

Transport for the South East (TfSE) response to the Department for Transport's consultation regarding Adapting the UK's transport system to the impacts of climate change Strategy

1. Introduction

- 1.1. Transport for the South East (TfSE) welcomes the opportunity to respond to the consultation regarding Adapting the UK's transport system to the impacts of climate change Strategy. This is an officer level response which will be presented to our Partnership Board in July 2024. A further iteration of it may therefore follow.
- 1.2. TfSE is the sub-national transport body (STB) for the south east of England, bringing together leaders from across the local government, business and transport sectors to speak with one voice on our region's strategic transport needs. Since its inception in 2017, TfSE has quickly emerged as a powerful and effective partnership for our region. We have a [30-year transport strategy](#) in place which carries real weight and influence and will shape government decisions about where, when and how to invest in our region to 2050. The Secretary of State has confirmed that they will have regard to our strategy in developing new policy. We work closely with the Department for Transport (DfT) to provide advice to the Secretary of State and our ambition is to become a statutory body with devolved powers over key strategic transport issues.
- 1.3. Our principal decision-making body, the [Partnership Board](#), brings together representatives from our 16 constituent local transport authorities, business, , district and borough authorities, protected landscapes, Highways England, Network Rail and Transport for London.
- 1.4. Our [Strategic Investment Plan \(SIP\) for South East England](#) provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades. The plan provides a framework for delivering our Transport Strategy, which:
 - Is a blueprint for investment in the south east.
 - Shows how we will achieve our ambitions for the south east.
 - Is owned and delivered in partnership.
 - Is a regional plan with evidenced support, to which partners can link their own local strategies and plans – a golden thread that connects policy at all levels.
 - Provides a sequenced plan of multi-modal investment packages that are place based and outcome focused.
 - Examines carbon emissions impacts as well as funding and financing options.
- 1.5. The plan presents a compelling case for action for investors, including government departments – notably the Treasury and Department for

Transport (DfT) – as well as private sector investors. It is written for and on behalf of the South East's residents, communities, businesses, and political representatives.

- 1.6. TfSE welcome the transport adaptation strategy publication and specifically, that the Government takes a long-term, national and informed approach to predicting, and developing the country's transport resilience needs. Achieving our vision for the south east is dependent on the government and operators' ability to maintain the existing transport network in addition to funding and facilitating new infrastructure to deliver the UK's and the south east's objectives. TfSE welcome the opportunity to respond to this consultation and we recognise the risk to the transport networks posed by climate change, and the benefit of a robust evidence led plan alongside appropriate funding to improve the Country's ability to cope with these effects while also resolving to reduce the cause.

2. Assessing climate risks

- 2.1. TfSE are not a Transport Infrastructure Operator (TIO), however as an STB we consider climate resilience at a strategic level although do not have access to any data that would enable assessment of the risks at the level enquired to in the consultation.
- 2.2. TfSE does not submit reports to government as part of the Defra-led process known as the Adaptation Reporting Power.

3. Whether TfSE support the policies included in the strategy.

- 3.1. The strategic priorities set out in the Transport Adaptation Strategy are aligned with Transport for the South East's. Our vision set out in our transport strategy is that by 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step change in connectivity and environmental quality. A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life.
- 3.2. Transport for the South East's mission is to grow the South East's economy by delivering a safe, sustainable and integrated transport system that makes the South East more productive and competitive, improves the quality of life for all residents, and protects and enhances its natural and built environment. Its ambition is to transform the quality of transport and door-to-door journeys for the South East's residents, businesses and visitors.
- 3.3. To deliver this will require new infrastructure and multi modal solutions, but also the protection of existing networks. Our Transport Strategy recognises the critical importance of climate resilience, particularly concerning the potential loss of infrastructure.
- 3.4. Our understanding has been further shaped by insights including those from the Department for Transport (DfT) led training - preparing the transport

network for climate change. Among many other things the training highlighted concerning projections that by the 2080's:

- a) Areas with railway lines exposed to flooding more frequently could see increases of 53% and 160% for 2°C and 4°C temperature rises respectively.
- b) The length of major roads at risk of flooding could increase by 41% and 120% for 2°C and 4°C temperature rises respectively
- c) The number of vulnerable railway stations at risk of flooding could increase by 10% and 28% for 2°C and 4°C temperature rises respectively

(Committee on Climate Change, 'Climate Change Risk Assessment 2017').

3.5. We support the centralised collection of data where possible to efficiently support and inform decision making by operators for investment in resilience. It is positive that the DfT are working with the Met Office to make it easier for the transport sector to use climate projections through provision of information and development of a tool to better understand the frequency of extreme weather events.

4. How effective TfSE consider the policies will be at enhancing the adaptation action taken by organisations responsible for transport infrastructure.

4.1. The Transport Adaptation Strategy makes the case for pre-emptive investment, yet maintenance budgets are in real terms reducing across the sector. Without adequate funding for mitigation, enforced reporting will likely lead to diluting maintenance funding to incorporate resilience. TIO's are already stretching their budgets and are working to targets for condition, service and reliability. The Strategy makes the case for climate risk understanding but there is little detail of how delivery of mitigation will be funded. Network Rail stated in their newly published southern region weather resilience & climate change adaptation plan 2024 – 2029 that they have had to make some tough choices around balancing spending in CP7 to provide the most value to both customers and the taxpayer. They expect it to become increasingly challenging to keep pace with the frequency and intensity of extreme weather events through the current control period, which will be a significant factor in planning for future control periods. This highlights that currently increased resilience mitigation is being funded to the detriment of maintenance and renewals.

4.2. TfSE are concerned particularly for Local Transport authorities that are already under intense funding pressure for maintenance, renewals and new infrastructure. We would like to see a commitment for clearer guidance and support to be given by central government climate experts in identifying locations and types of risk to TIO's so that they can include in their asset management plans and develop appropriate mitigation which they can be confident will be funded.

4.3. We support standardised methods of risk assessment to enable TIO's to ensure they are assessing risk at the same levels as each other and allow the government to compare like for like when it needs to prioritise funding. Additional skills and requirements that are placed onto TIOs will have a cost.

Therefore, we feel the more that can be delivered centrally the more efficient risk assessment and mitigation will be. Enabling TIO's to focus their efforts on mitigation and collaboration with other at risk parties.

- 4.4. The commitment to provide the guidance, tools, evidence, and knowledge to consider climate risks and make the case for action is positive. Providing the tools in order for TIOs at all levels to embed climate resilience into their asset management plans is positive. Adopting global best practice in the form of adaptation pathways also appears sensible. A database of best practice adaptation measures will support TIOs and relieve the problem of decision making, making it simpler and easier to consider potential costs at a strategic level. The additional climate information will support long term planning for the transport sector. The risk assessment guidance is also welcomed as this will help consistency throughout the network across modes.
- 4.5. We are keen to understand what action the government will take regarding funding once risk assessment is complete and there is an estimated volume of investigation and mitigation defined. It is intonated in the strategy but it is not clear whether TIO's will be expected to meet this need from existing budgets which would be a concern.
- 4.6. Within the TfSE region we are aware of resilience issues and the high cost of mitigation. Most recently one of our constituent authorities is facing extensive disruption as a result of landslides following flood events. In order to complete investigations to understand the risk and deliver immediate management of highway diversions and safety improvement works they require nearly £1.5m of funding which currently they do not have. The remediation and mitigation itself is still at this time unknown but likely to require central funding from government if further issues are to be averted. There are likely to be many similar situations throughout the country.
- 4.7. The "Why this action is needed" in the building the evidence base section is coherent but the cross sector actions seem more focussed on transition risks and low carbon solutions over climate resilience. We are not convinced it is enough to "factor climate risks into analyses as part of DfT business cases." This suggests that resilience will only be considered as part of schemes being delivered through another existing prioritisation. There is a case for resilience schemes to be prioritised on the basis of resilience alone as set out in the benefits of climate adaptation chapter.
- 4.8. Using funding agreements like RIS and Control Periods to incentivise resilience is likely to encourage adaptation in transport projects and policies. However, they might not fully support adaptation in asset management planning for infrastructure, beyond maintenance and renewals. We advocate for a clearer approach. This should include assessing networks as a whole to protect areas at highest risk. Projects should be prioritised based on their own merit. We believe it's crucial to focus on making entire areas more resilient, not just protecting separate assets. The current strategy mentions this under "cascading failures." Our concern is that TIOs, tasked with risk management, might overlook broader approaches. They might simply focus on their own assets and collaborate with other infrastructure owners in proximity where

they are agreeable. We suggest that the government could achieve greater efficiencies by looking at larger areas, rather than delegate to infrastructure owners that will have greatest regard for their own individual assets.

- 4.9. We are worried about the financial pressure on infrastructure operators, especially local highway authorities. High inflation and rising costs already limit their project delivery. Moreover, they must meet increasing metrics, including biodiversity net gain, carbon reduction, and benefit-cost ratio. Funding is not keeping pace with the growing requirements.
- 4.10. The strategy states, "Transport operators should decide on the warming scenario." However, we suggest it would be more appropriate for guidance to be given to operators on the best warming scenario. Operators would then not need to hire staff or consultants to review climate forecasts and make decisions that are outside of their area of expertise, and a more consistent view could be taken.
- 4.11. TfSE feel that more direction would be welcomed over cross sector collaboration to avoid duplication and independent development of systems that then do not work together.
- 4.12. We support commitment to the resilience framework but raise concern again over whether there will be provision of additional funding to service the increased need as it becomes clearer. We feel it is very important that the standards imposed as a result reflect the funding available and that operators' budgets are not squeezed any further than they already are.
- 4.13. We do have a concern regarding the apparent need to link climate change as cause to resilience. We feel resilience mitigation should be prioritised based on the other factors highlighted in the strategy for reliability, impact and pre-emptive mitigation being more efficient than replacement or repair after the fact. We agree that climate change should be monitored but are concerned of separating funding for resilience into different pots for transport infrastructure that can prove climate change causality and those which cannot.

5. What more TfSE think government could do to adapt transport infrastructure to the impacts of climate change.

- 5.1. We are keen to understand if there will be additional funding to carry out mitigation once identified. Without independent ringfenced funding for resilience it will have to compete with the other priorities set out for infrastructure operators with already strained budgets. Achieving the high levels of adaptation that are projected will require comprehensive action across all policy areas and implementation stages, likely requiring substantial additional investment. Network Rails southern region weather resilience & climate change adaptation plan 2024 – 2029 also states that In CP7 weather risk task force (WRTF) schemes will provide some investment in pure resilience, but prioritisation of available funding means that such investment will be limited elsewhere. How should TIO's prioritise potential (resilience) against known (condition) requirements. How will they be targeted and what are the

expectations on them if resilience is not funded independently of maintenance budgets.

- 5.2. For Local Highway Authorities there are tremendous pressures to adequately maintain their ageing/life expired assets in addition to the risk from climate change. If there were a dedicated fund for resilience there is still concern that until adequate funding is available to maintain, assets will become less resilient and more difficult and costly to keep in service.
- 5.3. Despite the points made in this response the science suggests we remain locked in to a degree of change. The reality is that to adapt transport infrastructure to counter the effects of a changing climate will be unaffordable in the short term. However public expectation is that infrastructure should always be available, despite extremes of weather. We would recommend central messaging to manage this expectation and be clear that from time to time our changing climate means that assets may not be available.