Landscape Institute
People, place and nature

Consultation on Sustainable Drainage Systems (SuDS) in New Housing Developments – Northern Ireland

Landscape Institute Response

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Questions & Responses

Introduction

The Landscape Institute welcomes the opportunity to respond to the Department for Infrastructure consultation on Sustainable Drainage Systems (SuDS) in new housing developments. The Landscape Institute represents chartered landscape architects, landscape planners and managers working across Northern Ireland and the UK, with extensive experience in the planning, design, delivery and long-term management of landscape-led SuDS.

We strongly support the direction of travel set out in the consultation document, particularly the intention to move towards nature-based SuDS as the default approach to surface water management in new development. This aligns with established best practice and with the Landscape Institute's long-standing position that landscape should be planned and managed as essential infrastructure, delivering multiple outcomes including climate resilience, biodiversity, water management and placemaking.

Our response draws on professional experience, Landscape Institute policy work on landscape-led development, and detailed feedback from members currently delivering SuDS across Northern Ireland.

Consultation Question 1

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

Yes.

The Landscape Institute strongly supports making nature-based SuDS a requirement in all new housing developments, subject to appropriate site assessment and design. Managing surface water through landscape-led interventions is fundamental to delivering resilient, high-quality places and reducing pressure on existing drainage and wastewater infrastructure.

Nature-based SuDS features such as swales, raingardens, detention basins, permeable paving and green roofs manage water at source, reduce peak flows, improve water quality, support biodiversity and enhance amenity and landscape character. This reflects landscape-led development principles, which emphasise early integration of water, landform, planting and public space to deliver long-term value.

A clear regulatory requirement would provide certainty for developers, reduce reliance on end-of-pipe solutions, and ensure consistent delivery of SuDS benefits across Northern Ireland. In doing so, it would help strengthen the long-term climate resilience of communities by embedding nature-based approaches that respond to increased rainfall intensity and future climate uncertainty.

Consultation Question 2

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

Yes, with qualifications.

The Landscape Institute supports the SuDS Management Train as the preferred approach for managing surface water in new developments. The layered sequence of prevention, source control, conveyance and site control reflects established best practice and aligns with the

landscape-led principle of managing water as close to source as possible.

This approach enables SuDS to be integrated into the landscape and public realm from the outset, rather than treated as an engineering add-on. When applied through a landscape-led design process, the management train supports multifunctional outcomes, allowing streets, open spaces and green infrastructure to perform drainage, biodiversity and placemaking roles simultaneously. However, we share concerns regarding the diagram titled “Various levels of SuDS intervention throughout development” in the consultation document.

The depiction of a storm drain connected directly to a watercourse does not reflect best practice. Direct connections risk conveying pollutants from roads and hard surfaces into watercourses during rainfall events, undermining water quality objectives. Future guidance should clearly reinforce that surface water is treated and managed through nature-based components before any discharge to receiving waters.

Consultation Question 3

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

Yes.

There is a clear need for consistent, regionally specific guidance on the design, delivery and maintenance of nature-based SuDS in Northern Ireland. While existing technical guidance provides a strong foundation, locally tailored guidance is required to reflect Northern Ireland’s climate, soils, governance arrangements and maintenance responsibilities.

From a landscape-led perspective, guidance should:

- Promote early integration of SuDS within masterplanning and site layout
- Treat water quantity, water quality, biodiversity and amenity as equal design objectives
- Set clear expectations for long-term landscape management and establishment periods
- Align SuDS design with planning, highways and open space standards to avoid conflicting requirements

Clear guidance of this nature would support better design quality, reduce delivery risk and improve long-term performance.

Consultation Question 4

Which organisation should be responsible for approving the design and construction of nature-based SuDS proposals? What is the reason for your choice?

A new dedicated SuDS Approval Body or specialist drainage body.

The Landscape Institute supports the establishment of a dedicated SuDS Approval Body, or a specialist drainage body linked to the Department for Infrastructure or NI Water, with clear responsibility for SuDS approval.
Approval of nature-based SuDS requires expertise across hydrology, drainage engineering, landscape architecture, ecology and long-term maintenance. Landscape architects are trained to integrate water management with landform, planting, public realm design and stewardship, ensuring systems function technically while also contributing positively to place quality and environmental outcomes.
A dedicated body would 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. Members have also highlighted the value of a

body with a strategic remit, capable of assessing cumulative impacts and identifying opportunities to connect SuDS networks across sites.

Consultation Question 5

How should the costs of administering any new nature-based SuDS Approval Body be met? Public funding and application fees.

A hybrid funding model is appropriate. Public funding reflects the wider public benefits delivered by SuDS, including flood risk reduction, environmental protection and climate resilience. Developer application fees are also appropriate to cover the costs of design review, inspections and compliance.

This approach is consistent with the principle that infrastructure delivering shared public value should be supported through a combination of public investment and proportionate developer contributions.

Consultation Question 6

Which organisation should be responsible for the future maintenance of nature-based SuDS features in new housing developments? What is the reason for your choice?

A dedicated SuDS Approval Body or statutory drainage body.

Long-term maintenance responsibility should rest with a public or statutory body, ideally the same organisation responsible for approval. This supports continuity from design through to long-term management and reflects the landscape-led principle that SuDS are enduring infrastructure assets rather than temporary features.

Reliance on private management companies or ad hoc arrangements risks inconsistent maintenance, declining performance and loss of public confidence over time. Nature-based SuDS are visible, multifunctional landscape assets and require ongoing, professionally informed management.

Consultation Question 7

Who should pay for the future maintenance cost of nature-based SuDS features in new housing developments? What is the reason for your choice?

A phased approach involving developers and public bodies.

Developers should fund initial maintenance through a bond or similar mechanism for an establishment period of at least 10 years, in line with the standard 10 year guarantee provided by developers via NHBC for new housing, ensuring SuDS features are fully established and functioning as intended.

Long-term maintenance should then be publicly funded through NI Water or a dedicated drainage body. This reflects the public benefits delivered by SuDS and avoids placing long-term responsibility on residents. The absence of domestic water charging in Northern Ireland continues to complicate funding arrangements and should be considered alongside wider infrastructure and investment planning.

Consultation 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 on Section 75 groups?

SuDS should be integrated from the earliest stages of masterplanning and landscape design, not added at a later stage. This is central to a landscape-led approach and supports efficient layouts, improved amenity, enhanced biodiversity and better long-term performance.

Inclusive design must be a core consideration. SuDS features should incorporate safe gradients, accessible paths, appropriate lighting and clear sightlines so that they function as inclusive green and blue infrastructure, benefiting all Section 75 groups and supporting health and wellbeing.

Experience from Scotland demonstrates the value of treating SuDS as a normal and expected component of development rather than an exceptional requirement. In Scotland, long-standing planning and drainage practice, supported by Scottish Water guidance on SuDS design and adoption, has encouraged early integration of surface water management within masterplanning and landscape design. This approach has helped embed SuDS as multifunctional blue-green infrastructure contributing to placemaking, climate resilience and public amenity. While governance arrangements differ, experience from Wales' statutory SuDS standards and approval framework demonstrates how clear approval and adoption arrangements can normalise SuDS delivery and support timely implementation. Taken together, this reinforces the importance of early design integration, professional oversight and clear maintenance responsibilities in achieving successful long-term outcomes.

We are concerned that the consultation does not explicitly reference the role of suitably qualified professionals, such as landscape architects, environmental engineers and ecologists, in the design and delivery of nature-based SuDS. Effective SuDS rely on the early integration of hydrology, landform, soils, planting, public realm design and maintenance considerations.

Landscape architects, working alongside engineers and ecologists, are trained to lead this integrated approach, ensuring SuDS function safely and effectively while contributing to place quality. Clear recognition of professional roles would support higher design standards, reduce long-term maintenance risk and improve consistency in the delivery of SuDS as essential infrastructure.

Finally, while the consultation focuses on housing, commercial, institutional and mixed-use developments also present important opportunities for SuDS delivery. Experience from other UK jurisdictions show that clear approval and adoption frameworks can accelerate delivery while supporting environmental outcomes.

References

Landscape Institute

A landscape-led approach to development – The Landscape Institute

New Floods Taskforce must prioritise nature-based approach to flood resilience – The Landscape Institute

Climate change – The Landscape Institute

Technical guidance

https://www.ciria.org/ItemDetail?iProductCode=C753

The UK's Leading Provider of Warranty and Insurance for New-Built Homes - NHBC

Scotland

https://www.scottishwater.co.uk/Business-and-Developers/NEW-Connecting-to-Our-Network/Developing-housing-and-commercial-properties/Applying/Waste-Water-Connection-Technical-Standards

Wales

https://www.gov.wales/national-standards-sustainable-drainage-systems-suds