



FPH Consultation Response: Adapting the UK's transport system to the impacts of climate change

This response has been prepared by the Climate and Health Committee and Transport Special Interest Group of the Faculty of Public Health (FPH). FPH is a membership organisation of over 5,000 public health professionals across the UK and around the world. Our role is to improve the health and wellbeing of local communities and national populations.

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](#) 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.

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.

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
- X - Less likely**
- Don't know (Go to 'Culture: embedding climate risk')

Culture: embedding climate risk reasoning

17. Explain your response.

The Faculty of Public Health understands that the purpose of this document is to consider how the UK transport system should adapt to climate change. However, given the large contribution that transport makes to greenhouse gas emissions, we believe that there should have been some attention given to mitigation efforts. Reducing the level of emissions will also reduce the need for as much adaptation. We believe that the document should acknowledge the wider context and include information on how it will meet the Committee on Climate Change's recommendations of no growth in air travel and a reduction in use of motorised vehicles (particularly lorries, vans and private cars) on roads, and the need for increasing modal share for public transport and active travel. Given that this context is not set out in the document, we suspect that there will be under-reporting on climate risks.

In addition, there are significant health risks relating to climate change, and many of these are affected by transport choices. The Faculty of Public Health would like to see the health risks also measured and relevant adaptation measures included.

Culture: embedding climate risk

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

The Faculty of Public Health would like to see not only include reporting on the risks but also reporting on actions taken to reduce mitigate these. This must include actions to increase active and sustainable travel.

We would also like the Government to include actions to increase public understanding and engagement on the impact of travel and transport choices (including home delivery transport) in order to garner support for interventions that create a modal shift from motorised transport use towards active travel, and to consider how freight options, including 'last mile delivery' systems might reduce urban congestion.

We believe that this document would be strengthened if it gave more consideration to the impact that climate change (with increased extreme weather events) will have an impact on active travel, with worse weather making cycling more hazardous. Given that safety concerns are already a barrier to active travel and public transport use, one clear adaptation need is for more protected infrastructure, and we would like to see ambitious targets, and increased funding, for this.

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

Providing the tools required: disagreement

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

The Faculty of Public Health does not believe the tools will provide sufficient support to adaptation as no consideration is given in the tools of the need to prioritise active travel and public transport, which have been identified by the International Panel on Climate Change as essential for combatting climate change and decarbonising the transport sector. The document also ignores existing government targets for increasing active travel and creating a modal shift from cars in urban areas.

The tools should require any business case to demonstrate how it will reduce the use of private cars and vans, and freight on our roads, in line with the IPCC and Climate Change Committee's recommendations and stated government policy.

The FPH would like to see alternatives to road transport for either freight or private transport included more prominently, and for the health risks of climate change and the co-benefits of active travel to carbon reduction, improved air quality, physical and mental health, congestion and productivity to be acknowledged. We would like to see the financial impacts of these elements quantified, including the evidence on the return on investment to the country (as well as the transport system) of increased active travel.

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
- X - 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.

Insufficient detail is given in this section to understand how research into active and sustainable transport will be included, or how innovations such as driverless EVs (which if all in shared ownership, could assist in both decarbonisation and congestion) will be managed.

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?

The Faculty of Public Health is very disappointed that the document appears to be based on the premise that the balance of spending is going to increase the capacity of the roads for motorised traffic rather than considering how to reduce this, in line with IPCC and CCC recommendations. Evidence shows that creating more space on roads for motorised traffic simply increases traffic, and that the new roads quickly fill up. Our population is already suffering significant harms to health from high rates of physical inactivity and supporting people to reduce the use of private cars, especially for short urban journeys, will have a major impact on congestion, productivity, air quality, social cohesion and physical and mental health.

The plan to spend 345m on improving walking and cycling is welcomed but this will go nowhere near creating the safe spaces that the British public require if they are to increase active travel to the levels seen in some other Northern European countries. Almost all of the 2.7bn in the plan will go on road schemes that will at best fail to reduce the harms that car dependency, hypermobility and transport related social exclusion have created in this country, and indeed are likely to exacerbate all of these.

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

Measuring progress: disagreement

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

The Faculty of Public Health believes that these commitments will not assist in measuring progress because they fail to acknowledge that our dependency on cars and motorised transport is cause significant economic, planetary, health, and social costs. Unless these factors are included in the planning, we will continue to see transport as a major cause of poor outcomes, inequalities and loss of productivity.

We believe that it is essential that the transport sector engages more effectively with health in order that we can get the population benefits from a health promoting transport system. By tackling issues such as transport related social exclusion together, we will see a reduction in inequalities and improved access to employment, educational and social opportunities. This will lead to major short-, medium- and long-term economic benefits.

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?

- X - 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.

The Faculty of Public Health supports a more consistent approach being taken to climate scenarios and risks but is not convinced from the material presented here that the approach being proposed will be sufficient to deliver the required changes to transport policy and climate change mitigation and adaptation.

Adaption standards

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

The Faculty of Public Health would like to see improving health and reducing inequalities, improving air quality and reducing carbon emissions at the heart of the country's transport strategy, and its plans for adaptation.

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?

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

Reviewing the role of regulators: supporting

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

The Faculty of Public Health believes that there should be a strong role for regulators but that the proposed role is too weak and will miss many opportunities for improvement, including through its failure to require the delivery of co-benefits to health.

The UK population's poor health status, and inequalities in this measure, lead to significant social and economic costs to the country. Transport systems can play a major role in reducing these inequalities and improving health and productivity (including enabling social and well as physical mobility) but none of this is recognised in this report.

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

Interdependencies: disagreement

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

As outlined in our response to previous questions, the view of the Faculty of Public Health is that disappointingly, this document fails to demonstrate a grasp of the importance of transport to other key deliverables such as health, housing, education, and social care. Because of this, it fails to consider these as key elements to be included in its adaptation plans, and its impact will therefore be very limited. Changing the plan to acknowledge and enable delivery of co-benefits will give far greater value for money and return on investment from the plan.

Final comments

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

The Faculty of Public Health is very disappointed by this strategy, as it fails to reflect the requirements set out by the IPCC and CCC to reduce demand for motorised transport and ensure no expansion of air travel. It also misses the opportunity to use transport to deliver co-benefits to health, air quality, carbon reduction and productivity. It should include stretching and enforceable targets on increasing active travel and a modal shift from private car use, supported by resource allocation away from traditional road expansion projects.

42. Any other comments?

The Faculty of Public Health would be delighted to work with the Department of Transport in revising the strategy and ensuring that all the co-benefits of a well-functioning, low carbon transport system, adapted to climate change, are delivered.