



Submission for:

**National Highways' Delivery
Plan for RIS3**

Introduction

TAN welcomes the long awaited publication of RIS3 on 26 March 2026. We would like to take the opportunity to feed into the development of National Highways' Delivery Plan for RIS3 before it is published in the summer. We hope you find our comments on how National Highways can better deliver RIS3 constructive.

Transparency

We were disappointed there was a lack of important detail in RIS3, especially regarding the budgets for Designated Funds and National Programmes, especially as these were rated higher than road enhancements by consultees.

In our submissions to DfT prior to the publication of RIS3 we had recommended a transparent approach, especially on costs of projects, timescales and budgets. We would therefore hope that this will happen in National Highways' Delivery Plan. We would also like to see more detail on how much will be spent on progressing the RIS4 pipeline.

In order to do this on an on-going basis will require National Highways to deliver the 'live dashboard' of capital enhancements that was accepted by the DfT as a recommendation of the Transport Committee's *Strategic Road Investment* report in 2023. DfT recently confirmed that this live dashboard is being progressed and would include previous and latest cost estimates for projects, so cost escalation can be tracked, as per the accepted recommendation. This dashboard is now already three years overdue.

Road safety

We were disappointed to see the level of ambition on road safety greatly reduced to a 7.5% reduction in KSIs by 2031. There are a lot of low-cost measures that are under NH's control, and we would like to see the Delivery Plan setting out how NH will maximise the impact of the funds it has to deliver the biggest safety impact and to go beyond the 7.5% target. It is worth noting that RIS3 funds can be spent outside of the Safety National Programme funds and Safety Designated Fund. For instance the Smaller Schemes National Programme could also be used to deliver safety schemes rather than delivering extra capacity on the network which will simply release induced demand, and have the perverse consequence of increasing traffic, congestion and collisions. Similarly, the renewals and maintenance works could include improvements to safety, as our suggestions under "Creating efficiencies" below.

Mitigating outfalls

We noted the Capital Commitment (in the Environment National Programme) for mitigating 190-250 outfalls. However, this total includes outfalls already mitigated in RIS2 and the interim period, meaning what will be tackled in RIS3 could be a lot lower. Given that the

Water Quality Performance Indicator in RIS2 did not measure numbers of outfalls, only the “length (km) of waterway enhanced” there is no clarity as to how many outfalls have already been mitigated prior to the start of RIS3. We would expect the Delivery Plan to be clear how many outfalls were mitigated previously, and how many National Highways expects to deliver between 2026 - 2031.

We believe National Highways could easily exceed this target range by incorporating best practice on drainage into its huge new renewals and maintenance programme (see below).

Creating efficiencies by coordinating workstreams

We were pleased to hear Duncan Smith at the Transport Committee hearing on 22 April 2026 say that National Highways has “sophisticated tools” to ensure the coordination and synchronisation of different work programmes, to minimise disruption and to reduce costs.

We believe with the increased focus and funding in RIS3 on renewals and maintenance there is plenty of opportunity for National Highways to achieve other objectives, exceed other Capital Commitments, whilst achieving efficiencies. For instance, any renewals and maintenance work on structures over watercourses should also take the opportunity to mitigate outfalls at this location at the same time. Similarly, opportunities should be taken whilst renewing assets to reduce severance and improve active travel connectivity.

We are aware that vital bridge works on the M27 crossing of the River Hamble in Hampshire are programmed during the RIS3 period. Although drainage works are included in this maintenance work, mitigating and replacing the aged and unmaintained outfalls at this location is currently not included. This is a missed opportunity, particularly as the River Hamble crossing with its ten high-risk outfalls is within a Special Area of Conservation (SAC) and Special Protection Area (SPA). Whilst seven of the downpipes will be removed during the bridge works, all the runoff from a considerable area will be directed instead into the remaining three outfalls on the foreshore. These outfalls have not been inspected and maintained in decades, and have almost certainly ceased to be effective. Including the replacement of these outfalls (with commitments to regularly inspect and maintain them) in the M27 bridge drainage works in RIS3, makes operational and economic sense.

If outfalls were mitigated at every location where renewals and maintenance works were scheduled in RIS3, National Highways would easily be able to exceed the 250 target. This would save money, create efficiencies, reduce disruption to motorists, and would help National Highways demonstrate that it is making best use of public funds

Similarly, consideration should be given to including road safety and active travel measures when renewing assets, to meet other objectives, KPIs, PIs, and Capital Commitments, and to achieve efficiencies.

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Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus and rail services, damaging road schemes and large unsustainable developments

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