

HOMES FOR EVERYONE

SOLVING THE HOUSING CRISIS WITHOUT DAMAGING NATURE OR THE CLIMATE



FOREWORD BY **CHRIS PACKHAM**



How to solve the housing crisis for people, nature and the climate

- 1.5 million+ derelict homes renovated.
- 1 million + unbuilt homes with planning permission, built.
- 1.2 million homes developed on brownfield sites, first.
- 165,000 empty commercial properties repurposed.
- 26 million empty bedrooms incentivised for rental.
- Millions of homes left undisturbed for nature.
- Country's entire carbon budget not used up.

**The answer is black & white.
Don't make the Green Belt a grey area.**

"Nature underpins everything - the economy, food, health and society - but we stand at a moment in history when nature needs us to defend it."
Steve Reed OBE MP - Secretary of State for the Environment, Food and Rural Affairs

Sign-up to protect our countryside, fields and Green Belt at
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We have a housing crisis, there's no doubt about that, but we have a biodiversity crisis too and that situation is critical. We say that we've 'lost' 97% of our flower-rich meadows since the 1930s, or that we've 'lost' 86% of corn buntings, or 97% of hedgehogs. Loss, lost ... as if this habitat and these species have mysteriously disappeared into the ether. Lost means inadvertently misplaced. But our wildlife hasn't been lost, it's been killed, starved, poisoned, ploughed up or concreted over. Less than 3% of England is adequately protected for nature.

We don't have 10 years to address the climate crisis and biodiversity loss. Scientists have given us 5 years at most. And that's not 5 years to keep things as they are, it's 5 years to put measures in place which will keep our planet a liveable space.

Labour's plans to make it any easier to build on the Green Belt will face strong opposition. Building on the Green Belt is going to create a hell of a furore. The Green Belt is incredibly important, it was designed to stop urban sprawl and enhance the quality of people's lives. That's something we will jealously protect.

But more importantly, we don't need to build on the Green Belt, nor even green fields in order to solve the housing crisis. As this briefing makes clear we need to think more creatively about how we can provide good quality, future-proofed, environmentally sound, affordable and liveable housing with human communities and nature in mind. The government needs more integrated and smarter thinking across all its departments to plan our living spaces, rather than relying on a powerful cabal of housing developers who are only interested in profit.

This government should reach out to independent ecologists for help. Let's work in partnership. Wouldn't it be amazing to see a whole raft of architects, developers, scientists, planners and designers who are able to create amazing spaces, offering everyone somewhere to live with access to nature, especially in intensely urbanised areas, improving health and air quality, reducing temperature, flooding and properly building biodiversity. This isn't about being a 'Not In My Back Yard' NIMBY. It's about being a 'Nature In My Back Yard' NIMBY, however small that yard may be.

EXECUTIVE SUMMARY

Over the coming 5 years the government wants **1.85 million** new houses to be built plus the construction of whole new towns to solve the housing crisis. To accommodate this building bonanza vast swathes of the countryside, including the Green Belt, are in the government's sight. This means that nature's homes - the habitat of hedgehogs, birds, butterflies - are directly under threat. And it's not just nature. In a paper, published in Ecological Economics (the first to comprehensively analyse the impact of the government's response to the housing crisis on national carbon and biodiversity goals), estimated that the government's business-as-usual housing strategy consumes England's whole cumulative carbon budget [1.5°C] by 2050.¹

There are many people in the UK living in insecure or inadequate housing, in emergency accommodation, or even homeless. Shockingly, figures published in August 2024 showed a record high of more than 150,000 children living in temporary accommodation in England. But the government's plans are not primarily directed at solving the housing crisis. Instead they are focused on making it easier for mass house builders to build houses on green open spaces. These are highly profitable for the developers. But they don't provide for those in real housing need despite the claims about providing 'affordable housing'.

We think the government could more clearly define the housing crisis and deliver solutions without building over nature, especially when this country is already one of the most nature depleted countries in the world.

We suggest a better approach is to require councils to apply a six-point test aimed at prioritising the use of brownfield sites where there is already enough land for at least **1.2m homes** as well as using and renovating properties which are either currently empty or could be repurposed. Using figures from the English Housing Survey, researchers have estimated that there are **over 1.5 million**² empty, derelict or underused homes. We also believe that, with more encouragement, some of the currently empty **26 million** bedrooms in this country could be better utilised. And why not start with the **1 million**³ or so homes unbuilt but already with planning permission.

And this approach would have public support. An opinion poll this month by More in Common showed 78% in favour of protecting nature and green spaces when it comes to the governments housing policies.

WHY THE GREEN BELT AND GREEN FIELDS ARE STILL IMPORTANT

The government wants a target-based approach to housing. This means setting housing number targets for councils and telling them that they must accept development on the Green Belt land and green fields if this is the only way to meet this target. The government wants to reform the planning system - the NPPF - in order that objections to planning proposals threatening the countryside, including the Green Belt, can be overridden.

These are not popular ideas. The British countryside is hugely valued⁴ for its beauty, its contribution to well-being and its wildlife. Almost everyone (93%) see it as a core part of our heritage and our identity. People are already worried that Britain's nature is in freefall.⁵

The idea of the Green Belt was first introduced to planning law in 1947. Its prime purpose was to prevent urban sprawl and it was remarkably successful. It became the 'countryside next door', making open green space accessible to town dwellers and protecting areas of beauty and wildlife habitat. Some areas of the Green Belt have become degraded over the years. The government calls these areas 'greybelt' and has declared them ripe for development implying that they undermine the overall value of the Green Belt. But says Simon Jenkins, former chair of the National Trust, the Green Belt remains an important resource. Even poor-quality areas can be restored to become 'the frontline in our fight to prevent climate collapse, a vital home for wildlife and an irreplaceable place where millions of people across the country can enjoy fresh air and the great outdoors'. Degraded Green Belt should not be reclassified as 'grey belt' and built upon. It should be regreened.

Professor Dasgupta who carried out a natural capital review⁶ for the previous government, says, 'Our economies, livelihoods and well-being all depend on our most precious asset: Nature. We are part of Nature, not separate from it.' Although economic growth may 'enhance' the economy for a limited time, most often, it also degrades our life support system - nature. In doing so it compromises the ability of future generations to meet their own needs. This is the opposite of sustainable development, whose goals are embedded into government policies, to be achieved by 2030.

Sir Dieter Helm, Oxford University professor of economic policy and former government adviser, in his 'In defence of the Green Belt',⁷ rejects the idea that the Green Belt is no longer fit for purpose nor that it should be opened up for housing development. He argues that this view is based on a number of flawed and often wrong assertions about the housing crisis and what will solve it. Meanwhile the Green Belt remains of enormous value. The Green Belt is a key element in any attempt to improve nature's chances. It should be regreened, not built upon. Losing space for nature is a high price to pay, especially high when it becomes clear that the rationale behind the government's strategy is based on a number of doubtful assumptions. These are outlined in the next section.

THE FLAWS IN THE GOVERNMENT'S APPROACH

1. THE HOUSING TARGETS MAKE NO SENSE

There has never been any good evidence to support the mantra that setting a 300,000 homes per annum (or higher, as now) target and asking developers to deliver will solve the housing crisis. There are already 1.5 million derelict homes. And there are a staggering 26 million empty bedrooms. It is therefore incorrect to say that there is a housing shortage. You could say there is an inefficient use of existing buildings. Yes, we do need new houses in the right places but it's too simplistic just to throw out a random and unachievable target of new build as the way to solve the housing crisis. There are doubts anyway over whether the target figures have been arrived at through rigorous analysis of population and household movements. For example, the predicted increase in households (not population) comes from a predicted increase in over 75's maintaining independent households. ⁸

This demographic does not need 3-4 bedroom new builds but on the contrary they could contribute to the solution by letting out spare rooms if further incentives were in place. Meanwhile, increased population is predicted to come mainly from young migrant workers who are likely to be renters. ⁹

The National Housing Federation, the Home Builders Federation and the estate agent Savills have said the government will fall short of its ambition to build 1.5 million new homes during this parliament by nearly half a million without 'significant government support for social housebuilding and first-time buyers'. Neither bar was met in the recent budget with only a small increase in support for social housebuilding and a punitive increase in stamp duty for first time buyers from March 2025.

2. THE REAL HOUSING CRISIS IS THE LACK OF SOCIAL HOUSING

The housing crisis is to be found amongst low income households - those on the housing waiting lists and in emergency accommodation, or those simply struggling to afford a home to buy or rent. According to Shelter, ¹⁰ there are 1.3 million people on the housing waiting list and 150,000 homeless children living in temporary accommodation. Kevin Mcloud - television presenter and architect - says the UK are 'world leaders in homelessness'. ¹¹

Most of these people cannot afford mortgages and, as explained in point 3 below, developer led mass house building will not bring prices down. What's needed for those who lack homes or housing security is affordable, social housing. The consensus is that we need 90,000 social homes a year in England for ten years. Shelter says that this would be enough to house every homeless household and clear most social housing waiting lists.

The government suggests that making developers build a proportion of affordable homes on new developments will create many more affordable homes. But all the evidence is that we cannot rely on the developers to build affordable housing. For the last decade there has been an absolute failure of developers to address the housing crisis. Councils usually give planning permission if developers agree to build some affordable houses but the developers often wriggle out of their obligations to provide social homes by applying for a 'variation' (invariably lowering the number of affordable homes on a development) after planning permission is granted.

Of course, affordable is also open to debate. Data published in March 2023 shows that in 2002, the median salary in England was £20,739 and the median house price was £102,000. This equated to an affordability ratio of 4.92. In 2022, the median salary was £33,208 and the median house price was £275,000. This means that the affordability ratio in 2022 was 8.28. Even with a 20% discount, for most people it still isn't affordable. And according to Jennie Daly, the CEO of Taylor Wimpey, one of the country's largest house builders, even housing associations are so short of cash that developers are struggling to find one willing to buy the 'affordable homes'.

And when it comes to rent, the average for a one-bedroom property in England is now taking up 47% of a woman's median earnings, up from 36% last year, compared to 34% and 26% for men respectively.

The developer's preferred (most profitable) model of housing is not providing the sorts of dwelling suitable for social housing. Nor are the new build estates in the right place for social housing. Where social housing is located, matters. Social housing should be near family, friends, work, school and public transport, not in 'bolt-on', or isolated, developments such as those car-dependent developments dubbed by Transport for New Homes 'cow pat developments'.¹² Expensive car-dependent semi-detached houses on greenfield land - which sacrifice nature's homes - are not the answer for those in greatest need.

Although social housing is costly, investment in terms of capital expenditure, would result in many important economic outcomes. Increasing support in the development of social housing would reduce expenditure on housing benefit which has now exceeded £29 billion annually, compared to £9 billion in 1991-1992.¹³ And with a record 150,000 plus children legally homeless and housed in temporary accommodation, a situation which Shelter says 'devastates children's lives',¹⁴ the council bill for this temporary housing, is estimated at £1.7bn annually. The potential savings from providing adequate social housing are huge especially when wider factors like health, education and employment opportunities are included.

3. MASS HOUSE BUILDING BY COMMERCIAL DEVELOPERS DOES NOT LOWER PRICES

The government is placing its hopes with the big commercial house builders. The assumption is that large numbers of new houses will solve housing shortages and bring down house prices. But there is no truth in this. There is no correlation between housing supply and house prices. Even if house build numbers increased, overall house prices would not fall. This is because prices are governed by the market and house builders manipulate the market to

keep prices high. Regulators and industry experts say their dominant interest is to control supply and keep up prices.

'Housebuilders do not want lower prices,' housing experts Toby Lloyd, Neal Hudson and Rose Grayston – now an adviser to housing minister Matthew Pennycook – wrote in a report for the Joseph Rowntree Foundation this year. 'Maintaining headline sales prices is...important for housebuilders seeking to keep ... profit rates up – even if this means selling fewer homes in the short-term'.¹⁵

One of the ways mass house builders control prices is to limit the supply of houses built, a practice known as 'land banking', meaning they hold numerous sites with planning permission but only release them to be built on when short supply guarantees higher prices.¹⁶

Another way of inflating profits is to build houses in desirable locations and on plots which are easy (cheap) to build on. This is why mass house builders are keen to end Green Belt protection, not because there is a shortage of 'brownfield' (previously developed) sites but because green field sites are more desirable. They require no remediation and are ideal for the low density (spaced out) developments that are the most profitable to the commercial developers.

These green field site developments often have nothing to do with local need. Indeed, websites of many of the developers reveal that many of the newbuild, low density houses, of the mass house builders are being marketed to foreign investors or snapped up by private equity investors to become expensive rental properties¹⁷ out of reach of local people's budgets. This has nothing to do with the real housing crisis.

4. DEVELOPERS CANNOT DELIVER THE TARGET NUMBERS

Because commercial builders are market players, meeting government targets is highly improbable. Only one out of fifty housebuilding companies surveyed by Knight Frank in October 2024 said the government could meet its 1.5 million plus housing target. 'Builders can only build if buyers can buy', the Home Builders Federation has said.

The government needs the private sector to build about 200,000 homes a year to hit its average annual target of 300,000 – or 1.5 million homes over five years – according to Savills. 'That looks basically impossible,' said Emily Williams, a research director at Savills, who found the private sector has not produced 200,000 homes annually since the 1960s, when the market was radically different.

'There is a tension,' Williams said. 'We can say there is a 'need' for more than 300,000 homes a year. But the question is who is in the position to buy those homes. You are looking at the difference between 'what is the need' and 'what is the market capacity'.

THE SOLUTION: A GREEN FIELD LAST SEQUENTIAL TEST

WE PROPOSE A SIX POINT TEST FOR COUNCILS IN ALLOCATING LAND

We need homes for everyone, nature included, but the reality is we do not need to build on green fields, Green Belt, or green spaces to do this. Land that is green, needs to be a very last resort, after all other options have been exhausted. There are better ways of meeting the needs of those caught in the housing crisis as well as meeting the needs for nature to have a home.

We are proposing a six-point sequential test for councils. We must make best use of what we already have before building on the countryside. This includes using brownfield land, empty homes, commercial conversions, and empty rooms. And we must use land wisely, building to high densities. And developers must build out their existing planning permissions or face penalties.

Before a single new home is permissioned on green field land, a council's local plan must demonstrate they have submitted local plans to the following six considerations:

1. BROWNFIELD SITES

Councils must ensure their brownfield land register is up-to-date and that all suitable land has been allocated for housing in the local plan

Local plans should have clear brownfield first policies. Local authority and Homes England support should be given on complex brownfield sites that require remediation work.

The CPRE's State of Brownfield report in 2022 found that **over 1.2 million homes** could be built on 23,000 sites covering more than 27,000 hectares of brownfields.¹⁸ This figure could be higher, as brownfield land registers are not always comprehensive or up to date. For example, Knight Frank found that **100,000+ homes** could be built above public car parks.¹⁹

The government must go further than the existing proposals for Brownfield Passports for urban areas.²⁰ Instead it must resurrect its robust brownfield first policy from over twenty-five years ago, applying it to all areas.

In 1998, Deputy Prime Minister John Prescott published 'Planning for the Communities of the Future'. This introduced the idea of 'brownfield first',²¹ which Prescott, the former deputy PM, described as: "a sequential and phased approach to the development of all sites, which means there will be a general preference for building on previously-developed sites first, especially in urban areas".

Subsequently, in March 2000, (planning policy guidance note 3)²² was published, with a brownfield first approach. Paragraph 31 of the PPG3 noted that brownfield sites were to be preferred to green field release unless they performed ‘so poorly’ as to preclude their use for housing. This planning guidance remains the best way to ensure nature’s homes are protected. Of course, in some situations, brownfield is now rich in biodiversity and should not be built on. Each site must be assessed.

2. EMPTY HOMES

Councils must ensure they have an active programme to bring empty homes back into use

1.5 million empty homes,²³ of which 70,000 are council and housing association properties left unoccupied,²⁴ must be brought back into use. Most of these homes have the benefit of already being connected to existing infrastructure. There is a large amount of embedded carbon in them to be saved too. The Office for National Statistics²⁵ also suggests there are over **1.5m unoccupied dwellings**.

The government must require councils to demonstrate an empty homes policy in local plans and must provide funding and support. Shelter²⁶ urges the government to invest £1.25 billion to bring vacant private homes back into use. A policy of acquisition and renovation could make 10,500 empty homes across ten British cities available for social rent in three years. Shelter believes this would be 20 per cent cheaper than building new social homes and massively cut the housing budget.

It has been calculated that the building spree favoured by the government **would consume England’s whole cumulative carbon budget (1.5C) by 2050**. Instead, bringing back empty housing into use along with more widespread renovation and retrofitting could be key in decarbonising the existing housing stock.

3. COMMERCIAL CONVERSIONS

Councils must complete a full review of commercial or public buildings suitable for liveable conversion and have a plan for encouraging conversion into residential units

In the words of Habitat for Humanity,²⁷ ‘An estimated **165,000 privately-owned commercial and business premises** remain empty across Great Britain, potentially providing a partial solution to the current housing and homelessness crisis’.

The government must stipulate that councils should have a Commercial Land Register and plan for conversions. Funding and support must be provided.

4. EMPTY ROOMS

The council must count rooms for lodgers towards its annual housing target and the government must allow for this

According to Spare Room, ²⁸ renting out just 1.74% of **26 million empty bedrooms** could see rents return to 2017 levels. It is little known that there is a government ‘Rent a Room’ scheme that allows one to earn up to a threshold of £7,500 per year tax-free from letting out furnished accommodation in your own home to host lodgers.

As Matt Hutchinson, SpareRoom director comments:

‘The common belief is that we simply need to build more houses. That’s true, but there’s also far more we could be doing to use our existing housing stock better. Persuading a tiny fraction of those with spare rooms to rent them out could effectively rebalance the market. That might not completely reverse the massive rent increases we’ve seen in the last couple of years, but it would potentially make a huge difference.

‘And it’s not a case of having to force people into doing it. Thousands of homeowners across the UK already take in a lodger, helping them cope with the high cost of living and the sharp rise in mortgage rates since last year’s mini budget. It’s a win-win, at a time when politicians seem out of ideas when it comes to bringing rents down in a meaningful way.’

The government must further incentivise, and publicise, its ‘Rent a Room Scheme’.

5. USE LAND WISELY

The council must optimise density in its local plan before planning permissions are granted

When green field (including Green Belt) land is permissioned for housing, it is imperative that it is used effectively for minimum land take. Not only does that help reduce the loss of farmland and habitat, it also brings social and economic benefits such as the ability of a development to sustain more community services.

A study by Create Streets ²⁹ has demonstrated that it would be possible to save 42,000 hectares, an area the size of the Isle of Wight, if we apply ‘gentle density’ thinking to all new developments. At Chippenham, Create Streets, working with cycling charity Sustrans, by redesigning a 7,500-home urban extension with a new gentle density masterplan, used only 40 per cent of the land to accommodate all homes in the original plan. That is a saving of 230 hectares of land, an area ten-times St James’s Park in Westminster.

Any new towns selected by the New Towns Taskforce ³⁰ or urban extensions must follow this model. However, a new town should be the last resort. They will necessitate a massive additional investment in infrastructure to connect the town, creating tarmac, car dependence, even more emissions and downstream pollution. New town proposals must be demonstrably funded to provide public transport and active travel options and must not be ‘unlocked’ by new roads, as so often is the case. When it comes to the government’s new

towns programme there are many unanswered questions. Nature must be at the forefront of any decisions made by the New Towns Taskforce. But do we even need a new towns programme given the alternatives available to provide homes? ³¹

The government must set a presumption in favour of higher density (compact communities). According to CPRE most developments could be planned at 100 dwellings per hectare or more. Anything less must be justified with good reasons. A public awareness campaign is needed to make the population aware of the benefits of higher density development and make it desirable.

6. A MILLION PLUS UNBUILT HOMES ALREADY WITH PLANNING PERMISSION

And finally, there are around one million unbuilt homes with planning permission in the system. ³² Channel 4 ³³ described these as the million missing homes. Houses stuck in the planning system should be built out, to give credibility to a planning system which the public has little faith in.

The government should consider the potential for financially penalising developers when homes remain unbuilt following permission being granted with an increasing scale of charge accruing as time elapses.

CONCLUSION: HOMES FOR EVERYONE

So, we can see it's not really a question of planning or market-led supply to solve the housing crisis. It's smarter, joined-up thinking that's needed. Being more efficient in use of land, better utilising buildings that already exist, whilst protecting nature and our climate at the same time.

Councils must be supported by the government to deliver these six, sequential steps, which reverse the current developer focused 'solutions':

STEP	COUNCIL ACTION	GOVERNMENT ACTION
1.	Brownfield Land Register is up-to-date and that all suitable land has been allocated for housing in the local plan.	Bring back Labour's brownfield first policy in the NPPF.
2.	An active program to bring empty homes back into use.	Requirement in local plans for councils to demonstrate empty homes policy. Funding & support by government.
3.	A full review of commercial or public buildings suitable for conversion has been completed and has a plan for encouraging conversion into residential units.	Requirement in local plans for councils to have Commercial Land Register and plan for conversions.
4.	Count rooms for lodgers towards a council's annual housing target.	Government must allow for this, must further incentivise home-owners and councils and importantly publicise the Room for Rent scheme.
5.	Optimise density in a local plan and planning permissions granted.	Presumption in favour of density. Densities in new developments lower than 100 dwellings per hectare must be justified with good reasons. Needs a public campaign: benefits of well-designed density.
6.	One million plus homes already with planning permission.	Houses already with planning permission should, be built out. Introduce a scheme to penalise developers when land with planning permission is not built out.

Some might call it recycling, repurposing or renovation as well as new build. It does not matter - it brings homes for everyone, including those most in need, nature and the climate.

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Community Planning Alliance

A nationwide alliance of local groups campaigning for affordable housing, protecting green spaces and nature.

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