

Submitted to Consultation on the Fifth Round of the Climate Adaptation Reporting Power
Submitted on 2026-05-18 11:30:11

Foreword

Introduction

1 Would you like your response to this consultation to be confidential in the event of an access to information request (see confidentiality and data protection above)?

Yes:

No

No:

Yes

If you answered 'Yes' please give your reason (s):

Please provide your full name

What is your name?:

Kate Guest

Please provide your email address

What is your email address?:

kate.guest@historicengland.org.uk

Please provide the name of your organisation

What is your organisation?:

Historic England

Which of the following is most applicable to your organisation's function?

Other

If you answered 'Trade Body' please tell us how many members and/or organisations you represent:

If you answered 'Other' please give additional information:

Non departmental public body

Consultation

Consultation

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

Agree:

Yes

Disagree:

No

Unsure:

No

Please explain your reasons (optional):

We support the proposed objectives and principles, particularly concerning the organisational maturity in risk assessment for those bodies which have already reported, provided they are supported by appropriate guidance as set out in the consultation document and that this does not disproportionately affect organisations at an earlier stage of risk assessment.

We also support minimisation and streamlining of processes around other regulatory climate adaptation reporting.

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4 Do you agree or disagree 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:
Yes

Disagree:
No

Unsure:
No

Please give reasons (optional):

Historic England supports the proposal to direct selected organisations to report to fill gaps in evidence, and where organisations which have been invited to report but did not do so in Round 4.

Given the finding within Defra's ARP4 evaluation that mandated reporting acts as a useful first step in securing ongoing reporting for future rounds and is only one of several drivers in encouraging organisations to report, we would support this targeted approach rather than a blanket directive on mandatory reporting.

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

Agree:
Yes

Disagree:
No

Unsure:
No

Please give reasons (optional):

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

Yes:
No

No:
No

Don't know:
Yes

If yes, please give details (optional):

Consultation

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

Agree:
Yes

Disagree:
No

Unsure:
No

Please give reasons and/or suggestions for incentives (optional) :

We agree with the proposed incentives to voluntary reporting, such as the proposed Charter Mark. As well as providing recognition for the work which goes into producing the reports, these incentives may also help those developing them in making the case for their value to senior colleagues and other organisations considering whether to report.

However, the proposal of publishing the names of organisations which were asked to report but did not do so may prove to be a disincentive, particularly where issues relate to organisational capacity. This could be amended to include incentives including the proposed sector guidance, opportunities for peer-to-peer learning across sector groups or publication of best practice examples to encourage recognition for those organisations which do report.

Consultation

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

Agree:
No

Disagree:
No

Unsure:
No

Please give reasons (optional):

9 Should reporting by strategic authorities be mandatory or voluntary?

Mandatory:
No

Voluntary:
No

Don't know:
No

Please give reasons (optional):

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

Free Text:

Consultation

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

Free Text:

No response

Consultation

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

Agree:
Yes

Disagree:
No

Unsure:
No

Please give your reasons and/or suggestions (optional): :

For the fourth round of ARP reporting, Historic England found the guidance and templates provided to be very helpful in producing our report, allowing us to understand the type of content and reporting information that is required. We believe that providing this for the fifth round of reporting is needed to ensure standardisation and read across over different sectors.

The fourth-round guidance encouraged us to be ambitious while being flexible enough to enable us to develop the level of detail and specific information in a way proportionate to the resources and information available for our organisation and sector.

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

Agree:
Yes

Disagree:
No

Unsure:
No

Please give reasons (optional):

The joint report from Historic England and English Heritage Trust is currently the only report under the cultural heritage sector. We would broadly support the development of sector specific guidance in advance of ARP5 to ensure clear understanding of Defra's requirements. However, we would support the suggestion that such guidance is developed in conjunction with Historic England and English Heritage Trust, as well as other bodies Defra may wish to invite to report under ARP5, to ensure that it is proportionate for the sector, recognises that Historic England does not have the ability to mandate reporting on adaptation from asset owners and supports the development of appropriate metrics, which we are currently at an early stage in developing for sector-wide adaptation.

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

Agree:

Yes

Disagree:

No

Unsure:

No

Please give reasons (optional) :

We would be pleased to support Defra colleagues in the development of sector-specific guidance for cultural heritage.
Our reasons are the same as for the response to Q13 above.

Consultation

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

Agree:

Yes

Disagree:

No

Unsure:

No

Please give reasons (optional):

In addition to our corporate climate disclosures, ARP provided a set timeframe for an updated sector-facing and organisational adaptation plan. As this round of ARP was more aligned with the timeframe for CCRA4, we were able to gather evidence that would support both activities at the same time, which has been very beneficial and more efficient.

Historic England is responsible to the Government for the care and operation of the National Heritage Collection – over 400 historic buildings, sites and monuments under the nation's ownership or protection – which is managed on our behalf by English Heritage Trust.

As a result, Historic England reports jointly with the English Heritage Trust. Although the organisations already have a strong working relationship pertaining to climate change action, the ARP reporting process prompted us to form a working group including colleagues from both organisations. This group proved very beneficial to joint working and will continue to meet regularly to discuss progress on actions set out in the ARP4 report and plan for the next reporting round.

Historic England also chairs the Heritage Adaptation Working Group, formed of the UK and Irish heritage agencies, English Heritage Trust and National Trusts. Although the other agencies do not need to report through ARP, it provided a good opportunity to discuss the information each organisation was gathering for their own adaptation plans and the processes they were following.

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

Agree:

Yes

Disagree:

No

Unsure:

No

Please give reasons (optional) :

We agree that ARP reporting can be a valuable addition to existing sector-specific regulatory obligations provided the relationship between the different obligations is clear. ARP reporting for the fourth round helped us in starting the TCFD process internally and clarifying ARP5's alignment with other expected reporting, such as TCFD disclosures and ESG reporting may also provide an incentive for organisations to report in future rounds.

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

Free Text:

There is a lot of overlap between reporting for different government bodies. Some of this is necessary and some allows for signposting to other reports, however, duplication can be reduced by:

- Clear statements about which reports represent the single source of truth for different pieces of information.
 - Providing clear and direct guidance on what information can be signposted to or copied directly from within each report (in line with the above point).
 - Providing a clear description of why different reporting is required.
 - Aligning reporting periods and/or allowing the same report to be submitted for multiple requests.
- o This would need to have clear templates along with aligned reporting boundaries and metrics

Consultation

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?

Agree:

No

Disagree:

No

Unsure:

No

Please give reasons (optional):

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

Please give reasons and/or other comments (optional):

Consultation

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

Agree:

No

Disagree:

No

Unsure:

No

Please give reasons (optional) :

Consultation

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

Agree:

Yes

Disagree:

No

Unsure:

No

Please give reasons and/or comments (optional) :

We agree in principle that collective reports covering new sectors, including those which have many small actors, would be useful while noting the caveat that this will inevitably reduce the level of detail about risks to specific assets and services.

Per our response to Q3, we support expanding ARP5 to fill gaps in evidence and specific sectors, provided that this is targeted and that expectations for reporting are proportionate to the likely capacity of organisations not just to respond, but to work collaboratively to develop a collective response, which may require relatively large resource.

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

Useful:

No

Not useful:

No

Unsure:

No

Please give reasons (optional) :

No response

Consultation

23 What feedback would you welcome on ARP5 reports?

Free Text:

Feedback on whether the content and level of detail given in the ARP5 report meets Defra's expectations for these reports, particularly relating to adaptation the action plans (public facing and internal), would be useful. This would help us plan for the next round of ARP and the types of information we should gather as we develop our report.

Given that the joint Historic England and English Heritage Trust report is currently the only one within the cultural heritage sector for ARP, generic feedback at sector level would not be helpful in the same way as it might be for energy operators or other larger sectors with multiple organisations submitting reports.

While we see the benefits of using AI to support providing feedback on reports quickly and efficiently, how this would work in practice in relation to providing feedback on different sectors would require considerable thought to make the feedback meaningful and relevant.

Consultation

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

Free Text:

No response

Summary of Questions

Annex – Reports received in ARP4