

## **LGA submission to the House of Commons Environmental Audit Committee inquiry into Heat resilience and sustainable cooling**

### **1. About the Local Government Association (LGA)**

- 1.1. The Local Government Association (LGA) is the national voice of local government. We are a politically led, cross-party membership organisation, representing councils from England and Wales.
- 1.2. Our role is to support, promote and improve local government, and raise national awareness of the work of councils. Our ultimate ambition is to support councils to deliver local solutions to national problems.

### **2. Summary**

- 2.1 Councils are critical in preparing people and places to the impacts of the changing climate. As leaders in communities, they deliver hundreds of essential services to protect public health, manage roads, prepare for floods, and provide open space. They are planning authorities, housing authorities, public health authorities, fire authorities and more. An adequately empowered and resourced local government will therefore be fundamental to ensuring communities are protected and resilient to impacts of climate change.
- 2.2 Climate ranks high in peoples' priorities. Research by Ipsos shows that 8 in 10 people are concerned by it, three quarters want to deliver net zero by 2050, and half want to bring that target forward. Councils recognise the urgency and scale, with over 300 having declared climate emergencies. Councils are now preparing, updating and implementing climate action plans, covering both mitigation and adaptation. Many are including climate adaptation policy measures in their neighbourhood plans and the Local Adaptation Advisory Panel (LAAP) continues to coordinate work with local authorities on climate change adaptation.
- 2.3 Earlier this year the LGA published [Accelerating Adaptation Action](#) which set out what the local government sector needed from government and partners to increase our preparedness for, and resilience to, the impacts of climate change. Risks in our communities from excessive heat was identified as the [greatest concern](#) for councils. Damage to critical infrastructure and buildings, including roads and homes ranked as the second greatest concern for councils. Widespread risks to people and the economy from climate related failure of the power-system was the third greatest risk.
- 2.4 Nationally we are not sufficiently prepared for the impacts of climate change and extreme heat, and central government must prioritise its work in partnership with local government to close this gap. A place-based approach to climate action is more efficient and cost efficient. [Research by Innovate UK](#) found that local climate action would hit net zero by 2050 while saving taxpayers around £140 billion and returning an additional £400 billion in wider co-benefits, in comparison to a national approach.
- 2.5 Currently local authorities lack a clear national framework and guidance to support local adaptation planning. It is vital that the Government provides a clear framework for adaptation planning for local authorities to follow, including guidance on what and how to prioritise and set targets. It should also include practical tools for identifying and addressing issues. Engagement with the local government sector should capture wider views and experience, in order to design and shape policy that will support councils with understanding climate risk and appropriate adaptive action.
- 2.6 Our [research](#) identified funding is the greatest barrier to accelerating effective adaptive action, with 93 per cent of councils reporting that a lack of finance was the greatest barrier to adaptation action. Local government currently receives no core funding for

climate action. All councils need adequate and stable core funding to take forward adaptation and mitigation action across their own services. Government should also mobilise a five-year local adaptation accelerator programme, enabling councils to lay the foundations for long-term adaptation, safeguarding people and places.

### **3. What evidence exists on the relationship between heat and human health (mortality and morbidity), and which communities are worst affected?**

- 3.1. Statistics published last October by the [ONS](#) show that the most recent period of extreme heat in the summer of 2022 represented a significant health risk to those who are older or have a health condition that places them at greater risk. These conditions include heart conditions, diabetes, respiratory or renal insufficiency, Parkinson's disease or severe mental illness.
- 3.2. The summer of 2022 broke temperature records in the UK, with the temperature exceeding 40°C on 19 July. A Level 4 heat-health warning was issued by the UK Health Security Agency for the first time on 18 and 19 July 2022. The magnitude, extent and severity of the extreme heat events experienced over five 'heat periods' throughout June and August 2022 was unparalleled when compared with previous hot summers in the UK.
- 3.3. During these five periods, [2,803 excess deaths](#) were recorded among those aged 65 years and over and 3,271 excess deaths among all (excluding COVID-19 deaths): the highest excess mortality figure during heat periods recorded since the Heatwave Plan for England was introduced in 2004. Over 17–20 July 2022, when temperatures were at their highest, [the ONS estimated](#) there were 1,012 excess deaths for those aged over 65 in England.
- 3.4. Research by the [University of Manchester and Friends of the Earth](#) identified that the communities most vulnerable to the dangerous health impacts of heatwaves are those with a high number of older people and children, those without green space to shelter from the heat, and those where the type of housing (for example mobile homes and high-rise buildings) is most susceptible to overheating.
- 3.5. The Met Office has predicted that hotter and drier summers could be likely to become more common as heat records are being broken more frequently. This will bring increasing challenges to communities and the councils that support them..
- 3.6. We must start to adapt to homes and buildings and our local infrastructure, to mitigate the impact of more extreme weather on communities' health and wellbeing. the Government must work with councils and others to turbo charge efforts to bring down carbon emissions and achieve our net zero targets, limiting further temperature increases in the future.

### **4. How can sustainable cooling solutions and adaptation strategies be implemented in such a way as to minimise overheating, reduce energy consumption and prevent overloading of the electricity grid during peak demand?**

- 4.1 Our report Accelerating Adaptation Action, and work with Local Partnerships to create the local authority adaptation toolkit, both demonstrate the whole-system, whole-place strategy needed to improve our resilience to climate change including excessive heat.
- 4.2 Councils developing local adaptation strategies are seeking to minimise overheating without consuming energy or loading on the grid, for instance through increasing shading,

providing green and blue infrastructure, and critically, providing advice to communities and businesses, and adapting their own local government services.

- 4.3 The LGA has also pressed the case for the adaptation effort to be given equal precedence with climate change mitigation. In particular, better retrofitted homes will keep the heat in during the winter and can keep the heat out during the summer. And deployment of rooftop solar PV can be most productive in generating electricity when cooling is most likely needed, reducing the demand on the grid.
- 4.4 Local government can play a huge role in delivering housing retrofit, targeting action where it is needed and can stimulate supply chains and wider markets, however our leverage is limited by a complex and uncertain funding landscape of small pots that come and go over time.

## **5. What actions can be taken to protect those most vulnerable to the impacts of extreme heat?**

### **Public health**

- 5.1 Those most vulnerable to extreme heat include older adults (over 75 years), especially those living alone who are socially isolated, the very young, and people with other long-term conditions such as diabetes or heart conditions are also at high risk, along with people who are homeless, and those who use drugs or alcohol.
- 5.2 Effective engagement with the public, and in particular those with increased vulnerabilities, is vital to help people take precautions and address the risks from extreme heat. [Research](#) undertaken by the National Institute of Health and Care Research (NIHR) in 2022 found that current messages about the dangers of hot weather are not getting through to vulnerable individuals and communities. The research found that vulnerable people who had heard the health advice were unlikely to take all the actions they could to protect themselves during a heatwave.
- 5.3 In 2023, the UK Health Security Agency updated its [guidance](#) on caring for people most at risk during a hot weather as part of a [wider collection of guidance](#) on how to minimise the health effects of adverse weather.
- 5.4 Councils have a key role to play in engaging with their communities about the risks of extreme heat and taking action to support vulnerable communities through their public health responsibilities and other frontline services such as adult and children's social care. Many local authorities have developed their own Extreme Heat plans which outline their core responsibilities during a heatwave, such as [this joint plan](#) by Portsmouth and Southampton City Council. Following the 2022 heatwave, many councils (such as [Doncaster](#) and [West Northamptonshire](#)) have updated their websites to include more information around the health impacts of extreme heat and how to mitigate them.
- 5.5 It is important that all council public health teams are effectively resourced to take a proactive and preventative approach to managing the impacts of extreme heat. The [public health grant has been reduced by 26 per cent since 2015/16](#). Cuts to the grant have often been greater in more deprived areas, where communities are more likely to suffer from poor health and have heightened vulnerabilities in extreme weather. Moreover, the Government has provided local authorities with funding allocations on an annual basis, impeding long-term service delivery planning.
- 5.6 We have long called for government to increase the focus on prevention, by uplifting the Public Health Grant and providing long-term certainty with multi-year funding settlements.

This will be vital to improve health outcomes, ensure communities are resilient and reduce health and social care expenditure.

## **Fire and rescue**

- 5.7 As climate change continues, the impact of extreme heat on the fire and rescue service (FRS) is expected to become more pronounced. For example, last year wildfires saw approximately a third of the fire services in the UK declaring major incidents on the same day, as the UK faced a prolonged period of heat and drought. Those wildfires saw homes destroyed and put Fire and Rescue Services across the country under intense pressure.
- 5.8 Unlike some public services which are demand led, the fire and rescue service needs to have enough resources available to provide an emergency response even in times of exceptional demand. This includes the ability to deal with large scale emergencies and/or a range of smaller incidents but all occurring simultaneously and/or incidents that are of extended duration. This often can rely on mutual aid arrangement being in place and coming into force at times of exceptional need.
- 5.9 The spate of wildfires during the heatwave in July 2022 showed the difficulties that can be experienced when the whole country is enduring the same challenging conditions. Multiple fire and rescue services declared major incidents, with services across the country responding to multiple incidents.
- 5.10 Ensuring that the Fire and Rescue sector is resilient and appropriately resourced to the risks facing the country both now and into the future, is therefore vital to protect the public. Especially as weather related incidents such as extreme winter storms, wildfires, coastal erosion and flooding are likely to increase as a result of climate change. This was included as a key ask in the [LGA's response to government's 'Reforming Our Fire and Rescue Service' White Paper](#) in 2022.

## **6. To what extent do the Government's Climate Change Risk Assessment and National Adaptation Programme (as well as other related strategies such as the Net Zero Strategy and Heat and Buildings Strategy) identify and address the risks from extreme heat?**

- 6.1. Local government plays a critical central role in supporting places to adapt to a range of interconnected climate related challenges. While many aspects of the National Adaptation Programme are positive for councils, it is altogether disappointing and does not deliver the funding and support necessary to enable urgent acceleration of local adaptation action that we proposed in our report [Accelerating Adaptation Action](#). This is similar to the Net Zero Strategy, which although includes welcome words on the role of local government, has not led to step change needed. The Heat and Buildings Strategy does not recognise councils at all.
- 6.2. Councils are pleased to see funding for skills, but it's important that this funding is devolved to councils and not something that they need to bid for. It is great to see more data for councils to use to prepare for climate risks in places, something the LGA has long been calling for. But while access to Local Authority Climate Data could provide some good learning and understanding for councils, they crucially need the resources and money to take action on their findings.

## **7. Does the current planning framework do enough to encourage heat resilience measures such as cooling shelters, water bodies, green infrastructure and shading to be integrated into urban planning? Where such measures are incorporated, how accessible and successful are they?**

- 7.1. The National Planning Policy Framework makes provision for climate change adaptation policies. However, councils continue to report that the plan-led system is being undermined by the use of viability arguments, which enable developers to avoid meeting Local Plan policy requirements including climate change mitigation and adaptation measures. This is despite the Government's amendments to the Planning Practice Guidance for viability in 2019 which stated that the "cost of fully complying with policy requirements should be accounted for in benchmark land value" and that "under no circumstances will the price paid for land be relevant justification for failing to accord with relevant policies in the plan".
- 7.2. Every day homes are built that will need future retrofitting for mitigation and adaptation purposes, with the cost and disruption loaded onto home-owners that are far greater than for developers to build to standards in the first place. To close these loopholes, we would like to see amendments made to the viability system – for example, removing the requirement to factor in an assumed developer or landowner return or, the removal of viability assessments as a material planning consideration entirely.
- 7.3. Adaptive measures and guidance in supplementary planning guidance should also be given the same priority as energy efficiency and net zero. Local Plan making provides an opportunity for adaptation to be reinforced as a priority. Local Plans are subject to a public inquiry as part of plan making and adoption, led by the Planning Inspectorate to determine whether or not a plan is soundly made. It should be explicit in the requirements for the plan making and for the inspection that climate adaptation measures are properly considered.

## **8. What can be done to protect the UK's existing public and private sector housing stock from the impacts of extreme heat while ensuring that homes are sufficiently warm in the winter months?**

- 8.1. Retrofitting existing homes and public buildings will be vital step to ensure communities are resilient to more extreme temperatures, as well as reaching net zero. However, national programmes are too short term and fragmented to deliver at the pace and scale that is needed, with local authorities forced into competing for small pots from schemes that come and go over time.
- 8.2. The Greens Home Grant national voucher scheme is a one example of this. The fast-paced procurement process, combined with the short-term nature of the scheme made it difficult for installers to mobilise to meet demand and the scheme had limited impact. A long-term plan for retrofit is needed so that businesses can respond, scale up capacity and train staff, in the knowledge that their investment will have a chance to pay off.
- 8.3. A place-based approach to retrofit and wider climate action is more efficient and more profitable. Innovate UK found targeted local action is more efficient at deploying technologies and leading behaviour change. In modelling interventions in heat, buildings, and travel, they concluded local action would hit net zero by 2050 while saving taxpayers around £140 billion when compared to national approaches and returning an additional £400 billion in wider co-benefits. This finding is reflected by relative success of more local schemes. For example, the Green Homes Grant local authority delivery scheme achieved more than the national voucher scheme.
- 8.4. As conveners of place, councils are best placed to lead on the fabric energy efficiency retrofit of homes in their area as they can stimulate local supply chains; install measures that are most appropriate for the building types in their area;

engage with the residents and property owners and work with local partners to put in place appropriate skills provision to build the workforce pipeline. Councils can also consider adaptation measures such as heat resistance and flood alleviation as part of a one-stop retrofit process.

- 8.5. The lack of sustained, long-term funding is the single biggest barrier to allowing councils to accelerate retrofit.
- 8.6. As we outlined in [our response to the Levelling Up, Housing and Communities Committee's recent inquiry into the finances and sustainability of the social housing sector](#), councils Housing Revenue Accounts (HRAs) are facing unsustainable income and expenditure pressures – alongside the financial pressures across wider local government services – while having to deliver on a growing number of priorities such as building safety, housing management and regeneration, decarbonisation of the stock and building new homes. Councils will need additional government investment and/or increased flexibilities to raise additional income – such as the flexibility to set local social housing rents - if they are to deliver everything that is required of them.
- 8.7. Our research estimates that the additional costs to retrofit homes and deliver net zero alone, compared to what is currently provided for in HRA business plans across the country, is £23 billion over 30 years (see page 23 of the '[Expenditure](#)' report). No HRA business plan is able to sustain decarbonisation of the stock and additional streams of income will be required to be identified. Whilst the Social Housing Decarbonisation Fund (SHDF) has been welcomed, the costs to deliver Wave 2 pilot schemes are increasing not reducing, and in the case of heat pumps, inflation has been significant. This is leading to a higher requirement for matched funding than initially envisaged in the programme, with some councils saying that they are not able to meet this increased requirement.
- 8.8. We are calling on the government to provide a long-term sustainable funding framework for social housing to ensure that councils have the ability to invest in and regenerate their housing stock, and to fulfil local and national ambitions of ensuring that everyone has access to a safe, secure and sustainable home.
- 8.9. We are also calling on government to bring forward all funding for retrofitting social and fuel poor homes (such as the Social Housing Decarbonisation Fund which is being phased over 10 years) and devolve the majority to councils. This would allow local areas to accelerate the retrofit of homes, target households most in need first and pump-prime local retrofit markets.

## **9. What role might reversible heat pumps (which can act as both heating and cooling systems) and other emerging technological solutions, such as the development of smart materials, play in meeting future cooling demands?**

- 9.1. Reversible heat pumps and smart materials could play a significant role in meeting future cooling demands. Air sourced heat pumps will most likely be the future of space and water heating for many homes, and work in a very similar way to air conditioning units. Just as heat pumps will be important for heating for comfort in the winter, air cooling will be important for cooling as our summers get hotter and hotter.
- 9.2. It is likely that many households will decide to install air conditioning systems of one kind or another in advance of reversible heat pumps. Currently fewer than 5 per cent of households have air-conditioning. There are opportunities for wider positive impacts, for instance using air filtration to improve air quality.

- 9.3. However a sharp increase will place additional pressure on the grid, and there have been examples of it leading to blackouts. While the installation of solar PV could help reduce demand on the grid, it is unlikely to be sufficient and so it is also important to improving the energy efficiency of air conditioning systems, and provide advice to households on cooling. And at a strategic level councils should be supported to work with the electricity system on energy planning.

**10. Does the Government's Future Homes Standard adequately consider overheating in homes? If not, what additional elements should it include?**

- 10.1. The Government's Future Homes Standard does not adequately consider overheating. However, this omission has partly been addressed through Part O of building regulations.
- 10.2. Part O requires developers of new residential developments to limit unwanted solar gains in summer and provide an adequate means to remove heat from the indoor environment. The regulations are outcome focused, rather than outlining specific measures, so they are open to interpretation. The regulations could therefore be strengthened by requiring specific adaptation measures to ensure new developments are future-proofed against overheating, but also other issues such as water scarcity.

**11. How effectively is the Government working across departments and with local authorities to ensure a coordinated approach is taken to heat resilience?**

- 11.1 Empowering councils to deliver on national and local adaptation needs will be vital to achieve our ambitions of reducing overheating and ensure communities remain resilient.
- 11.2 The Local Government Association commissioned Local Partnerships to carry out [research](#) into councils' preparedness for climate adaptation and understand what councils need from the national government policy, regulatory and funding framework, to accelerate central and local government's collaboration on place-based adaptation to climate change. It identified a number of issues which are holding councils back from going further and faster on adaptation.

**Awareness and prioritisation**

- 11.3 Adaptation and mitigation should go hand in glove. Yet, the research found that the majority of Government's engagement with councils has been on mitigation, and more could be done to prioritise adaptive action. To address this government should:
- 11.3.1 Refer to adaptation alongside mitigation, at every opportunity, providing a clear national message on climate change and the need for action.
  - 11.3.2 Engage with local government beyond the Local Authority Adaptation Panel (LAAP), which is a forum for council officers to engage with DEFRA officials. We recommend that a more senior, political level forum, with representation from local and national government, is established to agree strategic priorities for adaptation and funding requirements.
  - 11.3.3 Include adaptation measures alongside net zero and emissions reduction measures e.g., full incorporation into retrofit advice, EPC and DEC certificates etc.
  - 11.3.4 Implement a local climate test that all central government policy and funding decisions regarding local government should meet, so that they support local climate action.
  - 11.3.5 Provide access to training for all councils on adaptation literacy.

## **A clear national framework and guidance for adaption**

- 11.4 Currently local authorities lack a clear national framework and guidance to support local adaption planning. It is vital that Government provides a clear framework for adaptation planning for local authorities to follow, including guidance on what and how to prioritise and set targets. It should also include practical tools for identify and addressing issues.
- 11.5 Our research found that one of the most critical issues for local authorities is the lack of clarity on responsibilities for adaption. For example, different responsibilities sit across district and county councils, and Local Resilience Forums (LRF). While at the national level, different Government departments are responsible for the management of different risks.
- 11.6 Government should assign a clear set of roles and responsibilities for the different councils, and services, LRF, statutory undertakers, landowners and central government departments. They should also specify sub-national/regional partnership structures/framework bringing together councils to provide strategic and operational delivery of actions and provide clear identification and powers in relation to specific risks (these may not all be council owned e.g. surface water flooding).
- 11.7 Ownership of risks should be determined by lead organisation for future planning of services at the local level. LRF are undergoing elements of reform with strengthening of responsibilities through the [UK Resilience Framework](#) and may seem like a natural fit for a leading role in adaptation. LRF provide a key role in the emergency response to a wide range of critical incidents (from terror attacks to severe weather events and natural disasters) however the ownership of risk management and delivery of adaptive measures (including communication and messaging) is best held by local authorities as the lead in place making. Cooperation between neighbouring authorities and stakeholders (such as landowners, the EA, coast guard etc) is essential and a strong case can be made for a regional oversight body, to coordinate and facilitate co-operation, collaboration and to provide clarity over emergency response vs adaptive action planning.
- 11.8 One specific role that requires clarity is the ownership of data, toolkits and reporting frameworks. This is a role that could be best held by DEFRA, to provide access to a repository of robust, consistent data and risk assessment and reporting frameworks. Oversight of the regional activity could be undertaken centrally, based on governance structures that follow forthcoming recommendations from the CCC (CCRA4 will be taking a systems approach to identifying risk and cascading impacts).

## **Funding**

- 11.9 Local authorities report that 'lack of funding' and 'available finance' is the top barrier to addressing the impacts of climate change. Councils currently receive no core funding for climate activity. Instead, they are forced to compete for small pots from a labyrinth of schemes that come and go over time. This model is inefficient, with bids costing councils in the region of £30,000 to develop, and inherently disadvantages councils that may have less capacity and expertise.
- 11.10 To make meaningful change and apply sufficient resources to delivering on climate action plans (both mitigation and adaptation), local authorities need additional funding or the ability to generate finance opportunities. Local authorities are extremely stretched on officer resource and budget, and a key priority at the moment is just survival. As such, if



there is no funding or finance provided for non-statutory activity, it is likely to be overlooked by finance directors. A lack of understanding, or lack of data in order to understand risk of underinvestment in climate adaptation is preventing meaningful risk assessment and delivery of adaptive measures.

- 11.11 All councils need adequate and stable core funding to take forward climate action – adaptation and mitigation – across their own services.
- 11.12 Government should also mobilise a five-year local adaptation accelerator programme, enabling councils to lay the foundations for long-term adaptation safeguarding people and places. Within a national framework the government should strike accelerator agreements with every council – or group of councils - as soon as possible, and no later than April 2025. They would each be unique, but should all:
- 11.12.1.1 Deliver climate action across all key mission areas within an area, as determined by councils
  - 11.12.1.2 Provide multi-year place-based funding allocations with signals for longer-term commitments and appropriate fiscal freedoms
  - 11.12.1.3 Aggregate projects into programmes to pool resources and attract private investment
  - 11.12.1.4 enter a process of regular review, refunding, and adaptation at every spending review up to 2050
  - 11.12.2 Provide local adaptation accelerator funding, with allocations to every authority, building on long-term capacity for risk identification and adaptation action planning. Local government to agree top line objectives with central government, to receive the funding.
  - 11.12.3 Introduce a time limited technical advisory service to be provided alongside the accelerator funding with the outcome that funding recipients produce and adopt an adaptation plan
  - 11.12.4 Develop a transparent and long-term scheme of tax and incentives to enable delivery of a pipeline of investable projects, prioritising nature-based climate adaptation solutions.

## Data

- 11.13 Understanding data is the starting point for action and is critically important to evidence the need for adaptation funding. When a local authority wants to understand their actions in relation to mitigation, they first begin by calculating their baseline carbon emissions, to then determine what actions need to be taken to reduce emissions. However, a lack of clear data continues to act as a key barrier to addressing the impacts of climate change to communities and service delivery. In particular, it is not clear what the starting point for adaptation is and the process of collecting baseline data is not standardised across authorities.
- 11.14 The Environment Agency provides data on flood risk from rivers and the sea, as well as surface water flooding, and the Met Office provides data on climate projections. Joining up key data sources would provide authorities with a strong and consistent starting point, for example connection of the climate heat projections by local area with an understanding of the health demographics of the local population and the local housing stock would provide a basis for assessing areas most at risk from overheating. Public sector agencies largely run GIS databases and the ability to host central data sets in one location, with the ability to download and integrate with existing data sets would be a powerful tool which could be kept up to date.
- 11.15 An element of the data that requires further understanding is in relation to critical thresholds. A critical threshold is the point in a system at which sudden or rapid change occurs, and when exceeded, causes unacceptable losses or creates new

opportunities. The forthcoming datasets that will be available through the Met Office Climate Hub will support the identification of critical thresholds alongside a detailed review of service level risk registers. However, overlaying these critical thresholds on a national as well as local level would provide a greater picture of risk.

11.16 To improve access to and the use of data, government should:

- 11.16.1 Provide central statistics and open-source data in a consistent and user-friendly format, with the ability to link into central data sets and overlay other sets of local data and local impacts.
- 11.16.2 Provide a central repository for the data, for local authorities to access, and require these data sources are used to compile their adaptation risk registers and locally led plans.
- 11.16.3 Further research and funding into the financial implications of not adapting.
- 11.16.4 Provide a central repository for collation of the cost and impacts of extreme weather events (linked to reporting).
- 11.16.5 Provide a central repository for critical threshold data, and guidance on what this will mean for local authorities in their local context.
- 11.16.6 Commission research on the critical threshold trigger points, as opposed to the weather. E.g., at what temperature do council resources and services get diverted / closed.

### **Partnership working**

11.17 Local authorities have limited powers to effect change in some areas, including flooding and building design. Climate adaptation needs to take a multi-agency approach, that also reaches relevant private sector entities such as utility providers and large local landowners. Yet there is no formal mechanism that requires private sector stakeholders to engage in mitigation and adaption planning.

11.18 Government should enable and support regional partnership working and introduce a duty for organisations (landowners, water companies, Distribution Network Operators) to cooperate and work in partnerships with councils. Requiring these external bodies to engage with the local authority if asked to do so would provide additional leverage to broaden inclusion and improve the quality of adaptations available.

For further information, please contact:  
Megan Edwards, Public Affairs and Campaign Adviser

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