

North Yorkshire Council

Environment Executive Member

14 June 2024

Proposed response to the Department for Transport consultation on Adapting the UK transport system to the impacts of climate change

Report of the Assistant Director – Environmental Services and Climate Change

1.0 PURPOSE OF REPORT
1.1 To provide the Corporate Director and Executive Member with the proposed response to the Department for Transport’s consultation on adapting the UK’s transport system to the impacts of climate change, and to seek further views and approval to submit the response.

2.0 BACKGROUND

2.1 The government’s transport adaptation strategy has recently been published: [“Fit for a Changing Climate? Adapting the UK’s transport system”](#). It is intended to include actions and policies to:

- enhance climate adaptation planning across the sector
- ensure these plans are achieved
- lead to improved climate resilience in the transport system

These policies will be developed over the next 5 years to enable progress ahead of the fourth National Adaptation Programme.

2.2 The strategy is structured under four main headings:

- Culture: Embedding climate risk, for example by requiring Transport Infrastructure Organisations (TIOs) to undertake and publish climate risk assessments.
- Economics: Making the case for adaptation for example the department for Transport (DfT) will develop tools so the sector can identify adaptation measures and develop an online database with best-practice adaptation.
- Regulatory: Setting the long-term direction, including supporting the sector to take a consistent approach when using climate scenarios and climate risk assessments.
- Collaboration: Sharing knowledge, for example by using forums to drive industry collaboration, and by 2028, all TIOs should enhance their adaptive capacity by providing training on climate adaptation.

2.3 The timescale for delivery of the strategy is 2024-2028. Some of the milestones stated in the strategy are:

- 2024: TIOs to identify to DfT a senior officer responsible for adaptation
- 2024: DfT will develop an online database with best practice adaptation measures
- 2026: all TIOs to undertake and publish climate risk assessments

3.0 DEPARTMENT FOR TRANSPORT’S ADAPTATION STRATEGY CONSULTATION

3.1 The Department for Transport is seeking views on:

- the policies included in the strategy and whether we support them
- how effective we believe the policies will be at enhancing adaptation action taken by transport infrastructure organisations
- what more we think government could do to adapt to the impacts of climate change on transport infrastructure

3.2 The consultation takes the form of a simple online questionnaire. Officers from the council's transport, highways and climate change teams have contributed to the proposed response, which is attached as Appendix A.

3.3 In general, the officer view is reasonably supportive of the strategy. Key areas of concern are the need for effective data, and the desire to see good quality case studies and knowledge sharing across the sector. Much of the strategy seems targeted at national TIOs so does not have direct relevance to the council's operations.

4.0 ALTERNATIVE OPTION CONSIDERED

4.1 Not reviewing and agreeing to the response submission is rejected because it would prevent the council's opinions from being taken into account as part of national policy development.

5.0 FINANCIAL IMPLICATIONS

5.1 There are no financial implications as a result of responding to this consultation. Any financial implications that arise from DfT's future policies will be dealt with in future reports.

6.0 LEGAL IMPLICATIONS

6.1 Following on from the outcome of the consultation, there may be legal implications for the council which will be dealt with as required in future reports.

7.0 EQUALITIES IMPLICATIONS

7.1 An equalities impact assessment (EIA) screening has been carried out (Appendix B). Approving and submitting this consultation response will not have an impact on people with protected characteristics, so a full EIA is not required.

8.0 CLIMATE CHANGE IMPLICATIONS

8.1 A climate change impact assessment (CCIA) screening has been carried out (Appendix C). Approving and submitting this consultation response will not have a climate change impact, so a full CCIA is not required.

9.0 REASONS FOR RECOMMENDATION

9.1 Officers have produced a draft response to the DfT's consultation, which is attached as Appendix A. Any further comments and views are now being sought from the Corporate Director and Executive Member, along with approval to submit the response.

10.0 RECOMMENDATION

10.1 Subject to any comments received, it is recommended that the Corporate Director for Environment, in consultation with the Executive Member for Managing our Environment agrees to submit the proposed response (Appendix A) to the Department for Transport.

APPENDICES:

Appendix A – Draft Consultation response

Appendix B – Equalities Impact Assessment screening

Appendix C – Climate Change Impact Assessment screening

BACKGROUND DOCUMENTS: None

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Northallerton
14 June 2024

Report Author – John Ward-Campbell, Climate Change Business Partner
Presenter of Report – John Ward-Campbell, Climate Change Business Partner

Adapting the UK’s transport system to the impacts of climate change: DFT Consultation

Proposed consultation response

May 2024

Responses are highlighted in green

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.

Climate Risks are included in the council’s corporate risk register, and work is ongoing to develop a dedicated corporate approach to climate adaptation across the organisation.

Assessing climate risks: disagreement

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

[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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
long-term planning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
investment decisions	<input type="checkbox"/>	<input checked="" 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?

Climate Change Impact Assessments are required for decision reports which include consideration of climate adaptation.

Organisational details - reporting

The [Adaptation Reporting Power](#) gives [Department for Environment, Food & Rural Affairs’ \(DEFRA\)](#) 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?

Measuring progress: disagreement

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

Data is not collected systematically on the impact of extreme weather events.

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 adaption 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:

Whether you support the policies included in the strategy.

How effective you consider the polices will be at enhancing the adaptation action taken by organisations responsible for transport infrastructure.

What more do 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.

The methods outlined do not provide either a carrot or a stick to enact a change of culture within the organisations and to take on additional work.

Culture: embedding climate risk

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

More education and case studies to TIO's in order to show the benefits of undertaking reporting processes.

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:

Providing the tools required.

Building the evidence base on climate change and adaptation in the transport sector.

Incentivising adaptation actions.

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.

Tools will help to simplify the process and remove barriers to change also assisting with amending the culture of organisations.

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: disagreement

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

Evidence based decisions can only be made if climate responsible decisions are affordable and within the budget of TIO's.

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 checked="" type="checkbox"/>	<input 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?

Projects: The actions feel targeted to national TIO with strategic importance however on a local level: maintaining highways, footpaths and active travel infrastructure, there seems to be little to incentivise change. This will especially leave more rural areas behind.

Policies: The actions will enable higher management to set a direction for the future however as mentioned above the deliverable status of some projects under these policies may be questionable. Looking for a "do something" rather than a do nothing if it doesn't fit current policies.

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.

Data collation will allow comparison and progression analysis in order to push climate adaption.

Indicators will allow a baseline and progression to be measured between TIO's however they will require careful thought to allow them to be relevant to all TIO's

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Implementation of UK Government Resilience Framework commitment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adaptation standards	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Adaption standards

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

Leading role in order to ensure that fairness is enacted across the geographical area to ensure that the country develops at the same rate to ensure all TIO's receive similar benefits.

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.

It may be helpful for each sector to have its own regulator manage the climate change adaptations however this may create imbalance dependent on the motivation of the regulator to enforce/assist.

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.

Additional training is always welcome to help people development and understanding

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.

Being able to view all interdependencies from TIO's will mean that TIO's can also see where others transport systems overlap and synergy > to ensure a consistent approach training should be led/cascaded from the centrally available assistance such as tools and reporting.

Final comments

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

42. Any other comments?

Initial equality impact assessment screening form

This form records an equality screening process to determine the relevance of equality to a proposal, and a decision whether or not a full EIA would be appropriate or proportionate.

Directorate	Environment
Service area	Climate Change
Proposal being screened	Agreement to submit a response to DfT consultation on adapting the UK's transport system to the impacts of climate change.
Officer(s) carrying out screening	John Ward-Campbell
What are you proposing to do?	Respond to the Department for Transport consultation via their online questionnaire.
Why are you proposing this? What are the desired outcomes?	To ensure the council's views are heard in developing national policy.
Does the proposal involve a significant commitment or removal of resources? Please give details.	No

Impact on people with any of the following protected characteristics as defined by the Equality Act 2010, or NYC's additional agreed characteristics

As part of this assessment, please consider the following questions:

- To what extent is this service used by particular groups of people with protected characteristics?
- Does the proposal relate to functions that previous consultation has identified as important?
- Do different groups have different needs or experiences in the area the proposal relates to?

If for any characteristic it is considered that there is likely to be an adverse impact or you have ticked 'Don't know/no info available', then a full EIA should be carried out where this is proportionate. You are advised to speak to your directorate representative for advice if you are in any doubt.

Protected characteristic	Potential for adverse impact		Don't know/No info available
	Yes	No	
Age		x	
Disability		x	
Sex		x	
Race		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage or civil partnership		x	
People in rural areas		x	
People on a low income		x	
Carer (unpaid family or friend)		x	
Are from the Armed Forces Community		x	
Does the proposal relate to an area where there are known inequalities/probable impacts (for	No		

APPENDIX B

example, disabled people's access to public transport)? Please give details.					
Will the proposal have a significant effect on how other organisations operate? (for example, partners, funding criteria, etc.). Do any of these organisations support people with protected characteristics? Please explain why you have reached this conclusion.	No				
Decision (Please tick one option)	<table border="1"> <tr> <td>EIA not relevant or proportionate:</td> <td style="text-align: center;">✓</td> <td>Continue to full EIA:</td> <td></td> </tr> </table>	EIA not relevant or proportionate:	✓	Continue to full EIA:	
EIA not relevant or proportionate:	✓	Continue to full EIA:			
Reason for decision	Responding to the consultation will not have an impact on people with protected characteristics				
Signed (Assistant Director or equivalent)	Michael Leah				
Date	31/05/2024				

Initial Climate Change Impact Assessment (Form created August 2021)

The intention of this document is to help the council to gain an initial understanding of the impact of a project or decision on the environment. This document should be completed in consultation with the supporting guidance. Dependent on this initial assessment you may need to go on to complete a full Climate Change Impact Assessment. The final document will be published as part of the decision-making process. If you have any additional queries, which are not covered by the guidance please email climatechange@northyorks.gov.uk

Title of proposal	Response to DfT's consultation on climate change adaptation
Brief description of proposal	Draft response to DFT response presented for consideration and approval by director and executive Member
Directorate	Environment
Service area	Climate Change, Transport
Lead officer	John Ward-Campbell
Names and roles of other people involved in carrying out the impact assessment	

The chart below contains the main environmental factors to consider in your initial assessment – choose the appropriate option from the drop-down list for each one.

Remember to think about the following;

- Travel
- Construction
- Data storage
- Use of buildings
- Change of land use
- Opportunities for recycling and reuse

Environmental factor to consider	For the council	For the county	Overall
Greenhouse gas emissions	No effect on emissions	No Effect on emissions	No effect on emissions
Waste	No effect on waste	No effect on waste	No effect on waste
Water use	No effect on water usage	No effect on water usage	No effect on water usage
Pollution (air, land, water, noise, light)	No effect on pollution	No effect on pollution	No effect on pollution
Resilience to adverse weather/climate events (flooding, drought etc)	No effect on resilience	No effect on resilience	No effect on resilience
Ecological effects (biodiversity, loss of habitat etc)	No effect on ecology	No effect on ecology	No effect on ecology
Heritage and landscape	No effect on heritage and landscape	No effect on heritage and landscape	No effect on heritage and landscape

If any of these factors are likely to result in a negative or positive environmental impact then a full climate change impact assessment will be required. It is important that we capture information about both positive and negative impacts to aid the council in calculating its carbon footprint and environmental impact.

Decision (Please tick one option)	Full CCIA not relevant or proportionate:	X	Continue to full CCIA:	
Reason for decision	Approving and submitting the consultation response (the subject of this report) will not have a climate change impact.			
Signed (Assistant Director or equivalent)	Michael Leah			
Date	31/05/2024			