
From: David Fry <DavidF@cefni.co.uk>
Sent: 14 November 2025 14:13
To: +Comm Infrastructure Public Email
Cc: Mark Spence; Vincent Lundy
Subject: Re: Committee Stage of Water, Sustainable Drainage and Flood Management Bill - Submission from CEF
Attachments: CEF SuDS Briefing Note Oct 25.pdf; CEF response to Infra Comm call for evidence on SuDS etc Bill Nov 25.pdf
Importance: High
Categories: Red category

Dear Committee Clerk

Further to the below, please find reattached our briefing note to the Infrastructure Minister on the soft SuDS scheme at Belmont Hall, Antrim as well as an addendum paper that form our formal submission to the Committee Stage of the Water, Sustainable Drainage and Flood Management Bill. This addendum paper is based on engagement we had with DfI officials on their SuDS guidance consultation on 12 November.

We look forward to the Committee visiting the Antrim development on 3 December and are very happy to provide further oral evidence on our submission in the New Year.

If you have any further questions, then please just let me know.

Best
David



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From: David Fry <DavidF@cefni.co.uk>
Sent: 16 October 2025 09:20
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Subject: Committee Stage of Water, Sustainable Drainage and Flood Management Bill - Submission from CEF

Dear Committee Clerk

Further to the commencement of the Committee Stage of the Water, Sustainable Drainage and Flood Management Bill, please find attached a briefing note which will act, in the main, as our formal submission.

This was prepared for the Infrastructure Minister ahead of her visit to the Belmont Hall, Antrim site earlier this month and would also be the basis of the discussion for the site visit that the Committee will undertake.

You will note that four companies are referenced on the note: CEF, Antrim Construction Company, Turley and Marrac Design. Representatives of each will be involved in the site visit and, in the fulness of time, we would suggest that that combination gives oral evidence to the Committee as part of its deliberations in the New Year.

More than happy to answer any questions that you may have/provide additional comments.

Best wishes
David



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**marrac
design**

CEF CONSTRUCTION
EMPLOYERS
FEDERATION

Turley

Ministerial visit to Belmont Hall, Antrim Briefing and Case Study

About SuDS

Sustainable urban Drainage Systems (SuDS) fall into two categories – ‘hard’ and ‘soft’. Both address the same problem – slowing rainwater run-off from developments, which would otherwise put strain on watercourses and increase the risk of flooding.

Hard SuDS involve hard engineering – such as oversized storm drainage pipes and/or concrete attenuation tanks to store and slow run-off. Soft SuDS involve more natural storage, through landscaped channels and detention basins.

Confronting Northern Ireland’s Wastewater Crisis

In June 2025, the Wastewater Infrastructure Group (WWIG) led by CEF, NIFHA and NI Chamber published their position paper on the addressing the wastewater infrastructure deficits in Northern Ireland. The position paper detail 5 key actions that could collectively change the trajectory of the shortfall in wastewater infrastructure.

One of the key actions included supporting SUDs as proposed in the forthcoming Water, Flooding and Sustainable Drainage bill. SUDs will only apply to drainage on new housing sites. It will take many decades before this, and this alone, would have any meaningful impact on the challenge we face – it is, however, part of the solution.

The Issue

As was noted in DFI’s recent consultation on SuDS, there are currently no formal arrangements for approving or agreeing ownership and management responsibility for nature based / soft SuDS.

This strongly incentivises developers to pursue hard-engineered solutions, to avoid delay and uncertainty.

Case Study – Belmont Hall

A residential development of 393 homes on the edge of Antrim town, developed by Antrim Construction Company (ACC). Built near the Six Mile Water floodplain, drainage was a sensitive issue from the outset.

When originally approved in 2018, the plans proposed concrete stormwater storage tanks. However, from late 2016, ACC began exploring moving to a soft SuDS approach, delivering greater storage capacity and a better outcome for the natural environment.



Proposals were developed between Antrim Construction and its engineers (Marrac Design). However, due to the novelty of the proposals in Northern Ireland, approval was taken on by the Storm Water Management Group (SWMG) – a group of representatives from NI Water, DFI Roads and Rivers, and the NIEA.

The developer and its consultants were in regular contact with the Storm Water Management Group from Nov 2022 until approval of the design in December 2023. The applicant submitted a planning application for the SuDS in March 2024 (LA03/2024/0178/F), which was granted in July 2024.

Today, the SuDS basins are active, well-established and working effectively. A hydrobrake controls the rate of outflow from the basins into the Six Mile Water, and the basins themselves are an attractive area, providing visual amenity and habitat.

However, the basins are currently fenced off due to safety concerns raised by the Council, relating to times when standing water may be present. We argue that these safety concerns are easily addressed, and that the result has been to deprive residents of access to these potentially valuable areas.

Furthermore, as the Planning authority didn't consider the detention basins to function as public open space, ACC were required to create a community garden on the opposite side of the Mill Race to offset the perceived loss. It was fortunate that ACC were in possession of this land and were able to deliver 'compensatory' open space. The majority of new residential developments would not have the space to take this approach, so this could be a very significant constraining factor on the integration of soft SuDS across the region if not addressed.



Aerial view of one of the SuDS basins, showing landscaping and the Six Mile Water

Advantages of a Soft SuDS Approach



Biodiversity and Amenity

Soft SuDS can be incorporated into the landscape plan of the development, delivering valuable amenity for residents. In addition, by planting species that will thrive in the environment of the ponds or basins, it's possible to create habitat, delivering biodiversity gains.

At Belmont Hall, the planting scheme was very carefully considered and includes a mixture of damp meadow mix for low lying areas and a species rich seed mix, augmented by native species tree and shrub planting to the slopes of the basins. The planting scheme is now an important habitat and food source/foraging area for local wildlife.



Mimicking Natural Processes

As well as providing storage to allow the flow rate from the site to be reduced, soft SuDS also allow surface water to infiltrate into the ground and evaporate from the surface. This allows a reduction in discharge volume in addition to a reduced rate of discharge.



Maintenance

Soft SuDS are much easier to maintain than hard SuDS, meaning there are fewer blockages or other constraints during heavy rain.



Cost / Capacity

Soft SuDS approaches can deliver very high volumes of storage much more cost-effectively than hard SuDS, improving the viability of schemes.

Our Asks



Streamline the Process

We are calling for the creation of a dedicated approvals and regulatory process for soft SuDS. It would seem practical and logical to us that DfI Rivers would become the approving body for Soft SuDS as an extension of the role they already perform in assessing the efficacy of drainage assessments and flood risk assessments.



Allow SuDS to count towards Open Space

Guidance in other jurisdictions – for example from Scottish Environmental Protection Agency – is that SuDS basins should be multi-functional spaces and can, where appropriate form part of open space requirements. DfI should issue guidance encouraging the adoption of this approach.



Clear Guidance

In order to promote the use of SuDS and facilitate a practical and economic approach, clear guidance must be introduced within the planning and approval processes. This must accommodate a range of site characteristics – one size does not fit all.



Construction Employers Federation response to the Committee for Infrastructure's Call for Evidence on the Water, Sustainable Drainage and Flood Management Bill, November 2025

Introduction

The Construction Employers Federation (CEF) is the sole certified representative body for the second largest industry in Northern Ireland, the construction industry. We represent approx. 70% of construction in NI and around 800 businesses of all sizes employing over 30,000 staff directly and 65,000 in the wider supply chain.

This submission counts as an addendum to our pdf document *Ministerial Visit to Belmont Hall, Antrim* and is based on the feedback garnered at a member engagement event with Department for Infrastructure (DfI) officials on 12 November 2025 on their Sustainable Drainage Systems (SuDS) in New Housing Developments consultation.

Comments on the Bill as it relates to SuDS

We are supportive of the introduction of the Bill and look forward to its passage as an Act before the end of this Assembly mandate. Specifically, on the subject of SuDS, it is our strong view that, done rightly, they can provide much better amenity for homeowners and occupiers.

Reflecting on the separate consultation being undertaken by DfI on SuDS guidance, we note that this Bill has the intent of giving DfI the power to mandate soft SuDS and that, therefore, the importance of the guidance consultation (and others that will follow) must be a major focus for the Committee beyond the end of its Bill scrutiny as this is where more fundamental issues will be considered.

From our engagement with officials on 12 November, we believe that those areas of most significance can be narrowed down to:

- 'Who' should be the SuDS approval body – notwithstanding the good intentions of the Storm Water Management Group, the timescales of its processes with respect to the existing soft SuDS pilots were too long. We have suggested that an appropriately resourced DfI Rivers may be a suitable place for this to reside going forward.
- The importance of design guidance for developers and how this will be embraced by all planning authorities – while open to pilots in different council areas, homebuilders cannot be in a scenario where each planning authority takes a completely different approach to soft SuDS and DfI's powers with respect to the

enforceability of any guidance must be clear. An essential element to this will be how planning authorities will treat designated SuDS areas during the construction of any development. In our view, these could be appropriately used as a silt management pit in order to comply with any agreed construction management plan.

- Need for clarity on policy implementation timelines – many homebuilders will be looking to buy land now for development in 3+ years. The proposed timescales for soft SuDS implementation contained within the current guidance consultation are suggestive of a crossover and homebuilders need clarity – now - on whether those timescales will be met.
- Crucial that SuDS count as open space – our estimate is that on any major site (such as that at Belmont Hall in Antrim) approximately two acres of land would need to be set aside for features such as ponds. With 10% of development land normally set aside for open space on major developments, it is therefore vital that such features are included as open space so that we do not unduly further curtail housing development with this needing to be mandated across all planning authorities.
- Application and maintenance costs – linked to the purchase of sites is also their viability. Work must be expedited on what DfI believe these costs would look like and whether their preference for a Welsh-type model is likely to proceed. It is absolutely vital that policies around maintenance and adoption are clear and robust at the very outset and are not subject to undue interpretation.
- Clarity around extent of soft SuDS on sites – we are given to understand by DfI that, due to the proposed schedule of uplifts in Building Regulations, the Department of Finance has requested that property-level SuDS are not advanced at this stage. We would ask that that matter is fully clarified as the detailed policy development on SuDS guidance is advanced.
- Importance of retrofitting – reflecting on the Infrastructure Minister's three-pronged approach, we again reinforce the point that mandatory soft SuDS on new housing developments will do little to resolve our housing crisis as it relates to wastewater capacity. What does, however, offer more potential is the retrofitting of existing assets which we understand is a proposed part of NI Water's PC28 plan as well as being included as an initial £15m allocation from the Public Sector Transformation Fund. We look forward to such retrofitting proposals being significantly advanced as we move towards the commencement of PC28.

Finally, we would also like to express our thanks to those DfI officials who have worked collaboratively with us on policy development to date and we look forward to continuing that process as we move towards the more detailed guidance that will follow.