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# Sustainable Drainage Systems (SuDS) in New Housing Developments

**CONSULTATION REPORT  
MAY 2026**



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## 1.0 Introduction

- 1.1 The public consultation on Sustainable Drainage Systems (SuDS) in New Housing Developments sought views from stakeholders and the wider public on the development of future policy relating to the regulation and use of SuDS in Northern Ireland (NI). It aimed to outline the key considerations involved and to gather essential information and opinions on priority policy areas, potential implementation challenges, and opportunities to encourage the wider use of nature-based SuDS solutions.
- 1.2 The consultation opened on 22 September 2025 and closed on 19 December 2025. During this period, the Department encouraged all interested parties to share their views to help shape modern, robust and forward-thinking SuDS policy.
- 1.3 To mark the launch of the consultation, a press release was issued, and all consultation documents were published on the Department's website. These documents were also circulated to a wide range of stakeholders, including Section 75 groups, MPs, MLAs, local councils, central government departments, businesses, industry specialists, and other targeted organisations. The consultation was also promoted through social media channels to maximise public awareness and participation.
- 1.4 The Department wishes to thank all stakeholders and members of the public who took the time to respond to the consultation.

## Consultation Responses

1.5 A total of 46 responses were received from a range of organisations and individuals as shown below. **Appendix A** provides a full list of respondents.

- Local and central government - 12
- Individuals - 10
- Non-departmental public bodies - 3
- Organised interest group – 3
- Business operators - 2
- Housing developer - 3
- Not for profit organisation- 1
- Political party – 2
- Professional bodies - 8
- Industry representative bodies - 2

## Presentation of Consultation Findings

1.6 The consultation asked seven specific questions, and an open question seeking any general comments on the consultation document. This report provides a summary of the consultation responses received. It is intended to be a broad synopsis of key points raised by respondents rather than a comprehensive account of every view expressed.

1.7 **Section 2** of the report provides a statistical overview and summary of the responses received to each question. Not all respondents answered the eight questions directly; some provided general comments instead.

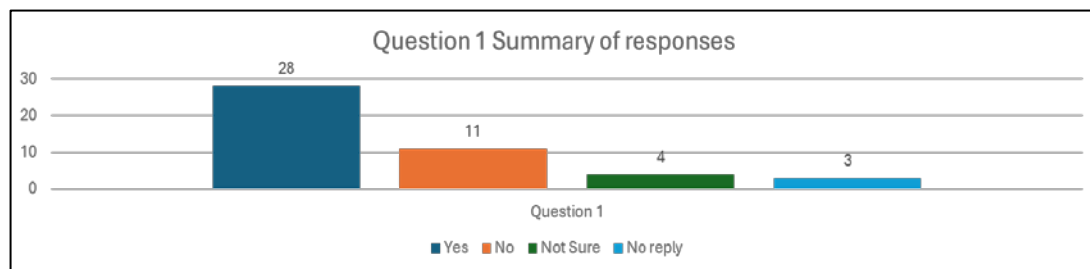
1.8 **Section 3** of the report summarises the main themes to emerge from the consultation.

1.9 **Section 4** sets out the conclusions and next steps for the development of future policy.

## 2.0 Overview of Consultation Responses

### Question 1

Do you agree that nature-based SuDS should be a requirement in all new housing developments?



- 2.1 This question sought views on whether nature-based SuDS should be mandated for all new housing developments, rather than relying on voluntary uptake or case by case discretion. Respondents were invited to select **Yes / No / Not Sure** and provide supporting commentary.

### Summary of Responses

- 2.2 Of the 46 responses received, a large majority of 28 consultees were supportive of mandatory nature-based SuDS. While 11 responses were recorded as 'no' and 4 others were 'not sure', most of these responses were in fact supportive of the use of nature-based SuDS in new housing developments, wherever appropriate. Those who opposed the mandating of nature-based SuDS explained that, whilst they were supportive of the concept of SuDS in general, issues such as site constraints, topography, location and size were potential barriers to mandating their use in new housing developments. They also pointed out that there was a need for clarity on the future maintenance and adoption of nature-based SuDS.

## Key Themes

### Strong support for making nature-based SuDS mandatory

- 2.3 The majority of respondents answered 'yes' to this question, indicating that nature-based SuDS should be required in new housing developments. Respondents noted benefits for flood management, climate resilience, water quality, and wider environmental outcomes.
- 2.4 Welcoming the proposed requirement, one respondent commented that nature-based SuDS *'will ensure that drainage solutions deliver multiple benefits beyond simple runoff management, including improved amenity, biodiversity, and climate resilience.'* Another who answered 'yes' felt that the requirement *'would provide certainty for developers, reduce reliance on end-of-pipe solutions, and ensure consistent delivery of SuDS benefits across Northern Ireland.'*

### Conditional support – nature-based SuDS required where appropriate

- 2.5 Whilst the majority of responses support the integration of nature-based SuDS into new housing developments, many said that this should only be done where appropriate, on a site-by-site basis. Possible constraints cited included limited space, brownfield complexities, contaminated land, high density urban areas, and heritage considerations. One council stated that *'The extent of SuDS required will be dependent on the nature and size of the proposed development and its location. Each development should be considered on its own merits having regard to the specific circumstances of the case.'*

### Some opposition to a blanket requirement

- 2.6 The Department received a number of responses that SuDS should not be mandatory in all new developments. However, those who qualified their answer, were not opposed to the use of nature-based SuDS per se, but to the mandating of their use in all new housing developments. One such respondent said, *'that to aspire to have nature-based SuDS in all new housing developments as the first-choice drainage solution (as described in the*

*consultation document) was fine, rather than a blanket requirement applied irrespective of suitability.'*

- 2.7 Another respondent pointed out that *'If required on new schemes, some sites could become economically unviable due to expected densities not being able to be delivered with nature-based SuDS incorporated.'* One representative of the housing sector explained that they use a combination of government grant and private borrowing to obtain land for affordable housing and, given the large surface area required for SuDS as opposed to underground solutions, mandatory SuDS would have *'profound negative impacts'* on space and cost.
- 2.8 The key concerns of those opposed to having nature-based SuDS as a requirement in all new housing developments include: loss of development land; cost pressures and viability; feasibility issues on small or constrained sites; and uncertainty about long-term maintenance and adoption.

### **Need for clear policy guidance and regulatory change**

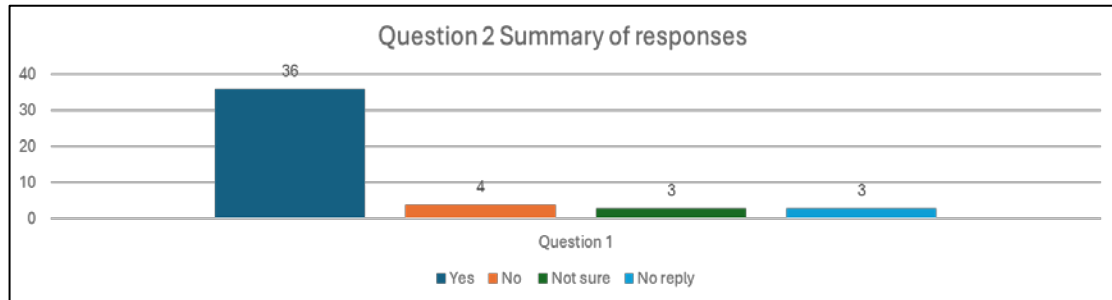
- 2.9 One theme which runs through all responses to this question is the need for clear policy guidance relating to the design, approval, adoption and maintenance of SuDS.

#### **Departmental Response**

The Department welcomes the indication of strong support for the use of nature-based SuDS as the first-choice drainage solution in new housing developments, whilst recognising the request for flexibility to reflect site-specific constraints. The Department will consider all feedback received and continue to engage with key stakeholders as it seeks to develop a robust and workable policy on the use of nature-based SuDS in new housing developments.

## Question 2

Do you agree that the SuDS management train approach should be the preferred drainage solution for new developments?



- 2.10 Respondents were asked whether they agreed that the SuDS management train should be promoted as the preferred approach for managing surface water in new housing developments. The management train involves using a sequence of linked SuDS components to manage, treat and attenuate runoff as close to source as possible.

### Summary of Responses

- 2.11 Of the 46 responses received, 36 agreed that the SuDS management train approach should be the preferred drainage option, while 4 were against the proposal and 3 were unsure. This indicates strong overall support for the SuDS management train approach.

### Key Themes

#### Overall support for the SUDS management train approach

- 2.12 There was overwhelming support for the SuDS management train approach with the majority of respondents selecting 'yes'. This reflects general agreement that this method represents established best practice in sustainable drainage design.
- 2.13 In support of the approach one respondent noted that the management train provides *'enhanced water quality outcomes achieved through multiple*

*treatment stages.’ Another respondent stated that ‘SuDS should not comprise of standalone components but rather a system of interconnected multiple interventions which combine to help deal with water locally on site and ensure the most effective outcome in intercepting and treating runoff which mimics natural drainage processes.’*

### **SuDS management train should be the preferred option with appropriate caveats**

- 2.14 Whilst a strong majority of respondents agree that the SuDS management train should be the preferred approach in new housing developments, some pointed out that it may not always be feasible due to the nature, size and location of a site. For example, one respondent stated that, *‘while the answer to the question is yes; this should be caveated .... that the extent to which nature-based SuDS can be provided will be largely based on the site and its location / size / ground makeup / ground topography.’*

### **SuDS to be considered at an early stage**

- 2.15 Another recurring theme was the need for SuDS to be integrated at an early stage of the design process. One council response said that *‘whilst the Council considers SuDS management train to be best practice for sustainable drainage, its success depends on early planning, good design and clear long term maintenance responsibility.’*

### **Concerns with SuDS management train**

- 2.16 While most responses were supportive of the approach, one respondent expressed concern stating *‘whilst this would be the most effective way to manage stormwater, it may not be the most practical solution and could add unnecessary complexity to maintenance / adoption / construction processes. In some cases, end-of-line detention basins are the most practical solution rather than swales and smaller basins spread across a site.’* The respondent added *‘where viable, the SuDS management train should be applied, but making it mandatory may cause more problems than solutions.’* Another respondent disagreed that the SuDS management train approach should be

the preferred drainage solution in new social / affordable housing developments, commenting that it would have an impact on space for building and the ability to demonstrate value for money when spending government grants. They also added that *'without clarity on adoption by a responsible body, long-term maintenance would become a significant risk to Housing Associations.'*

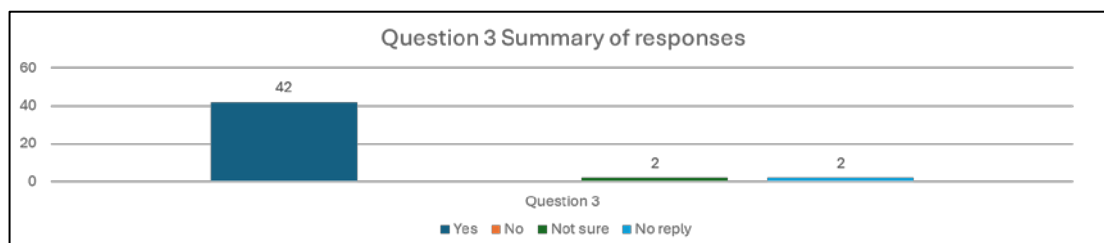
### **Departmental Response**

The Department welcomes the overwhelming support for the SuDS management train approach to surface water management in new housing developments and recognises that the full implementation of the approach may not always be feasible. The balance of responses indicates broad endorsement of the management train as a policy direction, provided the final policy framework retains sufficient flexibility to accommodate practical constraints and ensure deliverability across a range of development contexts.

The Department proposes that the SuDS management train approach should be the preferred drainage solution in new housing developments and will take all the comments received in relation to perceived constraints and limitations etc. into consideration when developing the policy on this further. The Department also agrees that SuDS needs to be considered early in the design / planning process and will be engaging with colleagues from local councils, DfI Planning Group, the construction industry and other key stakeholders throughout the policy development process.

### Question 3

Do you agree that new regional guidance on the design and maintenance standards of nature-based SuDS is required?



- 2.17 Respondents were asked whether they agreed that new regional guidance is required in NI to set out the design and maintenance standards for nature-based SuDS.

### Summary of Responses

- 2.18 An overwhelming majority of responses agreed that new regional design and maintenance guidance is required, with 42 respondents opting for 'yes'. The remainder of responses were either unsure or nil response.

### Key Themes

#### Need for consistency

- 2.19 Support for guidance was based on the need for a consistent approach across all council areas. One respondent stressed the need for uniform standards to be applied everywhere *'as differing approaches may make certain locations more attractive for developers if requirements are not as onerous...'* Another commented that *'having regional guidance in place for new developments would provide the best protection for consumers by supporting consistency in the design, delivery and maintenance of nature-based SuDS.'*

#### Need to recognise existing guidance

- 2.20 Presently, there are SuDS guidance documents available such as the CIRIA SuDS Manual, and SuDS guidance from England and Wales, however,

respondents noted that responsibility for the drainage system in NI differs from other parts of the UK. Different bodies in NI have responsibility for particular areas, each with their own guidance, including planning guidance produced by local councils. One respondent stated that whilst there is a need for regional guidance, *'it depends on the content of the guidance and the legal status of the guidance, ....and any new regional guidance does not undermine any existing adopted policy or guidance within the region and complements existing approval procedures for planning.'* Another suggested that *'the primary challenge within the region is not the availability of guidance, but the absence of a clear and consistent framework for asset ownership and long-term maintenance responsibilities.'*

### **Need to cover the full lifecycle of SuDS including maintenance & asset ownership**

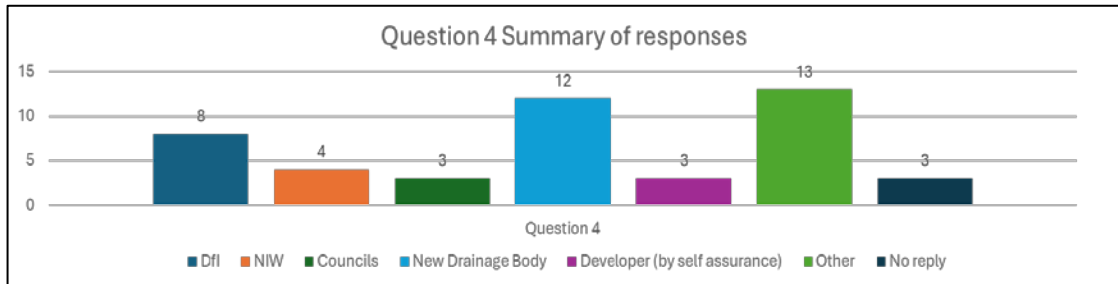
- 2.21 Respondents stressed the need for any new regional guidance to cover asset ownership and maintenance. One respondent said, *'This guidance must cover the entire lifecycle, from design specifications and construction quality to adoption and long-term maintenance requirements, ensuring assets function as intended for their lifespan.'*
- 2.22 Another respondent referred to the complex governance structure for SuDS and commented that it *'creates uncertainty regarding who should assume responsibility for SuDS assets once constructed. Although the maintenance tasks themselves are generally straightforward, the lack of clarity around ownership can hinder effective implementation and long-term performance.'*

#### **Departmental Response**

The Department notes the overall support for regional SuDS Guidance and the need to have guidance that is applied consistently across all geographical and functional areas. All comments received during the consultation will be carefully considered during the development of the SuDS policy and the approach to SuDS guidance.

## Question 4

Which organisation should be responsible for approving the design and construction of nature-based SuDS proposals? Department (DfI) / NI Water / Councils / New Drainage Body / Developer (by self-assurance) / Other (please state). What is the reason for your choice?



- 2.23 Respondents were asked to choose from a list of options of who they believe should be responsible for approving the design and construction of nature-based SUDS. Those who selected 'other' were asked to explain the rationale for their choice.

### Summary of responses

- 2.24 Of the 43 consultees who responded, there was a broad range of proposals, with the most popular being either to use and build upon the functions already provided by existing drainage / government bodies or to establish a formal statutory approval body. Responses highlighted the importance of clearly defined roles and raised concerns about the potential for delays in the planning process.

### Key Themes

#### Support for public-sector approval body

- 2.25 Most respondents supported the establishment of either a new drainage body or a hybrid approach to approving the design of SuDS. Suggested hybrid models involved local councils and DfI, DfI and NI Water, or DfI, NIEA and local councils. It was clear that the overwhelming majority of respondents

supported approval by one or more local or central government bodies. These government-based models would draw upon the expertise of each member i.e. water management, planning, road drainage, environment and water quality etc. Some respondents felt that SuDS approval should be managed by DfI as it has a Sustainable Drainage Directorate, Water and Drainage Policy Division, Planning and Roads within its remit. One stated that *‘the Department is probably the most appropriate body to provide the expertise and resources required to manage the substantial workload associated with a new SuDS approval body.’*

### **Approval responsibilities to align with existing functions**

- 2.26 Several respondents suggested that SuDS approval roles should be built around existing responsibilities, for example, DfI Rivers’ oversight of flood risk management and flood mitigation and NI Water’s responsibility for the assessment and approval of connections to storm and foul water systems via the Article 161 Agreement process. One suggested that *‘councils provide statutory planning approval and NI Water delivers technical sign-off. This approach combines place-based planning with engineering expertise, ensuring that SuDS are integrated into local development while meeting performance requirements.’*

### **New standalone SuDS approval body**

- 2.27 There was strong support for the establishment of a new dedicated SuDS approval body to *‘help ensure consistent standards, reduce the burden on individual councils, integrate approval with adoption and maintenance arrangements, and avoid conflicts of interest associated with developer self-certification.’* One respondent commented that *‘a single, technically competent body operating regionally is crucial for consistency, expertise, and efficiency’* whilst another said that a standalone SuDS approval body *‘may also provide greater consistency, clearer accountability and a more streamlined mechanism for integrating input from multiple agencies.’*

## **SuDS approval should not delay the Planning process**

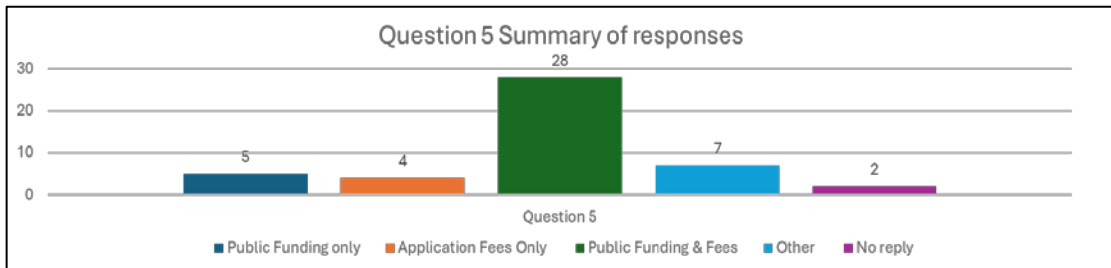
- 2.28 A recurring comment was that the SuDS approval process should provide clarity for developers and align with the current Planning System with one respondent commenting that it *'should be streamlined and integrated with existing planning and adoption procedures to avoid duplication or delays.'*

### **Departmental Response**

The Department notes the support for a government-based SuDS approval body, building upon existing responsibilities and synergies, but will consider all suggestions when developing the policy further. The Department will also explore the policies and arrangements in place in other jurisdictions and take on board the learning from experiences elsewhere.

## Question 5

How should the costs of administering any new nature-based SuDS approval body be met? Public Funding Only / Application Fees Only / Public Funding and Fees / Other (please state)



- 2.29 Respondents were asked whether the costs of administering any new nature-based SuDS approval body should be met through public funding only, application fees only, a combination of public funding and fees or via some other method providing the rationale for their choice.

### Summary of Responses

- 2.30 The majority of respondents indicated a preference for a hybrid model of public funding plus application fees (28), followed by public funding only and application fees only. 7 responses provided a mix of other rationales such as developer contribution and domestic rates charges.

### Key Themes

#### Application fees and public funding

- 2.31 Responses indicated there is overwhelming support for a combination of application fees and public funding to cover different elements of the approval process. Some felt that application fees should cover the cost of administering a new SuDS approval body, with one commenting that this may be acceptable to applicants and developers *'if they provide an effective, professional and timely service.'* Additional public funding would also be required to cover the remaining approval aspects.

- 2.32 One respondent felt that the cost should be met in the main through application fees but, *'given the potential savings of nature-based SuDS on the public purse due to less water entering the drainage network requiring treatment as well as less flooding, there may well be scope for some additional public funding to assist in the administration costs of a SuDS approval body.'* Others suggested that *'core policy, oversight and enforcement functions should be publicly funded, while application processing and inspection costs should be recovered from developers.'*

### **Further clarity required before a decision can be made**

- 2.33 At this stage in the policy development process, several respondents felt unable to make a recommendation in relation to funding. They did, however, expect to be able to comment further on this during the next policy consultation.

### **Learning from experiences in other jurisdictions**

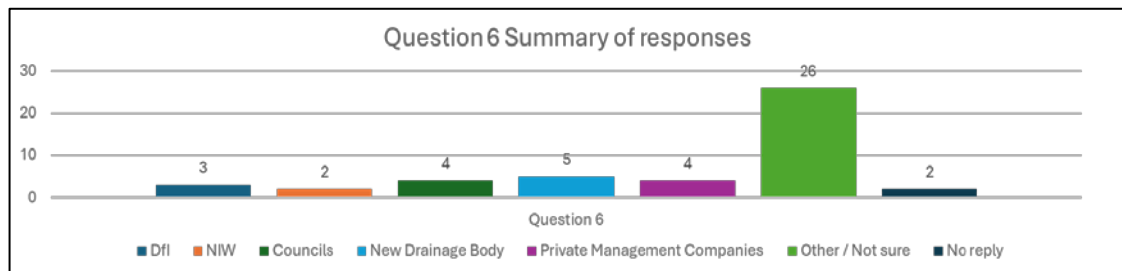
- 2.34 Some respondents pointed to the arrangements in other jurisdictions such as Wales and suggested that *'lessons can be learned from other jurisdictions on SuDS approval body and running costs. For example, the Welsh model charges developers' application fees which go towards the SuDS approval body's operational costs'*. Another referred to a review in Wales which *'recommends combining fees and service charges / commuted sums for maintenance.'*

#### **Departmental Response**

As the policy for nature-based SuDS in new housing developments progresses, the Department will be exploring options for funding, which may include the costs of a new SuDS approval body. This will include the consideration of different combinations and levels of private and public funding. The comments received during the consultation will help to inform this process.

## Question 6

Which organisation should be responsible for the future maintenance of nature-based SuDS features in new housing developments? Department (DfI) / NI Water / Councils / New Drainage Body / Private Management Companies / Other (please state). What is the reason for your choice?



- 2.35 This question sought views on which organisation should assume long-term responsibility for maintaining nature-based SuDS in new housing developments. Respondents were invited to choose from listed options (DfI, NI Water, councils, private management companies, a new drainage body, or 'other') and to provide supporting rationale.

### Summary of Responses

- 2.36 There was a wide variety of responses, indicating that there is no single preferred model for maintenance responsibility, at this stage. However, the majority of responses fall within the following common themes.

### Key Themes

#### Maintenance by a public body

- 2.37 Many respondents felt that responsibility for maintenance of SuDS should sit with a public body such as DfI, NI Water or a new drainage body. This would provide public accountability and consistency and ensure that nature-based SuDS in new housing developments are properly maintained. One respondent commented that *'Long-term maintenance responsibility should rest with a public or statutory body, ideally the same organisation responsible for*

*approval.* They believe that this approach provides continuity throughout the SuDS approval process from design through to maintenance and supports the view that SuDS are a permanent element of drainage infrastructure rather than temporary features. Another respondent expressed support for adoption by a public authority *'as this provides greater assurance that assets will be maintained throughout their lifecycle.'* There was also some support for maintenance to be carried out by local councils as they already look after parks and recreation areas.

### **Hybrid maintenance model**

- 2.38 There was strong support for a hybrid model, with maintenance responsibilities split for example, between NI Water, councils, and private management companies depending on the type of SuDS, location, function, and adoption arrangements. One respondent suggested that *'NI Water should adopt engineered components, while councils take responsibility for accessible green/amenity SuDS where capacity exists.'* Another proposed a hybrid model with maintenance responsibility linked to technical expertise and capacity, *'whereby some SuDS are adopted and maintained by NI Water, some are maintained by local authorities, and some are maintained by private management companies or residents' associations.'*

### **Support for maintenance by private management companies**

- 2.39 Some respondents suggested that private management companies would be best placed to carry out maintenance of nature-based SuDS as this already happens in some areas of Great Britain and Ireland. They pointed out that management companies can already maintain green open spaces in developments in NI and suggested that the maintenance of SuDS would simply be an extension of this, and the most efficient way forward.

### **Opposition to maintenance by private management companies**

- 2.40 There was also some concern expressed about private management companies holding responsibility for SuDS maintenance, with one local government body saying, *'private management companies can, and do, go*

*into liquidation; which leaves the problem of who takes over the responsibility of maintaining the drainage system?’* The need for effective maintenance of SuDS was widely recognised, given the important role they play in managing flood risk and protecting water quality, with one respondent stating that private management companies should only be given maintenance responsibility *‘where robust legal safeguards and contingency arrangements are in place.’*

### **Need for a clear maintenance plan**

- 2.41 There was, however, general agreement that appropriate management and long-term maintenance arrangements will be essential to ensure that nature-based SuDS in new housing developments manage rainwater effectively, support biodiversity, and remain safe and attractive.

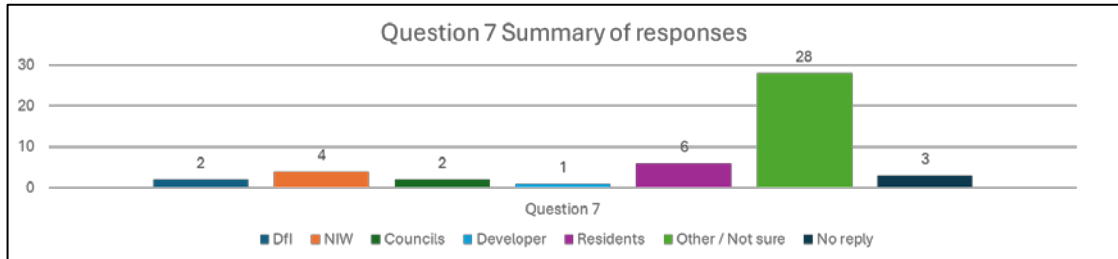
#### **Departmental Response**

The Department recognises the importance of having a clear and effective maintenance regime for nature-based SuDS in new housing developments. It also understands how the absence of such a regime is a barrier to the successful implementation of SuDS. This area will require further work in order to find a solution that will work for everyone. The Department is grateful for all the comments received and notes that whilst there were differences of opinion on the ideal maintenance model, the consensus is that having clearly defined maintenance responsibilities is essential.

The Department will consider all the feedback received during this consultation and will continue to engage with key stakeholders as it works to find the most suitable option for maintaining nature-based SuDS in new housing developments.

## Question 7

Who should pay for the future maintenance cost of nature-based SuDS features in new housing developments?  
Department (DfI) / NI Water / Councils / Developer / Residents / Other (please state). What is the reason for your choice?



- 2.42 This question sought views on which organisation / group should pay for maintaining nature-based SuDS in new housing developments. Respondents were invited to choose from listed options (DfI, NI Water, councils, developer, residents or ‘other’) and provide supporting rationale.

### Summary of Responses

- 2.43 There was a wide range of responses to this question, with many proposing different options for sharing the cost of maintenance rather than selecting any of the individual options presented. There was no clear preferred option for the payment of maintenance costs, but a number of common themes did emerge.

### Key Themes

#### Strong support for public-sector responsibility (DfI / NI Water)

- 2.44 Local council respondents felt that the cost of maintaining SuDS should be the responsibility of DfI, or NI Water funded by DfI. One council stated that SuDS are ‘*an alternative to storm sewers that are traditionally maintained by NI Water. SuDS should be an integral part of the storm sewer network.*’ Some expressed support for the findings of the DfI Stormwater Management Group in 2022, which recommended that ‘*the funding of SuDS maintenance should*

*be the responsibility of Dfl – either directly or through NI Water’ and that further work should be carried out to explore developers’ contributions for SuDS maintenance and to determine the market costs of SuDS maintenance.*

### **Mixed / hybrid funding model**

- 2.45 Many respondents proposed sharing the cost of maintenance where, for example, developers pay an initial sum or bond to maintain the SuDS features until they are established, with longer term maintenance responsibility transferring to the adopting body. One environmental group commented that *‘this approach would reduce the risk of abandoned or poorly maintained assets, and aims to ensure long-term sustainability by spreading the cost between the public and private sectors in a pragmatic and transparent way.’* Another individual supported this approach *‘to ensure consistent standards and enforcement across NI, rather than defaulting routine costs to residents, which risks inequity and under-maintenance.’*

### **Developer contributions**

- 2.46 Quite a few respondents propose developers paying an initial commuted sum to cover the cost of early years maintenance (e.g., 1–10 years). One commented that this *‘helps prevent “build-and-forget” drainage that can fail early and undermine water-quality benefits.’*

### **Residents’ Responsibility**

- 2.47 There was some support for the proposal that residents, as the main beneficiaries, should pay the cost of maintaining SuDS either through a management company or the local council. Management companies can already hold responsibility for the upkeep of open space within private residential developments, and homeowners are typically charged an annual service fee to cover these ongoing maintenance obligations. Given that this mechanism is well established, incorporating a dedicated SuDS maintenance fee into the same management structure may represent a feasible and practical option for funding the long-term operation and upkeep of SuDS assets.

## **Role for local councils**

- 2.48 A few respondents believe that local councils are best placed to adopt landscape and amenity-based SuDS features, as they already maintain parks and recreational areas. Some suggested that a SuDS maintenance fee, similar to that paid by residents to a management company for looking after open space, could be paid to the local council.

### **Departmental Response**

The Department accepts that the wide range of responses is understandable at this stage, due to the lack of clarity on a number of key issues, including adoption and costs.

The Department will consider all the comments and suggestions received during this initial consultation and will continue to work with stakeholders to develop a suitable funding model for nature-based SuDS in new housing developments.

## Question 8

Do you have any further comments or suggestions on the nature-based SuDS proposals included in this consultation document, including any potential impacts you feel there may be on any of the Section 75 Groups? (religious belief, political opinion, racial group, gender, disability, age, marital status, dependents and sexual orientation) - Please provide your comments / suggestions.

- 2.49 This question sought additional comments or suggestions on any of the SuDS proposals included in the consultation document and, on any potential impacts there might be on any of the Section 75 groups.

### Summary of Responses

- 2.50 30 respondents offered additional views, or reaffirmed earlier comments, which overall were strongly supportive of the proposals for SuDS in new housing developments.

### Key Themes

- 2.51 A range of comments were received, including:
- wider integration of SuDS and inclusion of retrofitting;
  - SuDS should be considered at an early stage in the Planning process;
  - the Planning process should be streamlined and consideration of SuDS should not cause delays;
  - developers need early notice of the timescales associated with the policy as they acquire land years in advance;
  - SuDS should count towards open space; and
  - consumers should be advised how SuDS work and how to ensure the system is not damaged.
- 2.52 Some focused on the environmental benefits of SuDS and how well-designed SuDS can contribute to habitats and biodiversity and to reducing carbon

emissions. One respondent suggested that any future guidance should include requirements specifically *‘for developments draining to sensitive or high-value fisheries to protect water quality and biodiversity.’*

- 2.53 In relation to the impact of the policy on Section 75 groups, one respondent stated that *‘Well-designed SuDS, particularly those that create high-quality green and blue spaces, can have positive impacts across all Section 75 groups by improving public realm, accessibility, and overall health and well-being’*. Another said that SuDS interventions *‘support improved mental and physical wellbeing, contribute to reduced flood risk and help create higher quality, more resilient neighborhoods. These benefits are particularly important for families, older people, individuals with health conditions, and other vulnerable groups.’*
- 2.54 A small number of respondents highlighted the potential for some negative impacts, including safety concerns for those with disabilities or dependents, where SuDS are badly designed or not maintained properly. Others mentioned the possibility of disproportionate cost impacts on residents in low-income areas. One respondent said that *‘If mandatory conditions were put in place, this could also have an impact on Section 75 groups, should some social housing schemes become unviable.’* Another pointed out that properties with SuDS features will need to be mortgageable, and this will need to be considered as the policy develops.

### **Departmental Response**

The Department acknowledges and welcomes the overall support for SuDS in new developments, and the *‘management train’* approach to surface water management. It greatly appreciates all the comments provided on a range of issues, in response to the consultation. These will all be considered and will help inform the detailed policy on the use of SuDS in new housing developments, as it develops. The comments received in relation to potential impacts on the Section 75 groups will feed into impact assessments to help the Department to develop policy that is acceptable and workable for all sections of the community.

### 3.0 Summary of Main Public Consultation Themes

3.1 The public consultation responses provided valuable insight into stakeholder priorities, concerns and expectations. Responses were received from a broad range of sectors, and although perspectives varied across the eight consultation questions, several clear themes emerged that will inform future policy direction.

<b>Main Consultation Themes</b>	
Support for SuDS Management Train	<p>A strong majority of respondents supported SuDS as the preferred or first-choice drainage approach for new housing developments.</p> <p>The SuDS management train was widely regarded as best practice and endorsed by most stakeholders, who recognised its benefits for surface water management, water quality improvement and wider environmental outcomes.</p>
Support for Regional SuDS Guidance	<p>There was overwhelming support for clear, consistent and region-wide guidance covering SuDS design, construction, maintenance, asset ownership and long-term stewardship. These elements will be incorporated into ongoing policy development.</p>
Support for Making SuDS Mandatory with Exceptions	<p>While most respondents supported making SuDS mandatory, many emphasised that full implementation must take account of site-specific constraints, including site size, topography, brownfield conditions and viability considerations. As a result, future policy will explore a flexible implementation model that balances the aspiration for widespread SuDS deployment with practical deliverability on the ground.</p>

## Main Consultation Themes

<p>Need for Clear Roles and Responsibilities, Aligned with Existing Organisational Functions.</p>	<p>No single preferred model emerged regarding SuDS approval, maintenance arrangements or long-term funding. A range of approaches was proposed, but respondents consistently highlighted the importance of minimising delays, ensuring clarity of roles and responsibilities, and aligning governance structures with existing organisational functions.</p> <p>Further work will be undertaken to explore opportunities for improved coordination and to assess the feasibility of new or hybrid implementation models.</p>
<p>Consideration of SuDS as Part of Open Space Requirements.</p>	<p>Developers and the wider construction sector also stressed the importance of recognising SuDS features within Planning policy open space requirements. The Department acknowledges this and will give the matter further consideration as part of the next phase of policy development.</p>

## 4.0 Conclusions and Next Steps

4.1 The consultation generated strong engagement across a wide spectrum of stakeholders with considerable variation in responses in some areas. This is to be expected given the early stage of the policy development process. While much of the detailed operational framework remains subject to further development, the primary purpose of the consultation was to gauge initial views on the use of nature-based SuDS and the management train approach. This has been achieved.

4.2 A number of responses raised issues not directly related to SuDS policy development. These matters have been noted and will be considered as part of other relevant policy areas. Following publication of this report, the Department will continue to progress the following activities:

- Development of a policy framework for the approval and implementation of nature-based SuDS, incorporating flexibility where required.
- Further analysis of key issues including maintenance responsibilities, ownership models and long-term financial implications.
- Continued engagement with stakeholders, including local councils, the construction sector, NI Water, environmental bodies and industry specialists, to refine technical, legal and operational considerations.
- Examination of the regulatory models in other jurisdictions, including the Welsh SuDS approval body framework, and identification of any lessons to be learned.
- Assessment of the resource implications, including the expertise and capacity required for new or hybrid approval arrangements.
- Impact Assessments, including those relating to equality, rural needs and other statutory requirements.

4.3 The Department will continue to work closely with key stakeholders as policy development progresses, taking account of the issues raised through the consultation.

- 4.4 Given the number of areas requiring further development and clarification, the Department intends to undertake additional public and stakeholder consultation. This next phase will provide greater certainty for stakeholders and help ensure that the emerging policy framework is practical, deliverable and sustainable.
- 4.5 The Water, Sustainable Drainage and Flood Management Bill is progressing through its Assembly stages. When enacted, it will provide the statutory basis for the Department to introduce regulations governing the design, approval, operation and long-term maintenance of nature-based SuDS. Subject to approval and commencement arrangements, it is expected that the Bill will come into force before the end of the Assembly's current mandate.
- 4.6 The Department welcomes the constructive feedback received and the strong support for the overall policy aims. This report represents the Department's formal response to the consultation exercise and marks the next step in the development of a comprehensive SuDS policy framework.

## Appendix A

### List of Consultation Respondents

No.	Respondent
1	Individual 1
2	Individual 2
3	Individual 3
4	Individual 4
5	Individual 5
6	Individual 6
7	Individual 7
8	Individual 8
9	Individual 9
10	Individual 10
11	Private housing developer
12	Private housing developer
13	Lisburn & Castlereagh BC
14	NI Housing Executive
15	Private housing developer
16	Tobermore Paving
17	Armagh Banbridge Craigavon BC
18	Construction Employers Federation NI
19	Mid & East Antrim BC
20	Local government
21	Institute of Civil Engineers ICE
22	Antrim & Newtownabbey BC
23	Local government
24	GreenTech
25	Political party
26	NI Freshwater Task Force / Marine Task Force
27	NI Water

## List of Consultation Respondents

No.	Respondent
28	Landscape Institute
29	Professional body
30	NIEA
31	Interest group
32	Local government
33	Political party
34	Consumer Council NI
35	Professional body
36	Professional body
37	Interest group
38	Professional body
39	Not for profit organisation
40	Professional body
41	Industry representative body
42	Local government
43	Local government
44	Industry representative body
45	Local government
46	Local government