Transport Action Network

Response to:

RIS3 variation consultation

Introduction

Transport Action Network (TAN) welcomes the opportunity to respond to the Department's consultation on varying the third Road Investment Strategy (RIS3). Our answers to the survey questions are below.

1. Name

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2. Email address

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3. Name of organisation you are representing

Transport Action Network (TAN)

4. What is your organisation category?

Environmental transport group

5. Do you support or oppose the changes to RIS3 outlined in the letter, including the overall £428 million reduction proposed and the specific areas for savings proposed to achieve it?

Support proposed changes (with caveats, as below)

6. Please let us know the reasons for your response and any other comments you have on the proposal or any alternatives

TAN strongly supports the proposed changes to cancel the £600 million A38 Derby Junctions and the £700 million A46 Newark Bypass schemes (saving £315m up to 2030). Ultimately these projects would cost at least £1.3 billion, yet have very weak business cases. The economic benefits included in the scheme assessments rely on small time savings spread over the 60 year appraisal period.

The evidence submitted in the DCO examinations show both projects will increase traffic levels, leading to wider network congestion. As well as increasing traffic, both projects will also lead to increases in noise and air pollution as well as carbon emissions. Both schemes will also lead to significant environmental impacts. We strongly disagree with the updated biodiversity assessment of the A38 Derby Junctions scheme in Annex A (more information under Q.11 below).

While some are suggesting the schemes should be paused rather than cancelled, that would hinder the development of alternatives offering better value and strategic fit, such as active travel and rail upgrades. This will also create more uncertainty and would be unfair on those whose homes would be blighted by the risk of being compulsorily acquired.

For the remaining £113m cuts to be found within RIS3 capital budgets, we do not support a blanket and indiscriminate 2% cut across all capital budgets. We propose a targeted approach, seeking cuts where proposed spending least aligns with RIS3 and wider government objectives to increase public transport and active travel.

For instance, capital spending which would increase traffic and congestion and would create more car dependency should be reduced. For this reason, we would support cuts to the 13 RIS4 pipeline road projects to be developed in the RIS3 period and built in the RIS4 period. Many of these RIS4 pipeline projects are explicitly seeking to increase road capacity for future housing and commercial development, creating more car and HGV/LGV usage. This is a 'business as usual' approach, leading to more traffic and congestion, and is not aligned to government objectives to tackle carbon emissions from transport.

Likewise, we would support cuts to capital spending on the Smaller Schemes and Growth and Housing National Programmes where the schemes would simply result in increasing capacity and releasing suppressed demand. However, smaller schemes that are designed to reduce severance and increase active travel should be prioritised, such as pedestrian and cycle crossings. The Smaller Schemes and Growth and Housing National Programmes are discretionary, and not responding to statutory requirements.

We strongly oppose any cuts to capital budgets for National Programmes for Safety and the Environment, and Designated Funds for improving road safety and the environment. We also oppose any reduction in funding to increase active travel provision on the Strategic Road Network.

The safety and environmental National Programmes were created to respond to legal requirements and mandatory obligations. Cuts to these road safety and environment capital budgets will result in Capital Commitments, targets and KPIs becoming even harder to achieve. Road safety improvements deliver good value for money, as well as saving lives, and it would be a mistake to cut the new National Programme for Safety capital budget. This year's National Highways annual report demonstrated that National Highways missed its safety reduction target by 12%, only reaching 38% of the 50% target by the end of 2025. Cutting any of the safety budgets would be a false economy, and would place lives at risk.

Mitigating outfalls and the Environment National Programme

For the first time, National Highways was given a Capital Commitment in RIS3 to mitigate 250 high risk outfalls during the RIS3 period. This was a significant achievement, after years of vague aspirations on 'water quality', no targets, and a failure to monitor and hold National Highways to account. National Highways has just published its list of 250 confirmed locations of the highest priority outfalls to be mitigated in RIS3[1], after a lengthy process of identifying and then validating and prioritising the 1,236 highest risk sites. This was a huge milestone and a significant amount of work.

National Highways has a legal duty under the Water Environment Regulations 2017 and Environmental Permitting (England and Wales) Regulations 2016 to not pollute water courses. It is therefore absolutely imperative that the capital budgets for the Environment National Programmes are not cut, and that the 250 target is not reduced. The public will be justifiably angry to see any backpeddling on this commitment.

However, the Office of Rail and Road warned in its 2025 Efficiency Review[2] (of National Highways' draft Strategic Business Plan) that the £159 million allocated to mitigate the 250 highest risk outfalls was not adequate and that National Highways "estimates that between £186m and £294m would be required to deliver all the mitigated assets by the end of RP3". We were very pleased to see the Department remain committed to the 250 target in the final published RIS3 in March 2026. National Highways will need adequate funding to deliver the 250 target before the end of the RIS3 period. The Environment National Programme capital funds should be ringfenced, to ensure the 250 outfalls Capital Commitment is honoured and delivered.

Climate mitigation and energy security

Recent official statistics show that domestic transport emissions have increased for the last two years. Progress on the only two quantified transport policies in the Carbon Budget and Growth Delivery Plan is insufficient: the consultation on scaling back the Zero Emission Vehicle mandate would go further in the wrong direction, while the key cycling and walking metric has gone backwards every year this decade. The lack of progress on decarbonising freight is even more concerning, and relevant for the SRN given its impact on emissions. Meanwhile geopolitical tensions putting pressure on diesel supply create resilience and security issues too.

With public and business concerns increasing as extreme weather events in 2026 broke more records, the reopening of RIS3 requires wider changes, to reflect growing constraints of carbon budgets as well as financial ones. That in turn requires a more radical shift in

[1] Water Quality Plan 2030: Confirmed high priority locations (2026 Update), National Highways, September 2026

[2] ORR's advice on National Highways' draft strategic business plan, ORR, 28 November 2025 (published 26 March 2026)

spending priorities as well as to its performance specification through inclusion of a user carbon metric, a proxy for reliance on foreign oil too.

Active travel funding

National Highways' active travel funding has been cut in successive Road Investment Strategies. This trend must be reversed starting with increasing, not reducing, active travel funding. This is not a discretionary activity, as described by the ORR, but is a core component of National Highways' work programme and Licence, to provide safe infrastructure for ***all road users*** not just motorists. The Infrastructure Act 2015 requires adequate funding be in place to deliver a Cycling and Walking Strategy (CWIS), which is delivered on the Strategic Road Network (SRN) by National Highways. The ORR and Transport Focus have called for National Highways to improve reporting of its performance for users of the SRN who walk, wheel or cycle, by publishing an annual active travel delivery plan with quarterly reporting. This would provide an opportunity to maximise value from increased funding.

Further cuts to enhancement schemes

Ahead of Autumn Budget 2026, further substantial savings could be made by cancelling two poor value for money road projects: the A66 Northern Trans Pennine and the Lower Thames Crossing. This would release substantial funds which could be used to fund better value public transport projects, road safety projects, strategic rail freight interventions, and low cost active travel schemes to create modal shift.

There is little transparency about the cost of the A66, however the ORR's Efficiency Review stated that National Highways' draft Strategic Business Plan showed the A66 cost estimate was £540 million higher than the most recent forecast (reported to ORR on a quarterly basis)[3]. At the DCO examination, the A66 was estimated to cost £1.5 billion, yet had a Benefit Cost Ratio (BCR) of just 0.92, meaning it would cost more to build than it would ever deliver in economic benefit. Now, with the costs having risen even further the BCR must surely have plummeted making the A66 project the worst value for money project in RIS3.

Meanwhile, the privatised Lower Thames Crossing continues to swallow public funds, yet also has a very weak business case, with an adjusted BCR of just 1.22. Whilst £3.1 billion has been committed from public funding, an additional £174 million has been allocated without announcement or scrutiny[4]. The Department should at the very least seek the extra £174 million pledged for the Lower Thames Crossing in RIS3 (over and above its supposed 'final' allocation of cash in the Autumn Budget), in efficiency savings.

The privatisation of the Dartford Crossings and Lower Thames Crossing will also lose the exchequer hundreds of millions of pounds in perpetuity due to the loss of toll revenues. This

[3] ORR's advice on National Highways' draft strategic business plan, 5.20, ORR, 28 November 2025 (published 26 March 2026)
[4] Extra £174m earmarked for 'spiralling' bill for Lower Thames Crossing, Guardian, 8 June 2026

will weaken the business case further. Having sunk political capital into two poor-value for money schemes is no reason to continue pouring good money after bad.

7. Do you agree or disagree with the prioritisation of capital funding for maintenance and renewals?

Agree

8. Please explain the reasons for your response to Question 7

The prioritisation of maintenance and renewals in RIS3 was a breakthrough, after years of prioritising outdated, poor value and increasingly expensive road projects. TAN strongly agrees that repairing and renewing our roads must be a top priority and funding protected from the proposed cuts. Repairing ageing assets now saves money later. The ORR has already expressed concern that the ambitious renewals and maintenance programme will be very challenging for National Highways. Cutting capital budgets will make this ambition harder to deliver.

Any renewals and maintenance should also enable higher uptake of active travel on the SRN, delivering on RIS3's improving safety for all objectives. 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 in its Capital Commitments. 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

9. Do you have any views on how the RIS3 objectives may be prioritised in any capital funding reductions?

Investing in active travel and small safety schemes and maintenance and renewals have a much higher Benefit Cost Ratio (BCR) and are much better at meeting RIS3 objectives. For instance, increasing active travel funding in RIS3 supports five of the six objectives (grow the economy, improved safety, network performance, resilient network, and improved environment).

Maintaining and renewing existing assets delivers all of the RIS3 objectives, especially growing the economy, and creating better network performance and a more resilient network.

Meanwhile, increasing capacity and releasing suppressed demand (by new roadbuilding) will not achieve RIS3 objectives, but will undermine them. The RIS4 pipeline of 13 new road schemes does not deliver on the five relevant RIS3 objectives. Road projects usually have weak business cases and so do not grow the economy (unlike better value transport interventions such as public transport, rail freight, and active travel projects).

The RIS4 pipeline would also increase traffic and congestion on the wider road network (especially during the construction period, where the economic impact of delays and disruption are often underestimated, see M25 Junction 10), undermining the network performance objective. The RIS4 pipeline would also not improve safety for all, as creating additional traffic makes cycling and walking more difficult and unsafe. The RIS4 pipeline does not deliver the improved environment objective either, due to increased traffic, noise and air pollution, biodiversity loss, and carbon emissions. Creating more car-dependency will not create a resilient network, but will simply lead to increased traffic and congestion. Similarly, the Growth and Housing Accelerator National Programme has the potential to undermine many RIS3 objectives, particularly if it simply leads to more car-based sprawl creating more congestion.

10. Regarding the two enhancement schemes, is there any further information or evidence you can provide to supplement the assessment information provided in Annex A?

Yes

11. If you ticked 'Yes' to Question 10, please provide any information or evidence here

TAN is concerned about the reliability of the information provided in the original and amended Annex A. The updated Annex A simply swapped over most of the data between the A38 Derby Junctions scheme and the A46 Newark Bypass.

A38 Derby Junctions

This locally unpopular road scheme would increase traffic, noise and air pollution (especially around the Royal School of the Deaf) and carbon emissions. It would also completely destroy Kingsway Local Wildlife Site and 11.8 hectares of mature trees including a veteran oak with no biodiversity net gain requirements. When the Annex A assessment table was updated, the

A38 biodiversity assessment went from 'slight adverse' to 'slight beneficial'. This is clearly wrong and is simply not credible.

The A38 project also risks worsening congestion on the local road network. The housing associated with the scheme risks entrenching further car dependency and increasing traffic, pollution and local road network congestion as there are no plans to improve public transport links for the new housing. The scheme is estimated to cost at least £600 million, has an extremely weak business case, and with no contractor and no full business case, it risks costing more to build than it will ever deliver in economic benefit.

A46 Newark Bypass

This controversial road-widening scheme would cost at least £700 million, and would lead to increased traffic, air and noise pollution and carbon emissions. The scale of this huge project is inappropriate for a historic market town. It would also cause significant harm to the Great North Road Grasslands Local Wildlife Site and destroy a rookery with up to 100 nests. The project would also increase traffic and congestion in Newark and do nothing for residents without a car. It is also very poor value for money with National Highways estimating it will only generate £1.20 of benefits for every £1 spent.

Conclusion

- We support the cancellation of the A38 Derby Junctions and A46 Newark Bypass schemes (saving £315 million up to 2030). Both are poor value for money and would have significant impacts on public health and the environment.
- We oppose an indiscriminate 2% cut across all RIS3 capital budgets. Savings should be targeted at spending that delivers least against RIS3 objectives and does not support legal or mandatory requirements.
- The £113 million of remaining savings should therefore come first from the 13 RIS4 pipeline schemes. These proposed road-capacity projects risk increasing traffic, congestion and car dependency, undermining RIS3 objectives around economic growth, network performance, resilience, safety and the environment.
- Savings should also be sought from the Growth and Housing Accelerator and Smaller Schemes National Programmes where projects primarily increase road capacity and traffic rather than delivering clear safety, environmental, accessibility or active travel benefits.
- Cuts should not be made to Safety and Environment National Programmes (especially mitigating toxic outfalls) and Designated Funds, threatening National Highways' ability to meet statutory and mandatory requirements.

- Active travel funding should be protected and increased, reversing successive reductions in investment. Active travel supports five of the six RIS3 objectives and can deliver safer, healthier and more sustainable journeys.
- Maintenance and renewals capital budgets should be ringfenced to meet RIS3 objectives including improving the environment (by tackling outfalls at the same time), and improving safety and active travel provision, and reducing severance.
- Further cuts can be achieved by cancelling poor value road projects like £2bn+ A66 and the Lower Thames Crossing which has at least £3.1 billion in public funding.

14 September 2026

Abby Coften
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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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