

UKGBC NATURE-POSITIVE FRAMEWORK FOR THE BUILT ENVIRONMENT

RESPONSE TO THE PUBLIC CONSULTATION [MAY-JUNE 2025]

As part of the development of the UKGBC [Framework for a nature-positive built environment](#), an open consultation was held to share progress and gather the sector's feedback to build consensus on the proposals at the time.

The Framework establishes a robust and shared understanding of what nature-positive means for the built environment sector, one that provides clarity and rigour, to support real-world impact. The final Framework includes:

- Definitions of the nature positive concept for the built environment sector to enable a shared understanding.
- Eight steps and recommended actions to align with the concept. The actions complement existing regulations and guidance and are mapped against the lifecycle of a built asset and its scopes of impact.
- A set of five calls to action that can guide and accelerate the uptake of nature-positive actions across the sector.

This document summarises the feedback received in response to the question asked and provides commentary from UKGBC.

We would like to sincerely thank the respondents for taking the time to share your insights and feedback. Your input has been invaluable in shaping the final Nature Positive report and strengthening its relevance and impact [can access here](#).

Your contribution has helped advance the conversation on how the built environment can play a meaningful role in protecting and restoring nature. We greatly appreciate your support and engagement. Please contact the Resilience Resource Use and Nature team at resilience.nature@ukgbc.org if you have any questions about the consultation process.

Note: The title of this work was originally named "Framework Definition.", and the consultation incorporated this wording when published and carried out. Upon further consideration, the word "Definition" has been removed from the title to emphasise that the Framework shows how nature-positive approaches are applied in practice, rather than establishing a new term.

The voice of our sustainable
built environment



This work has been made possible thanks to our Resilience, Resource Use and Nature Programme partners:



And our project partner:



CONSULTATION FEEDBACK AND RESPONSE SUMMARY

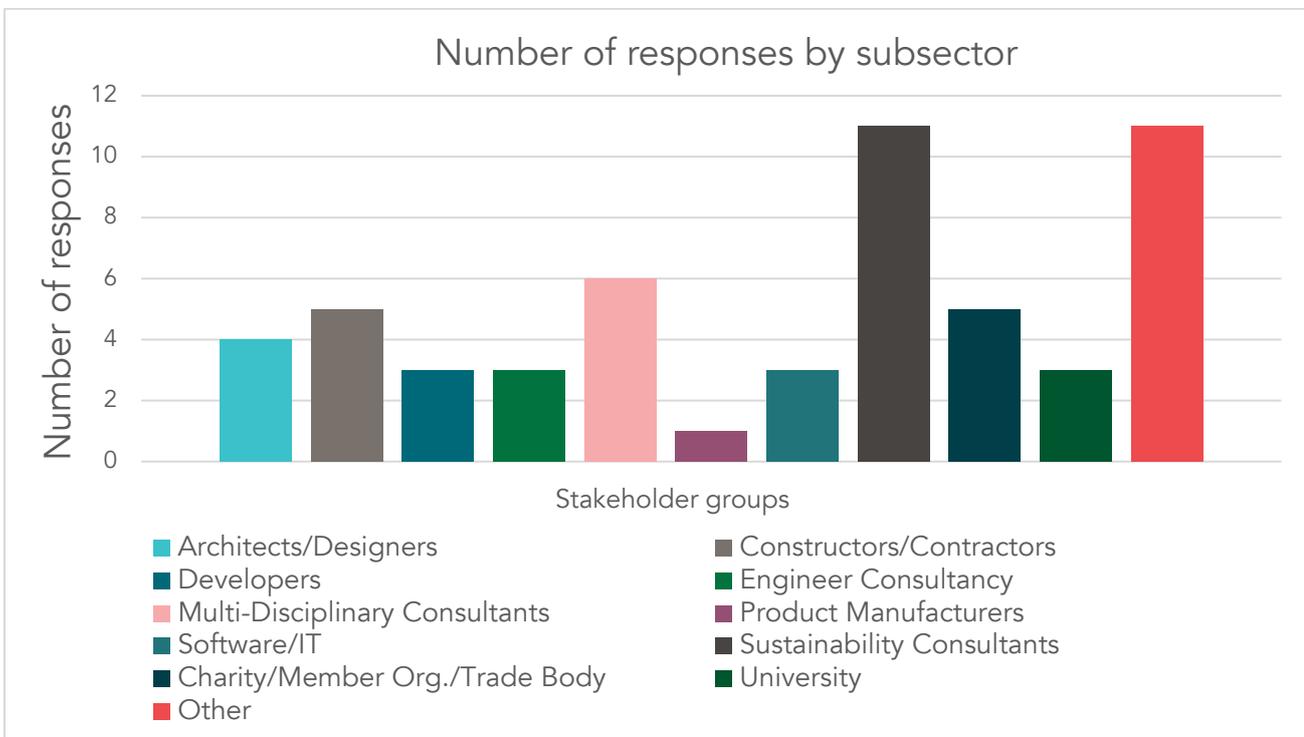
Between 15th May and 12th June 2025, UKGBC invited the built environment sector to consult on the initial proposals for the Framework for a nature-positive built environment. Feedback was sought from members of UKGBC, the wider sector and other relevant organisations to evaluate and comment on the proposals.

The following section summarises the most common points raised as part of the feedback received, including the level of agreement (where applicable) and the observations shared by respondents. UKGBC reviewed each comment to determine its relevance to the project scope and alignment with the project goals, and provided responses, including the actions needed to integrate improvements and address the gaps identified by respondents.

Section 1 - About the respondent

Question 1 – 8 related to personal (name and role) and organisational details (account name and sector). Details shared in these questions are held by UKGBC following GDPR procedures.

A total of 55 responses were received from individuals across 51 organisations. The graph below shows a breakdown of responses from subsector.

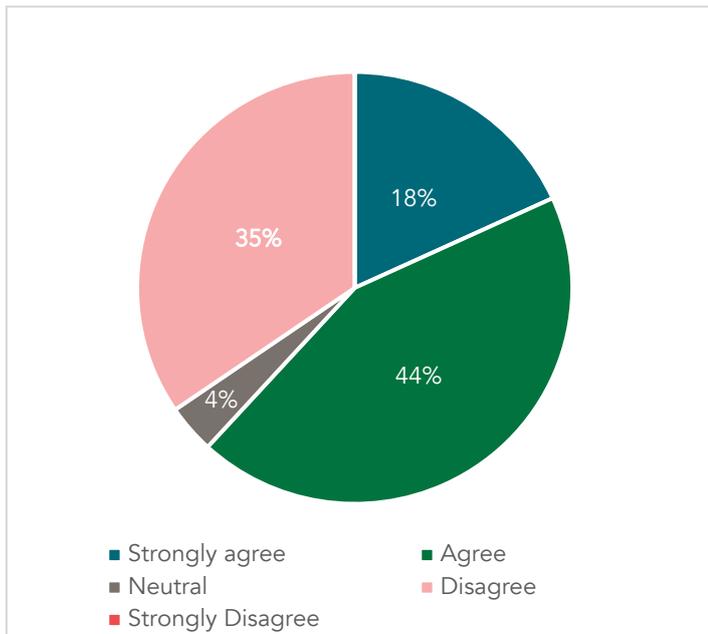


“Other” included landscape consultants, real estate investment organisations, housing associations or those whose organisations’ operations cover a range of roles listed above, such as developer, contractor, and operator.

Section 2 - Audience for the Framework Definition

Questions 9 &10.

To what extent do you agree with the list of primary audiences identified for The Framework Definition? If you disagree or somewhat disagree, please briefly share your reasons.



Comments included:

The majority of respondents (62%) agreed or strongly agreed with the primary audiences identified for the Framework. There was no strong disagreement.

The feedback highlighted additional stakeholder groups that could be considered part of the primary audience. The most frequently mentioned stakeholder groups were local authorities (18% of responses) and contractors (13% of responses). Government (9%) and Investors (7%) were also groups to be considered as primary audiences. Other groups mentioned less frequently (4/5%) included those involved in the operation and management of assets, NGO's/community groups, planners, ecologists, and landscape architects.

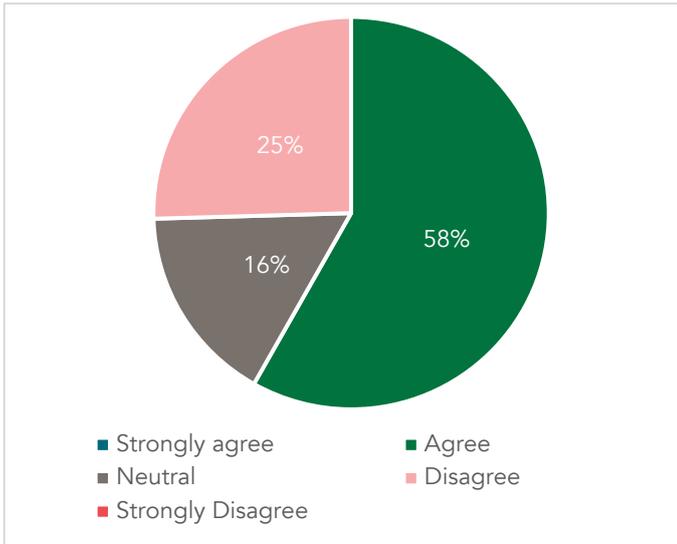
Response: The audience has been reviewed and has been modified to reflect the feedback, including certain sub-sectors from within the industry. The final audiences for the output are defined as:

- Project team members - including developers, consultants, designers, architects, urban planners, engineers, contractors, ecologists, and others.
- Building owners/occupiers - including portfolio managers involved in the acquisition, management and operation of existing assets; property and facilities managers; and estate teams.
- Supply chain - including materials suppliers and product manufacturers, who provide materials.
- Government - local authorities, national governments and devolved administrations that set regulations, policies, incentives, and monitoring frameworks.

Section 3 - Global context and core definitions

Questions 11 & 12.

To what extent do you agree that this diagram effectively conveys the key aspects of the nature positive global goal (page 6) and clearly supports the details of the contributing methods (concepts)? If you disagree, please briefly share your reasons.



Comments included:

There was general agreement that the diagram clearly illustrates the nature-positive global goal.

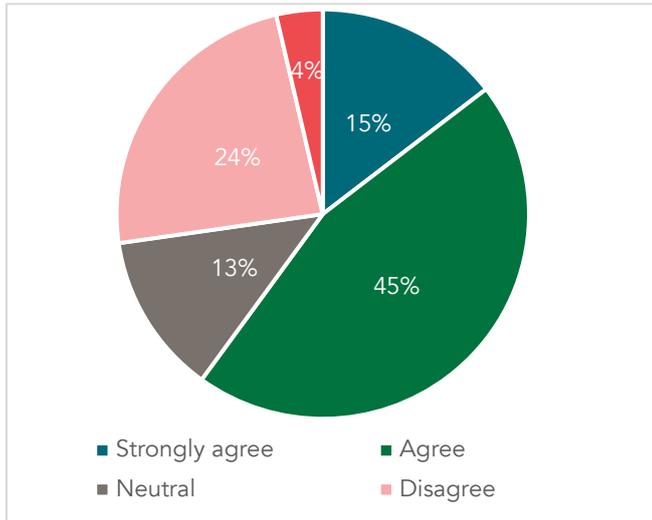
Comments noted that the timelines and axes on the graphic were unclear and/or difficult to distinguish. They also said it would be helpful to reference data sources on which the graph is based.

Further clarity was requested on why biodiversity was used to depict nature levels in the graph.

Response: The graphic has been updated to include a timeline along the X-axis and biodiversity on the Y-axis, which serves as a measure of progress toward nature positive. Higher levels of biodiversity indicate more nature, reflecting improvement towards nature positive (i.e., restoration of nature). The graphic clearly relates to the global goal, which it aims to visualise. Additionally, contextual information is provided in the report, with clear definitions of both biodiversity and the concept of nature positive.

Questions 13 & 14.

To what extent do you agree that the definitions provided are the most essential concepts for built environment stakeholders to understand to work towards a nature positive goal? If you disagree or strongly disagree, please briefly share your reasons.



Comments included:

60% of respondents agreed or strongly agreed with the definitions.

Overall comments included suggestions to add core definitions to the Framework such as biodiversity, nature, ecology, conservation. Some comments also addressed the clarity of other definitions and whether the definitions differ from those existing, such as Biodiversity Net Gain (BNG). Comments also suggested the definitions provided did not cover the supply chain impacts which are global in nature.

Response: The definitions list has been expanded to include a broader range of key terms, including nature, biodiversity, and ecosystem, in a glossary section. This covers the range of terms used within the Framework

Question 15.

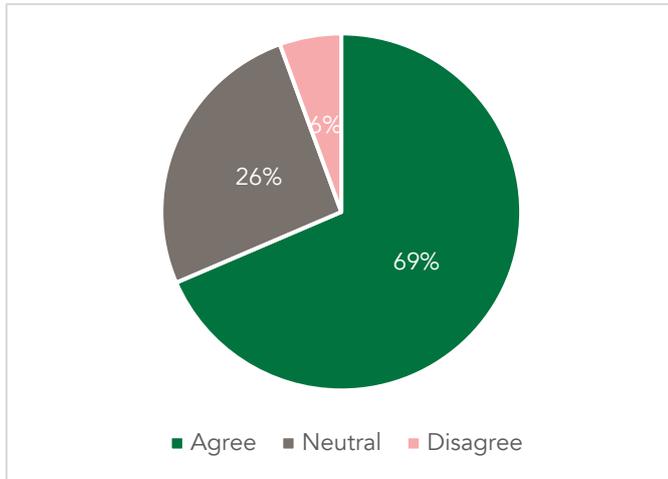
Are there any other concepts you think relevant to the Framework which could be provided as a definition to support built environment stakeholders?

Comments included:

Other concepts suggested for inclusion related to the following areas:

- Biodiversity Net Gain and Environmental Net Gain
- Nature based Solutions
- Green Infrastructure
- Natural Capital
- Embodied ecological impacts
- Supply chain
- Circular economy
- Carbon and Net Zero
- Water
- Health and wellbeing

Response: The glossary within the Framework covers definitions of the nature topics suggested, including embodied impacts, which occur through the supply chain. Within the report an there will be an explanation of how nature intersects and provides co-benefits to other sustainability priorities such as net zero, circular economy, climate resilience and health and wellbeing.

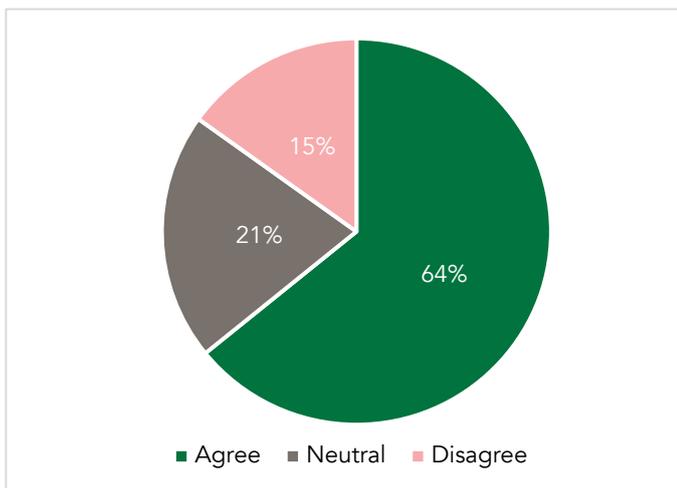


Question 16.

To what extent do you agree with the definition of 'net biodiversity loss'?

Highlighted results:

69% of respondents agreed with the definition, while 6% disagreed.

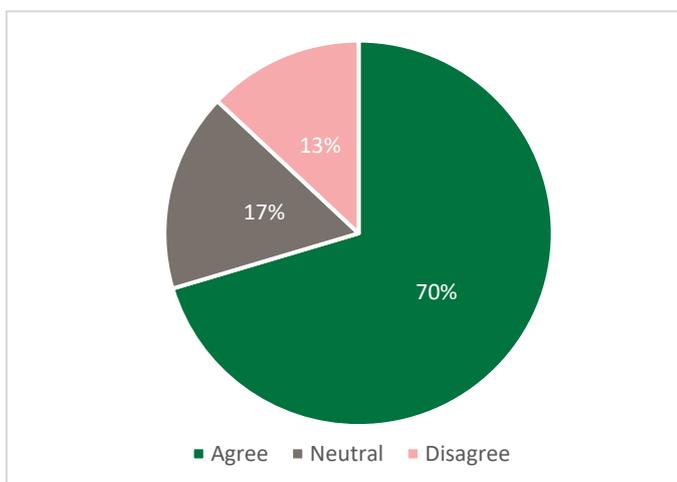


Question 17.

To what extent do you agree with the use of this definition of 'no net biodiversity loss'?

Highlighted results:

64% of respondents agreed with the definitions, while 15% of respondents disagreed.

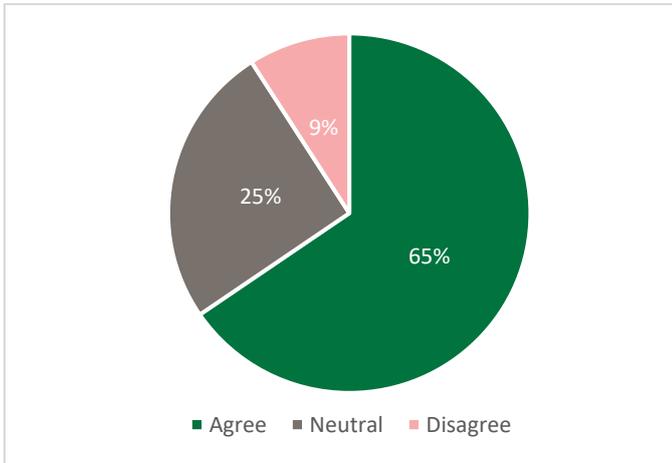


Question 18.

To what extent do you agree with the definition of 'net positive'?

Highlighted results:

70% of the respondents agreed with the definition provided, and 13% disagreed.

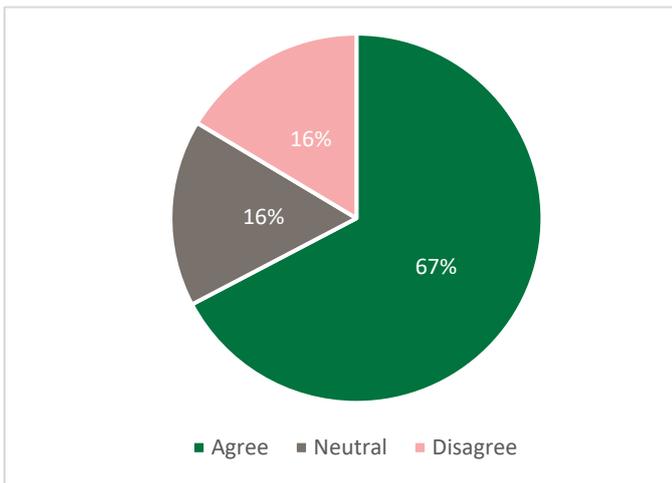


Question 19.

To what extent do you agree with the general definition of 'regenerative'?

Highlighted results:

65% of respondents agreed with the definition, while 9% of the respondents disagreed.



Question 20.

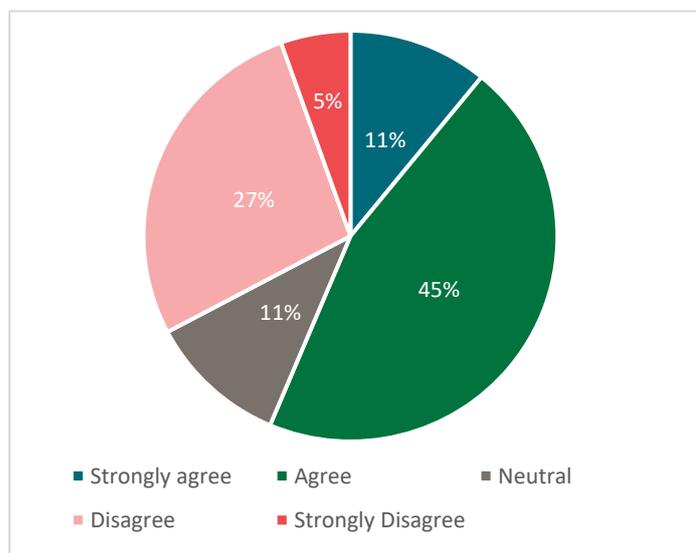
To what extent do you agree with the general definition of 'regenerative design'?

Highlighted results:

67% of the respondents agreed with the definition. However, 16% disagreed with the definition of regenerative design provided.

Question 21 & 22.

To what extent do you agree that the graphics (page 6) used to visualise each definition support understanding, reinforce clarity and prevent greenwashing? If you disagree or strongly disagree please briefly share your reasons.



Comments included:

56% of respondents agreed or strongly agreed the graphics would support understanding and reinforce clarity. 11% were neutral and 32% disagreed or strongly disagreed.

Some respondents noted that the graphics may require additional context to be fully understandable and actionable. They suggested that a single diagram may not capture all aspects needed to address greenwashing effectively.

Comments on the wording of the definitions included:

- Clarification requested on whether these are the key definitions to include.
- Greater emphasis asked on supply chain and embodied ecological impacts.
- The regenerative definition highlighted to be primarily focused on project-level impacts right now.
- Mention that the term "Net" could be clearer and more consistently applied, including guidance on offsetting and determining equivalent nature value.

Response: The overall graphic has been updated and the definitions have been moved to a different section of the report, to create better clarity, and allow other definitions to be included (see Q.15)

Question 23.

Is there anything else you think should be included in this graphic (page 6) to support industry alignment? If so please share your reasoning.

Comments included:

A large proportion of the comments related to the insights shared individually above. Some of these include:

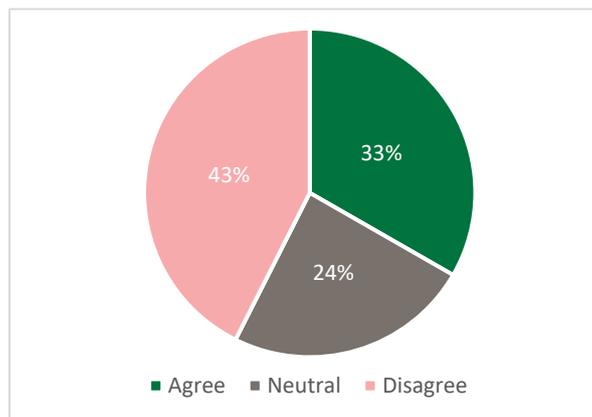
- The need for the graphic to clearly define the scope of nature-positive impacts, indicating whether it reflects project/site-level or supply/value chain effects, and to align with the definitions.
- Suggestions for improving clarity by showing the timeline, baseline, and current status, linking definitions to the diagram, and indicating how loss/gain relates to the global goal.
- Requests for the graphic to represent all aspects of nature, including species, ecosystems, natural processes, scale, and wider environmental impacts.

Additional feedback included incorporating competencies and capacity building, defining biodiversity gain alongside net biodiversity loss, including case studies and metrics, ensuring the regenerative definition reflects full lifecycle impacts, and aligning principles with IUCN business standards.

Response: The graphic has been reviewed and updated to reflect the global goal more closely. The axes have been amended to include time on the X-axis and biodiversity on the Y-axis. The definitions are separated from the graphic in the final output to simplify the diagram. The imagery has been updated to include a broader representation of nature. The Scope diagram has been updated to show the scopes of impact from site to global level and the supply chain impacts.

Section 4 - Scope for a nature positive built environment

In Part 3, Section 4, Pages 7 and 8 of this document, a diagram and associated text are presented which outline key aspects of the scope.

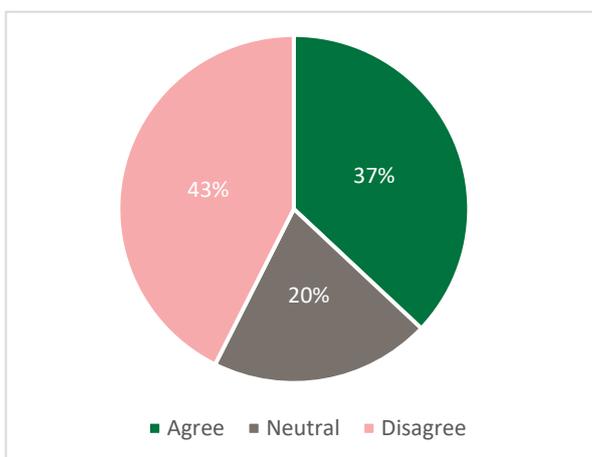


Question 24.

To what extent do you agree that the scope diagram (page 8) is clear and easy to follow?

Highlighted results:

43% of respondents disagreed, with 24% being neutral and 33% in agreement.



Question 25.

To what extent do you agree that the diagram (page 8) adequately depicts the scope of nature positive in the built environment?

Highlighted results:

43% of the respondents disagreed, 37% of respondents agreed with the diagram, and 20% were neutral.

Note that there were comments about the scope diagram (page 8), received in question 27. These are integrated below:

Question 27. Please share any additional comments or feedback on the Principles you think could help better align actions to a nature positive approach.

Overall, the feedback for this image indicated that the level of complexity was high, indicating difficulties in understanding the diagram as a whole. Particular aspects highlighted were:

- The need to improve terminology and clarify the diagram's labels.
- Suggestions to redesign the layout to centre project impacts and show connected impacts.
- Enhancing the graphic by including nature, supply chains, and loss examples.

Response: The scope diagram has been simplified by separating two key aspects:

- Geographical scope (site, supply chain, offsite)
- Level of influence in the built environment (project, organisation, industry). This has now been moved to a separate graphic showing the steps for nature positive.

This simplifies the scopes shown in the graphic for stakeholders when assessing their impacts, dependencies, and opportunities with nature. The diagram is accompanied by explanatory text, providing clear definitions on the impacts and where they occur from site to global level.

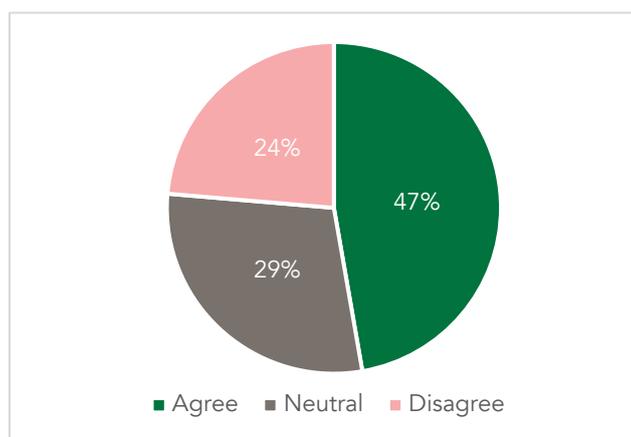
Examples of actions for nature gain and loss is also separated, with further detail provided in the actions section of the Framework.

Section 5 - Principles for a nature-positive built environment

In Part 3, Section 5, Page 9 of this document, Principles to follow for ensuring nature-positive actions are presented.

Question 26 & 27.

To what extent do you agree that the Principles provide a clear framework for stakeholders in the built environment to work towards nature-positive approaches?* Please share any additional comments or feedback on the Principles you think could help better align actions to a nature-positive approach.



Comments included:

47% of the respondents disagreed, 24% of respondents agreed with the diagram, and 29% were neutral.

The principles could be strengthened by including practical examples to reduce the risk of greenwashing, clearly assigning responsibility for delivery, being supported by measurable indicators and tools, and showing how they interconnect to reinforce one another.

Response: The original principles have been integrated into a set of Calls to Action for a nature-positive built environment. This shift reflects the intention of the final Framework to move beyond standalone principles and instead provide clear, actionable direction for the sector, supported by steps and actions at different levels of aspiration.

The Calls to Action bring together the intent of the principles into a coherent structure that supports delivery across the built environment lifecycle, at project, organisational and industry levels. They are designed to reduce the risk of greenwashing by linking ambition with accountability, practical action and long-term impact.

Comments on the individual principles:

Feedback on Principle 1: Centre nature in decision making

“Nature is central to every decision” may be unfeasible and needs to be balanced with other priorities. The onsite vs offsite balance could be benefited by further clarification; the definition of local context needs tightening. The idea of focusing on the most material risks and opportunities is critical and may deserve its own principle.

Response: The principle has been amended to “integrate nature into every decision” in balance with other themes that require equal care, such as decarbonisation, resource use and resilience for people and prosperity. Material risks and opportunities will continue to be part of call to action 3 when considering the whole life cycle.

Feedback on Principle 2: Embrace a systemic and regenerative approach

It was felt that “Regenerative” could be better defined, as well as its relationship to “nature positive”. “Renewal and adaptability” needs clarity on scale and application.

Response: The principle, now embedded in the call to action number 4, has been updated to clarify what is meant by regenerative. The Framework also includes additional content that defines and differentiates “nature positive” from “regenerative”, and explains how regenerative approaches involves systemic thinking.

Feedback on Principle 3: Champion Just actions

The current wording could be improved to avoid ambiguity, avoiding different interpretations.

Response: The principle has been clarified as “Just Transition” and emphasised as a core aspect that needs to be considered across all actions for the stakeholders of the built environment. It appears highlighted in the calls to action.

Feedback on Principle 4: Focus on the local context

Good guidance on how nature should be approached in development. The principles should explicitly link with other key themes like decarbonisation, circularity, wellbeing and social value. There are risks implying nature is something to be “provided” rather than inherent.

Response: The principle, now embedded across the relevant calls to action, has been clarified to emphasise that nature is inherent in every system and context, rather than something to be “provided.” The Framework strengthens links between local context and other key sustainability themes, including decarbonisation, circularity, wellbeing, and social value, providing guidance for decision-making that considers both local and global impacts.

Feedback on Principle 5: Be bold and accountable

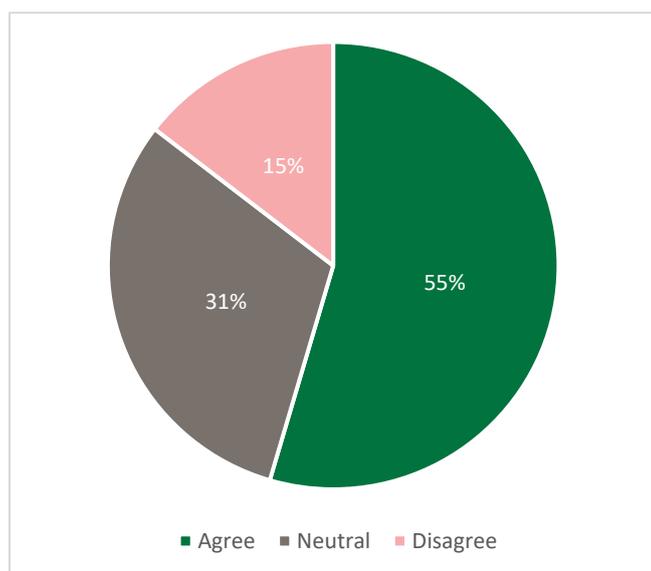
“Be bold” could be further detailed and provide actionable details. Accountability scope could be broader; adding measurable indicators and continuity of care.

Response: Practical examples that show what ambitious action looks like for the built environment are included in the actions table. The Framework now includes indicators, explicit responsibility for action, and guidance on continuity of care for nature, ensuring accountability at the level of projects, organisations, and the wider value chain.

Section 6 – Closing section

Question 28 & 29.

Do you agree that The Framework Definition will support industry clarity on the topic, avoid greenwashing and enable action? If so, how? If not, please explain why.



Comments included:

55% of respondents agreed that the definition will support clarity, whilst 15% disagreed and 31% were neutral.

Feedback shared by participants included their perception around the Framework Definition as a much-needed support for the industry regarding the clarity on what nature positive is. It was also mentioned that the Framework must include the embodied impacts and regenerative aspects more.

Consultation responses also asked for guidance to support companies implementing nature positive, and a database of examples or case studies to help provide clarity.

Response: The Framework includes a comprehensive set of actions for both the organisational and built asset level, covering nature impacts at a site level and through associated supply chain activity. This provides guidance and clarity for organisations on how to implement the Framework.

Question 30. How do you see yourself using this output? Please provide specific examples and how you could use them.

Comments included:

Respondents mentioned the benefit they see in the clarity and alignment that the Framework aims to deliver, and therefore they see themselves using it for learning and education on nature within the built environment.

At an organisational level, this could be used to shape organisational nature strategies and align work to the nature-positive goal. The Framework could help to show a board of directors the direction of travel needed, and inform colleagues on nature impacts on site and across the supply chain.

On projects, the Framework could be used to influence and inform project teams on the parameters of nature-positive. It could also help clients to understand the topic, informing them of the role they can play. The Framework opens a door to discuss impacts on nature with the supply chain and create an opportunity for dialogue on how to limit impacts.

It was also viewed as having potential use in standards and certification schemes, as well as influencing organisational policies and planning reform. Many highlighted opportunities for knowledge sharing and collaboration, while also noting the need for greater clarity, practical examples, and metrics to support wider adoption.

Response: The open feedback shared by respondents further supported the progress of the project, ensuring the Framework met the aims for the output, as well as aiding the direction of the output's format and type of content that best supports the users, making it practical and actionable.

Question 31. Please share any further feedback or comments on the Framework Definition.

Comments included:

Respondents welcomed the Framework as a valuable step for the built environment, yet called for greater clarity in language, definitions, and diagrams, alongside more technical guidance and practical examples to support application.

From those who commented, several highlighted the importance of consistent metrics, credible baselines, and clear scope to avoid greenwashing and strengthen accountability.

Suggestions included giving more emphasis to regenerative design, nature-based solutions, and links to climate change, as well as recognising co-benefits such as health and wellbeing.

Several offered tools, expertise, and collaboration, emphasising the Framework's potential to influence organisations, standards, and government policy if strengthened.

Response: We appreciate the time taken to provide further feedback at this point. These comments were considered through the full report when producing the final Framework, ensuring that greater clarity is provided where possible.