

Michael Potter, Infrastructure Committee Clerk
Room 416, Parliament Buildings
Ballymiscaw, Stormont
Belfast
BT4 3XX

Dear Michael

Re: Water, Sustainable Drainage and Flood Management Bill - Call for Evidence

The Woodland Trust is the UK's leading woodland conservation charity. In Northern Ireland, we work to protect and restore ancient and long-established woodlands, while planting more trees to combat climate change, support biodiversity, and create spaces for people to enjoy. Our vision is a world where woods and trees thrive for people and nature.

Building on our response to the Department for Infrastructure's Water, Flooding and Sustainable Drainage Consultation in 2022, we are pleased to have the opportunity to provide input to this call for evidence.

Sustainable drainage offers a significant opportunity to integrate trees and green infrastructure as part of the solution to flooding and water management. We support measures that enable sustainable drainage solutions, including natural flood risk management and Sustainable Urban Drainage Systems (SuDS), as part of nature-positive planning and development. In Northern Ireland, we want to see sustainable drainage solutions that are well-designed and effectively implemented, incorporating features such as tree and hedgerow planting and maintenance to help reduce flood risk and improve water quality.

To ensure these benefits are delivered without harm to irreplaceable habitats, our support is subject to the following safeguards:

- All works are preceded by a full Environmental Impact Assessment.
- No works are undertaken that will result in the loss or deterioration of ancient/long-established woodland or other irreplaceable habitats.
- Where tree loss or deterioration is unavoidable, wholly exceptional reasons must be clearly demonstrated.

Examples of how trees can be incorporated within sustainable drainage solutions include:

- [Queensland Court and Gardens \(Glasgow\)](#): Retrofitted green infrastructure around two apartment blocks (228 homes), integrating SuDS to manage flood risk, enhance

underused open space, encourage low-carbon behaviours, and create community nature spaces. Delivered through partnership between Southside Housing Association and Glasgow City Council.

- [St Mary's Drainage Strategy \(Dundee\)](#): A climate resilience project under the Water Resilient Dundee Partnership to deliver flood resilience, green spaces, active travel routes, and biodiversity improvements. Funded by Scottish Water and Dundee City Council and recognised by the Scottish Government as a national exemplar for addressing the climate emergency.
- [Greener Grangetown \(Cardiff\)](#): Transformed 12 Victorian streets with innovative SuDS including 108 rain gardens, tree pits, permeable paving, and combined kerb drainage, removing 40,000m³ of surface runoff annually from the combined sewer system. Delivered 127 new trees, 1,700m² of green space, safer junctions, and active travel routes, with estimated wider benefits of £8.4 million through a partnership between Cardiff Council, Welsh Water, and Natural Resources Wales.
- [Grey to Green \(Sheffield\)](#): Transformed redundant highways into 1.3 km of green streets with rain gardens, innovative SuDS, and multi-layered planting to manage surface water sustainably, improve biodiversity (561% increase), and enhance active travel routes. Delivered economic regeneration, public art, and climate resilience through partnership between Sheffield City Council and regional bodies.

Ancient woodlands (woodlands in existence since the 1600s) and long-established woodlands (woodlands originating from between 1750 and 1860) are one of Northern Ireland's richest and most complex terrestrial habitats, supporting more threatened species than any other. They are irreplaceable; their fragile ecological networks take centuries to develop, and any further loss must be avoided.

Sustainable drainage solutions, including natural flood risk management and SuDS, risk disturbing these habitats, leading to irreversible damage. For this reason, the Woodland Trust strongly opposes any works that would lead to the loss or deterioration of any ancient or long-established woodland.

We strongly urge the Department for Infrastructure to ensure that any water, sustainable drainage and flood management legislation governing sustainable drainage in Northern Ireland prioritises the protection of irreplaceable habitats.

Embedding strong safeguards for irreplaceable habitats and promoting nature-based solutions such as tree and hedgerow planting within sustainable drainage solutions will enable Northern Ireland to reduce water pollution, strengthen flood resilience, promote sustainable drainage, and deliver climate adaptation that works with nature, not against it.

Yours sincerely

Paul Armstrong

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