



Rt Hon Heidi Alexander MP
Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

Sent by email to: DFT.Ministers@dft.gov.uk

16 March 2026

Dear Secretary of State for Transport,

Maximising opportunities from the third Road Investment Strategy (RIS3)

This month you are due to set RIS3, the first road strategy or indeed policy of a Labour government since *Roads - Delivering Choice and Reliability* and *Delivering a Sustainable Transport Strategy* in 2008. The coalition government's roads reforms promised "aggressive" decarbonisation alongside mile a minute journeys. Yet a decade later, the strategic road network has missed its reliability, safety and environment targets, while underdelivering on economic benefits, at huge financial cost. Momentum lost in delivering more efficient travel choices has left our country all the more exposed to the biggest oil shock in history. The case for a rethink could not be more compelling nor urgent.

I am therefore writing to urge you to take the opportunity to rethink RIS3 to deliver real benefits for Britain, rather than sticking to the last government's approach of going through the motions in the face of declining ambition and performance. In other words, a RIS that is appropriate and adaptable for turbulent times, rather than one that keeps shifting a different era's priorities ever further to the right.

We have of course been here before. Transport Action Network (TAN) wrote to your predecessor in March 2020¹ to call for a RIS2 rethink on climate grounds. With the benefit of hindsight our concerns were proven correct. The transport sector has decarbonised a quarter less than was planned in 2016, with a rate of progress just a fifth of where it needs to be². Meanwhile recent evaluations³ show that official forecasts constantly overestimated traffic, whether due to the 2008 recession or the pandemic. As a result, billions have been wasted on lose-lose road projects that delivered lower economic benefits and worse carbon emissions than forecast.

We wrote again in 2022 calling for RIS2 to be rethought due to significant wider changes⁴. In response⁵, the former Conservative roads minister did not accept that National Highways was not on track to meet its targets such as safety. Yet at the end of RIS2, half of its statutory targets had been missed, including its top priority of safety. The former minister also stated that funding changes were not an appropriate reason to reopen RIS2. Following the Court of Appeal's judgment in TAN's favour last June⁶, that is clearly not arguable.

After the Transport Committee's strategic road investment inquiry in 2023 identified issues with governance and strategy, as well as underdelivery, and a decade after roads reform, it is clear these higher order issues need addressing urgently. The early departure of National Highways' chief executive is the latest example of deep-seated issues.

Some might argue for the economic importance of adding road capacity. Yet your own Department's research⁷ confirms that road repairs provide as much as four times more benefits than major road schemes and active travel three or more times. With reports of a third of roads into cities like London facing flood risk, resilience measures are likely to offer even greater benefits. Those risks also demonstrate the need to increase ambition to decarbonise transport (including through efficiency measures in addition to electrification), rather than keep reducing it. With the Strategic Road Network contributing a tenth of UK CO2 emissions, and that share set to increase, RIS3 needs to target far lower user emissions by 2031.

The list of challenges here may sound daunting - and there is more detail in Annex A - but the good news is there are many win-win solutions that can quickly boost the economy, protect the climate and the safety of road users. Some of these, whether high occupancy lanes or strategic transport budgets, that are multi-modal rather than siloed, were already on the last Labour government's agenda. We have set out how you can rethink RIS3 to ensure it is fit for these challenging times in Annex B.

I look forward to hearing from you at your earliest convenience and in any event by 17 April 2026.

Yours sincerely,

A handwritten signature in black ink that reads "Chris Todd". The signature is written in a cursive style and is underlined with a single horizontal line.

Chris Todd

Director, Transport Action Network

Cc: Ed Miliband, Secretary of State for Energy and Climate Change

Ruth Cadbury MP, Chair of Transport Select Committee

Toby Perkins MP, Chair of Environmental Audit Committee

Annex A

New factors requiring urgent reconsideration

Section 3 of the Infrastructure Act 2015 provides that:

In setting or varying a Road Investment Strategy, the Secretary of State must have regard, in particular, to the effect of the Strategy on—

- (a) the environment, and*
- (b) the safety of users of highways.*

While these are obviously material considerations, there are clearly others, which have been combined below.

Economics and business cases

Recently released evaluations confirmed significantly reduced economic benefits for what were expected to be the best performing RIS2 schemes⁸. The long-delayed Post Opening Project Evaluations (POPE) therefore suggest that RIS2 as a whole has delivered lower value for money, with significant implications for RIS3. Indeed, RIS2 was set in early 2020, just over a year since the last refresh of traffic projections.

By contrast, it is nearly four years since DfT last updated its National Road Traffic Projections, with the unprecedented record oil shock in 2026 making previous assumptions even less reliable. Unprecedented turbulence requires a different approach, one that considers what might be “least regrets” options against different scenarios, including traffic reduction in line with recommendations from the Transport Committee and Government Office for Science⁹.

Carbon

Emissions from use of the SRN make up over a tenth of UK CO₂ emissions, the largest climate liability under single management. Worryingly, the recently published POPEs showed higher than forecast carbon emissions from schemes, even with less traffic than forecast. This proportion is expected to grow significantly into the 2030s, all the more so with ambition to decarbonise the transport sector being repeatedly cut back¹⁰. Reducing ambition, combined with larger vehicles, is already having an impact, with UK domestic transport emissions reaching 30% for the first time in 2024¹¹.

The National Networks National Policy Statement was designated in May 2024, on the basis of “reasonable to high level of confidence” in the ZEV mandate. Yet the 2025 ZEV flexibilities would reduce savings by as much as 10%. Economic turbulence is likely to slow fleet turnover, reducing the pace of electrification and the anticipated savings. This is especially the case for heavier vehicles, which cause a disproportionate share of SRN user emissions.

Carbon assessment therefore needs to consider and reduce emissions from the SRN as a whole, rather than simply of new schemes. Inclusion of a KPI for user emissions on existing roads is in line with the approach of the PAS2080:2023 carbon standard. It is also justified by the relative increase in spending on Operations, Management and Renewals compared to major schemes.

Recent geopolitical and legal events now call into question the underlying baseline of the Carbon Budget and Growth Delivery Plan's Energy and Emissions Projections, which is heavily upside focused. The oil shock, data centre demand, and a recent High Court decision, strongly call into question whether this can remain a robust baseline¹².

Resilience

The Environment Agency suggests about half of UK transport infrastructure will experience frequent flooding by 2050, with railways disproportionately exposed¹³. These forecasts were published in 2024, but relied on the 2018 UK Climate Projections, meaning they were outdated on publication. Even if a 2024 climate model had been used, it would likely have underestimated risk given the accelerated warming observed over the past three years.

Though this is perhaps an issue of the environment having an effect on the RIS, rather than the other way around, applying the latest climate science is clearly crucial to a lawful decision on RIS3. Following more record floods in early 2026, it is also one where public awareness is increasing¹⁴.

Nature recovery

New data shows that only 3% of habitats are in favourable conservation status and over half of the top seven pressures on habitats are transport related¹⁵. While the Government is proposing to make Biodiversity Net Gain mandatory for infrastructure projects soon, there are three reasons why this is inadequate and cannot be used to sidestep detailed analysis of RIS3's impact on nature.

First, BNG is already in place for RISs, yet nature continues to decline. Second, there is no effective long-term maintenance in place, as the debacle over the deaths of half a million trees at the flagship A14 scheme showed. Third, and most significantly, BNG simply does not account effectively for the mortality, fragmentation and disturbance caused by road traffic, such as the effects of schemes increasing traffic on surrounding roads beyond the red line. With the Office for Environmental Protection advising Parliament that nature targets are ever further off track, this needs to be taken seriously.

Health

Recent data from the Office for National Statistics shows the first decline in healthy life expectancy in recorded data¹⁶. The safety of road users therefore needs to be viewed expansively, not being simply about death from collisions but also whether the SRN enables

healthy levels of physical activity. Much of the SRN is a major barrier to local connectivity, while few trunk roads make adequate provision for active travel. Reducing ill health and time lost to work as a result has obvious economic benefits too.

Particulate pollution and road run off

The 2025 Environmental Improvement Plan sets a most welcome stronger ambition on cutting particulate pollution, which is likely to require less traffic in urban areas, including on sections of the SRN. Reducing this and other forms of pollution, such as road runoff, is vital. The impacts of particulate pollution from road transport, in particular tyre wear, are only just emerging. In watercourses 40% of microplastic pollution comes from tyres, while a recent study shows that two-thirds of microplastic pollution in the air comes from tyres, with significant health risks¹⁷. The environmental principles policy statement clearly requires a precautionary approach to be taken here.

Annex B

Way forward

The former chair of the ORR recently described RIS2 as a “triumph of aspiration over affordability”. That came on the back of the Transport Committee 2023 inquiry that similarly raised concerns about a lack of delivery, transparency and assessment against different traffic scenarios¹⁸. The challenges now are a level above this. With UK road fuel usage increasing by 8% since 2020, while gas use has declined by 16% over the same period, different transport priorities are urgently needed. The Secretary of State for Transport should therefore lay a report before Parliament¹⁹ explaining that the oil shock requires a rethink before RIS3 is published.

Uncertainty

The Transport Committee in 2023 called for RIS3 to include *“a plan for how it will better anticipate, assess and deal with risks to timely delivery, and ensure projects remain on budget and good value for money”*. Though ministers from the PM downwards stated last year that a new era of global uncertainty and the end of globalisation had begun, the last month’s events take this to a new level.

The National Road Traffic Projections 2022 did not even consider the last government’s policies and funding to improve sustainable travel, let alone this government’s ambitious agenda for transport or indeed devolution. A new approach, National Road Traffic Scenarios 2026, is needed to manage uncertainty by choosing least regret options. This would be in line with

Recommendation 1 of the Transport Committee's Strategic Road Investment report which said: *"The Government should model and report on scenarios where traffic levels on the SRN are a) reduced and b) maintained at current levels, alongside the transition to a cleaner vehicle fleet, in order to assess the potential contribution of demand management to reaching net zero."*

Elements of RIS3

Making a major five year investment decision in such economic turbulence, including for many schemes already struggling to demonstrate value (like the A38 Derby Junctions where costs have escalated by more than 200% since 2020), is not credible. RIS3 should therefore be pared back to focus on Operations, Maintenance and Renewals with larger designated funds for safety, integration and resilience. This is already the approach taken for rail.

Going forward, an integrated strategic budget would be especially valuable to take an integrated approach to reducing disruption, whether a parallel railway being closed by a landslip, or a local road between the SRN and an industrial area frequently closing due to flooding.

Integration

If RIS3 does not take a fundamentally different direction to RIS2, the national ambition for integrated transport risks being stillborn. Besides causing unreliability, a lack of innovation in England now means long-distance travellers have far fewer travel choices compared to neighbouring countries. France, for instance, has a vibrant coach sector, over 100 lift share hubs around its motorways, with some integrated into local public transport. Enabling choice, as the last Labour government sought to, would help people with the cost of living as well as address Transport Decarbonisation Plan ambitions, like increasing occupancy, that have gone nowhere in five years. RIS3 should therefore aim to deliver 30 new interchanges and 300 miles of bus lane on the SRN, backed up by area wide travel planning.

Carbon monitoring and action

We were disappointed that the government did not take the opportunity in its new Infrastructure Strategy to respond to the National Infrastructure Commission's recommendation to establish a monitoring regime for transport decarbonisation plans by 2025, including annual reviews²⁰. The RIS3 performance specification needs to include a stretch KPI for user carbon, with PIs for modal shift and occupancy, plus requirements for putting plans in place, including through new partnerships with mayoral authorities. Influencing modal shift has already been achieved with Designated Funds in the Solent Travel Choice Project, but it needs formalising through a KPI and funding.

Devolution and route strategies

The inappropriate geography of route strategies, with Birmingham split between five, and the 2014 National Highways licence, with no requirements for cooperation, are totemic of how National Highways is years behind addressing the devolution agenda. With the Chancellor's

Mais lecture highlighting the importance of fiscal devolution, far greater change is needed. This is another reason why RIS3 and wider roads governance needs a rethink, rather than tweaks.

Transparency

In line with TAN's recent letter to the Transport Committee²¹, the Committee's 2023 recommendations for transparency, especially of enhancement costs, still have not been followed through. Beyond that, transparency of action plans will be crucial. During RIS2 National Highways did not publish its plans for safety and delays, preventing wider scrutiny and leading to KPIs being missed for both.

¹ [TAN roads letter to Transport SoS](#), TAN, 4 March 2020

² [Headwinds: transport decarbonisation in a storm](#) Marsden (2025)

³ ['Smart' motorway reports expose costly failure](#), TAN, 19 February 2026

⁴ [Reopen RIS2 letter](#) TAN (2022)

⁵ [DfT full response to TAN on RIS2](#) (2022)

⁶ [Transport Action Network Limited, R \(on the application of\) v Secretary of State for Transport \[2025\] EWCA Civ 702](#) 10 June 2025

⁷ [The condition and maintenance of local roads in England](#), NAO (2020)

⁸ ['Smart' motorway reports expose costly failure](#), TAN, 19 February 2026

⁹ [Net Zero Society: scenarios and pathways](#), GOS (2023)

¹⁰ [Headwinds: transport decarbonisation in a storm](#) EDRC (2025)

¹¹ [2024 UK Greenhouse Gas Emissions, Final Figures](#), DESNZ (2025)

¹² [Members of the Alternative A5 Alliance, Application Of \(Rev1\)](#) [2026] NIKB 10 (11 March 2026)

¹³ Environment Agency (2024) [National assessment of flood and coastal erosion risk in England](#)

¹⁴ [The English roads at risk of being underwater](#) (FT, 13 March 2026)

¹⁵ [Habitats Regulations 9A report for England 2019 to 2024](#) Defra (2026)

¹⁶ [Healthy life expectancy, UK: between 2011 to 2013 and 2022 to 2024](#) ONS (2026)

¹⁷ [Composition, interactions and resulting inhalation risk of micro- and nano-plastics in urban air](#), Nature (2026)

¹⁸ [Prioritise strategic road maintenance over new enhancements](#), Transport Committee (2023)

¹⁹ Pursuant to section 3(7) of the Infrastructure Act 2015

²⁰ Recommendation 13 in [second National Infrastructure Assessment](#): Establish a monitoring and review regime for transport decarbonisation plans

²¹ [TAN letter to Transport Committee](#), 18 February 2026