



## BRIEFING · CLIMATE IMPACTS AND THE PUBLIC REALM

## Built for yesterday's weather

Storm Boelo put Largs under water on 25 October 2026 two years after its seawall was rebuilt. Across the UK and the EU, the public realm that protects people from floods, fires, heat and storms is under-maintained by admission, yet almost no inquiry can prove a cut caused a death. The law should require readiness, not wait to assign blame.

## IN NUMBERS

|                                                                                                                                  |                                                                                                                             |                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| <b>3,000</b><br>of 38,000 high-consequence flood assets in England below required condition, the "worst on record" (Defra, 2025) | <b>£42m</b><br>Scotland's annual flood capital, fixed in cash since 2016; scheme costs now over £1bn (Audit Scotland, 2025) | <b>1 in 5</b><br>Northern Ireland flood schemes finished on time; DfI gullies and verges on "limited service" 2023–25 (NIAO, 2026) |
| <b>701</b><br>highest-risk municipalities in Castilla y León with no wildfire plan when 150,000 ha burned in 2025                | <b>1,504</b><br>heat deaths in England in the record summer of 2025 against 3,039 predicted; UKHSA credits heat alerts      | <b>0</b><br>prosecutions after the Ahr, Pedrógão Grande or Ischia disasters that reached a conviction on causation                 |

## WHAT HAPPENED

### Largs is a climate-exposure case, not a neglect case

Storm Boelo, named by the Dutch service KNMI, brought 84mph gusts to Argyll overnight on 24–25 October. Floodwater ran down Largs Main Street to what traders called its highest level ever; Saltcoats, Skelmorlie, Dumbarton, Rothesay and Millport also flooded. SEPA issued 35 flood warnings. More than 40,000 premises lost power in Ireland and about 7,000 were still off in Northern Ireland at lunchtime, mostly from fallen trees. No deaths were reported.

North Ayrshire Council completed a £4m replacement of the deteriorated 1970s seawall at Largs Bay in 2024, and the £48m Millport scheme is finished. The defences were maintained. They were built to a standard the sea has moved past.

## Under-investment is on the record, in every nation

- **England.** The Environment Agency needed £235m for maintenance in 2022-23 and received £201m. The 2027 protection target was cut from 336,000 to 200,000 properties (NAO, 2023). Ministers redirected £108m to urgent repairs in 2025.
  - **Scotland.** Of 40 schemes planned in 2015, 19 are complete and 8 abandoned with £30m sunk. Audit Scotland calls the funding process "not fit for purpose" and warns 400,000 properties could be at risk by 2080.
  - **Wales.** Natural Resources Wales cut 233 posts in November 2024, the month Storm Bert flooded 700 properties and killed one person.
  - **Northern Ireland.** DfI's 2023-24 budget was £112m short of need. Flood-risk resource funding fell to about £2.3m. Officials told MLAs: "We are pausing work that will probably end up being more expensive in the longer term."
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FINDING 2

Blame rarely survives an inquiry

Official bodies confirm failures of warning, command and delivery far more often than they confirm that a budget cut caused a death. Prosecutions usually fail on causation.

| EVENT                           | TOLL            | WHAT WAS FOUND                                                                                                          | GRADE                  |
|---------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------|------------------------|
| Ahr valley, Germany, 2021       | 136 dead        | Inquiry found warning and command failures; prosecution dropped as causation unprovable                                 | Official, no liability |
| Valencia DANA, Spain, 2024      | ~230 dead       | Judge called the 20:11 alert "late and wrong"; high court refused to charge ex-president Mazón (Mar 2026)               | Under investigation    |
| Pedrogão Grande, Portugal, 2017 | 64 dead         | Commission: roadside fuel-break rules not met; all 11 defendants acquitted, upheld 2025                                 | Official, acquitted    |
| Pas-de-Calais, France, 2023-24  | 5,000 homes     | Ministry inspection rejected the neglected-drainage claim: works overwhelmed "even when perfectly maintained"           | Rejected               |
| Newry and Downpatrick, NI, 2023 | 100+ businesses | DfI official: "I could not make the leap to say that not having the full budget resulted in a higher level of flooding" | Denied                 |
| Thessaly (Ianos), Greece, 2020  | 4 dead          | Ex-governor and officials given suspended sentences for failing to act; acquitted of manslaughter                       | Convicted (duty)       |

## A duty without money is a letter nobody answers

Since 2013 every Spanish municipality in a high-risk zone has been required to hold a wildfire plan and enforce scrub clearance where homes meet forest. **99 of 101** at-risk municipalities in Almería have no approved plan, including Los Gallardos and Bédar, where a fire in July 2026 killed at least 13 people, seven of them British. In Galicia only **64%** of 244,200 plots checked in 2025 were clear despite 88,000 notices. Spain's Ombudsman told councils in March 2026 to stop sending letters and clear the land at the owner's cost.

Small rural councils lack staff to pursue fragmented plots with absent heirs, and mayors pay an electoral price for fining neighbours. The duty exists; the resources and the enforcement service above the smallest councils do not.

## Kilroot and Ballylumford: generation on an unprotected coast

Northern Ireland's conventional generation sits on two sea loughs within 15 miles of each other. **Kilroot** (Belfast Lough, 824MW of gas plant since the coal units closed in 2023, 500MW more planned) is named on the NI flood hazard maps as an area of significant flood risk. **Ballylumford** (Larne Lough, Islandmagee) hosts the gas station, the 275kV substation, the 500MW Moyle interconnector to Scotland and the consented gas-storage caverns.

Storm Darragh (7 December 2024) did "significant and unforeseen damage" at Ballylumford: three of NI's six large generators went into extended outage, SONI ran the system "at an increased level of risk" all winter, and full output returned only in July 2025. When Coolkeeragh then overran its outage, the Executive raised Kilroot's permitted hours because running without it was "an unacceptable risk". Belfast sea level is projected to rise 27–58cm by the 2080s. NI has no equivalent of the Coast Protection Act 1949 and no department with clear responsibility for coastal erosion (CCRA3). In France, river-temperature limits cut 6.3GW of nuclear output in the June 2026 heatwave; in Storm Éowyn, wind farms cut out above 25 m/s as the lines came down.

## What works is provable

- France's national heat plan after 15,000 died in 2003: about 2,000 deaths in the 2006 heatwave against 6,400 expected.
  - Europe's 2023 heat deaths (47,000) would have been 80% higher without adaptation already in place (*Nature Medicine*).
  - Czechia's post-1997 reservoirs and warnings cut Storm Boris peaks by up to 80% in 2024: 7 dead against 60 in 1997.
  - The Netherlands funds its Delta Programme at about €1.9bn a year, by statute, to 2039.
  - Ofgem found after Storm Arwen that tree clearance near power lines is set for safety, not storm resilience; ESB found hedgerow timber caused 59% of Storm Éowyn damage. Both regimes are now under reform.
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## Six provisions for the Public Realm Bill

- 1 A statutory duty to maintain**  
designated public-realm assets, from seawalls and drains to roadside trees and firebreaks, to a published standard with annual condition reporting.
- 2 Public asset registers**  
in all four nations, so residents can see the condition of what protects them before the storm.
- 3 Delivery timetables and spending transparency**  
for every funded scheme. Valencia, Ischia, Thessaly and Middleton all had works on paper for years.
- 4 Emergency-planning duties**  
for small catchments, reservoirs and cooling and warm spaces, where the Limburg and Wallonia inquiries found the gaps.
- 5 Resources tied to the duty**  
, with a shared enforcement service above the smallest councils and cost-recoverable default powers. This is Spain's lesson.
- 6 For Northern Ireland:**  
a statutory coastal protection duty with a named lead department, published resilience assessments for critical-infrastructure sites on the flood maps, and a joint review of generator resilience standards and the severe-weather compensation exemption after Darragh, Éowyn and Boelo.

Flooding, drainage, roads, fire and public health are devolved. Provisions for Scotland, Wales and Northern Ireland need legislative consent or parallel measures. A concept paper for Northern Ireland's parties is in preparation ahead of the May 2027 Assembly and council elections.

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**Sources.** NAO, Resilience to flooding (2023) · Public Accounts Committee HC 71 (2024) · Audit Scotland, Flooding in communities (2025) · NI Audit Office, Flood risk management (2026) · DfI budget 2023-24 · Senedd Research on NRW (2024) · UKHSA heat mortality 2025 · Ofgem, Storm Arwen review (2022) · ESB Networks, Storm Éowyn review (2025) · Ahr prosecution dropped (2024) · TSJCV on Mazón (2026) · Pedrógão Grande acquittals · Pas-de-Calais inspection (2024) · Castilla y León fire plans (EFE, 2025) · Almería fire plans (2026) · Galicia clearance enforcement (2026) · WMO on Storm Boris · Irish News, Ballylumford storm damage (Jan 2025) · DfE written statement on electricity supply (1 Oct 2025) · Mid and East Antrim BC, Public Utilities paper (Kilroot flood risk) · CCRA3 Summary for Northern Ireland · STV, Storm Boelo (25 Oct 2026) · North Ayrshire Council, Largs seawall. Full evidence review with causal-link grading for about 60 cases available on request.