

Strategy for ARP5: ADEPT response to consultation

[Consultation on the Fifth Round of the Climate Adaptation Reporting Power - Defra - Citizen Space](#)

As submitted via Citizen Space consultation portal, 20th May 2026

Question 1: Would you like your response to this consultation to be confidential in the event of an access to information request? (required)

No.

Question 2: Do you agree or disagree to the proposed objectives and principles for ARP5?

Agree, but suggest an additional principle – reporting should facilitate retaining a continued focus on climate adaptation throughout a period of organisational change where some public bodies cease to exist and their statutory functions transfer to successor bodies (with particular reference to local government reorganisation where many existing councils will cease to exist and their functions transfer to new strategic or local authorities).

Question 3: Do you agree that government should make targeted use of the power in the CCA 2008 to direct selected organisations to report, whilst maintaining the voluntary approach with the remainder?

Agree.

Question 4: Do you agree with the proposed tests to determine who would receive a direction to report?

Agree.

Question 5: Are there any other criteria that should be used to target directions?

Where a new public body has been created and has taken on the assets/liabilities and statutory functions of predecessor authorities.

Question 6: Do you agree or disagree that additional incentives for voluntary reporting are needed?

Unsure. The examples of incentives in the consultation document would have little impact on the number of organisations choosing to report voluntarily. There would be greater impact if government offered to fund the full cost of voluntary reporting. Where reporting is mandatory, new burdens funding should be payable to local councils as well as to strategic authorities.

Question 7: Do you agree or disagree that reporting should be expanded to include strategic authorities?

Agree.

Question 8: Should reporting by strategic authorities be mandatory or voluntary?

Mandatory, subject to government providing sufficient funding to the mandated authorities to cover the full cost of reporting. Mandatory reporting by existing and new strategic authorities would help ensure that climate adaptation is given due attention and provides a higher spatial level framework for local councils to develop their adaptation plans. With several new strategic authorities due to be created in the next few years, care should be taken when setting cut-off dates for adaptation reporting that these new authorities are not excluded.

Question 9: What support is needed for successful reporting by strategic authorities?

New burdens funding.

Question 10: Do you have any comments or suggestions regarding the proposed additional scope changes? (optional)

It is important that government does not concentrate on strategic authorities to the exclusion of local councils – the latter have statutory responsibilities for the provision of universal and targeted services that require robust adaptation plans. Services to the most vulnerable people in our communities are provided by local councils, not strategic authorities.

Question 11: Do you agree or disagree with new sector-neutral guidance on additional aspects of climate risk management?

Not applicable.

Question 12: Do you agree or disagree that sector-specific guidance would be useful for ARP5?

Agree. Sector-specific guidance would be helpful for local government at a time when it is undergoing reorganisation, devolution, and political change.

Question 13: Would your organisations agree or disagree to participating in the co development of sector-specific guidance with government?

Agree.

Question 14: Do you agree or disagree that ARP reporting is a valuable addition to corporate climate disclosures and/or existing sector-specific regulatory obligations?

Not applicable.

Question 15: Do you agree or disagree that ARP reporting is a valuable addition to existing sector-specific regulatory obligations?

Not applicable.

Question 16: (optional) In what further ways can Defra reduce duplication between ARP and other climate risk reporting your organisation is subject to?

Not applicable.

Question 17: Do you agree or disagree that economically regulated companies reporting in ARP5 should be set a shorter deadline to submit their reports, to enable regulators to take them into account in their reports?

Not applicable.

Question 18: How much less time than the standard 3-year window should economically regulated companies be given to report?

Not applicable.

Question 19: Do you agree or disagree that large energy and telecommunications companies should report individually?

Agree. And water companies.

Question 20: Do you agree or disagree that collective reports covering new sectors and those which have many small actors should be invited?

Not applicable.

Question 21: Would a report by water and energy trade associations focusing on interdependencies between the two sectors be useful or not useful?

Useful.

Question 22: What feedback would you welcome on ARP5 reports?

It would be useful to have feedback on 'what good looks like' in terms of the content of the report but it would be more useful to have an assessment of the actions that organisations have committed to doing – the extent to which adaptation plans have been delivered, how effective they have been, and barriers to delivery.

Question 23: Do you have any further comments on the overall proposed strategy for reporting in ARP5?

Not specifically on the ARP5 reporting strategy but a wider comment on our disappointment that government has not taken recent legislative opportunities to introduce statutory climate duties (including reporting) on local councils and strategic authorities. See for example our submission to the LGA consultation last year <https://www.adeptnet.org.uk/documents/lga-consultation-local-government-and-legal-responsibilities-act-climate-change>.

We note that the new report from the Climate Change Committee [The role of UK local authorities in adapting to climate change](#) (May 2026) states that government can better support local adaptation by visible and consistent national leadership, long-term funding and a statutory duty for local adaptation, including mandatory adaptation reporting, to elevate its importance within local authorities. We support this recommendation and would expect that the ARP5 reporting strategy and the government's wider adaptation strategy will be consistent with it.