Acting on the Cunliffe Review: 'Wilder River Banks'

Policy briefing, September 2025

Executive summary

- The Independent Water Commission, known as the Cunliffe Review, has proposed a new framework for the water sector to improve environmental outcomes.
- The Review recommended that this reset encompass action to reduce water pollution from agriculture.
- The Wildlife Trusts propose a 'Wilder River Banks' policy to increase nature-rich habitats and land alongside waterways to prevent pollution from reaching rivers, to apply the Cunliffe recommendation to agriculture, improve other environmental outcomes and provide economic and social benefits.
- Wilder River Banks could be incorporated into the proposed new framework through a target in the National Water Strategy, supported by national policies, and by local actions to contribute to target achievement by regional systems planners.

Background

In July, Sir John Cunliffe published the final report of the Independent Water Commission setting out a package of recommendations to reset the water sector in England and Wales to better meet environmental goals. [1]

The report highlights that *'action by the agricultural and transport sectors is critical to restoring environmental health in water bodies'* and recommends that the proposed new regulatory framework for the water sector has a built-in function to reduce pollution from agriculture, as well as from the water sector and other sources. Two recommendations in the report set out how this cross-sector capability should work:

- Recommendation 1: A National Water Strategy (one document for England, one for Wales), to serve as *'a long-term, cross-sector strategy for water'…'setting out in one place the requirements on all the sectors impacting on or interacting with the water environment'*. The report stated that '*the Strategy should set out what existing levers and additional mechanisms are needed to mitigate the impact of key sectors, including agriculture'*.
- Recommendation 3: Proposed Regional Systems Planners (eight for England and one for Wales) to co-ordinate local action aligned with the National Water Strategy, informed by work *'with catchment partnerships, water regulators, and land managers to co-develop objectives that reflect local hydrological realities and environmental priorities'*. The report stated that *'systems planners should have a role in directing Environmental Land Management funding towards water system priorities to maximise its impact'*.

[1] Independent Water Commission final report, July 2025

On 21st July, the Secretary of State for the Environment, Food and Rural Affairs welcomed the report and confirmed that its key recommendations would be implemented through a Water Reform Bill (preceded by a White Paper). Recommendations explicitly greenlit by the Secretary of State included moving to a *'catchment-based model for water system planning'* to *'tackle all sources of pollution entering waterways so they can be cleaned up more effectively and more quickly'*.[2]

These are welcome commitments, which must be swiftly implemented to address high public concern about pollution and the pressing ecological need for freshwater recovery.[3] To assist with implementation The Wildlife Trusts propose a 'Wilder River Banks' policy, increasing nature-rich habitats around waterways to reduce agricultural pollution and providing other environmental, economic and social benefits. This policy should be included in the National Water Strategy for regional systems planners to then deliver at a regional level.

Wilder River Banks: Policy detail

Wilder River Banks would see land around English and Welsh waterways restored for nature, from sites where headwaters spring, to established riverbanks all the way through to estuary wetlands. Wilder land around waterways creates a stronger barrier against pollution from surrounding fields reaching the water. It also means a boost for nature recovery, new income opportunities for farmers, protection against flooding, and contributions to climate and public health efforts. Wilder river banks generate a cache of wild benefits, from which society can draw.

The case for restoring land around freshwaters has been made over recent years by The Wildlife Trusts and a coalition of environmental and farming groups.[4] The Government's progression of the key Cunliffe Review recommendations provides fresh incentive for policy adoption, to provide the new mechanism for action on agricultural pollution and nature recovery the Review identifies as necessary. The National Water Strategy and regional system planning framework proposed by the Review provide the perfect vehicle to apply the policy through.

Wilder River Banks will also provide a strong link between work across river catchments and improvements to river channels. The policy will link into Local Nature Recovery Strategies and Catchment Plans, which will identify not only opportunities for nature-rich river banks, but will connect these with work across river catchments to hold water, reduce pollution and create restored habitat, and with work in the river channel itself to improve the physical habitat of rivers, through everything from small-scale woody features that shelter invertebrates and juvenile fish, to large-scale river re-wiggling and floodplain reconnection. This holistic approach offers the best opportunities to restore rivers to health, in line with legal obligations and public expectation.

[2] Oral statement to Parliament by the Secretary of State for the Environment, Food and Rural Affairs, 21.07.25
[3] For full Wildlife Trust response to the Cunliffe Review, see blog published on 30th July
[4] See 'Wildbelt' for rivers proposals from The Wildlife Trusts and the work of the 'Making Space for Water' coalition, to which The Wildlife Trust belongs.

The current situation

After decades of agricultural intensification and urban development, nature rich habitats alongside waterways are under pressure. In many areas this fringing habitat is practically absent. Ploughed fields, grazed pasture, manicured lawns or urban hard surfaces extend almost to the top of the riverbank, leaving the banks bare of wild plants and trees. The post-Brexit end of cross-compliance requirements for farmers to maintain a 2m buffer strip next to waterways means this problem is likely to have worsened over recent years.

The absence of wilder banks has significant impacts on the form and function of rivers. Eroded soil and farm chemicals and manure flow straight into the channel. Exposed waterways, lacking in overhanging plants let alone trees, heat up in the summer sun, sometimes reaching temperatures that are fatal for fish and aquatic insects. Road run-off contaminated with urban chemicals also flows directly into watercourses. In times of flood, waters break out of the channel, causing disruption and damage to crops, roads and homes in their path.

Large swathes of absent fringing habitat means where nature-rich spots in other parts of the river do persist, they struggle. Pockets of habitat are isolated from each other meaning that the species they support are vulnerable to local pressures, unable to move in the event of a pollution event, flood or drought. The river itself provides a connection, but not one that is easily used by all species – we can think of these surviving habitat patches as like beads along a necklace, rather than a broad connected band.

In areas with particularly degraded soils, the absence of protective fringing habitat means rivers change colour during heavy rainfall as soil is washed straight into the river.[5] Such colour-changes are merely the most observable indicator of the quantity of farm soils reaching our waterways, carrying with them harmful pollutants and excess nutrients. It is perhaps no surprise that, as highlighted by the Cunliffe Review, *'agriculture has the most significant environmental impact on water bodies in England and Wales'*.

The Wilder River Banks solution: A target in the National Water Strategy

The National Water Strategy should include a nationwide Wilder River Banks target to increase the amount of land around water systems in recovery for nature. The target should be contained in both the English and Welsh documents and be set to the first 5-year strategy milestone, with ratcheted increases for further milestones. The Strategy should clearly commit the UK and Welsh Governments to making funding sources available as levers to achieve the Wilder River Bank target and delineate the funding streams that will be used for this.

The UK Government will need to commit to use of the following existing funding streams for Wilder River Bank target achievement:

[5] For example, see Natural Resources Wales report on River Wye, May 2024

- Environmental Land Management (ELM) schemes in England. This should provide financial incentives for farmers to create large buffers when their land adjoins rivers. Options within the current Sustainable Farming Incentive (England) for a 6-12 metre buffer should be improved to reward larger belts of connected habitat for wildlife. The new Countryside Stewardship and Landscape Recovery schemes should offer enhanced support for farm actions more ambitious than buffers, including restoring landscape-scale connection between terrestrial and riverine habitats. The Welsh Government should make a similar commitment to use the Sustainable Farming Scheme in Wales to achieve Wilder River Banks there.
- The Water Restoration Fund. Following the UK Government's welcome recommitment to this fund[6], established to ringfence water company fines for environmental enhancement projects, it should be used to support projects which restore nature to land around waterways to reduce pollution.
- The Flood and Coastal Erosion Risk Management budget. The UK Government consulted on welcome proposals in June 2025 to better equip this budget, intended to support work to reduce flooding risks, to support natural flood management approaches. Given the role that nature-rich spaces around waterways can have in slowing and storing water, Wilder River Bank projects should be eligible for support from this budget.

In addition to earmarking funds from the above three sources, the UK Government should set out in the National Water Strategy how further funding streams and policies will be used help achieve the Wilder River Banks target. Further policies to help achieve an increase in the amount of land around water systems in recovery to reduce pollution and provide other benefits could include:

- Further support for beaver re-introductions. In February, UK Government opened the door for licenced reintroductions of beavers into the wild, paving the way for his native species to roam wild in British rivers and lakes once more.[7] Once back in the landscape, beavers can make a direct contribution to achieving Wilder River Banks. Beavers are nature's engineers, playing a vital role in restoring wetlands, which slow and store water, improve water quality and provide habitat utilised by myriad other species. More beavers around waterways means wilder banks. Further Government support, from publishing a reintroduction strategy to assisting local Beaver Management Groups, will help achieve the target.
- Reformed and better enforced farming regulations. The current regulatory environment for farming in England is overly complex, with many farmers often unaware of their requirements meaning that compliance with existing rules is low. Poor compliance can lead to more pollution from farms, such as improperly stored slurry, reaching waterways. By reforming and better enforcing regulations the UK Government can reduce the burden of pollution Wilder River Banks will have to bear. Regulations could include a return to the 2m strips of land between farmland and rivers that had applied under cross compliance rules before Brexit. This could be usefully combined with SFI support for wider nature-rich spaces next to the mandatory 2m buffer strip. It is important to stress that such regulatory enhancements can't

[6] Response to parliamentary question, July 2025
[7] Wildlife Trusts beaver press release, February 2025

be made overnight, farmers will need support and guidance to improve compliance and transition to a new regulatory baseline.[8]

- Further improvement of ELM scheme support. Current Sustainable Farming Incentive (England) options to improve soil health and improve nutrient management should be enhanced, to help farmers reduce the amount of pollution before it reaches land adjacent to waterways. This reduction in pollution at source will help Wilder River Banks to tackle the remainder.
- Targeted action on intensive pig and poultry farming. Wildlife Trust research published in August 2025 found significant pollution problems arising from the intensive pig and poultry sector, which utilises significant amounts of land to produce feed products which are sent to pig & poultry housing units often concentrated in particular areas.[9] In one local authority, North Yorkshire County Council, the combined annual volume of excreta from pig and poultry production was found to be 1.7 million m3 - enough excrement to fill 675 Olympic swimming pools each year. Reforms to the permitting regime for intensive pig and poultry farms are required to reduce the environmental risks associated with the pig and poultry sector on waterways, and to decrease pollution at source.

The Wilder River Banks solution: Action by regional systems planners to contribute to target achievement

Beneath the National Water Strategy, the new regional systems planners should coordinate local action to achieve the Wilder River Banks national target, including furthering regional Wilder River Banks objectives sitting under the target. System planners would utilise funding and policy tools earmarked for this purpose in the National Water Strategy.

As proposed by the Cunliffe Review, systems planners would help farmers in their region to access ELM funding for freshwater actions and to apply it to maximum effect, including through joint work with other farmers through initiatives like Catchment Sensitive Farming Schemes. The Wildlife Trusts have extensive experience of such schemes and can testify as to how transformative they can be for nature, rural businesses and the wider community. To give one example, Derbyshire Wildlife Trust are delivering the Derwent Living Forest project, bringing together farmers and land managers to restore 30,000 hectares of natural habitat along the River Derwent, to provide flood protection and other ecosystem benefits for people living locally.[10] Systems planners could build on and expand such work, helping to co-ordinate ELM-enabled farmer actions across regional water systems to deliver joined up Wilder River Banks.

The Cunliffe Review also proposed that system planners become statutory consultees on Local Plans, and Spatial Development Strategies (the new regional spatial planning documents proposed by the Planning and Infrastructure Bill). This would allow systems planners to suggest local planning measures, where they would play a useful role in achieving regional Wilder River Bank objectives. For example, in a local authority where substantial urban re-development near rivers is planned, a local

[8] See The Wildlife Trusts Vision for Farming, June 2025
[9] Wildlife Trusts pig & poultry report, August 2025
[10] Derwent Living Forest Vision, Derbyshire Wildlife Trust

plan policy could require nature-rich riverside spaces as a condition of consent. In another local authority, where house building has affected nutrient pollution, contributions to compensatory measures to reduce nutrient pollution from farmland could be a more appropriate local plan policy to help achieve the regional Wilder River Bank objective.

The capacity for locally tailored actions to contribute to a national target is a real merit of the proposed national strategy and regional systems planner framework. It gives flexibility to allow delivery to vary to meet the needs of different areas. In line with this, Wilder River Banks will not necessarily look the same everywhere. In built-up areas there may be physical constraints to ambitious action, but useful opportunities could arise through parks and urban regeneration projects. Where the constraints of built infrastructure are fewer, more rural environments could allow significant opportunities for large-scale river restoration. This flexibility could also usefully apply to the monitoring of Wilder River Bank progress, with different system planners reporting back to Government on progress on the ground towards delivery of the national Wilder River Bank target and lessons to be learnt from the regional experience. The Government will then be able to provide new national tools to support regional systems planners as required, such as a potential National Development Management Policy to encourage planning measures across the board to support Wilder River Banks.

When coordinating farmer action and linking in with local plans to increase Wilder River Banks in England, regional systems planners will need to work closely with existing Catchment Plans and Local Nature Recovery Strategies (LNRS), the 48 documents setting out local plans for biodiversity action. Working with relevant LNRSs, regional system planners can help align policies, including use of Biodiversity Net Gain measures from developments, to best effect to further Wilder River Banks. There may also be opportunities for joint work to address wider environmental issues, for example efforts to reduce agricultural pollution at source could also reduce agricultural pollution impacts on terrestrial habitats, as well as on waterways.

Wilder River Banks: Environmental, economic and social benefits

The Cunliffe Review, and the UK Government's swift endorsement of key recommendations, has confirmed a policy objective of reducing agricultural pollution and set in motion a governance framework to achieve it. The Wilder River Banks policy would help achieve the agricultural pollution reduction objective and provide other significant environmental, economic and social benefits. As set out above, the policy could be neatly incorporated within the proposed governance framework.

Environmental benefits

By making agricultural pollution travel through buffer spaces before it reaches waterways, a proportion of the polluting matter can be captured before it hits the water, where pollution becomes diffuse and spreads quickly. A February 2025 evidence review conducted by the Chief Scientist's Group within the Environment Agency concluded that restored habitats projects *'were shown to enhance water quality through intercepting, transforming and storing nutrient pollutants'*.[11] A separate evidence review published in the academic press concurred, highlighting that the, *'reported*

[11] Environment Agency evidence synthesis, 2025

effectiveness of vegetated buffers reducing the movement of pesticides and nutrients ranged from 10 to 100% and 12–100%, respectively'.[12] The review highlighted that the amount of matter captured varied according to qualitative factors, including '*soil composition and structure, runoff intensity, plant community structure'*.

Monitoring of Wilder River Banks delivery will need to assess and share learnings of what factors deliver the most benefits for pollution reduction. Allowing complex habitat to develop, and then managing it to control nutrient-hungry species and remove pollution captured but not absorbed by the habitat, is likely to produce good results. Optimum results could be obtained through a combination of regulatory 2m buffer strip and a wider nature-rich space separating farmland from the waterway, allowing some pollution to be absorbed by the buffer strip acting as a sacrificial area, before reaching the nature-rich space.

Wilder River Banks will also deliver a significant boost for nature. The UK Government has a looming Environment Act target to halt the decline in species abundance by 2030, along with longer term habitat and species recovery targets and aligned international goals agreed to under the Kunming-Montreal Global Biodiversity Framework. The restoration of nature-rich habitats along water systems will turbo-charge efforts to meet those targets. Rivers form a vast connected water network, a system of watery veins reaching across the landscape, providing lifeblood for habitats and species. Restoring the quality of those waters, and growing nature-rich spaces alongside them, will provide transformative shelter, feeding and movement opportunities for wildlife, helping habitats and species to connect and thrive.

This nature-boost will also provide climate benefits. Healthy natural habitats are the most proven and effective carbon capture technology available to us. The House of Lords Science and Technology Select Committee's 2022 report on natural carbon capture concluded that NbS projects will *'play an essential role in taking carbon out of the atmosphere to compensate for the UK's "residual" emissions from the sectors where total elimination of carbon emissions will be impossible to achieve by 2050.'*[13] More restored habitats through Wilder River Banks means more progress towards net zero.

Economic and social benefits

Wilder River Banks will provide new opportunities for farmers. An improved ELM offer for freshwater actions could provide increased income for farmers for delivering an essential public good, with joint working coordinated by system planners providing wider partnership opportunities with other parts of the local economy. Growing evidence also shows that nature-rich spaces can increase farm profitability, providing services that otherwise would come from expensive artificial inputs.[14] For example, bats roosting on a wooded Wilder Bank site will consume insects over adjacent arable fields, reducing the need for expensive (and sustainability-harming) chemical insecticides.

[12] Academic evidence review, 2020
[13] House of Lords Science & Technology Select Committee report, 2022. See also 2020 The Wildlife Trust report on NBS & climate
[14] See Wildlife Trust Farming at the Sweet Spot report

Other economic and social benefits will be felt more widely across communities. Restored riverside habitats, such as healthy native woodland, can absorb accumulating water and slow down water flow, protecting communities from flooding. The February 2025 evidence review conducted by the Environment Agency reported medium to high confidence in all forms of habitat restoration protecting against flooding, with woodland being found to reduce flood risk by up to 50% in some cases.[15] There is also a potential for increased access to nature. Although it won't be appropriate on all Wilder River Banks, in built up areas new riverside nature-spaces could be created with built-in access for communities, including new river walks. Wild banks in rural areas adjacent to existing rights of way could increase the abundance of wildlife viewable from those paths. Such increase in nature access is associated with improved health[16] and educational outcomes.[17]

A Wilder River Banks target in the coming National Water Strategy, supported by national funding and policy levers and implementation in the new regional water planning systems, could unlock significant environmental, economical and social benefits. Wilder banks dip down to better waters.

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[15] Environment Agency evidence synthesis, 2025
[16] See Wildlife & Countryside Link briefing on health benefits from increased access to nature and blog on health benefits from accessing healthy blue spaces
[17] Wildlife Trusts research on educational benefits from increased access to nature