



Yorkshire and Humber Climate Commission response to Defra Consultation on the Fifth Round of the Climate Adaptation Reporting Power

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YHCC overall position

YHCC supports the overall direction of ARP5 as a valuable framework for improving climate risk management and strengthening the national evidence base.

However, to maximise its impact, ARP5 should move beyond reporting alone and further support coordination, alignment, and practical adaptation outcomes.

One-line summary

ARP5 is a valuable framework, but its impacts will depend on strengthening coordination, aligning with existing processes, and ensuring reporting translates into real-world adaptation outcomes.

Main bullet points

- The YHCC is supporting the ARP5 overall – valuable for climate risk management, but needs stronger focus on outcomes
- Better coordination needed – especially across sectors and at regional/catchment scale
- Mixed approach supported – targeted mandatory reporting for key organisations and voluntary elsewhere
- Avoid duplication – align with existing reporting and focus ARP on adaptation + system-level risks
- Include strategic authorities – but with phased approach and strong support
- Link reporting to action – outputs should inform planning, investment, and decision-making.

Overall: ARP5 should evolve into a framework that supports real-world adaptation and reduces vulnerability, not just reporting.

Key messages

1. ARP is valuable but needs to deliver clearer outcomes

ARP plays an important role in:

- raising awareness of climate risks
- improving organisational risk management

However:

- there is less consistent evidence of reduced vulnerability

Greater focus is needed on:

- measurable outcomes
- links to decision-making and investment.

2. Stronger focus needed on coordination and system-wide risks

Climate risks are inter-connected across sectors and places

ARP5 should better support:

- cross-sector coordination

- understanding inter-dependencies and cascading risks

This is critical for managing risks such as:

- flooding
- infrastructure disruptions
- energy and water system dependencies

3. Place-based and regional alignment is essential

Adaptation is often fragmented across organisations

ARP5 should help align activity at:

- regional scale (e.g. Yorkshire and Humber)
- catchment and place-based levels

Strategic authorities have an important coordinating role

4. Support a balanced approach: targeted mandatory reporting + voluntary participation

YHCC supports a mixed-model:

- Targeted mandatory reporting for key organisations
- Voluntary participation for others

Mandatory reporting should focus on:

- organisations with system-level influence
- critical infrastructure providers

Voluntary reporting should be strengthened through clear incentives and added value

5. Reduce duplication and align with existing reporting

Many organisations already report climate risks

ARP should:

- complement, not duplicate existing frameworks (e.g. regulatory reporting, TCFD),
- allow signposting to existing data.

Its distinct value lies in:

- adaptation focus
- system-level insight

6. Strategic authorities should be included (with support)

Strategic authorities are key for regional coordination and planning

YHCC supports their inclusion, but recommends:

- a phased approach (initially voluntary)
- strong guidance, funding, and support

Success depends on:

- collaboration with local authorities

- clarity on expectations

7. Reporting should be proportionate and practical

To be effective, ARP5 must:

- minimise burden and duplication
- provide clear guidance and templates
- reflect different levels of organisational capacity

8. Better feedback and data use are essential

Organisations need feedback that is:

- clear and actionable
- based on comparison and learning

ARP outputs should:

- support planning, investment, and policy decisions
- improve regional and national understanding of risks

9. Reporting approaches should reflect organisation size and role

Large, critical organisations → individual reporting

Fragmented sectors → collective reporting

Trade bodies can add value through:

- voluntary, sector-wide insights
- work on inter-dependencies (e.g. water–energy)

10. Overall recommendation

ARP5 should evolve from a reporting exercise into a framework that:

- supports coordination across sectors and places
- reduces duplication
- improves decision-making and investment
- ultimately contributes to less vulnerable and more resilient communities.

Appendix A: Redacted answers to each question

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

Not confidential

No question 2...

Question 3: Do you agree or disagree to the proposed objectives and principles for ARP5?

Partially Agree

YHCC partially agrees with the proposed objectives and principles for ARP5 and supports the overall direction of strengthening climate risk management. This position is informed by engagement with the YHCC network and YHCC's experience of supporting and developing regional adaptation capacity over time. In particular, YHCC welcomes the emphasis on supporting organisational maturity and improving the evidence base to inform the Climate Change Risk Assessment (CCRA) and National Adaptation Programme (NAP).

However, YHCC considers that the objectives could be further strengthened in the following areas:

1. Cross-sector coordination and system-level risks

YHCC considers that there is scope to place greater emphasis on cross-sector coordination and the management of system-level risks. While organisation-level reporting is an appropriate mechanism for building the evidence base, there is a risk that, without stronger integration, adaptation activity remains fragmented across sectors and organisations.

2. Place-based and regional alignment

YHCC considers that stronger recognition of place-based and regional alignment would be beneficial. Evidence from the Yorkshire and Humber region indicates that adaptation activity is often undertaken at the level of individual organisations, with limited coordination across geographies. Strengthening the role of ARP in supporting regional alignment could improve the effectiveness of adaptation planning.

3. Clarity on the use of ARP outputs

YHCC considers that further clarity is needed on how data collected through ARP will be used by government, including its relationship to the CCRA and wider policy development. Clearer articulation of how reporting contributes to national and sectoral climate risk assessments would support proportionality and help maximise the value of reporting.

4. Proportionality and alignment with existing processes

YHCC notes that much of the information requested through ARP may already be available within organisations. It will be important to ensure alignment with existing reporting requirements to minimise duplication and avoid unnecessary burdens on reporting bodies.

5. Focus on outcomes and vulnerability reduction

YHCC notes that ARP has made a valuable contribution to improving awareness and understanding of climate risks. ARP provides value, but there is less consistent evidence of measurable reductions in vulnerability. Reporting tends to focus on planned or on-going actions, with more limited use of standardised, outcome-based indicators. Strengthening expectations

around demonstrating measurable progress over time could enhance the effectiveness of ARP in supporting resilience.

Conclusion

Overall, YHCC supports the proposed approach as a logical progression from previous rounds. However, strengthening the focus on coordination, proportionality, and demonstrable outcomes would further enhance ARP's contribution to improving climate resilience and reducing vulnerability.

Question 4: 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?

Response: Agree

This view draws on practical insights from YHCC's regional coordination work and engagement with organisations participating in adaptation planning and reporting.

YHCC agrees that government should make targeted use of the powers under the Climate Change Act 2008 to direct selected organisations to report, while maintaining a voluntary approach for others. This represents an appropriate balance between ensuring coverage in key sectors and retaining the flexibility that has supported participation in recent ARP rounds. While reporting has been largely voluntary since Round 2, evidence suggests that a targeted approach to mandatory reporting may be effective in addressing persistent gaps in coverage, particularly where organisations have significant roles in managing climate risks.

YHCC considers that targeted direction should focus on organisations with material influence over critical systems and infrastructure, including those responsible for managing inter-dependent risks such as flooding, energy, transport, and water. In the Yorkshire and Humber context, this includes major infrastructure providers and public bodies whose activities have implications for regional resilience. Ensuring participation from such organisations is important for understanding system-level risks and inter-dependencies.

YHCC supports retaining a voluntary approach for other organisations, recognising that not all bodies have the same level of influence on climate risk management. This approach can continue to support proportionate engagement and avoid placing unnecessary burdens on organisations where the strategic value of reporting may be more limited.

To ensure that a targeted approach to mandatory reporting is effective, YHCC makes the following observations:

1. Inclusion of local and combined authorities

YHCC considers that local authorities and combined authorities should be strongly considered for inclusion within the group of organisations that may be directed to report. While recognising that mandatory reporting is not the sole determinant of participation, experience from ARP4 indicates that voluntary engagement from these bodies has been variable. Given their role in spatial planning, infrastructure coordination, and community resilience, clearer expectations—potentially supported by direction—could improve consistency of reporting and strengthen the overall evidence base.

2. Selection criteria and proportionality

YHCC supports the proposed criteria for issuing directions but emphasises the importance of applying them in a way that prioritises organisations with the greatest potential impact on climate risk management. This includes those that have not previously reported but operate in sectors where gaps in coverage remain.

3. Value of reporting

YHCC considers that, alongside mandatory reporting, it is important to ensure that reporting requirements provide clear value. Reporting should support improved understanding of inter-dependencies, coordination across sectors, and alignment across geographic scales, rather than functioning solely as a compliance exercise.

4. Clarity and support for reporting bodies

Clear communication from government, including guidance, expectations, and engagement with senior leadership, will be important in supporting participation and improving consistency. Standardised templates or minimum reporting expectations may also help to reduce variability and ensure outputs are comparable.

5. Continuity across reporting cycles

YHCC considers that encouraging continued participation from organisations that have reported previously would support consistency over time and strengthen the ability to track progress in climate risk management.

Conclusion

Overall, YHCC supports the proposed targeted approach to mandatory reporting alongside voluntary participation. This approach is proportionate and reflects the need to address gaps in coverage while maintaining flexibility. Its effectiveness will depend on clear criteria for direction, appropriate inclusion of strategically significant organisations, and ensuring that reporting delivers meaningful insights into climate risk and resilience.

Question 5: Do you agree with the proposed tests to determine who would receive a direction to report?

Broadly Agree

YHCC broadly agrees with the proposed tests to determine which organisations should receive a direction to report. This assessment reflects evidence gathered through YHCC's on-going engagement with regional stakeholders and observation of participation patterns across previous ARP rounds.

The focus on organisations that have not reported in ARP4, those reporting for the first time, and those representing critical national infrastructure that have not reported in recent rounds is appropriate. This approach supports improved coverage while recognising the effectiveness of voluntary participation in previous rounds.

However, YHCC considers that the proposed tests could be strengthened to better reflect system-level resilience, particularly where risks and responses span multiple sectors and organisations.

In particular, YHCC suggests that two additional factors could be more explicitly considered:

1. System influence

The extent to which an organisation shapes wider systems, including infrastructure networks, supply chains, and land-use patterns. Organisations with significant influence over these systems play a key role in managing climate risks beyond their own operations.

2. Inter-dependency importance

The degree to which an organisation's functioning is relied upon by multiple sectors. This includes organisations whose disruption could lead to cascading impacts across critical services or geographic areas. Incorporating these considerations alongside the proposed criteria would help ensure that directions are targeted not only at organisations that have not reported, but also those whose role is critical to the functioning of inter-connected systems.

Evidence from the Yorkshire and Humber region illustrates the importance of this approach. Organisations such as Yorkshire Water, Northern Powergrid and Environment Agency partners, play central roles in managing flood and water resilience and are highly inter-connected with other sectors. Ensuring consistent reporting from such organisations, supports a more comprehensive understanding of system-level risks.

Without consideration of system influence and inter-dependencies, there is a risk that the tests may prioritise organisational participation alone, rather than ensuring coverage of those actors most critical to overall resilience.

Conclusion

YHCC supports the proposed tests as a proportionate starting point. However, expanding the criteria to better capture system influence and inter-dependencies would strengthen their effectiveness and support a more integrated approach to climate risk management.

Question 6: Are there any other criteria that should be used to target directions?

Yes – additional criteria could strengthen targeting.

YHCC considers that additional criteria could be used to further strengthen how directions are targeted. This perspective is informed by YHCC's experience of working across inter-connected systems and facilitating cross-sector collaborations within the Yorkshire and Humber region.

YHCC suggests that the following factors could be considered alongside the proposed criteria:

1. System-level influence

Consideration could be given to the extent to which an organisation influences wider systems, such as infrastructure networks, supply chains, or land use patterns. Organisations with a high degree of system influence play an important role in shaping resilience beyond their immediate functions.

2. Inter-dependencies and cascading risks

Organisations whose operations are relied upon across multiple sectors could be prioritised, particularly where disruptions may have cascading impacts. Including such organisations would support a more comprehensive understanding of cross-sector risks.

3. Geographic and catchment-scale significance

Consideration could be given to organisations operating across large or strategically important geographies, such as major river catchments or regional infrastructure systems. In the Yorkshire and Humber context, this includes organisations operating across the Ouse, Don and Calder catchments, where coordinated approaches to flood risk management are required.

4. Enabling and coordination roles

Organisations that enable or coordinate adaptation activities across sectors and places—such as infrastructure providers or strategic authorities—could also be considered. These bodies can play a key role in supporting alignment and delivery of adaptation actions.

Conclusion

YHCC supports the proposed criteria as a proportionate starting point. However, incorporating additional factors relating to system influence, inter-dependencies, and geographic scale could further improve targeting and help ensure that reporting captures organisations with a significant role in supporting resilience outcomes.

Question 7: Do you agree or disagree that additional incentives for voluntary reporting are needed?

YHCC agrees that additional incentives for voluntary reporting could be beneficial in maintaining and strengthening participation in ARP5. While voluntary reporting has supported broad engagement in previous rounds, providing clearer incentives may help sustain participation and ensure reporting is prioritised alongside other organisational responsibilities. This reflects feedback obtained through the YHCC's regional network and engagement with organisations involved in adaptation activities.

YHCC welcomes the proposed recognition-based incentives, including the introduction of a potential ARP 'charter mark' and the publication of lists of participating organisations. These measures may help raise the profile of reporting and provide reputational value.

However, YHCC considers that incentives linked to practical benefits and outcomes could further strengthen engagement. In particular, feedback from organisations in the Yorkshire and Humber region indicates that the perceived value of reporting can vary, particularly where there is limited direct benefit to organisational decision-making.

YHCC suggests that the following additional incentives could be considered:

1. Access to shared data and analysis

Providing participating organisations with access to enhanced datasets, modelling, or analysis could support local decision-making and reduce duplication of effort.

2. Support for coordination and knowledge sharing

Linking voluntary reporting to participation in regional or sectoral coordination forums could encourage collaboration and support more aligned approaches to adaptation.

3. Alignment with funding and investment processes

Exploring opportunities to align reporting with relevant funding streams, where appropriate, could help demonstrate the practical value of participation and support the delivery of adaptation actions.

Conclusion

Overall, YHCC considers that voluntary reporting is most effective where it is supported by a clear value proposition. Strengthening incentives—particularly those that provide practical benefits alongside recognition—could help improve participation and ensure that ARP continues to support effective climate risk management.

Question 8: Do you agree or disagree that reporting should be expanded to include strategic authorities?

YHCC agrees that reporting should be expanded to include strategic authorities and supports this as a proportionate next step following the ARP4 local authority pilot. This position is based on YHCC's experience working with combined and local authorities in the Yorkshire and Humber region.

Strategic authorities are well-placed to support place-based and cross-sector coordination, reflecting their responsibilities for areas such as transport, economic development, and spatial planning. These functions position them to integrate climate risks into regional decision-making and to align adaptation activities across constituent local authorities and other stakeholders. In the Yorkshire and Humber region, organisations such as WYCA, SYMCA, York and North Yorkshire Combined Authority, and Hull and East Yorkshire Combined Authority operate at a scale that is well-suited to coordinating adaptation across inter-connected systems.

The proposal is also consistent with findings from the local authority pilot, which demonstrated benefits including improved awareness and integration of climate risks, while also highlighting challenges relating to capacity and consistency of reporting. Expanding to strategic authorities provides an opportunity to build on this learning and strengthen regional coordination.

YHCC notes the following considerations for implementation:

1. Capacity and capability

There is variability in the maturity and capacity of strategic authorities, particularly as many are relatively new. Providing appropriate support, guidance, and capacity-building will be important to enable effective participation.

2. Clarity on expectations

Clear and proportionate guidance on reporting requirements will be important to ensure consistency and comparability across organisations, while recognising differing levels of capability.

3. Relationship with local authorities

Strategic authority reporting will rely on inputs from constituent local authorities and other partners. Clear arrangements for collaboration, including roles and responsibilities, would support effective delivery. Considerations may also be given to how resource requirements are managed across different levels of government.

4. Proportionality and value

It will be important to ensure that reporting requirements are proportionate and aligned with existing processes, so that they add value and do not duplicate existing work.

Conclusion

YHCC supports the inclusion of strategic authorities within the scope of ARP5, given their role in enabling coordinated, place-based adaptation. Ensuring that this expansion is supported by clear expectations, appropriate resources, and effective collaboration with local authorities will be important in delivering its intended benefits.

Question 9: Should reporting by strategic authorities be mandatory or voluntary?

Phased approach (initially voluntary, with potential for targeted direction)

This view is informed by experience supporting organisations with varying levels of capacity and maturity, as well as learning from ARP4 engagement.

YHCC considers that a phased approach to reporting by strategic authorities would be most effective. There is a strong case for including strategic authorities within ARP5, given their role in coordinating activity across sectors and places. However, evidence from the ARP4 local authority pilot indicates that participation can be variable, with capacity constraints cited as a key barrier. Whilst the pilot also demonstrated benefits, including improved awareness and integration of climate risks, challenges remain in terms of capability and consistency of reporting.

YHCC considers that, in this context, an initial supported voluntary approach is appropriate. This would allow strategic authorities to build capability and embed adaptation within their functions, supported by clear guidance, tools, and engagement from government.

At the same time, YHCC recognises that voluntary participation alone may not ensure consistent coverage. A targeted use of direction powers, where necessary, could be considered to address gaps in participation, particularly for strategically significant organisations.

YHCC notes the importance of ensuring that any approach remains proportionate and reflects variation in organisational maturity. Strategic authorities are at different stages of development, and reporting requirements should be supported by appropriate resources and capacity-building.

Conclusion

YHCC supports a phased approach, combining supported voluntary reporting with the option for targeted mandatory reporting where appropriate. This approach would allow capacity to develop while providing flexibility to ensure consistent coverage across strategically important organisations.

Question 10: What support is needed for successful reporting by strategic authorities?

YHCC considers that successful reporting by strategic authorities will depend on a combination of clear guidance, adequate resourcing, shared evidence, and effective coordination mechanisms. These elements will be important to ensure that reporting is proportionate, consistent, and delivers meaningful outcomes. These priorities reflect insights from YHCC's engagement with combined and local authorities and experience supporting adaptation capacity-building across the Yorkshire and Humber region.

YHCC identifies the following areas of support as priorities:

1. Clarity on scope and expectations

Clear guidance will be needed on the scope of reporting, including the balance between:

- organisational risks and functions, and
- the wider climate risks affecting the regions strategic authorities serve.

Further clarity on expectations would support consistency and help ensure that reporting remains proportionate and aligned with strategic authority roles.

2. Resourcing and capacity

Evidence from the ARP4 pilot indicates that capacity constraints were a key factor affecting participation. Strategic authorities and their constituent local authorities are likely to require:

- dedicated funding or staff resource to support reporting,
- clarity on how "new burdens" funding will be applied, where directions are issued,

- recognition that local authorities hold much of the relevant data and may require support to contribute effectively.

Without appropriate resourcing, there is a risk that reporting may place pressure on existing capacity and limit the quality or completeness of outputs.

3. Practical and proportionate guidance

Strategic authorities would benefit from clear and accessible guidance that:

- sets out minimum expectations and reporting standards,
- aligns with existing planning and reporting processes (e.g. spatial strategies),
- includes templates or frameworks to support consistency.

This will be particularly important given variation in organisational maturity of strategic authorities.

4. Access to shared evidence and data

Providing access to regional-scale datasets, projections, and analysis would support more robust and consistent reporting.

In the Yorkshire and Humber context, this may include:

- catchment-scale flood risk data (e.g. Ouse, Don, Calder systems)
- cross-boundary risk assessments.

Shared evidence would reduce duplication of efforts and support more informed decision-making.

5. Support for coordination and collaboration

Strategic authorities will need to work closely with local authorities and other stakeholders.

Support could include:

- facilitating regional coordination platforms,
- encouraging engagement with infrastructure providers and key sectors,
- enabling collaboration across administrative boundaries.

This would help ensure that reporting reflects inter-dependencies and supports a more joined-up approach.

6. Proportionality and recognition of differing maturity

Strategic authorities vary in their level of development and capacity. It will be important that:

- reporting requirements are proportionate,
- timelines allow authorities sufficient time to prepare and collaborate (within the proposed 2026–2029 reporting window),
- outputs are assessed with consideration of organisational context.

Conclusion

YHCC considers that, with appropriate support, strategic authorities are well-placed to strengthen place-based climate risk management. Ensuring clarity, adequate resourcing, and effective coordination mechanisms will be critical to enabling consistent and high-quality reporting across regions.

Question 11: Do you have any comments or suggestions regarding the proposed additional scope changes? (optional)

YHCC supports the proposed expansion of scope for ARP5, recognising the importance of improving coverage across key sectors and reflecting evolving institutional arrangements. This position is informed by YHCC's cross-sector engagement and regional coordination experience.

The proposed changes—including enhanced reporting in the energy system, integration of new regulatory bodies, and greater attention to land management and infrastructure—provide an opportunity to strengthen the evidence base on climate risk and adaptation.

YHCC notes that, as scope is expanded, careful attention will be needed to ensure that reporting supports coherent and integrated understanding of risks, rather than increasing complexity or duplication.

YHCC offers the following observations:

1. Integration across sectors

YHCC considers that expanded sectoral coverage should be accompanied by a stronger focus on how risks and responses interact across systems. For example, proposed changes in energy, transport, and land management sectors present opportunities to better capture inter-dependencies. Encouraging cross-sector links within reporting would help ensure a more comprehensive understanding of climate risks.

2. Place-based and catchment approaches

YHCC recommends that scope changes support place-based and regional alignment, particularly where risks operate across administrative boundaries. In the Yorkshire and Humber region, this includes catchment-scale systems such as the Humber Estuary and the Ouse, Don, and Calder River systems, where land management, flood risk, and nature recovery are closely interrelated.

3. Alignment with existing frameworks

YHCC emphasises the importance of aligning new reporting requirements with existing regulatory and sectoral processes. This is particularly relevant where organisations are already subject to climate or resilience reporting (e.g. in transport, water, and energy sectors). Alignment will help minimise duplication and ensure proportionality.

4. Managing complexity and proportionality

As scope expands to include additional organisations and sectors, it will be important to ensure that reporting requirements remain proportionate. Clear guidance on expectations, including the balance between individual and collective reporting, will help to maintain consistency while avoiding unnecessary burden.

Conclusion

YHCC supports the proposed scope changes as a positive step in strengthening ARP5. Ensuring that expansion is accompanied by a focus on integration, place-based alignment, and proportionality will be important to maximise the value of reporting and support more effective climate risk management.

Question 12: Do you agree or disagree with new sector-neutral guidance on additional aspects of climate risk management?

YHCC agrees with the introduction of sector-neutral guidance on additional aspects of climate risk management. A consistent, cross-cutting framework can support improvements in reporting quality, comparability, and organisational capability across sectors. This reflects YHCC's experience working with organisations at different stages of adaptation maturity and observing variation in approaches across sectors.

Sector-neutral guidance is particularly valuable in that it:

- supports a consistent approach to climate risk assessment and adaptation planning

- improves comparability across reporting organisations,
- contributes to a more coherent evidence base for national assessments, including the Climate Change Risk Assessment (CCRA).

At a regional level, this can help align approaches across organisations operating within the same geography, where current methodologies and levels of maturity may vary.

YHCC notes that the proposed additional guidance is intended to complement existing ARP4 guidance and supports this approach.

To maximise its effectiveness, YHCC suggests the following areas for further emphasis:

1. Inter-dependencies and system-wide risk

Additional guidance could place greater emphasis on identifying and assessing inter-dependencies and cascading risks across sectors. This would support organisations in understanding how climate impacts may propagate across systems and improve the ability to manage shared risks.

2. Practical application and proportionality

Guidance should remain practical and proportionate, with clear examples of how additional tools (e.g. adaptation pathways, monitoring and evaluation) can be applied in different organisational contexts. This will be particularly important given variation in organisational capacity and maturity.

3. Use of scenarios and decision-making

Further clarity could be provided on how organisations should apply climate scenarios in decision-making. In particular, guidance could support organisations in interpreting higher-impact scenarios in a way that is relevant and proportionate to their functions and responsibilities.

Conclusion

Overall, YHCC supports the introduction of sector-neutral guidance as a useful step in strengthening organisational maturity and consistency in climate risk management. Ensuring that this guidance remains practical, proportionate, and focused on system-level understanding will enhance its value in supporting effective adaptation.

Question 13: Do you agree or disagree that sector-specific guidance would be useful for ARP5?

YHCC agrees that sector-specific guidance would be useful for ARP5. Tailored guidance can help reflect the differing risk profiles, responsibilities, and operational contexts across sectors, and support organisations in producing more relevant and proportionate reports. This view is informed by feedback from organisations within the YHCC network and practical experience supporting climate adaptation implementation across sectors.

Sector-specific guidance would complement the overarching and sector-neutral guidance by helping to translate high-level expectations into practical application. This is particularly important in sectors with distinct risk characteristics and operational contexts, such as land management, infrastructure, and urban systems.

YHCC notes that sector-specific guidance could support:

- Improved consistency and quality of reporting, through clearer expectations and sector-relevant examples,

- Greater clarity on reporting requirements, including appropriate levels of detail and proportionate approaches,
- More effective monitoring of progress, by supporting organisations to report on how risks are being managed over time, not only identified.

To maximise its effectiveness, YHCC suggests the following considerations:

1. Alignment with overarching guidance

Sector-specific guidance should be clearly aligned with the existing ARP framework and templates, ensuring consistency across sectors while allowing for appropriate flexibility.

2. Proportionality and practicality

Guidance should remain proportionate to organisational capacity, with clear templates or minimum expectations to support organisations at different levels of maturity.

3. Cross-sector linkages and inter-dependencies

While sector-specific detail is beneficial, guidance should also support organisations in identifying and reporting on inter-dependencies and cross-sector risks, particularly where impacts span multiple systems.

4. Data and integration

Consideration could be given to how outputs from different sectors can be interpreted collectively, supporting a broader understanding of system-wide risks and opportunities for collaboration.

Conclusion

YHCC supports the development of sector-specific guidance as a useful complement to existing ARP guidance. Ensuring that it is aligned, proportionate, and supports cross-sector understanding will help improve both the quality of reporting and its contribution to climate risk management.

Question 14: Would your organisations agree or disagree to participating in the co-development of sector-specific guidance with government?

YHCC agrees to participate in the co-development of sector-specific guidance with government, where appropriate. Collaborative development provides an opportunity to ensure that guidance is practical, proportionate, and informed by delivery experience. YHCC's contribution is grounded in its on-going engagement with regional stakeholders and its experience in convening cross-sector partnerships that support actions cutting across its four pillars, i.e. climate adaptation and resilience, rapid emission reductions, nature restoration and a just transition.

YHCC considers that it can add value to this process in several ways:

1. Regional and cross-sector insights

YHCC works across a range of sectors and stakeholders and can provide evidence on how climate risks are experienced across different geographies and systems.

2. Understanding of inter-dependencies

YHCC is well-placed to highlight inter-dependencies and cross-sector risks, supporting guidance that reflects system-wide interactions rather than isolated sectoral perspectives.

3. Convening role

YHCC can support engagement by bringing together partners including combined authorities, local authorities, and infrastructure providers to contribute to the development of guidance. YHCC notes that participation in co-development should be proportionate and clearly scoped, with sufficient clarity on expectations and time commitments.

Conclusion

YHCC supports the principle of co-development and would be willing to contribute where appropriate. This approach is likely to improve the relevance, consistency, and usability of sector-specific guidance.

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

YHCC agrees that ARP reporting represents a valuable addition to corporate climate disclosures and existing sector-specific regulatory obligations. This reflects YHCC's experience working with organisations navigating multiple reporting frameworks.

ARP provides a broader perspective on climate risk management and adaptation, complementing corporate disclosures such as TCFD, which tend to focus on financially material risks and are primarily designed for investors. In this context, ARP supports a more comprehensive understanding of organisational preparedness and progress on adaptation. At a regional level, ARP also provides value in supporting improved understanding of cross-sector risks and inter-dependencies, which may not be fully captured through individual corporate or regulatory reporting processes.

YHCC notes the importance of ensuring that ARP continues to operate as a complementary framework, aligned with existing requirements. To support this, the following considerations are highlighted:

1. Clear articulation of purpose

ARP should clearly set out how it complements other reporting regimes, including corporate disclosures and sector-specific obligations. This will help ensure that organisations understand their distinct roles in focusing on adaptation and resilience.

2. Alignment with existing frameworks

Efforts to improve alignment and enable signposting to existing reports are welcomed. This approach will help reduce duplication and ensure that reporting remains proportionate, particularly for organisations subject to multiple reporting requirements.

3. Usability and accessibility of outputs

To maximise value, ARP outputs should support:

- organisational and policy decision-making,
- improved understanding of cross-sector risks,
- alignment between local, regional, and national adaptation planning.

Ensuring outputs are accessible and actionable will be important in realising these benefits.

4. Connection to action and investment

Strengthening the link between reporting, planning, and investment decisions could further enhance the value of ARP. This would support organisations in using reporting outputs to inform adaptation actions and long-term resilience planning.

Conclusion

YHCC supports ARP reporting as a valuable complement to existing disclosure and regulatory frameworks. Continued focus on alignment, clarity of purpose, and the practical use of outputs will be important to ensure that ARP delivers additional value without creating unnecessary duplication.

Question 16: Do you agree or disagree that ARP reporting is a valuable addition to existing sector-specific regulatory obligations?

YHCC agrees that ARP reporting represents a valuable addition to existing sector-specific regulatory obligations. This view is based on experience working alongside regulated sectors and understanding how reporting frameworks interact in practice.

ARP provides a broader and more comprehensive perspective on climate risk management and adaptation, complementing sector-specific regulatory requirements that are often focused on particular risks or compliance processes. In this context, ARP supports a more consistent and forward-looking understanding of organisational resilience.

ARP can add value by:

- supporting assessment of a wider range of climate risks, beyond those captured in sector-specific frameworks,
- providing more comprehensive information on adaptation planning and progress,
- helping to identify cross-sector inter-dependencies, particularly where risks span multiple systems (e.g. water, energy, and transport).

In sectors such as water and energy, where organisations already undertake climate-related reporting as part of regulatory processes, ARP offers an opportunity to complement and amplify existing requirements, rather than duplicate them.

To maximise this value, YHCC highlights the following considerations:

1. Clear differentiation and alignment

ARP should clearly articulate how it complements existing regulatory obligations, including where organisations can draw on existing reports or datasets. Continued efforts to align reporting requirements and enable signposting are supported and will help minimise duplication.

2. Usability of outputs

ARP outputs should support:

- organisational decision-making,
- cross-sector collaboration,
- local, regional, and national planning.

Ensuring outputs are accessible and actionable will enhance their practical value.

3. Connection to planning and investment

Strengthening the link between reporting, planning, and investment decisions could further enhance the role of ARP in supporting adaptation delivery and long-term resilience.

Conclusion

YHCC supports ARP reporting as a valuable complement to sector-specific regulatory obligations. Ensuring that ARP continues to add value—through improved alignment, clear purpose, and a focus on practical application—will be important in maintaining engagement and supporting effective climate risk management.

Question 17: (optional) In what further ways can Defra reduce duplication between ARP and other climate risk reporting your organisation is subject to?

Response: Reducing duplication

YHCC considers that Defra can take several practical steps to further reduce duplication between ARP and other climate risk reporting requirements, while ensuring that ARP continues to add value. This reflects feedback from organisations engaged through the YHCC network who are subject to multiple reporting processes.

YHCC welcomes the proposed approach to improve alignment and enable organisations to reference existing reports. Building on this, the following measures could be considered:

1. Alignment with existing frameworks

Further alignment between ARP and existing reporting frameworks—such as corporate disclosures and sector-specific regulatory requirements—could reduce the need for organisations to adapt or reformat similar information across multiple processes. This may include greater consistency in terminology, metrics, and reporting expectations where appropriate.

2. Enabling cross-referencing and signposting

YHCC supports the proposal to allow organisations to signpost to relevant sections of existing reports. Expanding this approach, where appropriate, would help ensure that existing assessments, plans, and datasets can be reused rather than duplicated, including at local and regional levels.

3. Focus on areas of additional value

To minimise overlap, ARP should continue to focus on areas that are less consistently addressed in other reporting frameworks, particularly:

- adaptation planning and delivery,
- progress over time,
- inter-dependencies and cross-sector risks.

This would help ensure that ARP complements existing requirements rather than duplicating them.

4. Alignment of reporting cycles

Where possible, aligning ARP timelines with existing regulatory or organisational reporting cycles could help reduce administrative burden and support integration into established processes.

5. Integration of outputs into wider processes

Ensuring that ARP outputs are used within regulatory, planning, and investment processes would further reinforce its value and reduce the perception of reporting as a standalone exercise.

Conclusion

YHCC considers that duplication can be further reduced through improved alignment, effective use of signposting, and a continued focus on ARP's distinct contribution. This approach would support more efficient reporting while maintaining the value of ARP in strengthening climate risk management and adaptation.

Question 18: 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?

Response: Agree (with conditions)

YHCC agrees in principle that shorter reporting deadlines for economically regulated companies could be beneficial, where this supports regulators in preparing sector-level reports. This position draws on engagement with regulated organisations and understanding of reporting timelines and regulatory cycles.

Providing regulators with timely access to company-level submissions may improve their ability to:

- synthesise findings across their sector,
- identify common risks and challenges,
- reflect progress on adaptation within regulatory overviews.

This could enhance the overall value of ARP in supporting both sectoral analysis and national assessments of climate risk.

YHCC also notes that the extended ARP5 reporting window may already provide opportunities for informal alignment, for example through the sharing of draft reports between companies and regulators ahead of final submission. This approach could address timing challenges without introducing additional requirements.

To ensure that any adjustment to reporting timelines is effective and proportionate, YHCC highlights the following considerations:

1. Proportionality and flexibility

Shorter deadlines should be applied selectively, where there is a clear benefit for regulatory processes. A single approach may not be appropriate across all sectors.

2. Reporting quality

Compressed timelines should not compromise the quality of reporting. Organisations will require sufficient time for:

- data collection and analysis,
- internal coordination,
- alignment with other reporting requirements.

3. Alignment with regulatory cycles

Where shorter deadlines are introduced, they should be aligned with relevant regulatory processes (e.g. price reviews or sector planning cycles) to maximise their usefulness.

Conclusion

YHCC supports the use of shorter deadlines for economically regulated companies where this adds value for regulators. However, this should be implemented in a proportionate and flexible way, with consideration given to alternative approaches such as informal information sharing within the existing reporting window.

Question 19: How much less time than the standard 3-year window should economically regulated companies be given to report?

YHCC suggests that economically regulated companies could be given a reporting deadline approximately 6–12 months earlier than the standard 3-year ARP5 window, where this supports

regulator reporting. This reflects YHCC's practical experience of organisational reporting processes.

This indicative timeframe may provide a practical balance between:

- allowing regulators sufficient time to review and synthesise company reports into sector-level assessments,
- maintaining adequate time for organisations to undertake robust analysis, data collection, and internal coordination.

YHCC recognises that the appropriate reduction in reporting time may vary by sector, depending on the timing of relevant regulatory cycles and reporting processes. A flexible approach may therefore be more appropriate than applying a single uniform deadline.

Aligning reporting timelines in this way could help ensure that ARP outputs are available to inform both regulatory overviews and decision-making processes, including investment planning and price review cycles.

Conclusion

YHCC considers that a 6–12 months earlier reporting deadline, applied flexibly, may support better alignment with regulator reporting while maintaining the quality and value of submissions.

Question 20: Do you agree or disagree that large energy and telecommunications companies should report individually?

YHCC agrees that large energy and telecommunications companies should report individually under ARP5, in line with the proposed approach to ensure appropriate coverage of organisations with significant infrastructure and system importance. This reflects YHCC's experience working with infrastructure providers and understanding the importance of detailed, organisation-specific risk information.

The limitations of collective reporting—particularly the potential for reduced detail on specific assets, operations, and risks—mean that individual reporting is more appropriate for organisations whose infrastructure and services are critical to national and regional resilience.

Individual reporting can support:

- Improved transparency, providing clearer insight into how risks are identified and managed,
- Greater granularity, enabling consideration of asset-level and geographically specific risks,
- Enhanced understanding of inter-dependencies, particularly across energy, telecommunications, and other critical systems.

In regions such as Yorkshire and Humber, large infrastructure providers operate across diverse geographies, including urban areas, river catchments, and coastal zones. Climate risks vary across these contexts, and individual reporting can help ensure that this variation is adequately captured.

YHCC also notes the importance of proportionality in reporting approaches. While individual reporting is appropriate for organisations of sufficient scale and criticality, collective reporting may remain suitable for sectors composed of smaller or less system-critical organisations.

Conclusion

YHCC supports the proposed approach to require individual reporting for large energy and telecommunications companies. This is a proportionate measure to improve the detail and quality of information available on climate risks and adaptation, while retaining flexibility for other sectors where collective reporting remains appropriate.

Question 21: Do you agree or disagree that collective reports covering new sectors and those which have many small actors should be invited?

YHCC agrees that collective reports covering new sectors and those with many small actors should be invited under ARP5, as a proportionate approach to improving coverage and engagement. This view is informed by engagement with sectors characterised by fragmented structures and varying capacity.

Collective reporting, including through trade associations or sector groupings on a voluntary basis, can be particularly appropriate where sectors are highly fragmented and individual organisations may have limited capacity to report.

YHCC considers that collective reporting can provide several benefits:

- Reduced reporting burden, particularly for smaller organisations with limited resources,
- Enhanced sector-level insights, capturing aggregate risks, trends, and common challenges,
- Improved understanding of inter-dependencies, particularly where risks and responses span multiple actors within a sector.

In regions such as Yorkshire and Humber, sectors such as agriculture and small-scale manufacturing consist of many individual actors with shared exposure to climate risks. A collective approach can support a more coherent understanding of vulnerabilities and adaptation needs, while avoiding duplication of effort.

YHCC notes that collective reporting should be complementary to individual reporting, particularly where organisations are of sufficient size or criticality to warrant more detailed, organisation-specific submissions.

Conclusion

YHCC supports inviting collective reports for sectors characterised by large numbers of smaller actors. This is a proportionate approach that can strengthen the evidence base while minimising burden, provided it is implemented alongside individual reporting where appropriate and continues to capture inter-dependencies and sector-wide risks.

Question 22: Would a report by water and energy trade associations focusing on inter-dependencies between the two sectors be useful or not useful?

YHCC considers that a joint report by water and energy trade associations focusing on inter-dependencies would be useful, as part of a voluntary and collaborative approach to ARP5. This reflects YHCC's regional experience of inter-dependencies between critical infrastructure systems.

The proposed approach aligns with the aim of strengthening understanding of cross-sector risks and inter-dependencies, which are not always fully captured through individual sector reporting. Water and energy systems are closely inter-connected, with each sector dependent on the other for core operations.

A joint report could therefore provide:

- Improved understanding of shared vulnerabilities and cascading risks, particularly where disruption in one sector may affect the other,
- Enhanced sector-level insights, supporting more coordinated approaches to adaptation,
- Additional evidence on system-level risks, complementing individual organisational reporting.

This is relevant in regions such as Yorkshire and Humber, where water and energy infrastructure are co-located and exposed to shared risks, including flooding and water scarcity.

YHCC notes that such reporting should remain voluntary and proportionate, and should complement, rather than duplicate, existing reporting by individual organisations.

Conclusion

YHCC supports the proposed exploration of a joint water and energy sector report. This approach has the potential to strengthen understanding of inter-dependencies and support more coordinated, system-level climate risk management, while remaining consistent with the voluntary and proportionate approach to collective reporting.

Question 23: What feedback would you welcome on ARP5 reports?

YHCC welcomes the proposed approach to strengthening feedback on ARP5 reports, including the use of checklists, self-assessment tools, and analytical support, and considers this an important step in increasing the value of reporting for organisations. This reflects insights from organisations within the YHCC network regarding the importance of actionable and practical feedback.

To further enhance this approach, YHCC suggests that feedback could focus on supporting practical application, learning, and alignment, in addition to assessing report quality.

YHCC highlights the following priorities:

1. Clarity and usability of insights

Feedback could provide clear identification of:

- key climate risks,
- priority actions.

Concise summaries would support organisations in using ARP outputs to inform planning, policy, and investment decisions.

2. Comparative insights and learning

Providing benchmarking or comparative analysis—where appropriate—could help organisations to:

- understand their position relative to peers,
- identify good practice, common challenges, and gaps.

This would support continuous improvement across sectors.

3. Inter-dependencies and system-level understanding

Feedback could support organisations in strengthening their assessment of:

- inter-dependencies,
- cascading and cross-sector risks.

This would help move towards a more integrated understanding of climate resilience.

4. Place-based and regional relevance

Where feasible, feedback could include insights that reflect:

- regional or geographic variation in climate risks,
- opportunities for alignment across organisations operating in the same area.

This would support more coordinated, place-based adaptation.

Conclusion

YHCC considers that feedback on ARP5 reports could play an important role in supporting organisational learning and capability-building. Ensuring that feedback is clear, practical, and focused on actionable insights, alongside the proposed checklist and self-assessment approach, would help maximise the value of the reporting process.

Question 24: Do you have any further comments on the overall proposed strategy for reporting in ARP5?

YHCC supports the overall direction of the proposed strategy for ARP5, recognising its role in strengthening climate risk management, improving the evidence base, and supporting organisational capability. This position is grounded in YHCC's ongoing engagement with its regional network and its experience supporting coordination, alignment, and adaptation capacity-building across sectors and places.

YHCC considers that the following areas could further enhance its effectiveness:

1. Supporting alignment across sectors and organisations

A key challenge in climate adaptation relates to coordination across systems, sectors, and geographies. ARP5 could further support a shared understanding of risks and encourage greater alignment between organisations, while recognising that delivery sits across multiple frameworks and actors.

2. Strengthening the place-based dimension

YHCC considers that ARP5 could place greater emphasis on regional and place-based perspectives, supporting coordination between local authorities, strategic authorities, infrastructure providers, and land managers.

Experience from ARP4 suggests that while individual organisations can assess risks effectively, there are more limited mechanisms to align these assessments at a regional scale.

3. Addressing inter-dependencies and system-level risks

Climate risks often span multiple sectors and systems. ARP5 could further support organisations to identify and report on inter-dependencies and cascading risks, enabling a more integrated understanding of resilience.

This is particularly relevant in regions such as Yorkshire and Humber, where risks such as flooding, coastal change, and land management operate across catchments and administrative boundaries.

4. Strengthening the link between reporting and action

YHCC considers that the value of ARP5 will be enhanced where reporting clearly supports:

- planning and policy development,
- investment decisions,
- cross-sector collaboration.

Strengthening this link would help ensure that reporting contributes to practical adaptation outcomes.

5. Recognising the role of convening organisations

Regional and cross-sector bodies can play an important role in supporting coordination and knowledge sharing. Organisations such as YHCC can help connect stakeholders, support shared understanding, and facilitate alignment across geographies.

Conclusion

YHCC supports the overall ARP5 strategy. Enhancing its focus on alignment, place-based coordination, and system-level understanding—while maintaining its role as a proportionate reporting and evidence framework—would further strengthen its contribution to climate resilience.