

# Government response to the Climate Change Committee 2025 Progress Report to Parliament in Adapting to Climate Change

October 2025

HC 1413



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2025 Progress Report to Parliament in Adapting to Climate Change

HC 1413

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# **Executive Summary**

The impacts of climate change are accelerating, and the need to strengthen the UK's resilience is more urgent than ever. While significant steps have been taken to adapt to these risks, further action is needed to meet the scale of the challenge.

This document sets out the UK government's response to the Climate Change Committee's biennial progress report on adaptation, highlighting the progress that we have made over the past two years in building our resilience to the impacts of climate change. Key actions include:

- Nature The government<sup>1</sup> is building resilience into its foundational strategies for the environment, food and farming, it is also providing substantial investment in nature recovery schemes and flood defences. Through Environmental Land Management schemes, we are funding actions to enhance climate resilience, soil health and sustainable food production. The government has also updated planning guidance to support Local Nature Recovery Strategies and is implementing actions on wildfire resilience and soil monitoring.
- Working land and seas The Farming Innovation Programme, which has attracted over £54 million of private investment, is supporting Agri-Technology research and innovation, including in climate-resilience. The £6 million Fisheries and Seafood Scheme, which delivers investment in the sustainability and resilience of England's seafood sector, was relaunched in June 2025.
- Food security The farming roadmap, 'Farming 2050: Growing England's
  Future', will set out how farming will, must and can evolve in response to
  changing markets, technologies, and environmental pressures and how
  government will support that transition.
- Water supply Under the Water (Special Measures) Act 2025, Ofwat has a new duty to contribute to meeting Environment Act and Climate Change Act targets. Ofwat's 2024 price review (PR24) final determinations set incentivised performance targets in leakage, per capita consumption and business demand, supported by price control deliverables for accountability. Ofwat has also introduced a £100 million Water Efficiency Fund to promote behaviour change and fund innovation for water efficiency.

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<sup>&</sup>lt;sup>1</sup> Unless otherwise specified, references to "the government" throughout this publication refer to the UK government

- Energy DESNZ, Ofgem and the National Energy System Operator are working together on climate resilience to enhance our understanding of climate change and its impacts on the energy system, set a level of ambition for resilience and embed this ambition into policy and regulation. Many actions are closely aligned with the CCC's recommendations. For example, DESNZ will consider the introduction of resilience standards for the sector and Ofgem is supporting the government, the National Energy System Operator and industry to review standards and reflect any changes in energy codes (as set out in Ofgem Strategic Direction Statement 2025). Ofgem is also introducing improvements to regulatory tools in price controls, including working with network companies to develop Climate Resilience Metrics and Indicators to monitor climate resilience and drive action and introducing stress testing requirements to help inform a climate resilience goal. In 2025, DESNZ and the Met Office launched a workplan to translate climate science into actionable insights.
- Telecommunications and ICT The Cyber Security and Resilience Bill, which
  is scheduled for introduction in the first session of Parliament, could provide
  Ofcom with a statutory remit for the resilience of data infrastructure. Ofcom's
  Network and Service Resilience Guidance references recent advice to
  communication providers on integrating climate adaptation into network
  planning and operations.
- Transport DfT published a Transport Adaptation Strategy for consultation in April 2024. The strategic direction set by the Department was welcomed by the sector and the CCC. A finalised strategy will be published in due course. To support the sector with practical guidance, DfT launched Climate Risk Assessment Guidance in March 2025 to enable transport infrastructure operators to identify their climate risks and prioritise adaptation actions. Alongside this, DfT has published the Climate Adaptation HIVE in June 2025, an online tool for best practice adaptation case studies.
- Towns and cities In June 2025, the government published new national standards for Sustainable Drainage which encourage design to cope with changing climatic conditions.
- Buildings The Warm Homes Plan will help people to find ways to save money on energy bills and transform our ageing building stock into comfortable, low-carbon homes that are also resilient to climate change.
- Community preparedness and response The government is investing £15 million in UKRI-led research programmes to improve understanding of climate vulnerability and adaptive capacity across government and society.

- Health The UK Health Security Agency will expand plans, tools and the
  measurement of health impacts to a wider range of climate-related health
  risks to improve the protection of vulnerable populations. The updated Green
  Plan guidance, published in February 2025, sets out proposed actions for
  NHS providers to prepare for severe weather events and improve climate
  resilience of local sites and services, including digital services.
- Business The Small Business Plan, published in July 2025, sets out the
  government's comprehensive package of support for Small and Medium
  Sized Businesses (SMEs). DBT has also progressed work on resources and
  new guidance for SMEs in collaboration with Business Representative
  Organisations and the UK Business Climate Hub (UKBCH).
- Finance In June 2025, the government published a consultation on draft UK Sustainability Reporting Standards, which aim to include reporting on climaterelated risks, and adaptation efforts and investments. The government is also consulting on the role of climate adaptation in transition planning.
- International collaboration The cross-government National Security Strategy 2025 and Strategic Defence Review 2025 show the government's commitment to tackling specific climate-driven and international cascading risks. Under the Paris Agreement, the UK is also committed to the Global Goal on Adaptation and has adopted the UAE Framework for Global Climate Resilience, which sets out a shared vision for protecting people, livelihoods, and ecosystems through national adaptation planning and improved risk assessments.

# Introduction

The UK is already experiencing the impacts of climate change, with rising temperatures and more extreme weather events affecting people, infrastructure, and ecosystems.

All ten of the UK's warmest years on record have occurred since 2003, and 2024 was the second warmest year overall. February 2024 was also the wettest February since UK rainfall records began in 1836 (Met Office, 2025). These shifts are driving more frequent and intense extreme weather events, including heatwaves, floods, and droughts. The human, economic, and environmental costs of inaction are becoming increasingly apparent, with extreme weather disrupting food systems, damaging infrastructure, and threatening public health.

This report is being published at the same time as the government's Carbon Budget and Growth Delivery Plan and the Government response to the Climate Change Committee's 2025 Report to Parliament on Progress in Reducing Emissions. Together, these publications will help the government to deliver its Clean Energy Superpower Mission, as driving towards our carbon budgets will enable us to take back control of our energy and lower bills from homegrown clean power. The government recognises the need to both redouble our efforts to reduce greenhouse gas emissions and, at the same time, accelerate our efforts to adapt to climate change to reduce the impact on people, livelihoods and the natural environment.

The Climate Change Act 2008 provides a legally binding framework to cut UK greenhouse gas emissions as well as a framework for building the UK's ability to adapt to a changing climate. This framework allows us to track the diverse and challenging set of climate risks our country faces and to develop a co-ordinated response to the challenges.

In terms of adapting to climate change, the Act requires:

- A UK-wide assessment every 5 years of the risks and opportunities for the UK
  arising from climate change. The third UK Climate Change Risk Assessment
  (CCRA3) was published in 2022 and sets out the key climate change risks
  and opportunities that the UK faces today.
- A programme for climate change adaptation to address the risks identified in the CCRA to deliver resilience to climate change on the ground. The third National Adaptation Programme (NAP3) was published in July 2023, setting out the UK government's objectives, proposals and policies for responding to the risks and opportunities identified in CCRA3.
- 3. A strategy for the use of Adaptation Reporting Power (ARP) to invite or direct organisations, such as infrastructure operators and key public bodies, to report on their climate change risks and what they are doing to address them. The fourth ARP strategy was published alongside NAP3, with organisations invited to report between December 2024 and December 2025

The Climate Change Committee's (CCC) 2025 Progress Report on Adapting to Climate Change was published on 30 April 2025, alongside its annual assessment of progress on emissions reduction. This is the CCC's first statutory progress report on NAP3, which runs from 2023 to 2028. It assesses the extent to which NAP3 and its implementation are effectively preparing the UK for the impacts of climate change.

The government welcomes the CCC's 2025 Progress Report on Adapting to Climate Change and the recommendations it contains.

This response sets out how the government has addressed the CCC's recommendations and outlines a range of recent and ongoing actions to help the UK prepare for the impacts of climate change. The response is structured in three parts:

- Cross-cutting programme-level recommendations
- **Priority recommendations** (as identified by the CCC)
- All remaining sector-specific recommendations

Within this response we indicate where research and policy are integrating climate adaptation and net zero, ensuring we are cutting emissions whilst building climate resilience. Further information on the government's progress towards net zero can be found in the Government response to the Climate Change Committee's 2025 Report to Parliament on Progress in Reducing Emissions and the Carbon Budget and Growth Delivery Plan.

# Response to recommendations

Here the government provides detailed responses to each of the CCCs recommendations made in the 2025 Progress Report.

# Programme recommendations:

1. Improve objectives and targets. A clear vision for a well-adapted UK, underpinned by a set of specific and measurable sectoral targets is vital to give focus to what adaptation policy is seeking to achieve. The government has recently signalled its desire to strengthen objectives on adaptation.1 This must now be taken forward with urgency. A set of clear overarching adaptation objectives in key areas must be developed in 2025. These objectives must describe succinctly what 'climate-resilient' means for government departments and their different risk areas, with guidance for departments to formulate a set of quantitative sectoral targets consistent with national adaptation objectives. (Defra)

The government has committed to explore how stronger adaptation objectives can be set to improve preparedness for the impacts of climate change. This will support an ambitious and impactful fourth National Adaptation Programme due in 2028. To set objectives, we will first agree the planning assumptions of a minimum climate scenario for which we should be preparing and a timeframe. We have written to the Climate Change Committee's Adaptation Committee for their guidance on the planning assumptions of a minimum climate scenario and timeframe that we should prepare for.

The Committee provided their assessment on 15<sup>th</sup> October 2025. We are considering this advice as we set the common planning assumptions and will respond in due course. Subsequently, we will set measurable objectives, supported by delivery plans, in the fourth National Adaptation Programme that set out what the government aims to achieve under the planning assumptions.

Defra is supporting departments across government to develop these clear and measurable objectives and delivery plans across the fourteen systems identified for the fourth Climate Change Risk Assessment. Where appropriate, objectives and delivery plans will incorporate resilience standards to help define the intended level of resilience for systems and assets.

The National Adaptation Programme Monitoring, Evaluation and Learning Framework will be used to guide objective development and plans for implementation. All details will be set out in the fourth National Adaptation Programme, due in 2028.

2. Improve coordination across government. Greater coordination is required across different activities, spending decisions, sectors, and departments. Building upon the ongoing Cabinet Office Resilience Review, the government should set out how it will better integrate adaptation and climate change risk assessments with other resilience activities such as future editions of the National Risk Register. This should include stress-testing using a standardised set of extreme weather events (both those that are possible today and those possible in future climates) and a coordinated and coherent policy response framework to tackle acute and chronic climate change risks. (Defra, CO)

The Resilience Action Plan, published 8 July, sets out the UK government's strategic vision for a stronger and more resilient UK and the steps being taken to deliver this. It articulates an 'all hazards approach' to build resilience across the increasingly volatile and varied risks we face. It sets out how the UK government is taking action to build our national resilience and how it will support the whole of society to build their own resilience. The action plan also reiterates the governance for cross-government coordination and how we will work with devolved governments, local partners and others to increase the resilience of the UK.

To inform activities across government and beyond, the Cabinet Office has a suite of risk products. The government updated the National Risk Register (NRR) in January 2025. It is the public-facing version of the government's comprehensive National Security Risk Assessment (NSRA). This document outlines the most significant threats facing the UK and its interests overseas today. The NRR aligns with the dynamic assessment model, enabling more frequent risk evaluations to better respond to our rapidly changing security landscape.

The Cabinet Office has also published the first ever <u>Chronic Risks Analysis</u> - longer-term challenges facing the UK, on 8 July. This includes a number of risks including biodiversity loss and climate change. Chronic risks can make acute risks more likely and serious – for example, climate change can lead to an increase in the frequency and severity of weather conditions that cause floods and wildfires. Departments, through the risk assessment process, are strongly encouraged to consider interactions between acute and chronic risks.

As part of NAP3, the government also set up the cross-government Climate Resilience Steering Board, which has played a key role in NAP3 implementation. The government is currently reviewing the arrangements for the Board to further strengthen its impact.

3. Integrate adaptation within all relevant policies. The next Spending Review is vital to drive adaptation forward over the next three-year period, and for ensuring that adaptation is integrated into all relevant policies and plans. Department spending needs to ensure that it is not locking in additional and

costly climate risk, as well as ensuring that climate resilience planning is supported with sufficient people and research resources right across government. The spending review needs to ensure sufficient funding is available to meet the government's climate resilience objectives over the relevant period. The government must communicate clearly the respective roles of government, the private sector, and households in delivering and funding adaptation. Clear budget tagging should allow the government to estimate the baseline level of spend on climate resilience as well as the future path. (Defra)

HMT's Green Book sets out that all policies, programmes, and projects must be developed and assessed against how well they deliver on the government's climate and environmental objectives, as well as other policy priorities. In April 2025, Defra updated the supplementary Green Book guidance on Accounting for the Effects of Climate Change. The guidance supports the value for money assessment of spending decisions across government, enabling analysts across departments to use a consistent methodology for incorporating the impacts of climate change into the appraisal of policies.

Public spending is only one lever to deliver the government's adaptation objectives, which should be considered alongside wider policy interventions, including regulation. However, to ensure due consideration is paid to the climate and environmental impacts of fiscal decisions, HMT has established processes to assess the climate, and environment impacts of fiscal events, using these to inform, alongside other policy considerations, decisions made. For example, at Spending Review 2025, HMT set a requirement for capital bids to be assessed according to their climate and environmental impact, including their resilience to the effects of climate change.

4. Implement monitoring, evaluation and learning across all sectors. Monitoring and evaluation of adaptation is still not treated with sufficient urgency despite commitments in NAP3. Almost every indicator available to track adaptation progress lacks a target to measure progress against. Data collection to inform adaptation is essential. This must go beyond simply tracking of actions under the NAP to a coordinated process to collect key datasets across sectors annually and at a national scale. Government should coordinate relevant delivery and statistics agencies to collect the key indicators needed to track delivery of adaptation and evolution of climate risks. These efforts should be focused on areas where our assessment has highlighted a lower quality of indicator evidence and areas with significant data gaps, and coordinate collection of data with the private sector where appropriate. (Defra)

Defra is publishing a National Adaptation Programme Monitoring, Evaluation and Learning Framework in October 2025. This will set out a framework, process and guidance for effectiveness monitoring, evaluation and learning for the current NAP that can be taken forward for future NAP cycles. The framework focuses on embedding evaluation activities throughout adaptation policy development, an iterative approach that should be regularly reviewed, and the use of a broad range of information, including qualitative and quantitative indicators.

Defra is also internally reviewing the current landscape of adaptation indicators to build understanding of data available and evidence gaps for more strategic identification of research needs, in line with the Climate Adaptation Research and Innovation Framework (CARIF), published in April 2025. This will support the development of indicators for NAP4 and ensure greater alignment with the development of international reporting frameworks, such as the UNFCCC Global Goal on Adaptation.

# Priority recommendations:

### Land Nature and Food

1. Integrate its approach to adapting to climate change across the Department for Agriculture, Environment, Food, and Rural Affairs' (Defra) forthcoming foundational strategies. These include the Land-Use Framework, Environmental Improvement Plan, 25-year farming road map, and food strategy. These strategies should recognise the need for adaptation measures to ensure their goals are met. They should set out how these adaptations will be funded, have clear objectives and delivery targets, responsibilities and milestones. (Defra)

The UK Food Security Report identified the impacts of climate change as a key risk to food security. Our food strategy will maintain our food security by building resilience to shocks and chronic risks.

The farming roadmap 'Farming 2050: Growing England's Future' will involve government working with farmers and farming and environmental organisation representatives to set the course of farming over the next 25 years. It will set out how farming will, must and can evolve in response to changing markets, technologies, and environmental pressures - and how government will support that transition.

The roadmap will set out how the farming system needs to evolve to achieve its goals, working alongside the National Adaptation Programme, Environment Improvement Plan (EIP), Food Strategy, Net Zero Carbon Budgets and Land Use Framework.

Adaptation policy is embedded in the upcoming revision to the Environmental Improvement Plan, which includes a goal on mitigating and adapting to climate change with clear delivery information.

The Land Use Consultation, the outcomes of which are informing the development of the Land Use Framework, recognised that even with ambitious targets to reduce greenhouse gas emissions, climate adaptation will still be necessary. Potential actions could include supporting wildlife to move to more suitable climates, helping farmers and growers to diversify the crops they grow and the farming methods they use and renaturalising our water bodies and making space for water.

2. Clarify budgets and address non-financial barriers for the deployment of specific adaptation measures through the Environmental Land Management schemes. Following the Spending Review, there should be certainty about how farmers and land managers will be supported to adapt their land for production, nature and wider resilience. Government should ensure low-regret and low-cost measures are taken up through regulations or minimum requirements in agricultural support mechanisms. (Defra)

We are investing more than £2.7bn a year in farming and nature recovery. This includes environmental farming schemes (£5.9bn), tree planting (£816m) and peatlands (£85m) making a significant contribution to Environment Act targets, water quality and biodiversity. Recognising the need to invest for the long-term, this government has committed more than £10.5 billion into our flood and coastal erosion defences by 2035/36. The investment in nature schemes and flood defences will provide positive contributions to adaptation, nature and will provide many farmers with income for environmental delivery.

To address non-financial barriers, the Farming and Countryside Programme (FCP) will offer advice services across Environmental Land Management schemes (ELMs), including in schemes such as Countryside Stewardship, and in future years aims to make it easier for farmers to build partnerships and secure the advice and support they need to deliver a range of priorities.

The Farming Roadmap will set out how farming will, must and can evolve in response to changing markets, technologies, and environmental pressures - and how government will support that transition.

Additionally, in April 2025, Defra published the Corry Review, which identified opportunities for nature and growth, including reform of specific regulations and ensuring that Defra's approach to regulation drives economic growth without compromising the natural environment or farmers.

### Infrastructure

3. Set out in the 10-year infrastructure strategy how it intends to mainstream climate adaptation into the delivery of infrastructure across sectors. This includes setting out clear resilience standards for infrastructure systems. Government should establish the mechanisms to address infrastructure interdependencies where most effective to do so, including through standardised scenarios for stress-testing infrastructure resilience. (HMT, CO)

UK Infrastructure: A 10 Year Strategy, published on 19 June 2025, set out the government's plan to review existing resilience standards across critical national infrastructure sectors by the end of 2026, and then update these standards or develop new ones where the existing standards do not provide the certainty or coverage necessary to ensure resilience and underpin growth. The Strategy also outlines how these resilience standards may be incorporated in the setting and delivery of stronger adaptation objectives, which the government is exploring setting ahead of the publication of the fourth National Adaptation Programme in 2028 to improve preparedness for the impacts of climate change.

As set out in the recently published Resilience Action Plan, the resilience of the UK's critical national infrastructure is of central importance to ensuring that the essential services the public rely on continue to operate. To improve the resilience of the UK's CNI, the government will deliver the development of CNI Knowledge Base, the UK government's world leading tool which creates an interactive map of all CNI in the UK, which will help the UK government understand vulnerabilities between the 13 CNI sectors. In particular, this data will enable the government to identify areas of UK CNI vulnerability and interdependency and enable targeted interventions to address risks and improve resilience.

The UK government identifies and assesses acute risks in the National Security Risk Assessment (NSRA), with each risk being assigned to a relevant Lead Government Department (LGD). Departments can utilise the scenarios in the NSRA to stress-test plans and inform planning and preparation against a wide-range of risks.

4. Ensure key regulated funding agreements provide incentives for adaptation deployment. These include the next Road Investment Strategy and the RIIO-3 price control final determinations (for gas distribution, gas transmission and electricity transmission) – both due in 2025. The funding agreements should ensure that adaptation measures are deployed at scale and for a broad range of climate hazards. (DfT, DESNZ)

It is vital that regulating funding agreements incentivise climate adaptation.

The Department for Transport expects National Highways (NH) to expand the role of climate change adaptation within the third road investment strategy (RIS3) by placing a stronger focus on long-term adaptation strategies and embedding climate risk

management across the business. RIS3 will place greater emphasis on the maintenance and renewal of the existing network, to ensure it remains resilient and safe for road users.

The control period process enables government to request Network Rail to take action on adaptation, e.g. in CP7, we requested that Network Rail updated its Regional Weather Resilience and Climate Change Adaptation Plans and developed long-term strategies to influence future investment in the railway. Having clear statements such as these enables Network Rail to allocate appropriate resources to deliver the required adaptation actions.

Developing a fully climate-resilient energy sector will require clear goals set by government, alongside the development of tools to ensure the sector is future-proofed. Ofgem is taking steps to ensure these tools are developed and embedded across the sector.

For the RIIO-3 price control period, network companies were required to submit Climate Resilience Strategies with their business plans with the aim of better understanding how climate resilience is currently being addressed and how it will be progressed. This included referencing hazards in Adaptation Reporting Power (ARP) reports and will assist in building a clearer picture of operational and recovery costs to inform the potential avoided costs of proactive resilience measures.

Ofgem also asked network companies to map projected climate resilience costs for RIIO-3 to provide oversight of the scale and nature of expected investments.

Network companies are expected to provide updates through RIIO-3 annual reporting on their progress in climate scenario planning, stress-testing for high-impact, low probability climate hazards, and adaptation pathways. These updates should be completed by the second annual reporting submission in 2028.

We will continue to work with industry to develop this approach further, including building on the current work for the next electricity distribution price control.

5. Ensure that the next water regulatory settlement can fund and encourage more ambitious adaptation action. Through the reforms to the public water sector, currently being considered by Defra and Ofwat, the next water regulatory settlement (due in 2029) should fund and encourage more ambitious options to get the sector back on track for its demand and leakage reduction targets, considering the potential impacts on vulnerable customers. (Defra, Ofwat)

The government has announced plans to abolish Ofwat and establish a new single water regulator. Through these reforms we will ensure a stable transition for the sector. In the interim, as part of the Water (Special Measures) Act 2025, the government has placed a new duty on Ofwat to contributing towards the Secretary of

State's duties to meet Environment Act and Climate Change Act targets. The government will assess how to bring this Clause into force in line with the Independent Water Commission's final recommendations.

Additionally, in its PR24 final determinations Ofwat has set incentivised performance targets for the 2025-30 period in leakage, per capita consumption and business demand that are aligned with delivery of the UK government's demand targets. Ofwat has also applied price control deliverables to hold companies to account for delivery of key water efficiency measures such as the roll out of 10.4 million smart meters.

Furthermore, the £100m Water Efficiency Fund, will promote behaviour change that encourages people and businesses to use less water and fund the development of new technologies and processes for water efficiency.

Finally, Ofwat is currently conducting stakeholder engagement on its proposed climate change principles, with the view of updating its policy position to feed into the next price review period, PR29.

6. Include consideration of resilience to a range of climate scenarios and hazards in NESO's Strategic Spatial Energy Plan. This should include consideration of differing levels of exposure to flood, water scarcity and heat hazards in different locations, to ensure generation and network assets are sited to minimise risk of systems-level impacts during future extreme weather. It should also include consideration of high impact, low likelihood events. (DESNZ)

It is essential that infrastructure is developed in a way that will ensure resilience for the future. The rapidly changing hazard landscape presented by climate change, including extreme weather such as flooding and extreme temperatures, is one of the key factors that must be accounted for in the design of our future energy system.

In the National Energy System Operator's Strategic Spatial Energy Plan (SSEP) methodology, published in May 2025, they stated that their "assessment of climate change's impact will be considered through available data sources". NESO also stated that they will "use this information to consider the suitability of locating assets at a zonal level over the lifetime of generation assets. As far as possible, this will mitigate against assets being located in more vulnerable areas." The SSEP is expected to be published in late 2026.

DESNZ, NESO and Ofgem are working closely with the Met Office and other experts to expand these data sources to include the most up-to-date information on a variety of different climate projections. In addition, DESNZ is currently considering industry's approach to high-impact, low-likelihood risks, and will work closely with NESO and

Ofgem to ensure that these risks are properly accounted for in the planning of the future energy system.

### **Built Environment and Communities**

7. Include long-term targets on net change in flood risk in the next flood and coastal erosion risk management investment programme. These need to be supported with sufficient levels of funding and a clear delivery plan to ensure these targets are met. (Defra)

Recognising the need to invest for the long-term, the government is providing certainty over the budget for flood and coastal erosion, committing a record £10.5 billion until 2036 – the largest flood programme in history which is projected to benefit nearly 900,000 properties.

On 14 October 2025 the government announced a new <u>flood and coastal erosion</u> risk management funding policy, following a public consultation over the summer.

The new funding policy will optimise funding between building new flood projects and maintaining existing defences and will ensure that deprived communities continue to receive vital investment. We will use government funding to unlock investment from public, private and charitable sources, making every £1 of government investment go further. We will also invest at least £300 million in natural flood management over ten years – the highest figure to date for the floods programme. The new rules will apply from the start of the new flood and coastal investment programme in April 2026.

We have committed to exploring setting a long-term multi-decade target for flood risk management, also addressing recommendations from the National Audit Office and National Infrastructure and Service Transformation Authority.

8. Set out a long-term cross-sector plan to manage future heat risk and drive joined up action. This should bring together relevant government departments and agencies, and involve regional and local government, to ensure that adaptation delivery for future extreme heat is coordinated across the built environment, the health system, and community response nationally and locally. (Defra, MHCLG, DESNZ, DHSC)

We recognise the urgent need to take action to protect our communities and businesses from the impacts of increased heat. The government is committed to managing the impacts of climate change on our built environment, including those from heat. Within NAP3, specific actions are identified to address heat risk to the built environment, our health system, and to communities.

Action ownership is also clearly identified, with departments including Department of Health Social Care (DHSC), Department for Energy and Net Zero (DESNZ) and

Ministry of Housing and Communities and Local Government (MHCLG) named for each action.

Climate adaptation governance is through the cross-government Climate Resilience Steering Board (CRSB), including those departments named here. This acts as a central point of strategic discussion of climate risks, including those for overheating, and helps to promote closer cross-government working. The membership and Chair arrangements of the Board are currently being reviewed to strengthen its oversight of cross-cutting climate adaptation matters.

Considering overheating within our buildings is important for building our resilience. In line with this, DESNZ is developing the Warm Homes Plan which will set out the UK's commitment to upgrade 5 million homes and will transform our ageing building stock into comfortable, low-carbon homes that are resilient to a future climate. In addition, MHCLG is considering how we can hardwire heat resilience into our approach at the local level, ensuring both new and existing housing is fit for the future climate we are facing.

NHSE has updated their Green Plan Guidance to strengthen focus on adaptation, setting the specific actions for integrated care systems and trusts to improve their resilience to climate change impacts, including higher temperatures. This supports NHS sites to take effective actions to mitigate the impact on their estates and services.

## Health and Wellbeing

9. Develop an improved climate and public health adaptation plan, building upon the current Adverse Weather and Health Plan. This should cover a greater range of hazards and responses. This needs to be an action-oriented plan that provides improved quantitative targets and associated indicators to monitor progress related to health adaptation across sectors. (DHSC)

The UK Health Security Agency (UKHSA) will expand the Adverse Weather and Health Plan (AWHP) creating guidance and tools for weather health risks beyond heat and cold, to include flooding. This will provide clear advice on these risks for the public, private and voluntary sectors, so they can take co-ordinated action and better protect the health of the population for a greater range of extreme weather events.

The AWHP is routinely updated to ensure it remains relevant and can support responsiveness to emerging weather-related health hazards. UKHSA is evaluating how the AWHP and its supporting guidance are being used by healthcare settings. The evaluation will be completed in late 2025 and used to make the guidance more effective.

UKHSA will also improve its climate-related health protection tools for healthcare professionals to help them identify and better protect those at greater risk of harm

from extreme weather, such as the elderly, young or those from lower socioeconomic backgrounds.

UKHSA will broaden its monitoring of climate-health impacts using indicators beyond heat-related mortality, to monitor progress on adaptation including gathering data on morbidity and healthcare utilisation. This will support policymakers, the NHS, social care providers and local authorities to understand the effectiveness of interventions and adapt to emerging impacts of climate change on population health.

10. Strengthen the Green Plan guidance and NHS Climate Adaptation Framework. This should be done by defining outcomes and targets for implementation and accountability, monitoring and linkages with Net Zero. Integrated care systems and partnerships should also include adaptation within their integrated care strategies. (DHSC)

The updated Green Plan guidance (published in February 2025) strengthens focus on adaptation, setting out specific actions for systems and trusts to improve preparedness for climate change impacts on NHS sites and services.

It requires each organisation to set out SMART actions and key performance indicators for focus areas in their organisational Green Plan. To support monitoring and drive delivery, the Guidance suggests emissions- and non-emissions-based metrics, and signposts additional data and analytics tools.

Since the initial development of Green Plans in summer 2022, Integrated Care Boards (ICBs) and Trusts have been required to report annually on progress towards Green Plan delivery to their board and publish this in their annual report, including actions taken and planned, with quantitative progress data. A named board-level lead is required for Green Plan delivery; NHS England's regional teams provide assurance. ICBs' Green Plan priorities must align with and be reflected in the ICB Joint Forward Plan and relevant system-wide plans.

The recently published NHS Climate Adaptation Framework and Climate Change Risk Assessment (CCRA) Tool further support this agenda. CCRA Tool completion by trusts will be monitored as a mechanism for tracking progress in understanding and addressing local climate risks.

### **Economy**

11. Ensure that businesses have access to appropriate adaptation information to help manage their own risks. In part, this requires coordination of the emerging analytics and metrics resources across government into a portal accessible to companies, especially small and medium-sized enterprises (SMEs). (DBT)

UK SMEs make up 99.8% of the business population, accounting for 60% of all private-sector employment. As the trading environment for UK business continues to be shaped by the global impacts of climate change, DBT recognises the importance of supporting UK SMEs to adapt – securing future growth while minimising productivity losses – to remain globally competitive into the future.

Having access to data on climate risk and potential local impacts is a prerequisite for this, and the government can play a supportive role by combining this with guidance tailored to each stage in a business's growth journey. We have committed to delivering this guidance as part of DBT's Small Business Plan, launched with the Prime Minister in July, which sets out our new comprehensive package of support for SMEs to achieve growth and reach their full potential. This Plan completes the government's integrated approach to economic transformation, alongside the UK's 10-year Industrial Strategy and Trade Strategy, to deliver sustainable growth across the country.

Our approach also aligns with the government's forthcoming response to the recommendations of the Willow Review, which will outline the actions we will take to realise the commercial benefits of sustainability for UK SMEs and support them through this complex transition.

Since publication, DBT has progressed work on resources and new guidance for SMEs in collaboration with Business Representative Organisations and the UK Business Climate Hub (UKBCH). We aim to make new guidance and resources available via UKBCH by the end of the year. In the longer term, DBT will also seek to leverage the capabilities of the new Business Growth Service, which brings together all online services for SMEs into a single platform, as it develops after launch this summer.

12. Ensure that the commitments outlined in the Sustainable Disclosure Requirements integrate and streamline requirements for robust adaptation-related disclosure. This should ensure that reporting burdens for companies are minimised whilst providing effective disclosure of information to help the private sector monitor and manage corporate climate risks. (HMT)

The government consulted on the draft UK Sustainability Reporting Standards (UK SRS) over the summer and consultation feedback is currently being processed. The government will publish a response in due course, as well as the final versions of UK

SRS S1 and UK SRS S2. UK SRS are based on the two inaugural standards published by the International Sustainability Standards Board (ISSB) in June 2023.

These are IFRS S1, on general sustainability-related risks and opportunities, and S2, on climate-related risks and opportunities. These standards aim to support long-term, sustainable decision-making by the business and investment community by providing high-quality and internationally-comparable information about the sustainability-related risks and opportunities that businesses face. This includes how adaptation efforts and investment feature in their strategy for resilience, and what adaptation metrics are used.

The Financial Conduct Authority (FCA) has stated that it intends to consult on whether to update its listing rules to refer to UK SRS. The government will later consider whether to introduce requirements for economically-significant UK entities to report against these standards.

Consideration of whether and how to introduce reporting requirements against the standards will be done in a way that is consistent with the aims of the Modernisation of Corporate Reporting review that was announced on 21st October 2025. This review aims to streamline and modernise the UK's annual reporting framework and return the Annual Report and Accounts to its original purpose as an effective communication tool between companies, investors and creditors for financial decision making.

A consideration of the role of the UK SRS in achieving this aim, and the Prime Minister's broader goal to reduce administrative burdens for business by 25%, will be important.

13. Deliver on the 2023 Green Finance Strategy commitments to set out an adaptation finance action plan. This should seek to include adaptation within transition plan disclosure requirements and guidance, as well as how the government intends to mobilise private investment towards adaptation actions. (Defra)

This government's sustainable finance strategy, as set out in the Financial Services Growth and Competitiveness Strategy in July 2025, focuses on enhancing market transparency and enabling businesses and investors to make informed decisions. This will support the allocation of investment to support companies' climate adaptation activities, in addition to Net Zero and wider environmental activities.

The government consulted on the draft UK Sustainability Reporting Standards (UK SRS) over the summer and consultation feedback is currently being processed. The government will publish a response in due course, as well as the final versions of UK SRS S1 and UK SRS S2. The Financial Conduct Authority (FCA) has stated that it intends to consult on whether to update its listing rules to refer to UK SRS. The government will later consider whether to introduce requirements for economically-significant UK entities to report against these standards.

The government also consulted on a range of options for potential climate-related transition plan requirements. The consultation sought stakeholder views on the role climate adaptation and resilience could play in transition planning, including whether and how businesses are adapting to 2°C and 4°C global warming scenarios. A response will be published in due course.

There are several other initiatives the government is also funding through the UKRI-Defra 'Maximising UK Adaptation to Climate Change' programme, including the ATTENUATE research project. The project aims to unlock private sector funding for climate adaptation, building the case for greater public sector investment, and addressing governance barriers to investment.

### International Collaboration

14. Develop and implement a cross-government strategy to address climate-driven risks to migration, conflict and international cascading risks. This should include setting out its International Climate Finance contribution to the New Collective Quantified Goal as part of UK international leadership but also extend to how government can help maximise the impact of the UK's private and third sectors. (CO, FCDO)

The National Security Strategy 2025 and Strategic Defence Review 2025 identify climate change and environmental degradation as persistent transnational challenges and demonstrate how this government is mainstreaming them into the UK's wider defence and security planning.

The government is developing a strategic approach to anticipate, assess, and respond to these cascading and compounding threats, and is strengthening cooperation with allies and partners - including through the NATO Climate Change and Security Centre of Excellence (CCASCOE) and the UK-EU Security and Defence Partnership.

The UK is committed to delivering £11.6bn in International Climate Finance by the end of FY25/26. Now that the Spending Review has concluded, we will set out spending plans for future years in due course, which will contribute to meeting the global climate finance goal agreed at COP29 (the New Collective Quantified Goal - NCQG).

However, public finance alone will not scale up financing to developing countries by at least \$1.3 trillion, so it is critical to mobilise private investment, including in measures that strengthen resilience to climate-related impacts. We will build on our track record of partnering with the City of London and the private sector to make the UK the green finance capital of the world, using our science, technology and business expertise to develop innovative solutions that drive investment and growth domestically and globally.

### All other recommendations:

### Land, Nature and Food

1. Defra should produce a strategy to ensure the agriculture sector remains productive under a changing climate, set targets for this and collect data to monitor success. (Defra)

The Farming Roadmap will set out how farming will, must and can evolve in response to changing markets, technologies, and environmental pressures - and how government will support that transition.

We will continue to invest in our farmers and land managers to make their businesses and food production more sustainable and resilient through ELMs. A record 50,000 farm businesses and half of all farmed land is now managed under our schemes.

Through ELMs, we are funding actions to improve the environment, mitigate flood risk, and boosting resilience such as natural flood management. Additionally, we are funding Local Resource Options (LROs) to support farmer groups to collaborate on drought resilience measures.

Government is working with industry to unlock the potential of new and innovative technologies in agriculture, such as precision breeding. Secondary legislation to implement the Precision Breeding Act for plants in England will come into force in November, enabling the development of crops that are more climate resilient.

In the United Kingdom Food Security Report (UKFSR), published December 2024, climate analysis has been integrated across sectors (crops, fruit and veg, livestock, fish, transport, water) in place of a single agriculture focused climate indicator and strengthened using UK Climate Projection (UKCP) data.

2. The Land Use Framework should address the trade-offs and co-benefits of multifunctional landscapes to benefit climate mitigation, adaptation, food security, nature recovery, timber, recreation and rural livelihoods. (Defra)

The government published a consultation on Land Use in England in January, which proposed five land use principles to inform policy delivery, including multifunctional land use and taking a more spatially informed approach to land use decisions, and taking a long-term view to land use while being responsive to change.

The Framework, to be published in due course, will be a guide for decision makers on how we make the most of what our diverse landscapes have to offer. It will address the challenges faced by communities, businesses, developers, landowners and farmers, as they adapt to a changing climate and to new societal demands – aligning incentives to encourage land management that delivers on multiple

objectives, including for food security, nature and climate. It will also ensure accessible and high-quality data is available to those we require it.

# 3. The Home Office should create and implement a cross-departmental strategy with external stakeholders to identify and mitigate risks of wildfire. (MHCLG)

On 1<sup>st</sup> April 2025, ministerial responsibility for fire transferred from the Home Office to the Ministry for Housing, Communities and Local Government (MHCLG). The government is taking a joined-up approach to enhancing resilience to wildfires. Prior to the transfer of fire functions to MHCLG, the Home Office worked alongside the Department for Environment, Food, and Rural Affairs (Defra), its agencies, and other stakeholders to scope policy options for addressing the growing wildfire risk.

This included reviewing existing frameworks and governance, including departmental responsibilities. A number of stakeholder workshops were also hosted around thematic areas such as data collection, public communications, land management, response and recovery.

The outcomes of this work are currently being reviewed to inform next steps. The government is committed to the principles of collaboration and resilience outlined by CCC. We would also welcome continued engagement from the CCC as this work progresses.

4. Government should work with the private sector to enable more funding for building climate resilience for the agriculture, commercial forestry, and fisheries and aquaculture sectors, including (but not limited to) innovation, research and development, and jobs and skills. (Defra)

Government is working to accelerate private investment in protecting and restoring nature, many instances of which provide climate resilience in addition to nature benefits. The government ran a call for evidence on expanding the role of the private sector in nature recovery over the summer, per our commitment in the Land Use Consultation. A large number of responses were received, which will inform further policy development in this area.

Across the Farming Innovation Programme (FIP), we have spent £84 million to date with a further £70 million already committed to ongoing projects to support Agri-Technology research and innovation, including climate-resilience. In the recently published Modern Industrial Strategy, we committed to spend at least £200 million through FIP up to 2030, and up to £63 million has been allocated to FIP innovation grants starting in 2025/26. So far, the programme has attracted over £54m of private investment into the research projects being supported.

The over £6 million Fisheries and Seafood Scheme – which delivers investment to safeguard the sustainability, resilience and prosperity of the seafood sector across England – relaunched in June 2025. The Fishing & Coastal Growth Fund will invest £360m over the next 12 years. We will work with the industry to target investment

where it matters most. For example, new technology, investing in skills and promoting the seafood sector.

Defra is funding Forest Research to Identify a small number of 'species for the future', to focus research on silviculture, establishment and tree improvement on to diversity the species composition and enhance the resilience of England's commercial woodlands. The Tree Production Innovation Fund, Tree Production Capital grant and Seed Sourcing Grant support the enhancement of nursery capacity and seed availability, including for the commercial forestry sector.

We are also helping owners manage their woodlands and make them more resilient by providing Countryside Stewardship woodland management planning grants, infrastructure grants, and woodland improvement as well as a new supplement for transitioning to more resilient silviculture.

# 5. Government must strengthen policy and funding to restore coastal marine habitats by regulating bottom trawling, enforcing sustainable fishing quotas, and better protecting Marine Protected Areas to provide nursery areas to threatened commercial wild fish stocks. (Defra)

While Marine Protected Areas usually protect specific marine habitats and species, rather than aid commercial fish stocks directly, 60% of England's MPAs have byelaws to prevent fishing damaging the protected species and habitats, with further byelaws being consulted on. The MPA network protects some habitats, such as saltmarsh and seagrass beds, known to provide nursery grounds for commercial fish species. Defra is undertaking a review of the English Marine Protected Area network to look at whether sites are in the right places with the right protection. The review will explore ways to update protection and management approaches to better address the nature crisis and improve climate change resilience, while supporting wider government priorities.

Defra is playing a crucial role in supporting the growth of offshore wind to help derisk and accelerate planning decisions, while protecting and enhancing the marine environment. Defra recently committed to extending existing and/or designating new MPAs to deliver sufficient strategic compensation for likely environmental effects of offshore wind development on benthic habitats.

Defra works closely with the Marine Management Organisation and Inshore Fisheries and Conservation Authorities to ensure the appropriate arrangements to enforce fisheries regulations are in place to protect English waters. Defra works in partnership with devolved governments across the UK, and engages with Norwegian, Faroese and EU counterparts to develop and implement policy to prevent overfishing in UK waters.

# 6. Defra should include a stretching and comprehensive soil health target as a priority in its forthcoming Soil Health Action Plan. (Defra)

We are pursuing a national soil monitoring programme which will establish robust baseline data of soil health which will inform any future environmental targets. National soil monitoring is currently being undertaken within the Natural Capital and Ecosystem Assessment (NCEA) programme, as part of the England Ecosystem Survey, National Forest Inventory Plus+, and Mycorrhizal Diversity Dataset work.

NCEA is completing a 5-year strategic sample needed to establish a national soil baseline. NCEA's soil monitoring will be integral to indicator E7: Healthy Soils, of the Outcome Indicator Framework.

Policies intended for the soil health action plan for England (SHAPE) were included in the Environmental Improvement Plan 2023 in the form of several commitments, goals, and targets. EIP23 set out the government's strategic direction for improving and protecting soil health so that it is valued and appropriately managed, balancing sustainable food production alongside increasing biodiversity and protecting our environment.

The government is currently undertaking a comprehensive review of all commitments made by the last government to ensure they align with our new priorities and a decision regarding any future soil strategy or action plan will be made in due course.

# 7. The Environmental Improvement Plan goals should be mainstreamed across all government departments responsible for their delivery, and trade-offs with competing policies should be mitigated. (Defra)

The Environmental Improvement Plan (EIP) is a cross-government statutory plan for improving the natural environment and people's enjoyment of it. This includes how we prepare for climate adaptation. The upcoming revision will cover key interventions and actions to be delivered across government and how key upcoming strategies will align with the plan. The government also has a set of legally binding environmental targets for England under the Environment Act 2021, covering a range of environmental challenges.

The Environment Act also places a legal duty on Ministers of the Crown to have due regard to the environmental principles policy statement (EPPS) when making policy, which plays an important role in supporting the delivery of the EIP and our legally binding Environment Act targets. Active consideration of the five principles (integration, prevention, rectification at source, polluter pays, and precautionary principle) is required during policy design in order to put the environment at the heart of policymaking.

# 8. Defra must clearly link the multiple benefits delivered through meeting the new Environment Act (2021) targets to the suite of climate, environment and planning policies that support them. (Defra)

Following the Environmental Improvement Plan (EIP) rapid review, the revised EIP will provide updated Environment Act target delivery information and their corresponding updated interim targets. The EIP will also highlight how actions will interface with wider government priorities, as part of a system to improve the natural environment.

The revised EIP will ensure we are identifying and championing actions that deliver cross-cutting benefits for nature and climate, at sea and on land.

The government recently published the 'actions to jointly address climate change and biodiversity loss in England' report, setting out how the government is delivering its key commitments on climate and nature in an integrated way, and the opportunities to further enhance an integrated approach.

9. Defra should set interim adaptation targets to drive early action to improve climate resilience of nature, enable progress assessments, and secure adequate resources (including for green jobs and skills) to facilitate delivery of the targets. (Defra)

The Environment Act 2021 sets a series of legally binding statutory targets, including apex targets to halt and reverse declines in species abundance.

To meet our Environment Act targets we will create, restore and connect wildlife-rich habitat, reduce pressures on species including from pollution and climate change and take targeted action to recover specific species.

The N1 risk reduction goal in NAP3 is to halt the decline in species abundance by 2030 and to manage 30% of land in England in a way that recognises and responds to climate change risks by 2030, to reduce the risk to terrestrial species and habitats.

To achieve this, Defra will work with stakeholders to create and restore habitats and ecosystem functions, in a manner that is suitable in the context of climate change.

Defra is also supporting departments across government to develop measurable objectives and delivery plans for the fourth National Adaptation Programme (NAP4).

10. Defra should publish full details on how the Environmental Land Management scheme will support healthy ecosystems to build climate resilience, and the actions that reduce vulnerability to climate change that will be eligible for payments under the scheme. (Defra)

The Environmental Land Management Schemes are designed to support farmers and provide protection and restoration for nature, and many actions will have co-

benefits for climate adaptation and resilience. Defra publishes data online including the actions, payment rates and uptake of Environmental Land Management schemes.

Countryside Stewardship Higher Tier (CSHT) supports initiatives tailored to unique local landscapes and specific environmental needs. The latest round of CSHT opened on 18 September 2025 for applications to those invited to apply, and full scheme guidance and actions is available on the Find funding for land or farm tools on GOV.UK.

The government has also concluded a rapid review of the existing Environmental Improvement Plan (EIP23). We published a statement of the rapid review's key findings on 30 January 2025, to be followed by publication of a revised EIP which will include details of how ELM supports actions for nature recovery and resources for climate change.

Additionally, the Farming Roadmap will will set out how farming will, must and can evolve in response to changing markets, technologies, and environmental pressures - and how government will support that transition, including building sector resilience supported by ELM.

11. The Ministry of Housing, Communities and Local Government (MHCLG) should add an expectation in the National Planning Policy Framework that Local Plans and Design Guides support delivery of Local Nature Recovery Strategies and Natural England's Green Infrastructure Standards. It should ensure that the Environmental Outcome Reports provide equivalent or stronger protection for biodiversity than the current system. (MHCLG)

The National Planning Policy Framework (NPPF) makes clear that strategic policies set out in an area's development plan should make sufficient provision for green infrastructure. In addition, Natural England's Green Infrastructure Framework supports local planning authorities and developers in doing this, including through setting out standards for green infrastructure quality and quantity.

The government published updated planning practice guidance in February 2025 clarifying the role of Local Nature Recovery Strategies (LNRS) in the planning system, including how local authorities should consider the priorities set out in the relevant LNRS when determining how their local plan should contribute to and enhance the local and natural environment.

We will consider how we can further embed LNRS and green infrastructure standards through our work to create a policy framework that is accessible and understandable to all, and intend to consult on a set of national policies related to decision making this year. The current systems of environmental assessment have become increasingly complicated, inaccessible and are failing to deliver the environmental outcomes we need – including for biodiversity.

The government will introduce Environmental Outcomes Reports (EORs) in due course and in line with the provisions in the Levelling-Up and Regeneration Act 2023 (LURA). The LURA requires the government to be satisfied that the implementation of EORs will not reduce the level of environmental protection overall. EORs will deliver a more effective and outcome-focused tool for managing the effects of development on the natural environment.

# 12. Government should adopt the recommendations for revised technical standards for Sustainable drainage systems (SuDS) in England, to ensure that SuDS are multifunctional systems that support biodiversity, improve water quality and provide green space for people. (Defra)

Government has published the new <u>National Standards</u> for SuDS on 30 July 2025. They replace the previous standards and go further in that they not only focus on reducing the volume of run off, but also promote water quality, amenity and biodiversity benefits, and provide requirements for the information needed as part of maintenance arrangements. Standard 1 also introduces a runoff hierarchy, with water reuse at the top.

# 13. Government should invest in social and ecological research to understand how best to work with people to restore nature and build resilience to the impacts of climate change and other pressures. (Defra)

Defra is developing plans for delivering research that will inform its response to the impacts of climate change on nature, including building resilience to climate change and other pressures in England's habitats and species.

This research programme will begin in April 2026 and consider ongoing climate research from colleagues across government to enhance Defra's deliverables.

Furthermore, Defra is leading ongoing research to understand how to disaggregate the impacts of pressures such as land use change, invasive species, and chemical pollution from those of climate change.

Recent work delivered by Natural England has also identified areas of climate vulnerability and resilience both spatially and by habitat, enabling us to target our approach to maximise benefits over the coming years.

Defra is currently undertaking research with landowners to explore what they are currently doing on their land to support nature restoration, as well as any barriers and motivators to doing further action. This work is due to be completed in October and will be published shortly after.

### Infrastructure

# 14. Collate data from water companies on uptake of water efficiency measures as a national indicator. (Defra, Ofwat)

We recognise the importance of water efficiency activities undertaken by water companies. We introduced the £100m Water Efficiency Fund, which promotes behaviour change encouraging people and businesses to use less water and fund the development of new technologies and processes for water efficiency.

Our PR24 final determination sets out how we considered strategic demand reductions set out in companies' water resources management plans (WRMPs) and will incentivise delivery of demand reduction through performance commitment levels that measure outcomes concerning leakage, per capita consumption and business demand. We track performance through our annual performance reporting process.

In addition, we will use price control deliverables to hold companies to account for the water efficiency benefits that companies propose to deliver. Our annual performance reporting also tracks delivery of schemes to reduce both residential and business demand at a more granular level. We also continue to track delivery of water efficiency through the annual review of progress against WRMP targets.

In the context of these existing measurements, we do not consider additional monitoring on uptake of water efficiency measures as a national indicator necessary. We have previously considered metrics based on uptake of measures, however our concern with such a measurement is it does not focus on the desired outcome of a reduction in demand and that uptake of a water efficiency measure does not guarantee the recipient (e.g. residential or business customer) has necessarily implemented the measure or will continue to use it.

# 15. Require water companies to report weather-related interruptions to supply to Ofwat and collate this as a national indicator. (Defra, Ofwat)

We recognise that changing weather conditions due to climate change have the potential to increasingly impact on water companies' ability to provide water to their customers.

Ofwat already requires companies to report on their supply incident performance under our supply incident and unplanned outage performance commitments, which have financial incentives attached to them. Ofwat is currently consulting with stakeholders on its proposed climate change principles, including discussions on metrics and data which aim at increasing climate resilience.

Interruptions to water supply are complex incidents, where weather is one of the many possible triggers. Creating such a national indicator is challenging when the relative 'contribution' of weather factors is difficult to assess. Furthermore, effective response measures, can also mitigate the impact of supply interruptions. An indicator

that focuses on the number and duration of interruptions may mask the overall ability of companies to respond to climate change.

This should be seen alongside maintenance of assets, investment in new assets, and management of water supplies to preclude such incidents in the first place. We consider that companies should consider all risks, including weather as part of their incident planning.

Any work on this would also need to consider the Drinking Water Inspectorate's perspective, given their primary duty regarding incidents affecting drinking water sufficiency.

# 16. Conduct a review of governance arrangements for resilience to climate hazards in the energy system, to ensure they are fit for the new expanded and more diverse low-carbon system given increasing societal reliance on electricity. (DESNZ, Ofgem)

DESNZ had committed to conducting an internal review of governance arrangements for resilience to climate hazards in the energy system by 2024 so that they are fit for the new expanded and more diverse low-carbon system, given the increasing societal reliance on electricity. This review has been completed and, following the establishment of the National Energy System Operator (NESO), DESNZ have worked with NESO and Ofgem to conduct a further review of the roles and responsibilities. This cross-organisational approach is being tested with regulatory authorities, and industry stakeholders.

NESO, as an independent technical body, and Ofgem, as the independent energy regulator for, both have an ongoing role in the governance for resilience to climate hazards in the energy system.

# 17. Coordinate a systematic assessment of risks posed from cascading impacts across multiple sectors due to failures of the decarbonised energy system as part of the next round of the Adaptation Reporting Power. (Defra)

The overall health of the energy system, its planning and operation, is now the responsibility of the independent National Energy System Operator (NESO). Its duties were established by the Energy Act 2023 and include working to ensure the security of supply to existing and future customers of electricity and gases, as well as the planning of the future energy system with consideration for climate change.

DESNZ is working with NESO to enhance our understanding of critical interdependencies within the energy system. Government will also consider any learnings with regards to the relationship between energy and wider sectors, following the National Energy System Operator's report into the North Hyde Substation fire.

These activities align with steps set out in the government's Resilience Action Plan, and necessitate detailed consideration of the impact of decarbonisation and planning to minimise risks and ensure resilience.

# 18. Designate Ofgem and parties responsible now and in the future (including the new Future System Operator) for the maintenance of energy sector codes and standards, with a clear mandate to ensure climate and weather resilience. (Ofgem, DESNZ)

In NAP3, DESNZ committed to designating parties responsible now and in the future for the maintenance of energy sector codes and standards with a clear mandate to ensure climate and weather resilience by 2024.

The Energy Act 2023 set the legislative framework for the establishment of the National Energy System Operator (NESO). DESNZ work closely with NESO and Ofgem to ensure that the hazards presented by climate change are being properly prepared for.

NESO's license conditions include an obligation to produce an Energy Resilience Assessment annually, covering all matters of resilience including the threat posed by climate change. In Ofgem's Climate Resilience Report they stated that "NESO will have an important role in identifying risks and making recommendations to improve resilience to government and Ofgem, including climate risks to the energy system"

The Energy Act 2023 gave Ofgem new functions to set the direction for the development of designated electricity and gas industry codes. Ofgem set out in its preliminary Strategic Direction Statement 2025 that it will work with government and key stakeholders to consider how climate resilience may be reflected in energy codes, with any changes made by 2027–28.

DESNZ will consider the introduction of resilience standards for the sector, as recommended in the 10-Year Infrastructure Strategy and the recent Cabinet Office Resilience Action Plan.

# 19. Extend requirements for reporting on outages to include the cause, duration and customers affected for all outages and collate this as a national indicator. (Ofgem, DESNZ)

Ofgem requires annual reporting on performance against targets relating to the average number of interruptions (Customer Interruptions) and the average duration of interruptions (Customer Minutes Lost) arising from planned and unplanned interruptions in both RIIO2 and RIIO ED2 as part of the regulatory reporting packs. Ofgem stated in its Climate Resilience report ARP4 that they will look to improve monitoring, both internally and with network companies.

Ofgem is working collaboratively with network companies to develop Climate Resilience Metrics and Indicators (CRMI) which will enable all parties to monitor and measure climate resilience and drive action on improving climate resilience within

price controls. Ofgem will consider what data is required to be collected as part of the CRMIs, alongside data routinely reported to the regulator through the regulatory reporting packs, for use at the start of ED3 and future price controls. Ofgem will consider the merit of national indicator(s) as part of this.

# 20. Mandate reporting on climate risk and adaptation plans by all generators, network operators and regulators under the Adaptation Reporting Power. (Defra)

The fourth round of reporting under the Adaptation Reporting Power (ARP) closed at the end of 2024, with 17 reports received from the energy sector out of 24 organisations invited. This included two regulators (Ofgem and the Office for Nuclear Regulation) and 11 network operators (electricity and gas transmission and distribution). The approach to reporting in the electricity generation sector was codeveloped with industry and resulted in a sectoral report from Energy UK, jointly for the first time with Solar Energy UK and Renewables UK. Through the cross-sector Climate Change Adaptation Reporting Group (CCRAG), network companies are required to share learnings and support reporting on climate risk and mitigations.

Ofgem has introduced requirements in its network regulation to improve risk assessment and to join up identification of risk mitigation measures and justification for investment and climate resilience has been formally introduced as a targeted funding area into Ofgem's RIIO-ED2 price control. While Ofgem does not require generators to submit climate resilience strategies, many operators will have obligations to consider and report on climate resilience depending on the type of assets as well as their size and location.

We are now reviewing our approach ahead of a fifth round of ARP and will consult on our proposals in due course. This will include the approach to reporting by the energy sector, including generation.

# 21. Commission further research to improve understanding of how climate change is altering key weather hazards that will impact the energy system. (Defra)

The Department for Energy Security and Net Zero (DESNZ) is deepening its understanding of how climate change is altering key weather hazards through a strategic partnership with the Met Office, formalised via a Memorandum of Understanding in October 2024. This collaboration enables DESNZ to commission tailored weather and climate services that directly support UK energy security.

In addition, climate change impacts and adaptation was a central theme of the Climate Services for a Net Zero Resilient World (CS-N0W) research programme, which ran from 2021-2025. This included work to better understand climate change impacts on key weather hazards, climate risks to UK energy network infrastructure,

and the impacts of climate change on energy demand for heating and cooling. DESNZ is currently scoping a follow-on programme.

In 2025, DESNZ and the Met Office launched a workplan to translate cutting-edge climate science into actionable insights for policy officials. This includes a detailed review of climate projections for relevant hazards and weather conditions, and a review of datasets and methodologies used to assess the impact of these events on security of supply and infrastructure resilience. These outputs will inform stress testing, scenario planning, and policy decision-making.

### 22. Designate Ofcom with a statutory remit for climate resilience. (DSIT)

### Telecoms

The government's recently published Chronic Risks Analysis sets out the range of long-term risks facing the UK, including climate change. The Resilience Action Plan, which was published on the same day, highlights the importance of CNI and the role it plays in ensuring that essential services the public rely on continue to operate for the broad range of risks facing the UK.

Under the Communications Act 2003 (amended by Telecoms Security Act 2021), Ofcom has a duty to ensure that communications providers (CPs) take appropriate steps to maintain telecoms service availability against all risks, including extreme weather. Ofcom's Network and Service Resilience Guidance outlines measures CPs can adopt to manage a range of risks, including climate change.

While the Communications Act does not assign Ofcom specific duties relating to climate change, climate-related risks—such as flooding and storms—are relevant to Ofcom's current duty to ensure network availability across the UK.

### Data Infrastructure

The UK's data infrastructure—particularly domestic data centres—is currently under legislative review as part of the forthcoming Cyber Security and Resilience (CSR) Bill. As part of this process, Ofcom could be formally designated as the joint competent authority, with DSIT, responsible for overseeing the resilience of data infrastructure.

Primary legislation is scheduled to be introduced in the first session of Parliament in 2025. This legislation will provide structure to the sector on security and resilience.

# 23. Design a pathway to develop and implement minimum climate resilience standards for Telecommunications and ICT infrastructure. (DSIT, Defra)

As set out in 'UK Infrastructure: A 10 Year Strategy and the UK Government Resilience Action Plan', DSIT will work with the Cabinet Office to map and fully use existing resilience standards across critical national infrastructure sectors. This work

will assess the effectiveness of the current landscape and identify any areas that could be strengthened by the development of new or updated resilience standards.

Where appropriate, DSIT will support efforts to address any gaps identified through this process.

### Telecoms

Ofcom's Network and Service Resilience Guidance takes a broad view of resilience and outlines expectations for CPs to design networks that can withstand and recover from disruptions, including climate-related events. The guidance offers advice on enhancing network architecture, design, and operations. It also references ENISA's Technical Guidance on Security Measures, which notes that risk assessments "should take in consideration current and forecasted environmental security risks e.g. related to climate change".

Additionally, the guidance references BDUK's 2025 Environmental Resource Guide for Digital Infrastructure, which advises CPs to integrate climate adaptation into network planning, design, and operations to maintain resilience against extreme weather.

We will continue to review this recommendation as we develop the system-level objectives ahead of NAP4.

### **Digital Infrastructure**

The Data Infrastructure team are currently reviewing various standards, frameworks and guidance for the sector to implement when the new legislation has been introduced. The requirements will be introduced in secondary legislation, following the CSR Bill. The guidance and requirements are currently being developed but climate resilience is being considered as part of the requirements due to the risks that face the sector from the effects of climate change.

# 24. Develop a set of indicators to enable monitoring of the impacts of weather and climate on Telecommunications and ICT services and the actions being taken to manage them. (DSIT)

### <u>Telecoms</u>

Section 105M of the Communications Act 2003 (as amended by the Telecoms Security Act 2021) establishes Ofcom's duty to ensure that Communications Providers (CPs) comply with security obligations and grants Ofcom broad powers to request information on any matter affecting network resilience. This includes data relevant to climate-related risks, such as service outages caused by extreme weather, infrastructure vulnerabilities, and adaptation measures.

While Ofcom does not operate a specific climate monitoring framework, incident reports often capture weather-related disruptions and CPs risk assessments frequently consider climate threats such as flooding or overheating.

These reports, along with CPs' risk assessments, are being used to inform the development of resilience indicators. DSIT will explore the development of structured indicators to monitor climate impacts on telecoms sector through the future NAP4 climate adaption objectives.

### Data Infrastructure

Currently, the data infrastructure sector shares climate risk and mitigation information on a voluntary basis, using surveys and direct engagement. DSIT is considering introducing reporting requirements for metrics that could be used to assess critical climate change preparedness and resilience within the sector, such as energy and water efficiency metrics, as well as data related to overheating and climate impacts. This could help DSIT asses the sector's exposure to climate change and develop relevant guidance and indicators for resilience. A public consultation will assess the sector's readiness to provide this information should it become a legal requirement.

The Cyber Security and Resilience Bill would enable such measures to be set, whether via official guidance or secondary legislation. Ofcom could act as the sector's designated joint competent authority regulator responsible for overseeing compliance.

### **Built Environment and Communities**

### 25. Make the National Resilience Standards a statutory requirement (CO)

As set out in the recently published Resilience Action Plan, the government is committed to ensuring the legislative framework, standards and guidance supports local responders to identify and manage the changing risk landscape.

The RAP and the response to Grenfell Inquiry has made clear commitments to updating National Resilience Standards for LRFs in England and to undertake a statutory review of the Civil Contingencies Act 2004 and its supporting regulations, culminating in the publication of a Post Implementation Review by 2027.

## 26. Undertake an assessment of the characteristics of vulnerability and adaptive capacity across England. (Defra)

The UK's third Climate Change Risk Assessment (CCRA3), published in 2022, was supported by an Independent Assessment from the Climate Change Committee. This assessment identified 61 climate change risks and opportunities, considering vulnerability, exposure, and hazards, as well as socio-economic drivers. It highlighted that the most affected groups vary by geography and individual characteristics.

The government published its third National Adaptation Programme (NAP3) in 2023, addressing the risks set out in CCRA3. An Equality Impact Assessment for NAP3 considered the aims of the Public Sector Equality Duty and the nine protected characteristics under the Equality Act 2010. The assessment identified that many of the actions in NAP3 are unlikely to have any specific identified impact on those with

protected characteristics. Where negative or potential negative impacts have been identified, reasonable steps are being taken to mitigate this.

In 2024, a new £15 million research programme was launched with UKRI to build the evidence on effective adaptation action. The programme will identify the skills, standards and data provision needed to increase adaptation capability across government and wider society and is conducting place-based research across devolved governments to provide insight on different contexts, exposure and vulnerability to climate risks and adaptive responses. The programme will enhance the assessment of vulnerability to climate impact and integrate with existing hazard data to produce improved climate risk information.

As part of the fourth National Adaptation Programme, due in 2028, the government will consider how climate change impacts on different groups, including those with protected characteristics.

# 27. Expand the Part O Building Regulation requirement to cover refurbishments of existing buildings, conversions of non-domestic buildings to residential and prisons. (MHCLG)

The government invited feedback on expanding the requirements of Part O of the Building Regulations in a recent call for evidence as part of the Future Homes and Building Standards Consultation.

One of the areas that the consultation sought feedback on was whether Part O should apply to dwellings created through a material change of use. We are carefully considering all the responses received and will publish a response in the coming months.

## 28. Undertake post occupancy evaluations of new build homes to monitor summer temperatures to ensure homes meet Part O when built. (MHCLG)

We are keen to encourage developers to focus on build quality when building new homes, as part of our ambition that the 1.5 million homes we will build over the course of this parliament will be high quality, well designed and sustainable. The call for evidence on Part O, as part of the Future Homes and Buildings Standard, was undertaken to understand which elements of Part O should be prioritised for review and would benefit from research and analysis to better understand any omissions or issues.

We are carefully considering the responses we have received, and this will then be used to inform any update to Part O and the Approved Document O over the longer term. The Building Safety Regulator will consider relevant research gaps when shaping forthcoming research activities.

29. Increase understanding of overheating risk in existing buildings by making use of annual empirical studies of overheating. For example, the Energy Follow Up Survey would be a useful tool to track overheating in homes if it were to be conducted each year. The government should also assess other innovative ways to monitor temperatures in buildings, for example by using smart data. (DESNZ)

As set out in NAP3, DESNZ, MHCLG, DHSC and UKHSA have committed to carrying out research to address evidence gaps on overheating, this includes looking at metrics and indicators for monitoring overheating risk. DESNZ is collecting detailed temperature monitoring data through the Homes for Net Zero project which will improve our understanding of patterns of overheating in the housing stock. Separately DESNZ is exploring if and how existing data collected for EPCs could be used to understand overheating risk of existing homes.

DESNZ published research completing in 2024 on "The effect of energy efficiency measures on summertime overheating in English homes", which provided evidence that the installation of individual energy efficiency measures did not significantly increase the risk of summertime overheating, and in the case of loft insulation could reduce the risk.

MHCLG is undertaking research work to support and inform place-based design and planning policy development to mitigate overheating risks.

MoJ's 2022 climate change risk assessment considered temperature, and research projects, such as the National Research Hub on Net Zero, Health and Extreme Heat (HEARTH) are looking at overheating in prison settings. MoJ Digital Twin pilots in houseblocks will also assess temperature.

# 30. Through the cross government working group on overheating ensure the government is actively addressing the need to mitigate overheating risks when installing measures to increase the energy efficiency of buildings. (DESNZ)

The Warm Homes Plan will transform our ageing building stock into comfortable, low-carbon homes that are resilient to a future climate. It sets out the UK's commitment to upgrade up to 5 million homes across the country by accelerating the installation of technologies like heat pumps, solar, batteries and insulation. We have announced investments of £13.2bn over the period up to 2029/30, in line with the Manifesto commitment. This builds on last year's initial settlement of £3.4bn.

The Department of Energy and Net Zero is developing the Warm Homes Plan informed by research to identify the buildings most vulnerable to extreme heat and where these are located. The Warm Homes Plan will set out a long-term strategic approach to consider adaptation, particularly overheating, as buildings are upgraded. DESNZ will continue to carry out research into appropriate adaptation solutions to

inform detailed policy development. DESNZ continues to require all energy efficiency measures installed under current government funded schemes require installers to be Trustmark registered and measures must also be installed in accordance with the Publicly Available Specification (PAS) 2030 and PAS 2035 standards. This ensures the risks of unintended consequences, such as mould, condensation, and overheating due to poor ventilation, are minimised.

DESNZ will continue to work with colleagues across government to develop the adaptation research base and deliver action through the Warm Homes Plan.

31. Work with the Environment Agency and other risk management authorities, such as water and sewerage companies, to set clear targets for the uptake of property-level flood resilience and set out standards for quality and maintenance. This should include improved data collection and monitoring. (Defra)

We continue to take a collaborative approach to ensure that appropriate standards are set for the uptake of property flood resilience (PFR). The PFR Code of Practice provides industry with clear guidelines to enhance flood resilience in properties, helping to reduce damage and accelerate recovery from flooding. It also underpins industry accredited professional training programmes for PFR professionals, such as those delivered by the Chartered Institution of Water and Environmental Management (CIWEM), and includes standards for the operation and maintenance of PFR measures.

In January 2024, the Environment Agency (EA) introduced new requirements for PFR product standards and supplier competence for providers on their PFR Framework. In January 2025, the EA commissioned independent review of Property Flood Resilience to assess progress since the 2016 Action Plan and explore opportunities to grow the PFR market, with associated robust standards.

On 16 October 2025 the FloodReady report was published, setting out how the nation can accelerate practical and affordable flood resilience measures for homes, while offering a clear roadmap for boosting resilience and helping people recover faster from floods.

The report sets out 22 recommendations and many supporting actions for the government and industry including:

- PFR product suppliers ensuring that PFR products are appropriately tested and certified to protect consumers and build trust to support uptake
- Professional bodies providing training and certification where appropriate to improve the PFR skills and capability of their members
- The completion of a data standardisation prototype for flood performance certificates

 UKRI establishing a network of academics and applied researchers with supporting infrastructure to deliver against the evolving research and innovation needs of PFR.

Since January 2025 Defra has secured PFR data collection questions in the ONS Opinions and Lifestyle Survey. Over time, this will provide insight into private household uptake of PFR measures.

On 14 October, following consultation, Defra announced major changes to its flood and coastal erosion funding policy. The reforms have removed the requirement for projects to demonstrate that properties would move from one risk band to another to be eligible for funding supporting resilience actions such as property flood resilience. This potential increased investment in this space is welcome. It will help support those at risk, build confidence in the supply chain and build trust for property owners to adopt PFR measures.

In August 2025 Defra commissioned a Property Flood Resilience (PFR) Evidence Synthesis and Gap Analysis project. The project will consolidate and critically assess existing research, data, and stakeholder insights on PFR measures in England and Wales, with the aim of informing future policy and strategic decision-making.

# 32. Planning policy should be reformed to ensure that climate resilience is a priority, with mandatory adaptation interventions on all built-environment project applications. (MHCLG)

The National Planning Policy Framework (NPPF) makes clear that the planning system should take full account of all climate impacts, including overheating, water scarcity, storm and flood risks, and coastal change. It sets out that planning should help to shape places in a way that minimises vulnerability and improves resilience to the effects of climate change through suitable adaptation measures.

In that vein, the NPPF makes clear that development plans should take a proactive approach to climate change mitigation and adaptation, in line with objectives in the Climate Change Act 2008.

To go further, we revised the NPPF in December 2024, to make clear that climate change adaptation should also be considered when preparing and assessing planning applications, and that this should take into account the full range of potential climate change impacts.

We will consider whether further changes are required to address climate change, and climate adaptation specifically, when we consult on national policies related to decision making later this year.

# 33. Government should set long-term targets for the number of people and buildings at high to very low risk for all sources of flooding (sea, river, surface water, and groundwater). (Defra, MHCLG)

Based on the Environment Agency's <u>National Assessment for Flood and Coastal Erosion</u> published in December 2024, there are currently 6.3 million homes and business in England at risk from flooding and this could increase to 8 million properties by 2050 (1 in 4) – the breakdown by each source of flood is shown in the table below. Improved data and modelling methods for assessing the likely frequency of flooding means that, for the first time, the display of surface water risk is now complemented by information which shows specifically how climate change may affect future flood risks from rivers and the sea.

Planners and developers are now better able to make informed choices on progressing with development in the right places. Defra is continuing its work with the EA on how to measure progress on flood risk management for the next investment programme which is due to start in April 2026.

We are exploring setting a long-term target for flood risk management. This would be a multi-decade target, which would set out the reductions in flood risk and the increases in flood resilience that the nation wants and can afford. To set this target, we would use the best available information from the Environment Agency's new national flood risk assessment.

<u>Table showing the current properties at risk of flooding from different sources and how this is expected to change by 2050 due to climate change published in the National Flood Risk Assessment in December 2024.</u>

Flood Source	Properties at risk as of December 2025	Projected properties at risk by 2050 due to climate change	Increase
	Properties	Properties	%
Surface Water Flooding total	4,600,600	6,100,000	33%
Surface Water Flooding high risk	1,071,800	3,100,000	189%
River and Seas flooding total	2,435,000	3,100,000	27%
River and seas flooding high risk	367,900	637,600	73%
Total (rivers, sea & surface water flooding)	6,300,000	8,000,000	27%

## 34. Policy decisions within shoreline management plans should be statutory. (Defra)

Shoreline Management Plans (SMPs) are developed and owned by the local councils and coastal protection authorities. These provide long-term strategic plans which identify approaches for managing the flood and coastal erosion risks at every stretch of coastline. SMPs have recently been refreshed with updated action plans. This follows several years of collaborative work between the Environment Agency and coastal groups. On 28 January 2025 the EA published the new <a href="National Coastal Erosion Risk Map (NCERM) data">NATIONAL COASTAL EROSION RISK Map (NCERM) data</a>. This includes future scenarios accounting for climate change.

The government launched a consultation on 3 June 2025 on proposals to reform the way we fund flood and coastal defences. As part of this, the government invited views on potential changes which would enable better integration between strategic flood and coastal risk management plans.

## 35. Set out mechanisms for funding installation and maintenance of SuDS and green infrastructure. (Defra, MHCLG)

Contributions from developers already play an important role in delivering infrastructure, including sustainable drainage systems and green infrastructure, to support new development and mitigate its impacts. Local planning authorities can secure these contributions by charging a Community Infrastructure Levy (CIL) on a new development and by negotiating section 106 planning obligations.

The government is committed to strengthening the system of developer contributions to ensure that new developments provide necessary affordable homes and infrastructure.

## 36. Urgently collect data on the location, type and standard of SuDS and green infrastructure interventions. (Defra, MHCLG)

The Natural Capital and Ecosystem Assessment (NCEA) Programme has produced the England Green Infrastructure Mapping database. This database is designed to provide technical evidence on the Green Infrastructure of England as an open data product, it combines social and environmental data to provide evidence on access to green and blue spaces. The evidence forms part of the Green Infrastructure Framework published by Natural England in 2023.

The Mapping provides baseline information on the location of Green and Blue Infrastructure assets, their public accessibility, and inequalities in their distribution using approximately 120 map layers. Future updates will incorporate data from the 2021 census, and pilot new thematic information such as urban habitat and naturalness mapping. The mapping database can be used to locate our green infrastructure assets and interventions, and be used to set targets for future interventions.

It is the responsibility of local authorities to monitor development in their area and to prepare evidence to inform and monitor their local plans. National planning policy is clear that plans should make sufficient provision for conservation and enhancement of the natural environment, including green infrastructure and planning measures to address climate change mitigation and adaptation.

As a key component of green infrastructure, SuDS play a dual role in addressing climate change: they help mitigate impacts by improving water quality and biodiversity, and support adaptation by reducing flood risk.

# 37. Provide a mechanism for setting out place-based targets for urban greenspace and unplanned impermeable urban surfaces in towns and cities. (Defra, MHCLG)

The National Planning Policy Framework (NPPF) is clear that the designation of land as Local Green Space through local and neighbourhood plans enables communities to identify and protect green areas of particular importance to them. The NPPF details that plans should sufficiently provide for the conservation and enhancement of the natural environment including green infrastructure. In addition, Natural England's <u>Green Infrastructure Framework (GIF)</u> helps set standards on accessible greenspace.

The government is committed to the delivery of high-quality sustainable drainage systems (SuDS) to help manage flood risk and to adapt to the effects of climate change. The NPPF was revised in December 2024 and sets the expectation that – where development could have drainage impacts - developments of all sizes are expected to use appropriate SuDS techniques.

In June 2025, government introduced new <u>national standards</u> on SuDS. SuDS built using these standards should be designed to cope with changing climatic conditions. SuDS should also be designed to deliver wider water infrastructure benefits such as flood prevention and storm overflow reduction, offering reuse opportunities, reducing run off, and helping to improve water quality, amenity, and biodiversity.

We will consider whether further changes are required to manage SuDS and greenspace provision when we consult on national policies related to decision making later this year.

38. Planning policy should ensure that assessments for all type and size of built development include, at a minimum, an assessment of current and future flood, erosion, and heat risk under future climate scenarios. This requires tighter controls on Functional Floodplain and Coastal Change Management Area designation, as well as statutory consultees with appropriate skills to assess future climate risks. (MHCLG)

The National Planning Policy Framework (NPPF) sets out that development plans should proactively approach climate change mitigation and adaptation, accounting for long-term implications of flooding, coastal change, and overheating due to rising

temperatures, in line with objectives in the Climate Change Act 2008. To go even further, we revised the NPPF in December 2024, clarifying that these factors should also be considered in both the preparation and the assessment of planning applications.

On flooding specifically, the NPPF is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from high-risk areas, including floodplains (Flood Zone 3b, where water flows or is stored during flooding) – this means new housing and most other development types are not appropriate here. Where development is necessary in such areas, it should be made safe for its lifetime without increasing flood risk elsewhere.

In addition, where appropriate, planning applications should be supported by a site-specific flood-risk assessment. Planning Practice guidance further sets out that the assessment should demonstrate to the decision-maker how flood risk will be managed now and over the development's lifetime, taking climate change into account, and with regard to the vulnerability of its users.

With regards to Coastal Change Management Area (CCMA) designation, planning policy outlines that local authorities should identify any area likely to be affected by physical changes to the coast as a CCMA. These are defined as areas where shoreline change rates are anticipated to be significant over the next century, considering climate change.

In January 2025, a moratorium was announced on new statutory consultees and a commitment made to review existing arrangements. The Environment Agency and lead local flood authorities are already statutory consultees on flood risk issues, and will remain so, with the Environment Agency committing to performance improvement. The government will shortly consult on reforms to the statutory consultee system.

We will consider further changes for managing flood risk, coastal change, and other impacts of climate change within the planning system when consulting on national policies for decision making later this year.

### Health and Wellbeing

39. The Department of Health and Social Care (DHSC) must work with MHCLG and local authorities to develop a long-term cross-sector approach to address risks in the social care sector, including using appropriate levers to accelerate adaptation action and ensuring that monitoring of overheating occurrences and air quality in care homes is undertaken frequently. (DHSC, MHCLG)

The present Care Quality Commission (QCQ) Single Assessment Framework (SAF) incorporates provision for assessment of healthcare and social care providers' resilience to the effects of climate change, such as overheating. A public consultation on key changes to the content of CQC's assessment frameworks and methodology will launch in October 2025.

CQC will ensure the recommendation from the CCC report is considered alongside feedback from the consultation. There will also be wider engagement on the detail of the assessment frameworks, with stakeholders and the public encouraged to input.

In addition, findings from UKHSA's ongoing evaluation of the efficacy of its Adverse Weather and Health Plan (AWHP) and supplementary guidance, expected to conclude in 2025, will be used to improve advice to support health and social care organisations to better prepare for, and respond to, significant adverse weather events, including progressing climate adaptation actions. UKHSA is also developing its climate-focused health protection tools for healthcare professionals to assist them in identifying and better protecting vulnerable population groups, including those cared for in social care settings.

Following extensive local authority engagement, UKHSA is also creating a Local Authority Resilience Adaptation (LARA) toolkit for climate change adaptation, including heat; this is intended for use by local authorities when developing their heat action plans and monitoring progress locally, including in social care settings, and is due to be published in 2026.

To further support policymakers, the NHS, and social care providers in adapting to the emerging threats of climate change, UKHSA will extend its climate-health monitoring to include data on morbidity and healthcare utilisation. This will provide a clearer understanding of the population health impacts to better focus and refine adaptation action.

To allow the development of effective adaptation policy, DHSC has invested £12m in research funding through the National Institute for Health and Care Research to advance understanding of the impacts of, identify effective adaptation solutions to, and build resilience to climate change risks across the health and social care system. A number of applications ranging diverse topics across healthcare delivery are expected to be awarded, and initial projects to begin by the end of 2025.

DHSC is working with its funded support partners to consider how to identify good practice in climate change adaption in Adult Social Care. The Department will seek to identify good practice and explore where there is scope for climate change adaptation to be further strengthened for the Adult Social Care sector and to establish any issues that need further consideration to achieve this.

## 40. Make available long-term, protected funding to adapt hospitals, care homes and other healthcare buildings to the impacts of climate change. (DHSC)

In the NHS, most sites are owned or leased by NHS Trusts, who are responsible for maintaining their estate. This includes adapting premises to reduce risks associated with climate change and severe weather, as set out in the NHS Standard Contract. NHS Trusts are supported to understand their climate risks through the NHS climate change risk assessment tool and the requirement to undertake risk assessments when clinical sites breach 26°C.

DHSC is supporting the improvement of NHS sites by investing £30 billion over the next five years in day-to-day maintenance and repair, with £5 billion allocated specifically to address the most critical building issues. NHS Trusts will be able to direct this funding towards adaptation subject to local priorities and managing other risks across the estate.

DHSC are making sure all new hospitals are fit for the future. DHSC's New Hospitals Programme requires schemes to achieve a minimum rating of BREEAM 'Excellent' for new builds, and 'Very Good' for refurbishments. In addition, all NHS investments in new buildings and upgrades to existing facilities that are subject to HM Treasury business case approval process must align with the NHS Net Zero Building Standard, which includes a focus on overheating risks.

DHSC is taking steps to strengthen the healthcare estate's ability to adapt to the impacts of climate change and has committed £12 million in applied research funding through the National Institute for Health and Care Research over the next five years, with a focus on adapting health and social care systems to withstand climate change related extreme weather events. This will help address critical evidence gaps and develop scalable, impactful and value-for-money adaptation measures to support health system-wide climate change resilience, including in social care settings.

Dedicated research on extreme weather and adaptation strategies in adult social care was commissioned in May 2025 to compare existing evidence of impacts and help identify effective interventions from international comparators, assessing the suitability and cost-effectiveness of implementing these interventions for the UK. This will help to further understanding of the nature, severity and scale of the impact on social care settings, and to inform potential future trials to determine optimal solutions

# 41. The Care Quality Commission (CQC) must include the readiness of health and care providers to manage overheating and other extreme weather within the new Single Assessment Framework inspections. (DHSC)

CQC has rolled out the single assessment framework (SAF) nationally and assesses healthcare provider climate adaptation under its "Safe environments" and "Governance, Management and Sustainability" quality statements. This includes readiness to withstand overheating and flooding risk. Guidance on the quality statements is made available on the CQC website to highlight the importance of climate adaptation in healthcare settings and to support appropriate provider action ahead of regulatory assessments.

Quality statements against which providers are assessed are based on site-specific needs such as evidence of risk or changes in care quality for the individual provider. As such, 'Safe Environments' and 'Governance, Management and Sustainability'

(and therefore adaptation) may or may not be assessed at every site on every assessment.

A public consultation on key changes to the content of CQC's assessment frameworks and methodology will launch in October 2025. CQC will ensure the recommendation from the CCC report is considered alongside feedback from the consultation. There will also be wider engagement on the detail of the assessment frameworks, with stakeholders and the public encouraged to input.