the backlog of housing need, including overcrowded households, those living in homes they cannot afford, young people living with parents for longer, and older and disabled people living in homes unsuited to their needs. One estimate puts the number of these 'concealed households' at 2.4 million⁹.

Lack of supply is frequently assumed to be a national issue, when it is actually a London and South East problem with some other localised hotspots¹⁰. Communities in other parts of the country suffer less from lack of supply than from quality problems related to the age of existing housing and weak incentives for improving conditions and modernising, particularly in the private rented sector¹¹.

Improving existing homes could, in many places, be a better solution with less impact on nature and climate. However, financial disincentives work against this. New builds are VAT exempt but repairs and retrofits for existing buildings are not. Grant funding for housing excludes works on existing homes, and is only available on regeneration projects for 'net additional' homes. This means grants cannot be used to improve or replace existing homes, thus contributing to net losses of social housing in many regeneration schemes¹².

Calculation of house-building targets is fundamentally market-led, focussing on increasing demand for market homes and satisfying that demand¹³. However, satisfying housing demand is a very different thing to satisfying housing need. Housing need can be understood as the amount and type of housing space required to meet social and economic needs, so that households can live in decent, dignified conditions close to work opportunities and personal networks. This is different to housing demand: the amount of housing space that people will choose to buy (or rent), given their preferences and ability to pay. A policy focus on housing need specifically, rather than on ramping up market supply, could help to reduce the aggregate impact of new housing on nature.

Some local housing markets feature high levels of demand for homes which make no contribution to meeting local housing need. In 2018/19, 495,000 properties in England were primarily used as holiday homes and short term lets (like Airbnb) or other types of secondary homes, including future retirement homes. While second homes are not always in the right places to meet housing need, there are still roughly twice as many second homes in England as there are homeless households¹⁴.

Without change, Government could meet its targets but still have a housing crisis, and in the process add to the climate crisis and lose valuable space for wildlife – exacerbating the nature emergency and reducing our ability to tackle climate change through nature-based solutions. If we continue to build in the same environmentally costly way, we will get the same results: increased congestion, poor air quality, pollution, more disconnect from nature and continued deterioration in people's quality of life – the economic cost of this will be felt from increased health and social care requirements and reduced productivity.

Nature is our home and as the Dasgupta Review¹⁵ makes clear, good economics demands we manage it better and rebalance our demand of nature's goods and services with its capacity to supply it through truly sustainable growth and development. If we don't, future generations will be picking up the bill.

The following principles will enable homes to be provided at the scale needed whilst meeting climate and biodiversity targets set for 2030.

PRINCIPLE

1

Build the right homes...

New homes should only be built if they address the housing needs of people in the area in which they are being sited. This requires more accurate assessments of housing need than a nationally set target. Local authorities should be required and supported to assess the local need for different tenures, types and sizes of housing, including for social rent and other types of affordable housing. These assessments should then inform new, tenure-sensitive housing targets.

Build affordable homes as the priority: In most places, genuinely affordable (often meaning socially rented) homes are what is most needed. In defining local housing need, planning authorities and developers must put affordability first and prioritise the needs of those on their housing lists.

All new development should meet local authority policies for genuinely affordable homes or provide a ring-fenced proportion of Infrastructure Levy for social housing.

Priority should be given to improving, modernising and repurposing existing homes, buildings and estates. Constructing new builds can produce ten times more CO₂ than refurbishment¹⁶ and consumes more land which might otherwise be used to support nature's recovery. To encourage this, financial disincentives for improvement work must be removed, by including repairs and retrofits within grant funding for home building, reviewing VAT to bring repairs in line with new builds and restoring dedicated funding for regeneration projects. To take a 'needs first' approach to new housebuilding, government must take action to reduce the price at which land comes into development, enabling a greater diversity of homes to be built. This should include powers for a public body – like a council or a development corporation – to compulsorily purchase land at prices which exclude 'hope' value, by reforming the Land Compensation Act 1961, following recommendations from Shelter, the National Housing Federation, centre-right thinktank Onward and many others¹⁷.



PRINCIPLE

2

... in the right place

Once the 'need' for new housing is established, appropriate location is vital. Our natural environment is finite, and its protection should be a priority. Avoiding harm to wildlife and natural spaces at the outset will reduce risk, delays and expense for developers. The location of housing should be strategically and spatially planned with nature and its recovery at the heart. Nature Recovery Network mapping provides an understanding of where nature exists and where it needs to be better protected, restored and created for the future. Local Nature Recovery Strategies will incorporate this nature mapping and should form part of the Local Plan, informing the location of development. At a wider level The Wildlife Trusts are calling for a spatial strategy for land use in England. This would plan sufficient space nationally for nature's recovery, and locate infrastructure strategically around this. This is needed to enable us to build sufficient infrastructure to meet net zero carbon targets without making the nature crisis worse. The strategy should identify how land uses should be prioritised and include strategic nature-based solutions to mitigate negative impacts.

New homes and communities must be built to withstand a significantly changing climate. Homes should not be built in flood risk areas. Nature-based solutions to aid climate resilience should be incorporated into development¹⁹. These need to be in the right place to be most effective. When combined with other environmental information, spatial mapping can unlock practical and pragmatic 'win-wins', where nature can be an integral part of the solution to pressing public policy issues such as flooding, air quality and the need for access to nature near homes. Local Nature Recovery Strategies can also be used to identify where habitat creation or restoration can deliver the best outcomes for wildlife and people. For example, re-establishing naturally functioning floodplains can provide improved wildlife habitat as well as flood control and enhanced protection for settlements downstream.

New houses and settlements need to be well-connected for wider services and access to jobs. Mobility and accessibility should be designed around active travel and public transport links and should not increase reliance on car ownership. This means rethinking the way we plan and design movement within developments, so it is more joined up and integrated into the grain of the natural landscape and ensures easy access to local services.



PRINCIPLE

3

... in the right way

Whether constructing new homes or retrofitting existing buildings, housing must reflect the challenges of the 21st century. Development must be designed to deliver sustainable low carbon homes that meet housing need, minimise water use, allow people to enjoy the beauty of nature on their doorstep, and give nature space to recover and thrive. The right way means:

- building homes in a way that avoids and minimises biodiversity loss and damage.
- using sustainable construction methods and materials to deliver quality, affordable homes, with low environmental footprints.
- creating energy efficient homes – reducing emissions and household bills – by incorporating wall and loft insulation, high quality windows, solar panels, passive cooling and heating and natural ventilation.
- creating water efficient homes and developments that conserve water and its use by installing water-saving taps, showers, toilets and appliances. And by incorporating sustainable urban drainage, swales and rain gardens to reduce surface water flooding and provide wildlife habitat. There should be no impermeable hard-standing surfaces in new developments.
- getting the density right, by designing compact, social and walkable places that integrate nature with the built environment to create wildlife corridors, strong communities and promote well-being.
- designing space for nature into buildings and their surroundings, providing nesting space and shelter for birds, bats and bees and planting with wildlife in mind. Artificial, plastic lawns are damaging to climate and nature and should be avoided.

Building places is as important as building homes and contributes to a sense of place and community¹⁹. Designing new housing around nature and integrating more nature into new and existing housing developments builds in climate resilience, provides vital wildlife habitat and many community benefits. For example, urban trees improve the view, aid privacy, provide shade and help reduce pollution and flash flooding; community green spaces bring people together; and local parks and woods provide valuable places for people to walk, play and relax. Such approaches can also be incorporated into the renovation of existing social housing estates^{20,21}. Currently many are subject to in-fill through estate regeneration programmes, often reducing the amount of space that could serve to provide nature-based climate resilience²².

The Future Homes and Buildings Standard²³ aims to bring new buildings in line with the UK's 2050 net zero emissions target, but sets no maximum permissible emissions per home and does not incorporate embodied emissions from construction²⁴. In the absence of clear Government standards, BREEAM standards²⁵ – based on a range of sustainable categories – should be applied to all developments alongside other good practice guidance for green infrastructure²⁶, low carbon design²⁷, energy efficiency, sustainable transport and water management.

Homes fit for the future

1. Good use of roof space — solar panels and green roofs
2. Water butts collecting rainwater from guttering
3. Bird boxes and bat boxes
4. Shade trees for wildlife, summer cooling and improved air quality
5. Heat recovery and ventilation
6. Heat pumps
7. Sustainable drainage — permeable driveways, gutter-fed ponds, swales and rain gardens
8. Green infrastructure — trees, hedgerows and other habitats provide space for nature and help to reduce flood risk
9. Wildflower verges along roads and formal open spaces
10. Local wild space — easy access to wilder spaces improves people's physical and mental health
11. Lighting designed to avoid disturbing wildlife
12. Safe, attractive pedestrian and cycle routes for active travel
13. Native, wildlife friendly plants used in gardens and landscaping
14. Wildlife-friendly boundaries between gardens and open spaces
15. Deadwood piles or bug hotels



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PRINCIPLE

4

... using nature and people-centred design

All people should have everyday access to nature close to home. Spending time in nature is known to improve health and quality of life^{28,29,30}, and contact with nature is beginning to be prescribed as part of the solution to health problems, through 'social prescribing'³¹. During the Covid pandemic, nearby nature has provided a lifeline to people, particularly helping to tackle the mental health impacts of lockdown^{32,33}. As we face a cost-of-living crisis, adding stress to already difficult lives, the need to give people proper access to nature becomes even more important. Enabling contact with nature close to where people live could reduce visits to GPs and other health professionals in future and save the National Health Service millions of pounds.

There is evidence that deep inequalities exist between people's access to nature in the UK. For example, a survey conducted by Natural England found adults living in poverty were three times more likely to lack access to shared or private greenspace³⁴. And adults from ethnic minorities and those with long-term health conditions were less likely to have had a recent visit to a natural place.

There have been best practice standards for Access to Natural Greenspace for years, but most local authorities do not prioritise meeting these targets. Some local authorities have developed Green Infrastructure strategies. However, these strategies act as guidance only, often without the power to inform strategic decision-making to guide other local authority decisions. Green Infrastructure strategies often have little influence over other public bodies, such as transport authorities and other landowning public bodies.

To create places where people can enjoy healthier lives, adequate high quality and accessible natural green space must be integrated into urban areas through innovative design and placemaking.

The Government should set targets for Access to Natural Green Space that local authorities must achieve. These should include a requirement for all homes to be within five minutes' walk of natural green space, taking into account the routes used to reach such spaces.

Local Nature Recovery Strategies should be used to identify where better access to nature is needed so that investment can be effectively targeted.

A duty should be placed upon local authorities to develop, implement and monitor a local Green and Blue Infrastructure Strategy, informed by the Local Nature Recovery Strategy, that provides a network for nature's recovery through and beyond the urban area and connects people with nature in their daily lives. All public bodies should be required to contribute to the delivery of the local Green and Blue Infrastructure Strategy.

New developments should contribute to the local Green and Blue Infrastructure Strategy by including:

- greenspace, managed to increase wildlife
- improved access to nature for surrounding communities as part of the infrastructure levy
- connected, green walking and cycling routes linked to decarbonised public transport, local amenities and schools to provide everyday access to nature.

The Government Levelling Up missions should include provision of access to nature as a way of helping address health inequalities.

Options for re-using brownfield sites should include the creation of urban nature parks in areas where there is not enough nature space for communities.



PRINCIPLE

5

...planning development within environmental limits

Our environment can no longer sustain the pressures that we put on it. Humans are using the world's natural resources far more quickly than they can be replenished. All decisions about the planning, design and construction of new housing must be based on a thorough understanding of the natural environment's capacity to meet the demands placed on it.

Strategic planning, informed by a strategic environmental assessment, is needed to ensure that the principles we propose can be met and that development proposals stay within environmental limits for nature, carbon and water.

In addition to the previous principles, strategic planning must consider:

- the cumulative impact of multiple projects. Too often, impacts are deemed insignificant on their own, but over time have amounted to death by a thousand cuts for vulnerable habitats and species.

- water availability: the Environment Agency has forecast that in some areas of the country water demand will outstrip supply by 2050, and already much of England is classed as 'Seriously Water Stressed'. Development must not place additional stresses on water supply. Government should update and tighten Building Regulations to strengthen water efficiency, and require development to achieve water neutrality wherever sources are over-abstracted.

- the current issue of domestic wastewater adding to the problem of nutrient pollution of water courses, coastal waters and protected wetland sites. Nutrient offsetting schemes, proposed by the Government as a short-term solution, will prevent housing developments making the situation worse but do not go far enough. Development, as the main source of wastewater, has contributed to the problem for many years and must now contribute to the solution through nutrient negative schemes. These take more nutrient pollution out of the system than the development puts in; we believe that schemes should deliver a reduction compared to pre-development levels in order to improve water quality over time.

- future proofing homes and places so they require as little alteration and retrofitting as possible will be key for all new developments. Considerations should go beyond the build itself to include infrastructure such as locally sourced clean energy, active travel and access to nature and services. Investing upfront will ensure housing is cheaper to run and more desirable – offering long-term health and wellbeing benefits, while minimising the current and future disruption to nature.

- nature based solutions. Healthy ecosystems on land and sea can absorb vast quantities of CO₂ from the atmosphere, locking it away as carbon. However, human activities, including poorly planned and executed development, release this stored carbon, driving nature's decline. We need to identify and protect important ecosystems to avoid carbon release and maximise its absorption.

Healthy habitats and ecosystems:

- slow, store and filter water, reducing the risk of flooding downstream, and supporting river flows during drought
- offer protection from coastal erosion and storm surges
- clean air and water resulting in fewer pollutants such as nitrates, phosphates and particulates
- help regulate temperature
- connect people with nature
- improving health, wellbeing and enjoyment of life; and provide the pollinators, soils, nutrients, food and water that sustain us.



PRINCIPLE

6

Contribute to nature's recovery

Putting nature into recovery across a mosaic of connected habitats will deliver countless other cost-effective benefits for housing developments and the people and communities that occupy them. All developments should contribute to this through biodiversity net gain and nutrient negativity. New housing should adhere to the mitigation hierarchy and achieve a positive contribution to nature's recovery. This means:

- preventing damage to biodiversity by locating developments in the right place and ensuring good early design. Developments should avoid loss or damage to irreplaceable, ancient and high-value habitats and important international, national and local wildlife sites. These are all remnants of a rich past and essential to our future.

- minimising biodiversity loss by:

- incorporating existing habitats into landscape design to retain natural corridors and networks – new housing must work with as much existing habitat as possible. For example, retaining, enhancing and managing woods, copses, hedges and streams as integral parts of the development.
- integrating new habitat into design, using best practice to reduce construction impacts.

- as a last resort where impacts to existing sites, habitats and species are completely unavoidable, effective mitigation and compensation measures should ensure no overall loss in biodiversity.

- delivering more for nature than is lost – habitat restoration and creation should be a standard feature of all new housing development to secure at least a 20% biodiversity net gain. This should be assessed and measured objectively using the Defra biodiversity metric and informed by ecological expertise once the mitigation hierarchy (avoid, mitigate and compensate) has been properly applied. All development must enhance biodiversity, even where no damage to nature occurs.

- maintaining natural green spaces should be regarded with the same importance as maintaining other infrastructure and financially planned at the outset, through for example, service charges or capital endowments. Communities should be empowered – with the support of local charities and social enterprises – to maintain shared spaces and grow food, bringing new skills and opportunities to the area.

A RENTERS' RIGHT TO NATURE

13 million people are private renters in the UK – that's 1 in 5 of us, including 1 in 4 families³⁵. Renters deserve a nature-friendly and climate-proofed home, but are usually unable to make the necessary changes to their homes themselves. There is no incentive for private landlords to provide their tenants with nature, and current energy efficiency regulations only require them to meet very basic standards. This is despite the average renting couple in England spending 41% of their income on rent³⁵.

Private landlords must be encouraged to bring nature into their properties through changes to the Government's Model Tenancy Agreement and through tougher requirements to provide green space and energy efficient homes.



Principles into practice

The Wildlife Trusts believe that there should be no conflict between providing the homes people need and achieving nature's recovery. We engage in the planning process from local to national level, using the Wildlife Trusts' experience of protecting nature through the planning system to provide advice on how policy and legislation can be improved to enable the Government to meet its environmental goals.

We work with developers and housing providers (e.g. housing associations) who want to build and deliver to the highest sustainable standards in a way that protects and enhances nature. We provide advice on how this can be achieved. Some Wildlife Trusts provide habitat creation and management services.

We are happy to work with developers who:

- build necessary development addressing local housing need and meet local authority policies for affordable homes and other community infrastructure.
- contribute to nature's recovery by:
 - delivering at least 20% Biodiversity Net Gain
 - delivering nutrient negative homes
 - avoiding building within a Nature Recovery Network unless the Local Nature Recovery Strategy highlights opportunities for development to contribute to its delivery.
- ensure sustainable development respects environmental limits: meeting highest standards for sustainable development, e.g. BREEAM outstanding standard for housing.
- Comply with highest voluntary targets for accessible natural greenspace.



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