

# Department for Transport's Consultation: Adapting the UK's transport system to the impacts of climate change

The Chartered Institution of Highways and Transportation (CIHT) welcome the release of the Department for Transport's strategy "Fit for a changing climate? Adapting the UK's transport system".

We see this strategy as the first step towards a more extensive commitment from the Department to incorporate adaptation and resilience to climate change into the objectives, operations and delivery of transport services,

Although CIHT support the overall intention of the strategy, we invite the Department to reflect on the three observations below as it would be a missed opportunity if stronger actions are not taken on these points:

- **Urgency to act now:** CIHT appreciate the strategy's plan to gradually integrate adaptation into transport but setting 2026 as the target for Transport Infrastructure operators to include adaptation in their objectives is too late. There is a risk of significant and expensive infrastructure losses if resilience measures are not recognised as key strategic objectives now.
- **Funding for maintenance:** CIHT believe that the economic case outlined in the strategy overlooks the importance of maintaining the current transport infrastructure. CIHT call for investment in maintenance of our existing highways and infrastructure to ensure the continued and efficient use of our transport network. Incrementally adapting infrastructure and proactively maintaining it are crucial for extreme weather resilience and meeting decarbonisation goals.
- **Mandatory resilience risk assessments:** CIHT encourage the Department to make it a statutory requirement for all transport asset owners to carry out transport resilience assessments. This will help to identify vulnerabilities in the network, prioritise remedial action and identify who should be responsible.

CIHT offer their support to the Department to the future developments of this strategy through our work on "[Resilience and adaptation to extreme weather events in the highways sector](#)" that will be published in the Autumn of 2024.

CIHT's project focuses on:

- Investing now in maintaining, renewing and adapting our roads to extreme weathers
- Best practice of the design of road infrastructure, the implementation of new materials, the construction processes and practice that allow the infrastructure to reduce future risks associated with extreme weather events;
- Actions and considerations to implement adaptation pathways.

While we are already in discussions with DfT officials on this topic, we extend our support to the broader efforts of the Department and can provide expert technical assistance.

# Adapting the UK's transport system to the impacts of climate change

## Introduction

Thank you for responding to our consultation on the transport adaptation strategy.

Closing date is 31 May 2024.

## Accessibility statement

Read our [accessibility statement for SmartSurvey forms \[opens in a new window\]](#).

## Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation on the policies and actions within the transport adaptation strategy.

View our [DfT online form and survey privacy notice \[opens in a new window\]](#) for more information on how your personal data is processed in relation to this survey.

In addition to the information outlined in the privacy notices, we are asking organisations:

- for the job title of the individual responding, to ascertain their position in the organisation
- for the name of the organisation and the best description of the activities of the organisation, for identification
- if the organisation:
  - assesses climate risks and how, and whether climate risk assessments are used to inform planning and decision-making
  - reports to government on adaptation as part of the Adaptation Reporting Power
  - measures the impact of extreme weather and how that information is used to enable us to understand the context of your response

## Personal details

**1. What is your name?**

Sara Zuin

**2. What is your email?**

Sara.zuin@ciht.org.uk

**3. Are you responding on behalf of an organisation? \***

- Yes
- No (Go to 'Transport adaption strategy')

## Organisation details

**4. What is your job title?**

Policy Advisor

**5. What is your organisation's name?**

Chartered Institution of Highways and Transportation (CIHT)

**6. What best describes your organisation?**

- Transport infrastructure operator
- Transport industry group
- Transport regulator
- Transport arms length body
- Non-transport arms length body
- Local transport authority

Non-government organisation (Go to 'Transport adaption strategy')

Academia (Go to 'Transport adaption strategy')

Consultancy (Go to 'Transport adaption strategy')

Another type of organisation: (Go to 'Transport adaption strategy')

## Organisational details - assessing climate risks

7. Does your organisation currently assess climate risks?

Yes

No (Go to 'Assessing climate risks: disagreement')

Don't know (Go to 'Organisation details: measuring progress')

## Assessing climate risks: agreement

8. Explain how climate risks are assessed in your organisation.

[After answering go to 'Organisational details – assessing climate risks']

## Assessing climate risks: disagreement

9. Explain why climate risks are not assessed within your organisation.

We are a membership organisation and not an asset owner, the below questions do not apply.

[After answering go to 'Organisational details – measuring progress']

## Organisational details - assessing climate risks

10. Do climate risk assessments currently inform your organisation's:

	Yes	No	Don't know
operational plans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
long-term planning	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
investment decisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you answered 'yes', explain how climate risk assessments inform planning and decision-making, if you answered 'no', explain why they do not inform planning and decision-making?

## Organisational details - reporting

The [Adaptation Reporting Power](#) [open in a new window] gives [Department for Environment, Food & Rural Affairs](#) (DEFRA) [opens in a new window] Secretary of State the power to require infrastructure providers and bodies with functions 'of a public nature' to submit a report every 5 years on how they are addressing the impacts of climate change on their business.

11. Does your organisation currently submit reports to government as part of the Defra-led process known as the Adaptation Reporting Power?

Yes

- No
- Don't know

## Organisational details - measuring progress

12. Does your organisation currently measure the impact of extreme weather on operations?

- Yes
- No (Go to 'Measuring progress: disagreement')
- Don't know (Go to 'Transport adaption strategy')

## Measuring progress: agreement

13. What does your organisation measure?

14. How is that information used?

[After answering go to 'Transport adaption strategy']

## Measuring progress: disagreement

15. What are the barriers to your organisation measuring the impact of extreme weather?

n/a

## Transport adaptation strategy

The government has a vision for a well-adapted transport network that is flexible, reliable, operates safely and is responsive to a changing climate.

The [transport adaptation strategy \[opens in a new window\]](#) aims to enhance adaptation planning across the sector, ensure these plans are delivered and lead to improved climate resilience in the transport system.

The policies and actions in the transport adaptation strategy have been grouped into 3 themes - culture, economics and regulation.

These themes overlap and support each other, with collaboration underpinning everything. Some policies are relevant to all transport modes, whilst others target mode-specific challenges.

We are seeking your views on:

1. Whether you support the policies included in the strategy.
2. How effective you consider the policies will be at enhancing the adaptation action taken by organisations responsible for transport infrastructure.
3. What more you think government could do to adapt transport infrastructure to the impacts of climate change.

[Full details of our consultation information is available \[opens in a new window\]](#).

## Culture: embedding climate risk

To effectively adapt to climate change, a culture shift is required in how climate risks are considered in the transport sector.

This section of the strategy looks to build on the positive progress made by many transport infrastructure operators by identifying further actions to embed climate risk in planning and operations across the sector.

Main policies include:

- by 2024, Transport Infrastructure Operators identify senior ownership of climate risks and, by 2026, include adaptation in their organisational objectives
- between 2024 and 2026, improve risk assessment across the sector through the DEFRA-led adaptation reporting process and inviting voluntary risk assessments
- regularly reviewing and assessing climate risks to the transport sector as part of Department for Transport's role in the '[Lead Government Department' model \[opens in a new window\]](#) of preparing for and responding to significant and complex emergencies.

Read 'Culture: embedding climate risk' to view all of the policies in this section.

**16. Overall, in your view, will the actions in 'Culture: embedding climate risk' make organisations responsible for transport infrastructure more or less likely to report on climate risks?**

- More likely
- No change
- Less likely
- Don't know (Go to 'Culture: embedding climate risk')

## Culture: embedding climate risk reasoning

**17. Explain your response.**

CIHT believes a cultural change is essential, however we are concerned that this section does not acknowledge the urgency and scale of change that is necessary to ensure we proactively include adaptation actions in the way we plan, build and deliver transport.

The timescale that government is proposing, does not take into account the scale of the risk we are facing. A 2026 timeframe to include adaptation as a strategic objective for Transport Infrastructure Operators is too late. Extreme weather events are happening with increased frequency and intensity - we must act now to mitigate the risk of possible losses.

Setting 2026 as the target for Transport Infrastructure Operators to include adaptation measures is too late. We should encourage all owners and operators to consider these measures now and to implement them gradually.

CIHT's current work on "Resilience and adaptation to extreme weather events in the [highways sector](#)" will propose a range of options for asset owners to consider. We would be keen to share the findings of our final report and meet officials at the Department to discuss the findings from the study and its implications for the sector.

Moreover, we encourage the Department to make it a statutory requirement for all transport asset owners to carry out transport resilience assessments. This will help to identify vulnerabilities in the network, prioritise remedial action and illustrate who is best placed to be responsible for implementing.



## Culture: embedding climate risk

**18. In your view, what more, if anything, could government do to further encourage reporting on climate risks?**

- Making it mandatory to include resilience as a strategic objective for all asset owners and transport operators in 2024. Achieving resilience involves taking small, but prioritised gradual steps. It is important to recognize the need for action now, even if on a small scale at first.
- Mandating all transport asset owners to conduct resilience assessments.
- Supporting the development of appropriate skills related to climate change and resilience in the industry, including a risk-based approach to measuring network resilience

## Economics: making the case for adaptation

Effective adaptation across the transport sector will require a systemic change in how we understand climate risks and take them into account in investment decisions. The 'Economics: making the case for adaptation' section of the strategy will equip the transport sector with the tools, guidance and evidence to take account of climate risks in decision-making and monitor progress.

Main policies include:

- by 2025, enhance climate risk assessment guidance, in line with [HMT's Green Book \[opens in a new window\]](#), and develop tools to identify best-practice adaptation measures
- research and development (R&D) programme including [£10 million research hub, launched in September 2023 in partnership with UK Research and Innovation \[opens in a new window\]](#)
- by 2025, embed consideration of climate risks in DfT [business case process \[opens in a new window\]](#) and decision-making, supported by associated guidance, including transport analysis guidance
- by 2025, incentivise adaptation measures through funding agreements, such as the [Road Investment Strategy \[opens in a new window\]](#) and [Network Rail Control Periods \[opens in a new window\]](#)
- by 2027, collate the data that transport stakeholders capture on weather and climate related disruption and costs
- by 2028, progress the development of indicators to measure adaptation outcomes

Read 'Economics: making the case for adaptation' to view all of the policies in this section.

We are asking about:

1. Providing the tools required.
2. Building the evidence base on climate change and adaptation in the transport sector.

3. Incentivising adaptation actions.
4. Measuring progress.

**19. Overall, in your view, will the commitments in 'Providing the tools required' support organisations responsible for transport infrastructure in taking adaptation action?**

- Yes**
- No (Go to 'Providing the tools required: disagreement')
- Don't know (Go to 'Building the evidence base')

## Providing the tools required: agreement

**20. Explain how the commitments will support adaptation action.**

CIHT encourages the Department to provide a coherent and consistent guidance to the sector on how to undertake risk assessments on resilience. There is a need to avoid different operators and asset owners developing their own internal assessments from different assumptions, leading to non-transferable or non-sharable data.

There is a significant opportunity for sharing information and lessons learnt, especially on resilience where there is uncertainty around the impacts of climate change.

We call on the Department to take a leadership position to ensure information is shared and methods, criteria and targets for data collection are consistent nationwide.

[After answering go to 'Building the evidence base']

## Providing the tools required: disagreement

**21. Explain why the commitments will not support adaptation action.**

## Building the evidence base

22. Overall, in your view, will the research commitments in 'Building the evidence base' support organisations responsible for transport infrastructure to make evidence-based investment decisions on climate change adaptation?

- Yes
- No (Go to 'Building the evidence base: disagreement')
- Don't know (Go to 'Incentivise action')

## Building the evidence base: agreement

23. Explain how the commitments in this section will support evidence-based investment decisions.

[After answering go to 'Incentivise action']

## Building the evidence base: disagreement

24. Explain why the commitments in this section will not support evidence-based investment decisions.

CIHT believes the argument around building the evidence-based investment decision should be based on the fact that the UK transport infrastructure, especially the road network, is ageing and is constantly, and increasingly, being exposed to wear and tear from extreme weather conditions.

We call for investment decisions to prioritise preventive maintenance now, to avoid expensive asset losses.

This logic is something that CIHT has also [advocated for the Strategic Road Network](#).

## Incentivise action

25. Overall, in your view, will the actions in 'Incentivise action' support organisations responsible for transport infrastructure to embed adaptation into:

	Yes	No	Don't know
projects	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
policies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you answered 'yes', explain how the actions in this section will support organisations to embed adaptation, if you answered 'no', explain why the actions will not support organisations?

CIHT is concerned that the Department is prioritising major projects and building new infrastructure before ensuring that the existing vast network is resilient to climate change and can adapt to the likely worsening extreme weather events.

CIHT also calls for the Department to ensure that consistent and clear leadership is provided through policies and projects, especially around resilience assessment and knowledge sharing.

We are looking forward to the developments that will follow this strategy and offer CIHT's support to the Department in ensuring a coherent approach is developed.

## Measuring progress

26. Overall, in your view, will the commitments in 'Measuring progress' help organisations responsible for transport infrastructure in measuring progress on adaptation?

- Yes
- No (Go to 'Measuring progress: disagreement')
- Don't know (Go to 'Regulatory: setting the long term direction')

## Measuring progress: agreement

27. Explain how the commitments will assist in measuring progress.

[After answering go to 'Regulatory: setting the long term direction']

## Measuring progress: disagreement

28. Explain why the commitments will not assist in measuring progress.

CIHT urges the Department to ensure consistency and coordination across the country in measuring and assessing resilience. We note that if, by 2027, the Department wants to collate all data that transport stakeholders capture on weather and disruption, there needs to be a common process in place.

The Department should ensure that all stakeholders are collating the same type of data, with similar processes and that assessments are made against the same criteria nationwide.

To achieve this CIHT calls for a firm direction from the Department on how to collate and report data and to ensure that the reporting processes are not labour extensive or the data is difficult to collect.

## Regulatory: setting the long-term direction

The 'Regulatory: setting the long-term direction' section of the strategy considers how Department for Transport can use its unique position in the transport sector to explore untapped or under-utilised policy levers to identify new opportunities and reduce uncertainty for the sector by setting a clear direction for adaptation ambition.

29. Overall, do you support or oppose the actions in the strategy aimed at standardising the approach to climate adaptation?

Support (Go to 'Adaption standards')

- Oppose
- Don't know (Go to 'Adaption standards')

## Standardising the approach: opposition

30. Which aspects, if any, do you support or oppose?

	Support	Oppose	Don't know
Consistent approach to climate scenarios and climate risk assessments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Implementation of UK Government Resilience Framework commitment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adaptation standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explain why you support or oppose the actions.

CIHT overall supports the above actions because of:

- The necessity for leadership from central government to provide direction, prioritise effectively, and build a sense of urgency.
- The importance of establishing a consistent approach to data collection and reporting across the sector.
- The need for coherence within the broader government, ensuring that resilience and adaptation are integrated into wider governmental actions, including energy, economy, and social aspects.

## Adaption standards

31. What role, if any, would you like government to take in setting adaptation standards, including why?

CIHT calls for the government to provide the correct leadership that the sector currently needs, ensuring a coherent approach to measuring resilience and adaptation across the different nations.

Assessments criteria and standards are already being developed in the sector, and there is a risk that these different lines of work - if not coordinated by government-led guidance, will not align and will inhibit cross-disciplinary learning.

CIHT calls for the government to provide the sector with the right direction to set resilience and adaptation standards in order to:

- Prioritise evaluation criteria and methods, considering methods beyond economic appraisal to more sustainable decision-making methods
- Establish a consistent approach to data collection and reporting across the country
- Include social considerations into resilience and adaptation appraisals, where solutions account for fairness and accessibility to all in society.

## Reviewing the role of regulators

Transport regulators have an important role in ensuring safety standards are upheld across the transport system. Currently transport regulators do not have a specific mandate for ensuring climate resilience however this does not prevent them from taking steps to promote adaptation action within their sectors.

The [Climate Change Committee recommends designating transport sector regulators with consistent remits for climate resilience \[opens in a new window\]](#) as this could ensure long-term investment decisions incorporate, and are resilient to, the future impacts of climate change.

**32. Do you support or oppose a review of transport regulators' remits regarding climate change adaptation?**

- Support (Go to 'Reviewing the role of regulators: supporting')
- Oppose
- Don't know (Go to 'Collaboration: sharing knowledge')

## Reviewing the role of regulators: opposition

**33. Why do you oppose a review of transport regulators' remits regarding climate change adaptation?**

[After answering go to 'Collaboration: sharing knowledge']

## Reviewing the role of regulators: supporting

**34. Provide your suggestions, if any, as to how this review should occur.**

We have no suggestions at this time.

## Collaboration: sharing knowledge

Understanding of the impacts of climate change, and preparedness for them, varies across the transport sector. The 'Collaboration: sharing knowledge' section of the strategy identifies actions that will bring transport operators together to collaborate, address their interdependencies within transport and wider infrastructure, share best practice and expand their knowledge on managing climate risks.

**35. Overall, in your view, will the actions in 'Working in partnership' support organisations responsible for transport infrastructure to expand their capability on climate change adaptation?**

- Yes
- No (Go to 'Working in partnership: disagreement')
- Don't know (Go to 'Interdependencies')



## Working in partnership: agreement

**36. Explain how the actions in this section will support organisations to expand their capability on adaptation.**

CIHT urges the Department to promote collaboration across all modes of transport and infrastructures affected by extreme weathers and expected worsening climate impacts.

Given that our strategic networks of road, railways, water and energy supply tend to be designed as linear systems, these services are often co-located in the same physical corridors, when an extreme weather event happens they can be mutually impacted. Such concurrent interruptions can have a major societal impact and render normal activity difficult to sustain.

CIHT calls for the Department to create a strategic, cross-modal team to explore and identify the “common impact points” where different networks are most likely to be affected by extreme weather and prioritise resilience planning to avoid multiple failures at such locations.

This work should aim at identifying such high-impact sites through geographic-based assessments and weather forecast to prioritise collaborative preventive measures. While collaborative working is essential to this approach, it is suggested that a multi-agency overview is necessary to be most effective to minimise the wider effects when adjacent modes share a common impact.

[After answering go to ‘Interdependencies’]

## Working in partnership: disagreement

**37. Explain why the actions in this section will not support organisations to expand their capability on adaptation.**

## Interdependencies

Interdependency refers to the dependence of the transport network on other infrastructure networks such as energy and telecommunications networks, and vice versa. If one network is impacted by extreme weather, then effects may cascade across dependent networks.

**38. Overall, in your view, will the actions in the strategy help organisations to understand their interdependencies across different infrastructure?**

- Yes
- No (Go to 'Interdependencies: disagreement')
- Don't know (Go to 'Final comments')

## Interdependencies: agreement

**39. Explain how the actions will help understanding of interdependencies.**

[After answering go to 'Final comments']

## Interdependencies: disagreement

**40. Explain why the actions will not help understanding of interdependencies.**

## Final comments

**41. What, if any, further comments do you have on the transport adaptation strategy?**

n/a

**42. Any other comments?**

n/a