

INLAND WATERWAYS ASSOCIATION – RESPONSE TO THE NPPF CONSULTATION (2025/26)

Preface

The comments below submitted by the Inland Waterways Association (IWA) have been formulated and agreed by the IWA Planning Advisory Panel.

The Inland Waterways Association (IWA) welcomes the opportunity to respond to the consultation on the revised National Planning Policy Framework (NPPF). Our membership spans communities and stakeholders who live, work and engage with the UK's inland waterways – including canals, navigable rivers, and associated infrastructure. Many of these waterway environments are not only heritage assets in their own right but also vital forms of green and blue infrastructure, supporting biodiversity, climate resilience, recreation, tourism, housing, employment, drainage systems, water supply and sustainable transport.

The IWA has a proud record of restoring and protecting navigable inland waterways and in safeguarding and enhancing their heritage and recreational value. Canals and navigable rivers often traverse multiple planning authority boundaries and may not be fully covered by co-ordinated Development Plan policies. The NPPF can therefore play an important part in ensuring that there is wider recognition of the contribution inland waterways make, and can continue to make, to national and local social, economic and environmental objectives.

Key Areas where NPPF Policy should be strengthened

1. Recognition of Canals and Rivers as Strategic Infrastructure

Canals and rivers, as noted above, perform a wide range of material planning-related and environmental functions. The NPPF should explicitly require waterways, especially navigable waterways, to feature in strategic planning policy and in Plan-making and Decision-taking to ensure they are factored into housing, infrastructure, transportation and place-making strategies.

2. Residential Moorings and Housing Provision

Residential boaters are a long-established housing group with specific needs. Development Plans should be required where necessary to assess and make provision for residential moorings and live-aboard boat communities, with appropriate criteria that reflect their locational and infrastructure requirements.

3. Waterway Heritage and Environment

Waterways not only form the historic cores of many urban areas but also contribute to the character of our rural villages and countryside. Planning policies should safeguard heritage settings and ensure development protects and enhances waterway character and biodiversity within both urban and rural environments.

4. Green and Blue Infrastructure Integration

The NPPF should include clearer cross-references between policies on green infrastructure, climate adaptation and waterways, ensuring waterway corridors are integrated strategically into planning for climate resilience and nature recovery.

5. Statutory Consultation and Expertise

Development Plans must ensure waterways' bodies and technical experts remain engaged where plans or developments affect waterway corridors, flood risk areas and infrastructure. Representing the main users of the inland waterway network, the IWA would ideally wish to be a Statutory Consultee as this would greatly assist in monitoring proposals affecting inland waterways.

Further Information

Further information on the benefits and value of inland waterways can be found at:

- 'Waterways for Today' report published by the Inland Waterways Association (November 2022) <https://waterways.org.uk/campaigns/waterways-for-today>
- 'Valuing Our Waterways' report published by the Canal & River Trust with social-value experts Simetrica-Jacobs, with all methodology aligning with 2022 HM Treasury Green Book valuation techniques (November 2022) <https://canalrivertrust.org.uk/about-us/valuing-our-waterways>

Conclusion

The Inland Waterways Association broadly supports the draft NPPF's intention to streamline and clarify national planning policy. In its current and draft form, however, it insufficiently recognises inland waterways' diverse social, environmental and economic roles and potential. We therefore advocate the need for the text of the NPPF to reflect the value of canals and navigable rivers as nationally important man-made and natural resources.

IWA also considers that the draft should be improved in a number of other areas that indirectly affect the environment and users of inland waterways, as detailed below.

Detailed comments and amendments requested in response to the National Planning Policy Framework consultation document and questions:

Chapter 3. Decision-making policies

DM3: Determining development proposals

Q24) Para. 1.d. "Consult statutory or internal consultees only where it is necessary to do so."

Whilst a greater emphasis on timely responses from statutory consultees may be justified, the suggestion that they may not need to be consulted at all undermines the position of consultees and could lead to bad decisions due to important information not being provided or considered.

DM4: Emerging development plan proposals

Para. 2. "Development proposals should not be refused on the grounds of being premature..."

This undermines the integrity of the plan-led planning system. As said in the Introduction:

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

Proposals should therefore not be determined in accordance with a plan that does not yet formally exist.

The default position should be that applications based on allocations proposed in a plan are premature prior to that plan being adopted, unless material considerations indicate otherwise.

DM5: Development Viability

Q28) As the 'housing crisis' is primarily an insufficiency of affordable housing, developers should not be permitted to reduce agreed or conditioned affordable housing provision based on changed viability representations.

DM6: Use of planning conditions and obligations

Q29) This section should explain to what extent CIL (Community Infrastructure Levy) replaces or supplements S106 planning obligations.

DM8: Unauthorised development and enforcement

Q31) Taking account of the intentionality of unauthorised development is a welcome change.

Chapter 4. Achieving sustainable development

S4: Principle of Development Within Settlements

Q37) Fundamentally disagree that this support in principle for development within settlements should be assessed against only national policies in this Framework and not the development plan as a whole.

S5: Principle of Development Outside Settlements

Q39) The specific categories of development allowed outside settlements should include residential boat moorings in approved marinas connected to canals and navigable rivers.

Q40) 5. “The preceding parts of this policy do not apply to development proposals in the Green Belt ...” As worded here, the exception of the development around stations (1.h) does not apply to the Green Belt (5.) which is supported. However, the statement at Key Policy Changes 2 in the Proposed Reforms document is inconsistent with this and the references to ‘default yes’ should be removed as this misleadingly conflicts with the more detailed criteria in policy S5.h and the footnote 26.

Chapter 6. Delivering a sufficient supply of homes

HO1: Assessing the need for homes

Q49) Add “2.k. Live-aboard boaters.” Explanation: The policy should also take account of the needs of live-aboard boaters for the provision of properly serviced residential moorings in marinas and other sites connected to canals and navigable rivers.

Also add “2.l. ‘Park home’ permanent caravan dwellers.”

Chapter 10. Securing clean energy and water

W4: Water infrastructure

Q99) Add after 1.a. “The potential of canals for water transfer to balance areas of supply and demand.”

Chapter 13. Protecting Green Belt land

GB2: Assessing Existing Green Belt Land

Q132) 2. It should be made clear that to be effective the Green Belt needs to be physically continuous and should not be fragmented by large scale developments within it.

3. The concept of ‘grey belt’ land is fundamentally misguided, ill-defined, with no clear responsibility or process or for its designation, and a trojan horse for developers to invade the Green Belt. It should be limited to previously developed land.

It should be made clearer that grey belt can only be designated through the development plan and not by owners or applicants.

Guidance and Glossary

Q145) The concept of ‘grey belt’ land is fundamentally misguided, ill-defined and a trojan horse for developers to invade the Green Belt. The definition should not be loosened as suggested but tightened to limit it to previously developed land.

Chapter 14. Achieving well-designed places

DP3: Key principles for well-designed places

Q148) At 1.e insert “water-based travel” after cycling to include canoes, ferries and water taxis.

Chapter 15. Promoting sustainable transport

TR1: Vision-led approach to planning for transport

Q150) At 1.d insert “water-based travel” after cycling to include canoes, ferries and water taxis.

At 1.e expand “ports” to “coastal and inland ports” to include canal and river transport.

TR3: Locating development in sustainable locations

Q152) At 1.b insert “water-based travel” after cycling to include canoes, ferries and water taxis.

TR7: Marine ports, airports and other aviation facilities

Q156) Amend title to “Coastal and inland ports, ...” to include canal and river transport.

Chapter 16. Promoting healthy communities

HC4: Proposals for new and improved community facilities and public service infrastructure

Q160) 1. “Substantial weight should be given to the benefits of providing new or improved public

service infrastructure or community facilities.” This should include supporting the restoration of canals for public recreation and associated biodiversity, heritage conservation, drainage and other benefits. Canal restoration projects are typically led by volunteers through community based charities and take several decades to achieve, needing continuity of planning support.

Chapter 18. Managing flood risk and coastal change

F2: Planning for effective flood risk management

1.c. Add “and blue” after green. Explanation: The restoration of canals as green and blue infrastructure can provide drainage improvements and contribute to reduction of flood risk.

Chapter 20. Conserving and enhancing the historic environment

HE2: Conservation Areas and World Heritage Sites

Q187) 2. The requirement for Conservation Areas to be reviewed “periodically” is not new as section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 says local planning authorities must review their conservation areas “from time to time”. However, some Conservation Areas, including some linear CAs along canals designated in the 1970s and 1980s, have not been reviewed. The timescale is therefore too vague and “periodically” should be defined, perhaps in a footnote, as “at least every ten years”.