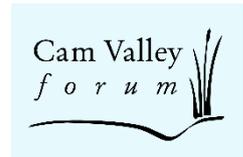


## CVF response to NPPF consultation, deadline 10 March 2026

<https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>



### F8: Sustainable Drainage Systems and watercourses

This policy is partly a redraft of paragraph 182 of the current Framework, which requires all development proposals that have drainage implications to incorporate Sustainable Drainage Systems. The policy adds a new requirement that Sustainable Drainage Systems should be designed in accordance with the National Standards for Sustainable Drainage Systems to provide a consistent basis for improving their design. A further change also introduces a new policy to avoid the enclosure of watercourses and encourage the de-culverting and re-naturalising of river channels. This addition is intended to deliver multiple social and environmental benefits of re-naturalising rivers, including improvements to water management.

**Question 175: Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels?**

**Our reply:**

We strongly support the proposed policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels. This is vital for improving natural habitats and the quality of life for local communities. It also helps improve resilience against flooding, which will be an increasing problem due to climate change

### N6: Areas of particular importance for biodiversity

This policy clarifies the hierarchy of internationally, nationally and locally designated areas of importance for biodiversity, as well as irreplaceable habitats, drawing on current Framework paragraphs 193(b) and (c), 194 and 195. It anticipates the introduction of Environmental Delivery Plans and introduces new national policy clarifying protections for sites which are designated locally, addressing a gap in the current Framework. Local Nature Recovery Strategies will enable local authorities to more easily identify where these areas are, as they align with the guidance for responsible authorities to map areas which are of particular importance for nature.

**Question 184: Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?**

**Our reply:**

The UK holds 85% of the world's Chalk Streams, but they are drying up. We note that the government has promised to "make clear, unambiguously, our expectations for how plan makers and decision makers should treat chalk streams."—[Official Report, 13 November 2025; Vol. 775, c. 407.] For example, in East Anglia, the Chalk Streams are drying up because of over abstraction of water from the chalk aquifer, primarily for the purposes of public supply, with a smaller proportion used for agriculture. The unsustainable growth plans for our region increase the threats to both the irreplaceable Chalk Streams and our supply of drinking water

We need ensure that growth only takes place when, and where it is genuinely sustainable. To help achieve this we need to a) list Chalk Streams, along with ancient woodland as irreplaceable habitat, and b) nominate the UK's chalk streams as a serial UNESCO Natural World Heritage Site

Given that climate change is making the West wetter, and the East drier, the NPPF should encourage long-distance national water transfer and the creation of local reservoirs, supplied by winter river-flow.