



CONTEXT:

The Government's landmark Planning and Infrastructure Bill has been described as a 'win-win' for both housing development and nature protection and recovery by Secretary of State for Housing Angela Rayner — building on Labour's <u>Manifesto commitment</u> to build more houses 'without weakening environmental protections'.

Part 3 of the Bill aims to establish Environmental Delivery Plans (EDPs). These are intended to provide a broad assessment of an environmental landscape over a large, yet-to-be-defined, geographic area, and to enable developers to 'offset' any damage to nature and species they incur by paying an unspecified fee into a central levy — the Nature Restoration Fund (NRF) — instead of remediating any damage themselves.

But as the Bill has progressed, it has been met by sustained criticism. It has become clear that, far from being a 'win-win' for nature, the Bill's assumptions are built on shaky foundations of poor data, and that, if enacted, it could have a catastrophic impact on the UK's natural environment. Even the Government's own impact assessment of the Bill revealed that the Government had 'very limited' data on how environmental obligations impact planning, with <u>admissions</u> that estimating the environmental impact of the NRF is a 'challenging' exercise. The unverifiable view that nature is a 'blocker' to development has been extrapolated almost entirely from the issue of nutrient neutrality — a niche issue that impacts <u>less than a quarter</u> of Local Planning Authorities (LPAs) in England — or from the single example of the HS2 Bat Tunnel which was a tiny fraction of a complex web of factors that are delaying the project.

Despite some amendments tabled by the Government, the independent Office for Environmental Protection <u>maintains</u> that the Bill would 'in some respects, lower environmental protection on the face of the law'. Meanwhile, the Environmental Audit Committee, in a recent letter to the Minister for Housing Matthew Pennycook, identified that the Government's proposals for an NRF were <u>at odds</u> with the broader ambition of the Government to encourage private sector investment into nature improvement projects and demanded further explanation.

Now, the Bill faces scrutiny in the House of Lords, where a series of impactful cross-party amendments have been tabled to improve its environmental protections. The Government has a key window of opportunity to make tangible, common-sense tweaks which will not only strengthen the Bill, but, as the findings of this report elaborate, protect key Labour seats across the country. Failure to act will mean that, as well as the growing popularity of Reform, which will squeeze the Labour vote, Labour will also face a concerted threat from a rising 'Green Faultline'. Ultimately, policies which destroy nature will drive swings to parties with stronger environmental credentials key in marginal seats.







Summary of findings

Arbtech's nationally representative poll of just under 10,000 adults identified three major fault lines in the Planning and Infrastructure Bill — each carrying political and environmental danger for the Government.

This report explores these three findings further and sets out simple, commonsense amendments the Government should consider to protect nature, retain local environmental safeguards, and still deliver its ambition to build 1.5 million homes before the end of this Parliament.

THE CONCEPT OF 'CASH TO TRASH' IS DEEPLY UNPOPULAR AND HAS NOT BEEN EXPLAINED TO VOTERS.

Public awareness of the Bill is strikingly low, with more than three-quarters of voters practically unaware of its provisions. More than half of the public (52%) reject the concept of 'cash to trash' by allowing developers to bypass environmental assessments and proceed to building, and even amongst loyal Labour voters, there is more opposition to the concept (43%) than there is support (34%). The public also overwhelmingly prioritise nature over housebuilding when presented with a trade-off, with two-thirds of those polled wanting to protect local habitats over accelerating development.

THERE IS STRONG RESISTANCE TO MOVING ENVIRONMENTAL MITIGATIONS ELSEWHERE.

More than half of voters believe that any environmental damage from development should be repaired locally, not offset miles away. This sentiment is strongest in areas with high-value landscapes, but also resonates in urban communities where green space is already scarce.

THIS CREATES AN ELECTORAL 'GREEN FAULTLINE' WHICH PRESENTS A CLEAR ELECTORAL THREAT TO LABOUR.

Our modelling identifies 40 Labour-held seats on a knife-edge if the Bill passes in its current form, from rural constituencies like the Forest of Dean and South West Norfolk, to mixed urban-rural seats like Darlington, Ashford, and Stoke-on-Trent South. A swing of just 1–2% could hand victories to the Conservatives, Liberal Democrats, or Greens. MPs, including Parliamentary Private Secretaries like Olivia Bailey MP (Reading and Mid Berkshire), and the co-chair of the Labour Growth Group, Lola McEvoy MP (Darlington), are at risk.





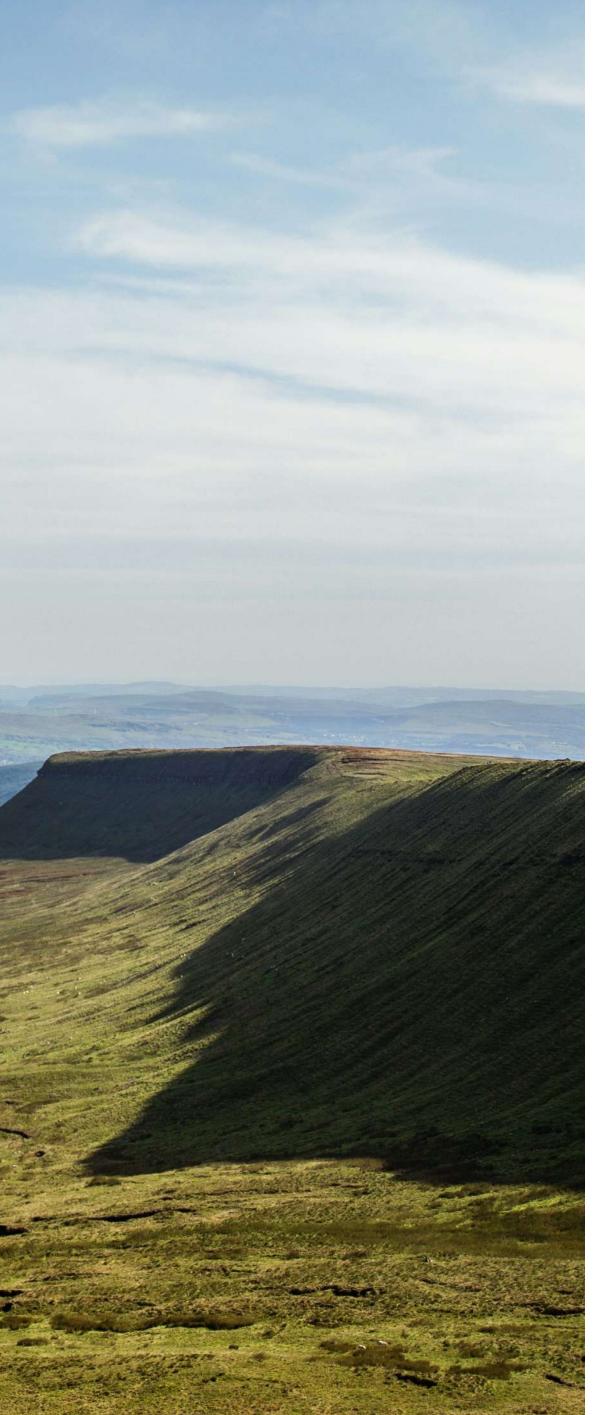


The Planning and Infrastructure Bill proposes that nature is treated as a homogeneous entity that can be offset by a singular fund, rather than a complex and interconnected ecological habitat. But the UK is one of the most nature-depleted countries in the world, and the State of Nature Report <u>found</u> that one in six species in the UK is threatened by extinction.

Arbtech's polling revealed a fundamental opposition to the concept of allowing developers to bypass environmental assessments by simply paying into a levy. More than half of those surveyed (52%) rejected this concept, with 32% strongly opposed to the idea, and 20% tending to oppose.

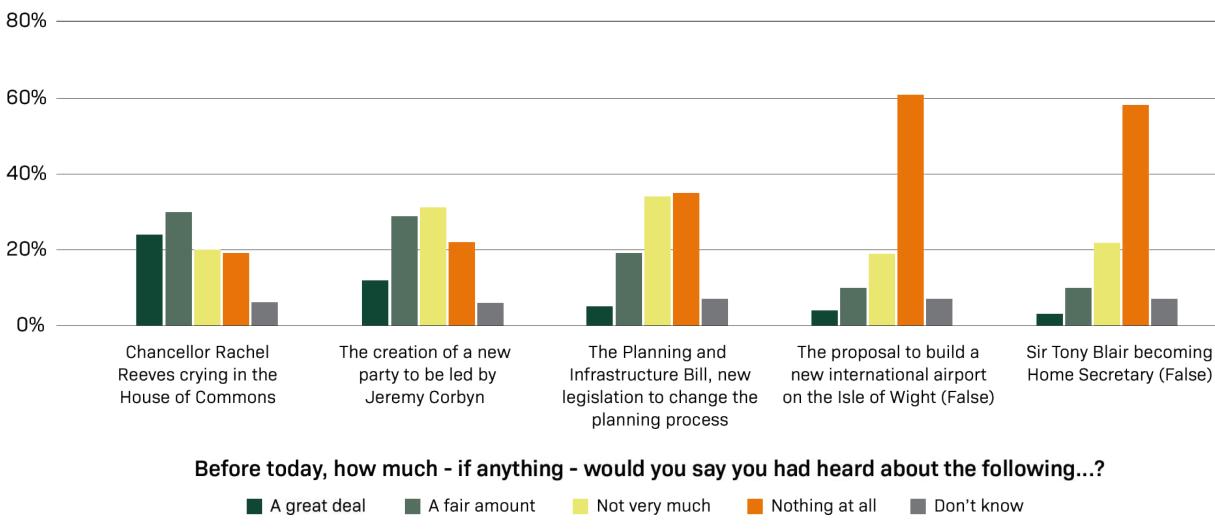
Very few voters were willing to come out to support the idea of paying to skirt environmental obligations — only 6% of the public surveyed strongly supported the proposals, with only 13% tending to support the proposals. This indicates a deeply entrenched net opposition to the proposals.

While loyal Labour supporters are more strongly in support of the Bill more generally (with 13% supporting its proposals), specifics elicit strong opposition within the party too. In total, 24% of Labour supporters surveyed strongly opposed the concept of paying to circumvent environmental obligations. A further 19% indicated some opposition to the concept. Even within Labour's core base, there is more opposition to specific proposals (net 43%) than support (34%).



A LACK OF SUPPORT IS EXACERBATED BY A LACK OF AWARENESS.

Figure 1: a grouped bar chart of public awareness of the Planning and Infrastructure Bill compared with several other political events, some of these events are fictitious and provide a baseline for the proportion of people who overstate awareness.



Despite the Government's claim that the Bill represents a 'win-win' for nature and housing development, it has failed repeatedly to provide evidence that this is the case, or to explain to the public what the Bill does, and why the Government deems its provisions on nature necessary.

Indeed, Arbtech's poll found that only 24% of the public know either 'a great deal' or 'a fair amount' about the Planning Bill, with the other 76% of the public knowing little to nothing about its provisions.

Even amongst those groups deemed to be more 'politically aware', the understanding of what the Bill entails sits at only 29%.





THE PUBLIC OVERWHELMINGLY PRIORITISES NATURE PROTECTION OVER HOUSEBUILDING

When presented with the choice between accelerating housing development and protecting nature, more than two-thirds of the general public (68%) believed that protecting nature, wildlife, and green spaces is more important than accelerating housing and development. Less than a fifth of those surveyed across the country (19%) prioritised housebuilding.

These preferences hold even across political and geographical divides. Arbtech's Multilevel Regression and Post-stratification (MRP) showed consistently high preferences for protecting green spaces amongst Labour (65%), Conservative (69%), Lib Dem (73%), Green (77%) and Reform (72%) voter intentions.

IF YOU HAD TO CHOOSE ACCELERATING HOUSEBUILDING, OR PROTECTING NATURE, WHICH WOULD YOU CHOOSE?

- Accelerating housebuilding over the protection of nature and green spaces
- Protecting green space is more important than accelerating housebuilding
- Don't know

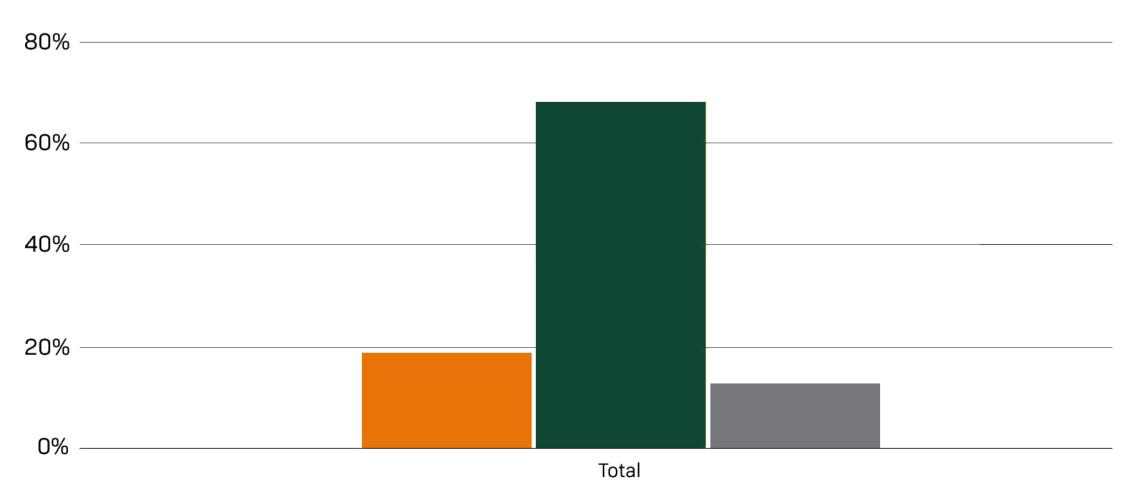
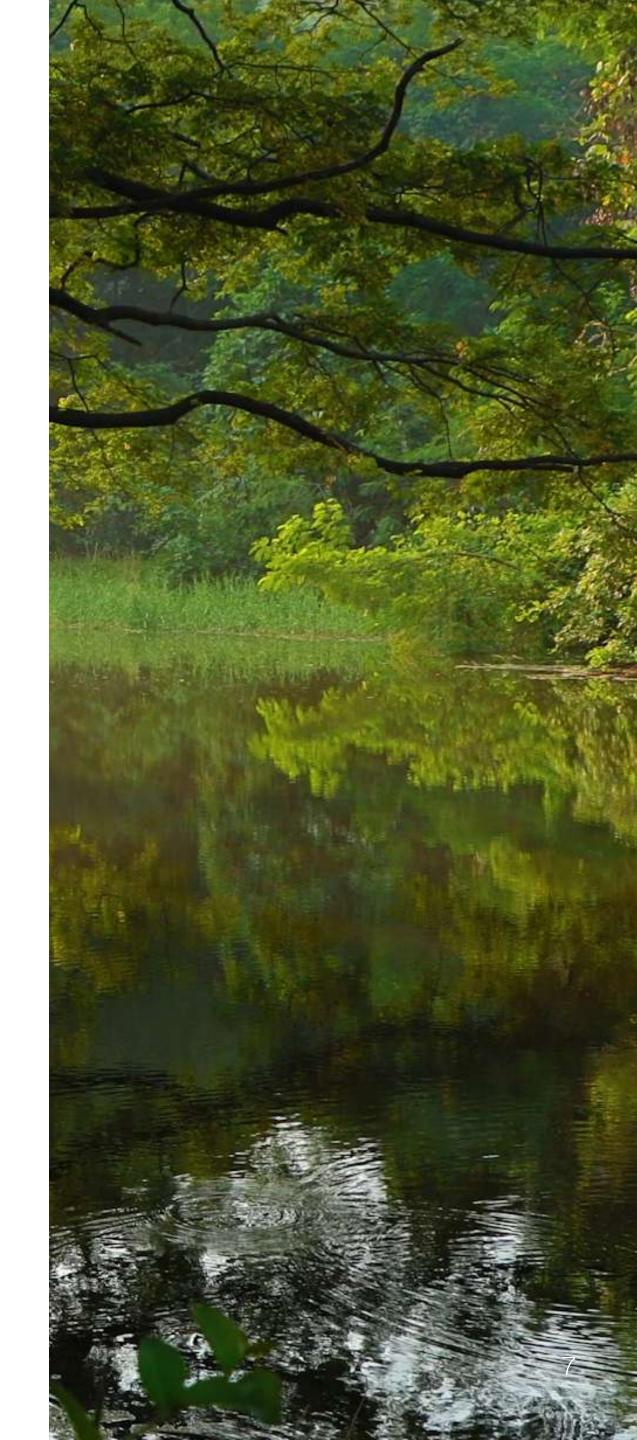


Figure 2: a vertical bar chart showing that two-thirds of the public prioritise protecting green space over accelerating housebuilding.

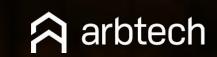
The divide in opinion across rural and urban voters also isn't as cavernous as one might expect, with clear majorities favouring nature protection. 78% of rural voters prioritise nature protection over development when presented with a binary choice, alongside 69% of suburban voters and 61% of urban voters.







FINDING 2: OFFSETTING NATURE AWAY FROM LOCALAREASISUNACCEPTABLE FOR WOTERS





The Government states that the NRF and EDPs will enable more strategic, large-scale environmental restoration efforts across regions, rather than developers taking site-by-site action. By paying into the NRF, Natural England will in theory have the ability to decide where and what environmental projects are delivered across the country, with little to no regard for the impact on specific communities impacted by development.

The idea of offsetting environmental impact outside of a local area does not poll well with voters. Overall, more than half of respondents (52%) said they would prefer that any damage to the environment incurred is offset within the local area, with only a third of the public (33%) supporting the proposals outlined in the Bill to offset environmental damage where it is most efficient.

IF YOU HAD TO CHOOSE, WHICH IS MORE IMPORTANT TO YOU?

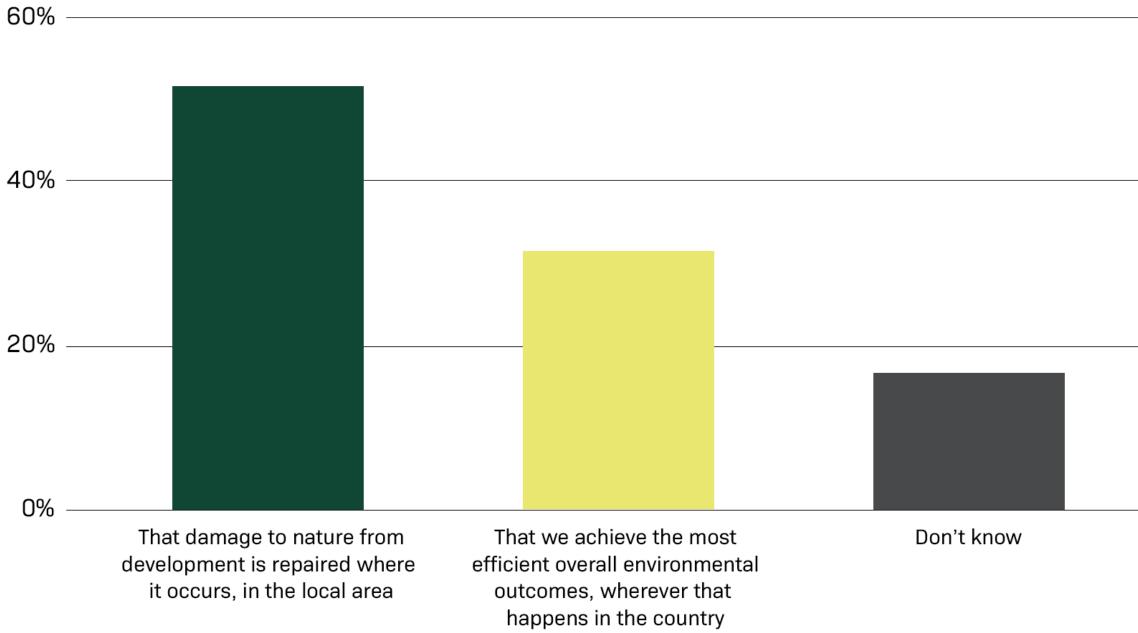
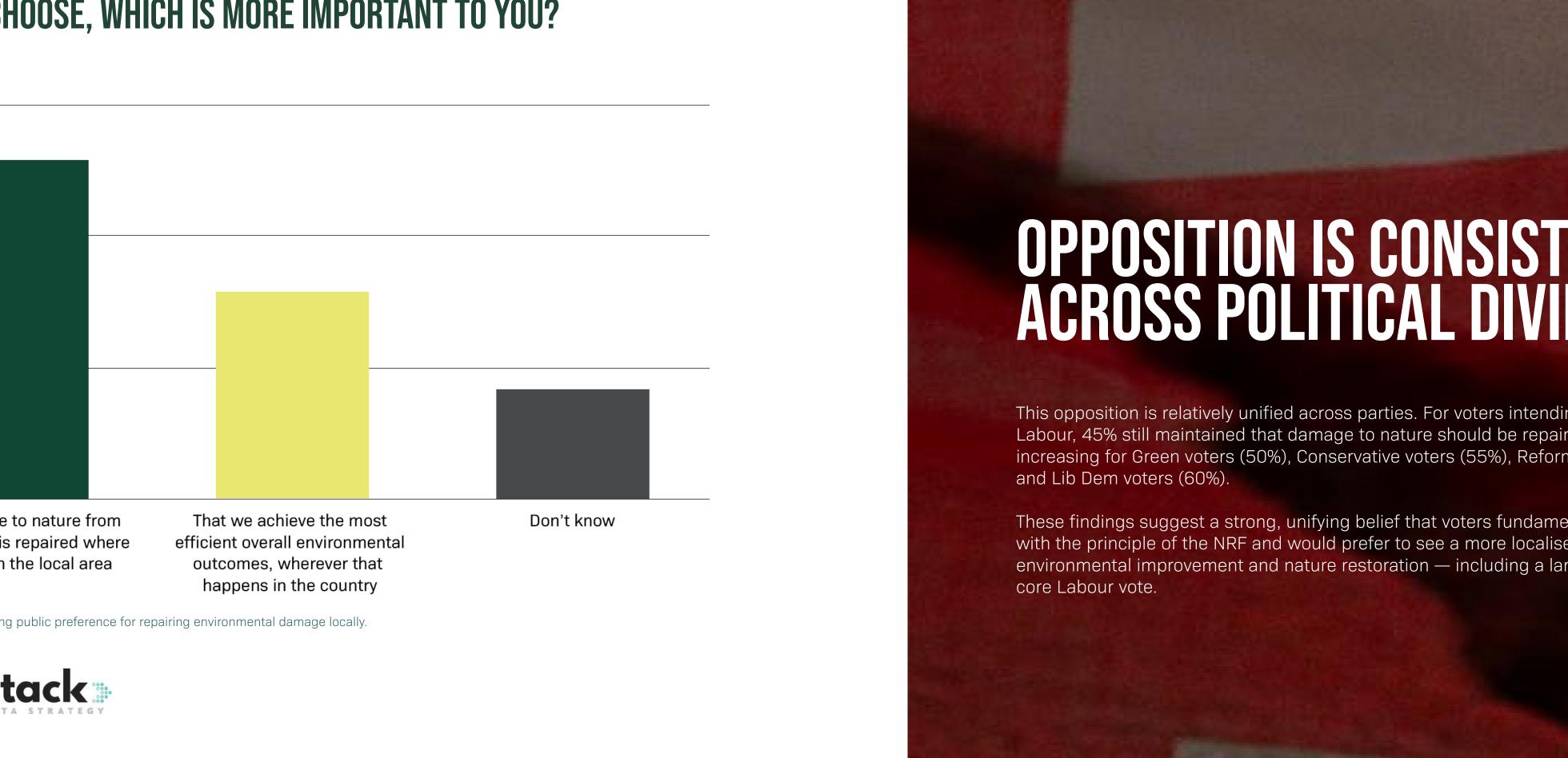


Figure 3: a vertical bar chart showing public preference for repairing environmental damage locally.



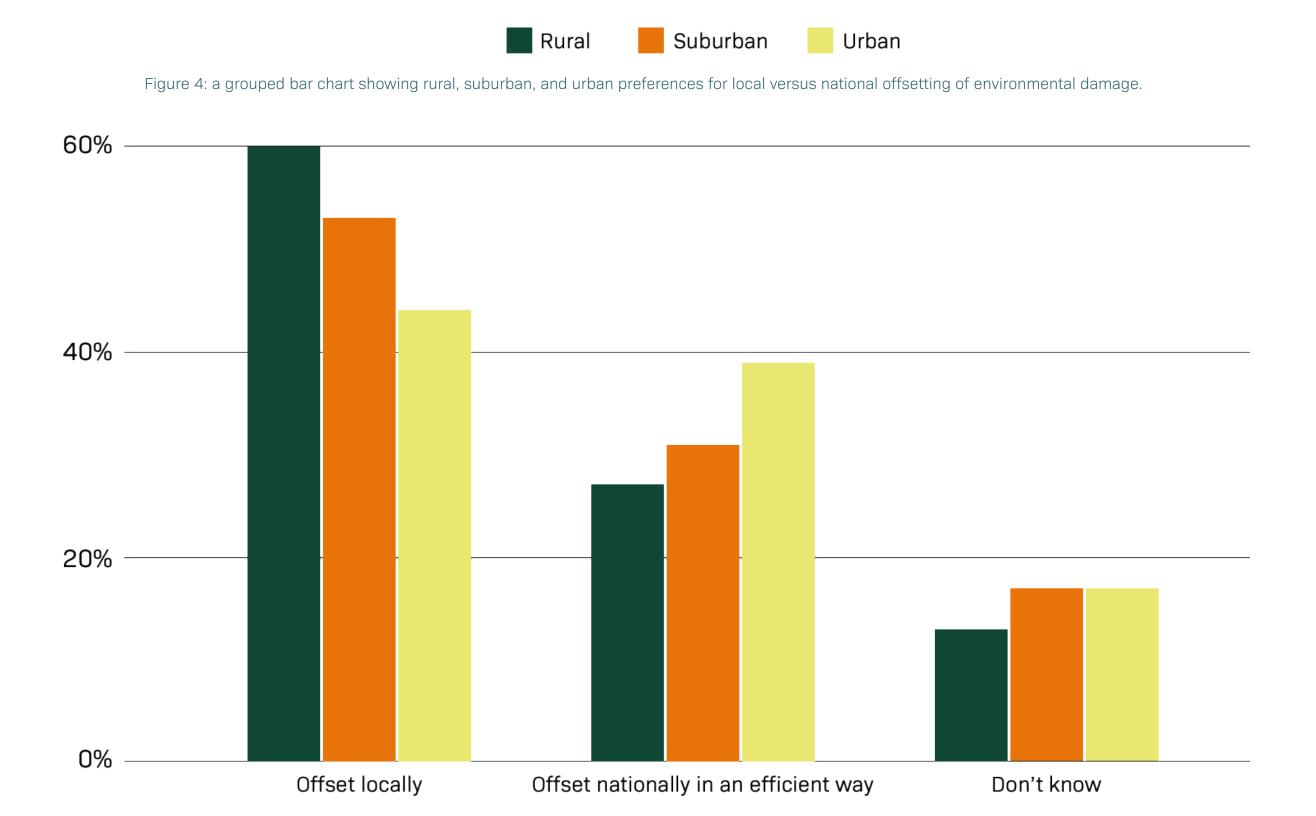




BUT THE IMPACT OF OFFSETTING RUNS DEEPER

The negative consequences of nature offsetting are most likely to be felt by those living in urban areas, as the Government has proposed a 'Brownfield first' approach to development. However, brownfield land tends to be in traditionally urban and industrial areas, and environmental deprivation studies have found considerable spatial inequalities in areas with more brownfield land. This means that development is likely to be concentrated in such areas, but EDPs will not require developers to deliver environmental benefits at these sites. Put another way, those seeing the most development will see the least environmental benefit.

Failing to direct environmental benefits in the vicinity of the development means that wealthier regions may disproportionately benefit from conservation efforts, while less affluent areas are left with degraded environments and reduced access to green space, creating ecological deserts and a nature 'postcode lottery'. Arbtech's MRP found that 44% of urban voters would rather have nature benefits delivered locally, rather than efficiently distributed across the country, contrasted with 39% who favoured the alternative approach.



Beyond the environmental impact, the opposition to offsetting environmental damage away from local areas speaks to a wider issue: the impact on public health. Research has consistently shown that access to nature improves public health outcomes, reduces stress, and fosters social cohesion. The National Institute for Health and Care Research <u>found</u> every 10% increase in access to green spaces was linked with a 7% reduction in anxiety and depression. Concerningly, every additional 360 metres an individual lived away from green space was linked with a 5% increase in anxiety or depression.

By allowing developers to concrete over nature, without having to replace the environmental features that were once there, communities are at risk of living in ecological deserts. The Government's proposals could deepen existing disparities, reinforcing the idea that high-quality environments are a privilege rather than a right and seeing development in poorer communities subsidising nature recovery in wealthier ones.

IF YOU HAD TO CHOOSE, WHICH IS MORE IMPORTANT TO YOU?





OPPOSITION TO THE BILL PRESENTS WORRYING ELECTORAL FAULT LINES FOR THE GOVERNMENT THE TIMES





Labour vote bulldozed by backlash over

housing

THE HEADLINE FROM THE CONSTITUENCY-LEVEL MODELLING IS CLEAR:

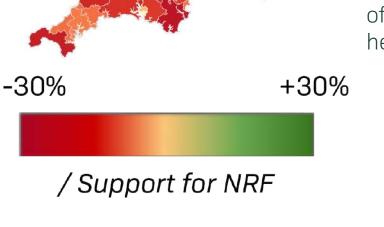
PUBLIC OBJECTIONS
TO THE PLANNING AND
INFRASTRUCTURE BILL
ARE NOT JUST BROAD,
BUT CONCENTRATED IN
THE VERY PLACES THAT
MATTER MOST TO
LABOUR.

When voters are asked to choose between protecting nature and accelerating housebuilding, they choose nature by large margins, and they do so decisively in constituencies with meaningful environmental protections.

This pattern is politically salient. Many newly-won Labour seats sit in or near these 'average-to-high protection' areas, including large stretches of England's Green Belt. Framing the Bill as a 'win-win' obscures a real trade-off, and, when presented with that trade-off directly, voters overwhelmingly prioritise nature restoration over new building. This is an electoral warning light to the Government.

Arbtech and Stack's constituency-level mapping of attitudes reveals two clear national skews. First, the NRF itself is unpopular in many constituencies that combine large local environmental protections with the pressure of development. In places like Arundel & South Downs, East Hampshire and Henley & Thame, net support for the NRF is at its national lowest (-28% to -26%), echoed by 79% of voters who say that, if they were to choose, they would prefer protecting nature over housebuilding. These are the 'leafy commuter' and peri-urban areas where the politics of the Green Belt live, and where residents feel they have the most to lose from an offsite, 'pay-to-proceed' regime.

Figure 5a: a constituency-level map of net support for the Nature Restoration Fund (NRF), showing strongest opposition in environmentally protected commuter-belt areas.



Second, the same polarity can be seen in reverse in a small cluster of urban seats. In the highly urban East London constituencies of Hackney South & Shoreditch, Bethnal Green & Stepney, and Poplar & Limehouse, the NRF's provisions command net positive support, representing a probuilding corner. However, in a forced choice, nature protection still wins out over housebuilding here — in Hackney South & Shoreditch, 55% of voters prefer the former at the cost of the latter, with just 33% opting for more housebuilding.

This is crucial: in urban centres, even where green spaces are scarce, biodiversity benefits are hard to observe, and there is intense pressure to build, voters still instinctively side with nature in a trade-off.

This poses a formidable threat to a
Labour Government that saw wins
across UK cities. Even in
these urban heartlands,
voters are not pro-building
enough to support it at
any cost. Worse still,
as soon as voters in
the peripheries of cities
see first-hand nature's
benefits to communities,
they are far more sceptical
about the idea

of a central pot that allows damage here to be 'repaired' somewhere else.





accelerating housebuilding





ENVIRONMENTAL PROTECTION STATUS OVERLAPS WITH CONCERNS ABOUT THE BILL

We conducted a spatial analysis integrating the major environmental protection layers: Areas of Outstanding Natural Beauty (AONBs), National Parks, Sites of Special Scientific Interest, Special Areas of Conservation, ancient woodland, and National or Local Nature Reserves.

While each layer individually covers a modest share of England (AONBs at 7.4%, National Parks at 4.8%), in aggregate these protections place a large number of voters within or near sensitive landscapes. In such seats, the perceived risk of the Bill is immediate and local, and the NRF is read as offshoring environmental responsibility

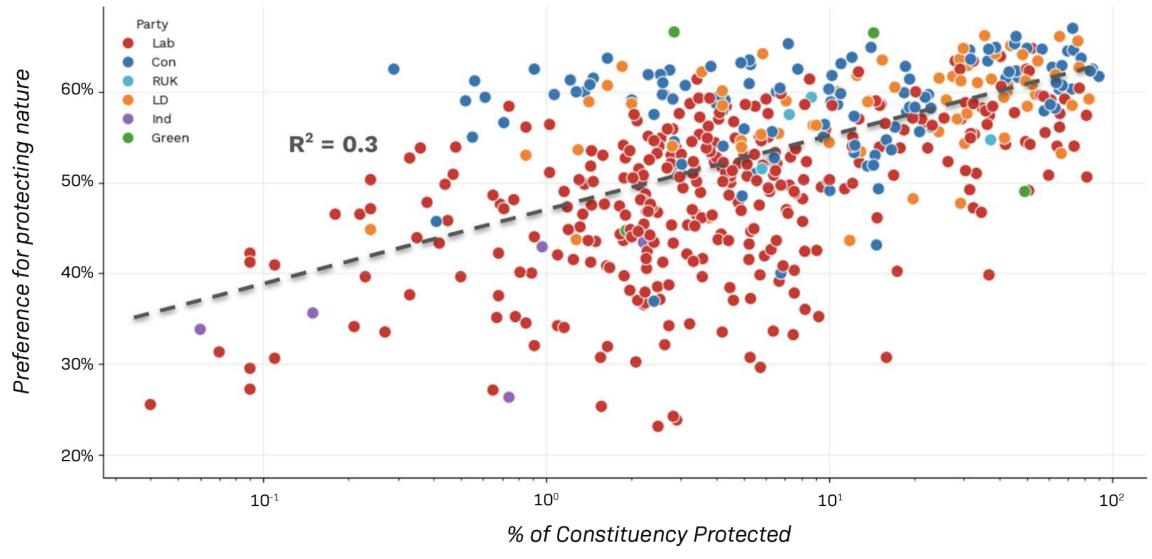
Figure 6: a spatial map of England showing major environmental protection layers, with coverage percentages for AONBs, National Parks, SSSIs, Special Areas of Conservation, ancient woodland, and nature reserves.

LAYER	TOTAL COVERAGE	
Areas of Outstanding Natural Beauty (AONB)	7.4%	
National Parks	4.8%	
Sites of special scientific interest	3.4%	
Special area of conservation	2.2%	
Ancient woodland	1.4%	
National nature reserves	0.5%	
Local nature reserves	0.2%	



The findings detail a strong relationship between the percentage of a constituency under protection and the share of voters who pick nature over housebuilding in a forced choice. Importantly, the vast share of Labour MPs are not clustered in 'high environmental protection, low build' locales, but in the broad middle. These are average-protection constituencies where: development pressure is real; local environmental assets are present and valued; and voters are especially resistant to the 'cash to trash' logic. This is where the political risk for Labour sharpens.

Figure 7: a scatterplot showing the positive non-linear relationship between constituency-level environmental protection and voter preference for protecting nature over housebuilding ($R^2 = 0.3$), coloured by 2024 General Election winning party.









JOHN WHITBY Derbyshire Dales



Lichfield

TERRY JERMY

PETER SWALLOW

Bracknell

LOUISE JONES North East Derbyshire





NEIL DUNCAN-JORDAN Poole



CHRIS HINCHLIFF North East Hertfordshire



JONATHAN HINDER Pendle and Clitheroe



LAUREN EDWARDS Rochester and Strood



SADIK AL-HASSAN North Somerset



Sittingbourne and Sheppey



ANNA GELDERD South East Cornwall



South West Norfolk



MATT BISHOP Forest of Dean



PETER PRINSLEY Bury St Edmunds and Stowmarket



LAURA KYRKE-SMITH Aylesbury



LOLA MCEVOY Darlington



TRISTAN OSBORNE Chatham and Aylesford



THE 'GREEN FAULTLINE':

LABOUR'S DANGER ZONES

To identify the seats where these trends matter most electorally, we overlaid three

factors:

• The smallest majorities in the 2024 General Election (fewer than 3000 vote

Relatively high local protection (top third by protected area share), and

• The least support for the NRF (bottom half by net NRF support).

This yields a list of seats where the Bill puts Labour majorities on a knife edge, and

where decisions made in Parliament will materially shift votes.

These Labour MPs at risk would have most to gain from advocating common-sense

amendments that block a 'cash to trash' system. Likewise, they are where opposition

parties would have the most to gain from doing the same.

difference),



Middlesbrough South and East Cleveland



North West Leicestershire



AMANDA HACK





Tamworth



JENNY RIDDELL-CARPENTER

Suffolk Coastal

AMANDA MARTIN

MAYA ELLIS



Portsmouth North



NOAH LAW

St Austell and Newquay

OLIVIA BAILEY

Reading West and Mid Berkshire

LEE PITCHER Doncaster East and the Isle of Axholme



Southend West and Leigh

SOJAN JOSEPH

Ashford



CHRIS BLOORE Redditch



ALEX MAYER

Dunstable and Leighton Buzzard

BEN GOLDSBOROUGH South Norfolk



CALLUM ANDERSON Buckingham and Bletchley



JESS ASATO Lowestoft



JACOB COLLIER Burton and Uttoxeter



ALLISON GARDNER Stoke-on-Trent South



SAM CARLING North West Cambridgeshire



RACHEL TAYLOR North Warwickshire and Bedworth





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In many of these at-risk seats, the Labour margin is well under 2,500, and when presented with the forced choice between 'protect nature vs. build', voters overwhelmingly opt for the former.

This asymmetry will serve as an electoral tinderbox for a Government already facing serious objections to its proposals. The list also includes many within the party identified as the next generation of 'rising stars' — including co-leader of the Labour Growth Group Lola McEvoy MP, and Private Parliamentary Secretary to the Department for Work and Pensions, Olivia Blake MP.

THE GREEN BELT IS THE POLITICAL SHORTHAND FOR PERI-URBAN ANXIETIES.

It represents the areas where fears about urban sprawl, loss of access to nature, and diminished local character meet concerns about fairness. The NRF, as currently framed, looks like a mechanism that could enable developers to degrade nature-rich edges of towns and cities, while promising compensation miles away. Many of these constituencies sit on or near protected landscapes and Green Belt-adjacent areas: South Dorset is 68% protected, Reading West & Mid Berkshire 65%, Ashford 64%, and Derbyshire Dales 52%. Polling shows that when these voters are given the straight binary, they too come off the fence and choose local nature protection by substantial margins. That movement is particularly strong among rural and semi-rural respondents and among those most likely to vote. This is the profile of decisive voters in many Labour-Conservative marginals and Labour-Liberal Democrat contests in the South and Midlands.

SMALL SWINGS COULD WIPE OUT MULTIPLE LABOUR GAINS.

Districts like Mid Derbyshire, North East Hertfordshire, and Tamworth show double-digit negative net support for the NRF while posting nature-over-building preferences near or above 55-60%. These constituencies swung in 2024, and represent pockets of precarity for Labour. As recent Conservative voters, they are unlikely to support proposals that monetise local habitats, only to deliver benefits elsewhere.

OPPOSITION TO AN OFF-SITE, CENTRAL-POT MODEL IS NOT CONFINED TO POSTCARD AREAS.

The modelling shows that average environmental protection does not mean average levels of concern. Every constituency on the list of at-risk seats shows double-digit negative net support for the NRF (typically between -10% to -23%). At the same time, clear majorities prefer protecting nature when forced to choose. Crucially, this pattern holds even where formal environmental protection shares are modest (e.g. Tamworth 2.4% protected; North East Hertfordshire 3.2%). Places like Darlington, Stoke-on-Trent South and Ashford which have very mixed geographies, with urban cores, green corridors, edge-of-town habitats, still exemplify this clear trend.

COASTAL AND MARKET TOWNS HANG IN THE BALANCE.

Seats such as Suffolk Coastal, South Norfolk, and South West Norfolk sit amid protected coastlines, marshes and farmland. Here, voters' sensitivity to 'offsite' mitigation is acute, and the NRF framing tests badly.







In its current form, the Bill poses a dual threat: to England's already depleted natural environment and to the political standing of the Government that enacts it. Far from delivering the promised 'win-win' for housing and nature, its core mechanisms are seen by the public as a licence to destroy for developers.

This is not the view of a narrow activist fringe. Labour loyalists, swing voters, and even those open to other parties share a consistent resistance to the Bill's provisions, both in rural seats rich in environmental protections, and in urban constituencies where green space is scarce but deeply valued.

For Labour, the political jeopardy of the 'Green Faultline' is real. In key marginals, provisions that alienate decisive voter blocs could tip the balance. A swing of just one or two per cent could hand victories to the Conservatives, Liberal Democrats, or Greens. The Bill raises questions which are more than just political. As it stands, it presents fundamental challenges to the principle of environmental injustice, with development concentrated in less affluent, often urban areas, while restoration projects are delivered elsewhere. This would deepen inequalities in access to green space, undermining public health, community cohesion, and quality of life. In a country where one in six species is already threatened with extinction, treating nature as interchangeable across geography ignores both ecological science and public sentiment.

There is still time for the Government to change course. With the Bill in the House of Lords, targeted amendments could strengthen environmental safeguards without diluting housebuilding ambitions:

1. PRIORITISE LOCAL DELIVERY.

Developers should first seek to deliver environmental benefits on-site or in the local community, before paying a flat fee into the Nature Restoration Fund. As with the Biodiversity Net Gain mitigation hierarchy, this would incentivise local action before resorting to distant offsetting. There has been welcome guidance issued on this by the Government, but it needs to be written into legislation.

2. LEVERAGE PRIVATE EXPERTISE.

The UK's network of private-sector ecologists can rapidly deliver efficient, high-quality environmental assessments, helping developers identify and implement simple changes to mitigate damage before turning to the NRF. Over £250m of private investment has flowed into the sector in the past five years, not counting substantial in-house investment by businesses scaling up their work to protect nature. Harnessing this capacity before defaulting to EDPs would encourage development that understands and limits its own impact. An amendment to implement this process is already tabled in the House of Lords.

3. ENSURE SOME FORM OF SITE-BY-SITE ASSESSMENT REMAINS FOR THE MOST VULNERABLE SPECIES AND NATURE.

The opposition to offsetting outside of the local area runs deep, and the Government could implement amendments to the Bill to ensure that the most vulnerable forms of nature, such as protected species or ancient woodland, are protected. The Bill could include a list of bad use cases, where there is no evidence at all that EDPs would improve local outcomes, and could require a rapid ecological assessment on planning applications to ensure that, should a developer pay into the NRF, it is adequately financed. Again, an amendment to this effect already sits within the House of Lords.

BY EMBRACING **AMENDMENTS THAT** KEEP ENVIRONMENTAL RESPONSIBILITY CLOSE TO THE COMMUNITIES AFFECTED, THE GOVERNMENT CAN TURN A LOOMING LIABILITY INTO A LEGISLATIVE WIN FOR NATURE, FOR HOUSING, AND FOR ITS ELECTORAL FUTURE.







ABOUT ARBTECH

Arbtech is the largest ecology consultancy in the UK, with over 150 employees, exclusively serving the planning and development sector. In 2024 alone, Arbtech undertook 13,800 environmental assessments nationally. Last year, only one of these applications was refused — a 'blocker versus enabler' ratio of 0.007%.

ABOUT THE DATA

On behalf of Arbtech, the UK's leading ecological consultancy, Stack Data Strategy interviewed 9,269 adults across Great Britain in July 2025. Respondents were representative of the population by age, gender, education, ethnicity, age interlocked with past vote, gender interlocked with past vote and education interlocked with past vote. Interviews were conducted online, with respondents recruited from multiple sources via our data partner Walr.

We employed several Multilevel Regression and Post-stratification (MRP) models in this analysis. This involves the creation of multi-level models which take account of respondents' age, gender, level of education, 2024 General Election vote and ethnicity, as well as information about the area they live in including socio-geographic indicators. These models are then used to estimate public opinion down to the Output Area level.





