



*Response to:*

# **Request for feedback on draft RIS3**

**November 2025**

## Summary

We remain concerned that the ‘tail’ of RIS2 schemes which will be constructed in the RIS3 period will swallow up a disproportionately large part of the £24.983bn RIS3 settlement, leaving insufficient funds for maintenance and renewal, and vital environmental and safety programmes. These are the elements that need to be prioritised in RIS3.

There is little to no transparency about the costs and value for money of enhancement schemes and no evidenced reasoning for expanding road capacity in the face of its failure to reduce congestion. RIS3 is an opportunity to increase transparency about how significant amounts of public money are spent and to present how congestion can be best reduced on the Strategic Road Network (SRN).

The RIS4 pipeline must not default into a long list of historic, yet ultimately unaffordable and poor value, twentieth century road schemes. This will result in National Highways wasting public funds pursuing unviable schemes, while embedding traffic growth and congestion, and undermining the economy. It will also prevent investment in sustainable non-road alternative solutions.

Unfortunately, RIS3 decisions continue to be based on outdated and undeliverable National Road Traffic Projections (NRTPs) which contain no traffic neutral or traffic reduction scenarios, ignore investment in public transport and fail to address increasing instability.

The draft RIS3 (dRIS3) was thin on detail in many key areas, including the KPIs and PIs that will be selected. This makes it difficult to comment substantively on many issues. In summary, our concerns include that the dRIS3 contains:

- No assessment of existing assets
- No assessment of the quantity and cost of maintenance and renewals required in RIS3 and future road periods
- No information on the proportion of funding going on maintenance and renewals versus enhancements
- No evidence to justify investing in road enhancements compared to active travel, public transport or rail freight
- No evidence of learning from the implementation of previous road investment strategies and from scheme Post Opening Project Evaluation (POPE) reports
- No sense that more sustainable alternatives to capacity enhancements will be properly and openly assessed in accordance with PAS2080:2023 commitments, when assessing network issues.

- No Key Performance Indicators (KPI) or Performance Indicators (PI) to show how RIS3 and National Highways will be held to account
- No assessment of risks to meeting Environmental Improvement Plan targets and commitments.
- No up-to-date modelling or scenarios to justify decision-taking at a time of unprecedented uncertainty, instead 2022 NRTTP still appears to be the basis.

For the final RIS3 to be credible in the context of the Government's missions and challenges, the following will need to be addressed in detail, alongside far greater transparency:

- **Treatment of uncertainty**, given the increasing instability around politics and the climate.
- **National Programmes** - need proper targets and enhanced monitoring
- **Enabling choice** - needs to be a National Programme to deliver the change required
- **Road user carbon** as a KPI
- **Outfalls and soakaways KPI** - water quality was a PI only in RIS2, with no target, and ORR failed to assess it as a PI in RIS2.
- **Ringfenced funding** for an outfalls and soakaways National Programme
- **Natural environment** - a step change in approach is required here.
- **Reassessing tail RIS2 schemes** to see if cheaper options or alternative non-road based solutions would deliver.
- **Clarity on funding reporting** - Operations, Renewals and Maintenance (ORM) to be split into separate budgets so it is clear where money is being spent.
- **Designated funds** to be spent on rectifying the many problems on the existing SRN, not misused to pay for mitigation to reduce enhancement scheme costs, or for public relations.
- **Reducing RIS future funding**, especially given the waste recently identified from cancelling unaffordable schemes and the moves towards devolution.

## Introduction

We welcome the opportunity to comment on the draft RIS3, before it is finalised in March 2026. Since the last and only public consultation on RIS3 development in 2023, over two years ago, much has changed, including the election of a Labour government with new priorities.

Previously, we submitted a response<sup>1</sup> in February 2022 to the DfT's *Planning ahead for the Strategic Road Network: Developing the third Road Investment Strategy* policy paper. We also responded to the 2023 consultation on the National Highways' Initial Report, *Shaping the future of England's strategic roads*<sup>2</sup>. These frame many of our concerns with strategic roads policy in England.

Although there has been confirmation since then that the £16+bn Lower Thames Crossing will no longer be funded from National Highways' RIS3 settlement, the publicly funded elements of the LTC will still be funded from DfT wider budgets, as will some of the additional roads required to make it function. This will divert funds away from better value for money active travel and public transport and rail freight schemes which are more likely to deliver reduced congestion and economic growth than building bigger roads.

## 'Tail' RIS2 enhancement schemes swallowing up RIS3 funds

Since the 2025 spending review, the Government has approved DCOs and committed funds for many large and expensive RIS2 schemes such as A66 Northern Trans Pennine, A38 Derby Junctions, A46 Newark Bypass, M54-M6 Link, and M60 Simister Island. Many of these schemes have not yet started construction, yet are now committed for RIS3 with no information in the public domain of how much they will cost. Meanwhile RIS3 funds will also continue to be spent on many expensive RIS2 schemes still in construction (such as the A428 Black Cat to Caxton Gibbet, A417 Missing Link, A57 Link Roads, M3 Junction 9, M25 Junction 10, and the three A47 schemes).

The Office of Rail and Road's Annual Assessment of National Highways' performance: end of the second road period April 2020 to March 2025<sup>3</sup> contained details of significant costs increases on five RIS2 schemes since June 2020. See Figure 5.10 below which shows the five enhancement schemes that had an increase in total outturn forecast of greater than £200 million.

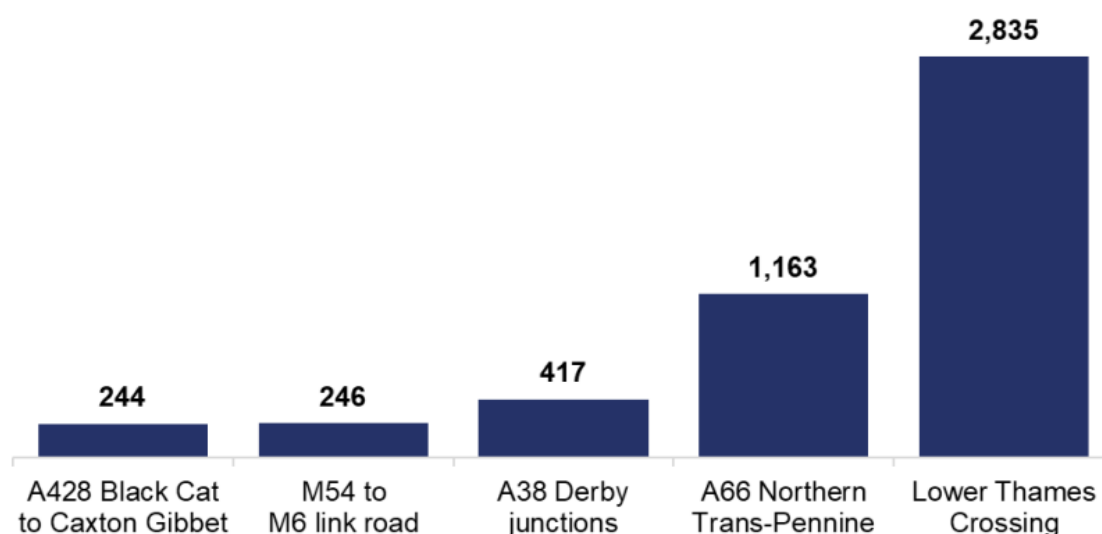
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<sup>1</sup> <https://transportactionnetwork.org.uk/wp-content/uploads/TAN-response-to-DfT-RIS3-paper.pdf>

<sup>2</sup> <https://transportactionnetwork.org.uk/wp-content/uploads/TAN-Interim-Report-RIS3-consultation-response-with-refs-1.pdf>

<sup>3</sup> [Annual Assessment of National Highways' performance: end of the second road period April 2020 to March 2025](#), Office of Rail and Road, July 2025

**Figure 5.10 Largest increases to total outturn forecast since the start of RP2, (£ million)**



Although the Lower Thames Crossing (LTC) is no longer funded out of National Highways' RIS3 settlement, the cost increases of the other four schemes which will be constructed in the RIS3 period total a minimum of £2,070 million. It is likely that other tail RIS2 schemes have suffered cost escalation / underestimation, especially given that construction inflation has risen faster than the background rate.

Meanwhile, the benefits and strategic case for 'tail' RIS2 schemes has decreased. The proposals for road pricing for EVs will also change forecasts. As long ago as 2006, the Eddington Transport Strategy called for schemes to be assessed against road pricing scenarios, and this cannot be put off any longer. Similarly continued declines in trip rates<sup>4</sup> alongside the prospect of tighter immigration controls, reducing population growth, should be included in the core scenario of the National Road Traffic Projections (NRTP). Smaller interventions would not only be more effective and faster at cutting congestion, but will also help to deliver the 1.5m homes to be built in this Parliament target, while offering better returns across a wider range of future scenarios.

In order to maximise a quick boost to productivity, committed RIS2 schemes that have not yet entered construction (such as the A66 Northern Trans-Pennine and the A38 Derby Junctions scheme) should, even at this late stage, be fundamentally reassessed to see if objectives could be achieved through cheaper alternatives. For instance, cheaper and quick safety schemes should be implemented on the single carriageway sections of the A66<sup>5</sup>, and public transport improved in Derby to alleviate congestion.

<sup>4</sup> [National Travel Survey: 2024](#), DfT, August 2025

<sup>5</sup> [Improving safety on the A66 – faster, cheaper](#), Keith Buchan, April 2025

## Lack of transparency on scheme costs

Despite claims (in Q19 of the DfT's RIS3 stakeholder event FAQ<sup>6</sup>) that up to date scheme costs are available on National Highways' website, this is simply untrue. Costs are often missing from National Highways' scheme pages or are out of date. Information requests are routinely refused by National Highways, and the lack of transparency is a perennial problem recognised by the Transport Committee. This means that MPs and the public are being kept in the dark as to the true cost of these big road schemes.

It was only through the publication of the ORR report on the whole of RIS2 that we found out that there had been over £2 billion cost increases on four large schemes. It is unacceptable that the public only finds these things out once every five years or when it suits National Highways.

In 2023 the Government accepted<sup>7</sup> Recommendation 8 of the Transport Committee's Strategic Road Investment report<sup>8</sup> that:

*"The Government should work with National Highways to introduce a "live" project dashboard which provides up-to-date information on each project in the RIS 1, RIS 2 and subsequent RIS portfolios. The dashboard should provide information on original and current: costs; Start of Work date; Open for Traffic date; and planning status (if applicable). (Paragraph 68)"*

The Government acknowledged the "appetite for more frequent updates for the enhancements portfolio in a single dashboard format" and committed to "work closely with National Highways and the ORR, to explore the opportunity for more frequent public project reporting in one place".

Yet, despite the Government accepting the recommendation and this specific commitment over two years ago, National Highways has failed to create a live project dashboard with original and current cost estimates for schemes. This is completely unacceptable.

For transparency purposes we strongly recommend that the most up to date scheme cost estimates are included in the list of committed schemes in RIS3, as confirmed in Lilian Greenwood's response to Rt. Hon Dame Priti Patel MP on 23 July 2025:

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<sup>6</sup> The DfT's FAQ for RIS3 was produced for its national stakeholders events in September 2025, but has not been placed yet in the public domain

<sup>7</sup> [Strategic road investment: Government response to the Committee's sixth report of Session 2022–23](#), October 2023

<sup>8</sup> [Strategic road investment Sixth Report of Session 2022–23](#), Transport Committee, July 2023

*“Scheme costs for the SRN schemes will be confirmed as part of the setting of the third Road Investment Strategy, planned to be published by the end of March 2026”<sup>9</sup>.*

We would regard publication of the latest cost estimates for enhancement schemes to be a pre-requisite in a Road Investment Strategy. However at the 24 September 2025 stakeholder event and in its FAQ circulated after the event, the DfT contradicted the written answer from Lilian Greenwood. We were told then that scheme costs would **not** be included in the final RIS3, but would instead be included in National Highways’ Delivery Plan (usually published in July). However, the FAQ now says “National Highways’s Delivery Plan will confirm key milestones for each committed project”, yet does not confirm it will include up to date scheme costs.

If up to date scheme costs are not included in the final RIS3, the lack of transparency on scheme costs identified by the Transport Committee in 2023 will continue up to 2031. This secretive approach is completely unacceptable and simply cannot continue. In the interests of transparency, to Parliament and to the public, scheme costs must be published in the final RIS3, and should be updated on at least an annual basis and listed publicly, either in the promised ‘live dashboard’ or in National Highways’ Delivery Plan which is published annually. The DfT and National Highways are spending public money, and must be accountable and transparent about the costs of schemes they are committing to.

## RIS4 pipeline

Due to constrained public finances and the dRIS3’s stated intention to refocus on maintenance and renewal, not enhancement schemes, it is essential the RIS4 pipeline of capacity enhancements is vastly reduced. Construction of RIS pipeline schemes was deferred by Written Statement<sup>10</sup> until after 2030 in March 2023 due to "funding headwinds and pressures facing transport infrastructure delivery". However these 31 schemes were still left in development, wasting public funds and preventing more sustainable solutions from emerging. There is no publicly available information about these 31 “RIS3 pipeline” schemes on the National Highways website, demonstrating the same lack of transparency which the ORR and Transport Committee have both complained of.

RIS2 also included strategic studies, some of which have been published such as the M4 to Dorset Coast study (M4DC)<sup>11</sup>. The M4DC study (unsurprisingly, given National Highways is a highways company) recommended yet more undeliverable road building (including an unviable “strategic highways scheme at Salisbury”). The recommendation is simply a rehash of discredited schemes which have been rejected time and again since the late twentieth

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<sup>9</sup> [Written Answer](#), 23 July 2025

<sup>10</sup> [Written Statement to Parliament](#), 9 March 2023

<sup>11</sup> [M4 to Dorset Coast: Strategic connectivity study](#), National Highways, December 2023

century. The justification for the uncoded recommendation to plough huge sums into the A350, A36 and A338 was to benefit the relatively minor ports of Bournemouth and Poole.

Similarly, the RIS4 pipeline should not include undeliverable road projects within our most protected landscapes such as in the Pennines and the Peak District. These must be finally rejected outright, to prevent National Highways wasting further resources on unbuildable schemes with enormous environmental impacts.

DfT must resist pressure from local and regional interests and business groups to include their aspirations for outdated and unaffordable road schemes in the RIS4 pipeline. Instead DfT must be much clearer in RIS3 that there is no overflowing pot of cash and that investment is moving away from predict-and-provide enhancement schemes. RIS4 pipeline schemes should be limited to small-scale road safety improvements, or bus lanes, or other low impact or multi-modal infrastructure to achieve wider government objectives.

Reducing the number of RIS4 pipeline schemes also prevents National Highways from wasting scarce public funds on pursuing unaffordable road schemes that are unlikely to be built. By taking a stronger stand on this the DfT would enable better (multi-modal) solutions to tackling road congestion to come forward. As it stands it risks being the blocker to progress.

## Road safety

We welcome that ‘Improve safety for all’ remains one of the overarching objectives of RIS3, as reflected by the priority given to it by road users in the consultations. However, we are disappointed that there is no acknowledgement that ambition has slipped since RIS2 and remain concern about progress on safety.

We noticed that a number of safety schemes were quickly implemented at the end of the RIS2 period and during the Interim Settlement period (2025-26). We would like to see this approach considered in place of enhancement schemes, to rapidly improve safety and save public funds. For instance, safety features should be considered immediately on the single carriageway sections of the A66, instead of the A66 Northern Trans Pennine project. This will prevent £2.2bn being wasted on a project which will take five years to build, will lead to more collisions on the dual carriageway sections, and would cause considerable environmental harm. Our expert report<sup>12</sup> showed safety features could be introduced immediately, costing less than 0.02% of the cost of the A66 project.

The DfT should also consider reinstating the hard shoulder on existing Smart Motorways under its maintenance and renewals programme. If the technology remained in place, but the hard shoulder was reinstated, this would bring greater safety benefits.

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<sup>12</sup> [Improving safety on the A66 – faster, cheaper](#), Keith Buchan for TAN, February 2025



## Concerns about what's missing in the draft RIS3

### Assessment of existing assets on SRN

In planning any road investment strategy, a prerequisite is to have a clear idea of the state of the assets. Therefore, we would expect to see a comprehensive assessment of the condition of the SRN included in RIS3, so that sufficient resources could be allocated to maintaining the network in a safe and viable condition in RIS3 and beyond.

The dRIS3 quotes an 'Economic analysis of the second road period' study, published by National Highways over five years ago in July 2020, giving an expected average Benefit-Cost-Ratio (BCR) for capital enhancement schemes. However, there is no equivalent analysis for the BCRs of maintenance and renewal schemes, which likely offer better value for money. A study by the DfT, quoted by the National Audit Office<sup>13</sup> showed that roads maintenance delivered a BCR of 7, meaning £7 was generated for the economy for every £1 spent, which is significantly better value for money for taxpayers. Again providing this information should be a given.

### Assessment of the quantity and cost of maintenance and renewals required in RIS3

As well as no overall analysis of the state of the SRN being presented publicly, there was no analysis of the quantity and cost of the maintenance and renewals required in RIS3. This is important for two reasons. Firstly, National Highways needs to work out what is affordable and to schedule its workload, which it cannot do in the absence of any data. Secondly it is important for transparency.

### Budgets for maintenance and renewals versus enhancements

In a Road Investment Strategy that emphasises the need to provide a “greater focus than ever” on maintenance, it is important that the funds match the rhetoric. Without clarity over spending it is impossible to tell whether maintenance is being prioritised.

### No evidence to justify investing in road enhancements compared to active travel, public transport or rail freight

The draft RIS3 talks a lot about the current economic importance of the strategic road network, but it does not make the case that increasing road capacity is the best way to generate economic growth or to support new housing. This is especially pertinent when the

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<sup>13</sup> [The condition and maintenance of local roads in England](#), NAO, 23 July 2024, highlights that the DfT's 2020 estimate of the benefit-to-cost ratio of local road maintenance was 7:1 (significantly higher than new road schemes)

N RTP modelling suggests that enhancing capacity on the road network will see congestion rising, i.e. to keep spending money on bigger roads is a failed policy.

None of these issues are mentioned, let alone discussed, so there would appear to be a gaping hole in the justification for this business as usual approach in the draft RIS3. Certainly, there is no justification for why £24.983bn warrants being spent on the SRN and why some, or all of it, is better spent on roads rather than other forms of transport which better support Labour's missions, including growing the economy and often have better business cases.

## **Learning from previous RISs and POPEs**

There was no sense from the draft RIS3 that much had been learned from the implementation of previous road investment strategies and from scheme Post Opening Project Evaluation (POPE) reports. This is not helped when the DfT delays the publication of POPE studies, such as for 'smart' motorways. These delays deny the public the ability to see whether the claimed benefits for road schemes have materialised and whether public money has been well spent. For POPE studies to be useful they need to be released in a timely manner and measure the same things that were modelled when the case for the scheme was made. Otherwise, as is often the case, it is impossible to fully understand the true impact of the scheme. For instance, recent POPE studies have not compared the same geographical areas when assessing whether journey time savings have been achieved, rendering the conclusions useless.

Given the projected poor value of road schemes in RIS2, with a predicted Benefit Cost Ratio (BCR) of only 1.8, it is a real surprise to see so many resources being allocated to building bigger roads. This is even more so when modelling suggests they will result in congestion worsening on the road network. Plus BCRs are often lower than predicted.

Clearly a new approach needs to be taken but the DfT seems incapable of doing this

## **Assessment of alternatives**

At present, there is no open and accountable way to show that more sustainable alternatives to capacity enhancements have been properly and openly assessed. Firstly, National Highways doesn't look at what the transport needs of an area, or a corridor, are. It just considers road issues. Secondly, it only looks to see whether there is funding allocated to improve public transport. Often there isn't. It then compares this with a budget of often several hundred million pounds for a new road and unsurprisingly, it picks the road as the only feasible option as that is the only one with funding.

At no point does it consider whether necessary transport improvements could be achieved by deploying the money allocated for the road in a different way, including across multiple

different interventions. This was true in its development of the A27 Arundel Bypass, while for the A303 Stonehenge it just ignored inconvenient facts around alternative road and tunnel configurations.

Exactly the same problems arise for National Highways' route strategies. Route strategies have a more strategic approach and look at longer distances. This makes sustainable public transport and active travel solutions more viable, but still National Highways always recommends bigger roads. This is unsurprising given it is a roads company. The task of assessing options should be given to a truly independent, mode-neutral body, not National Highways, in accordance with PAS2080:2023 commitments.

## **KPIs and PIs**

There was no detail in the dRIS3 of the Key Performance Indicators (KPIs) and Performance Indicators (PIs) for RP3. These will be critical in properly assessing the impact of RIS3 and ensuring National Highways actually delivers on the government's priorities set out in the RIS, and ensures it is delivering value for money. However TAN has concerns that the Office of Rail and Road is not effectively scrutinising National Highways' performance and whether it is meeting its KPIs and PIs. This is evidenced by the ORR failing in its assessment of National Highways' performance in the RIS2 period to even mention the Water Quality Performance Indicator (PI 4.7), let alone scrutinise it.

## **No assessment of risks to meeting environmental targets and commitments**

The dRIS3 contains no information about relevant environmental targets and commitments and how these will be effected by the schedule of enhancements and other work, nor what the risks of not meeting them are. Given the NAO highlighted breach of environmental laws as one of DfT's biggest risks<sup>14</sup> this would seem a major omission.

## **No up-to-date modelling or scenarios**

The National Road Traffic Projections (N RTP) date from 2022, and were not robust when published. All of the traffic growth scenarios result in a predicted increase in congestion, even with all the schemes in RIS2 being constructed, with only the behavioural change scenario bucking the trend up to 2040<sup>15</sup>.

Concern around the N RTP was raised by the Transport Committee in its report on strategic road investment and in particular that it only considered ever increasing traffic. It recommended:

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<sup>14</sup> Page 7, [Department for Transport \(DfT\): Departmental Overview 2022-23](#), National Audit Office, November 2023

<sup>15</sup> [National Road Traffic Projections 2022](#), Department for Transport, December 2022

*21. 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<sup>16</sup>.*

While the previous government noted, but did not accept this recommendation, on the basis it did not want to stop people moving around (in cars)<sup>17</sup>, that is exactly what it did for people who want to travel by active travel and public transport by not investing sufficiently in these modes.

Most of the scenarios are not compatible with our legal commitments on net-zero carbon emissions<sup>18</sup>, but equally, their modelling is so flawed and out-of-date that they are not much help in determining what exactly their impact will be.

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<sup>16</sup> [Strategic road investment: Sixth report of session 2022 - 23](#), House of Commons, 27 July 2023

<sup>17</sup> [Strategic road investment: Government response to the committee's sixth report](#), House of Commons, 20 October, 2023

<sup>18</sup> [National Road Traffic Projections 2022](#), Department for Transport, December 2022

## What should be in RIS3

### Treatment of uncertainty

This should be at the core of RIS3, given the increasing volatility of politics and the climate, leading to the need for a least regrets approach to developing infrastructure, focussing first and foremost on resilience and adaptation. This is connected to the need for up-to-date modelling in the NRTPs, which includes scenarios that reflect heightened modern risks. Where there are capacity issues, the DfT should focus RIS3 on multi-modal, least-regrets solutions.

### National Programmes

We welcome the introduction of new National Programmes “to deliver defined outputs that support RIS objectives or commitments” with the intention DfT “can more effectively monitor their delivery and outcomes”. We hope this will enforce a more prescriptive approach than the Designated Funds, which has enabled the abuse and wastage of public finance.

The National Programmes should have KPIs and specific targets attached to them to ensure delivery and improve monitoring. We especially welcome that DfT will become more involved in monitoring delivery and outcomes (presumably also value for money), as we are not convinced that the ORR has performed this role effectively during RIS2. Despite the glacial progress on tackling high-risk outfalls and the inclusion of Water Quality as a PI, the ORR did not assess this in RIS2.

### Enabling choice

TAN was pleased to see that increasing occupancy has been included in the Carbon Budget and Growth Delivery Plan (CBGDP). This was a commitment in the Transport Decarbonisation Plan (TDP) but was cancelled in 2023 alongside misleading rhetoric about “compulsory car sharing” by former PM Rishi Sunak.

A new National Programme is now required to enable modal shift and higher occupancy, not just dispersed funding from Designated Funds. This will need to consist of a mixture of physical infrastructure, such as lift sharing hubs, high occupancy or bus lanes and coach interchanges as are common on the continent, and promotion - built on the successful Highways Agency’s Influencing Travel Behaviour programme cancelled in 2011. This will require a reallocation in resources, human as well as funding, from legacy schemes as well as of road space.

The target for half of journeys to be walked and cycled by 2030 and 55% by 2035 reappearing in the CBGDP was welcome too, alongside the recognition of the importance of prevention in the 10 year health strategy. England is very far off the trajectory necessary to meet this target, however, which is why more needs to be done to increase active travel along and across the SRN.

After some isolated schemes on existing roads and poor integrated infrastructure in new schemes such as the A556 and A14, RIS3 must signify a step change for active travel. Fortunately there are strong synergies between providing new and upgraded active travel infrastructure across and along the SRN (whether within the red line or on adjacent local highways) and cutting congestion. Radical interventions like closing smaller junctions to private motor traffic to improve SRN flow as well as active travel convenience should be trialled.

### **Road user carbon KPI**

In our response to the Initial Report, we argued that there is a strong case for a KPI for road user carbon to be introduced, to incentivise National Highways to take responsibility for the decisions it takes which lead to increases in road user carbon (such as increasing traffic growth through adding additional capacity to the SRN).

RIS1 stated that National Highways “will need to develop an appropriate methodology for a new PI [for road user carbon]”, however this was not included in RIS2. It has been argued that road user carbon can only be influenced by central government policies. We disagree, as while the government does have control of many of the levers to influence demand, National Highways is not without agency to have an impact itself. For example, it could look at alternatives to expanding capacity through parallel investment in a number of alternatives such as bus lanes, car share facilities, cycle superhighways, getting more freight on rail, and working with large traffic generators near its network to develop green travel plans. These, either in isolation or combination, could be more cost effective and have wider benefits than bigger roads and could help reduce road user carbon emissions more quickly as well as enabling more choice.

Backing up a user carbon KPI, with PIs covering modal shift, mileage of active travel paths meeting LTN 1/20, electrified miles driven (with heavy duty vehicles having a greater weighting), occupancy for passenger vehicles and freight, would bring greater clarity around the changes needed.

### **Outfalls and soakaways KPI**

It is also vitally important there is a specific KPI in RIS3 for tackling the 1,236 most high-risk outfalls on the SRN. As long ago as RIS1 in 2015, tackling high-risk outfalls was included as a Performance Indicator (PI) yet little to no progress has been made since then. The Water

Quality Performance Indicator (PI 4.7) in RIS2 was ineffective and poorly defined, allowing National Highways to fail to take proper action. The PI vaguely required National Highways to “improve” water quality, without specifying what was meant by “improve”, nor how NH should do this, nor targets to measure progress. National Highways reported small lengths of watercourses that had been “improved”, but without saying how they had done this, how the improvements were measured, or where they took place.

It is clear the inclusion of a PI for outfalls and soakaways ten years ago has been ineffective and poorly regulated. That’s why this needs to become a KPI in RIS3 with ambitious targets for the numbers of high-risk outfalls to be mitigated each year.

### **Ring-fenced funding for outfalls and soakaways**

There needs to be substantial and ring-fenced funding to tackle the 1,236 most high risk outfalls and soakaways and ensure proper monitoring and classification of the 25,000 under National Highways’ control. The entirety of RIS2 was spent researching and planning, with the publication of the Water Quality Action Plan in 2023, but with very little action thereafter. We welcome the confirmation at the stakeholder event that tackling high-risk outfalls and soakaways will be one of the new National Programmes. However, this will require strict and ambitious targets and substantial funding, to make up for inactivity of the previous ten years.

National Highways must also be instructed in RIS3 to combine tackling the high-risk outfalls with other maintenance and renewals works, such as on the M27 where ten high-risk outfalls are contaminating the Solent Maritime Special Area of Conservation (SAC), and bridge strengthening works are being programmed. Coordinating these works will create efficiencies, save public funds, and minimise disruption to the travelling public.

### **Natural environment and Environmental Improvement Plan targets**

At a minimum, RIS3 will require a step change in long term care of mitigation and compensation planting, with adequate funding allocated for this. This is an issue long ignored, resulting in high profile failures like the A14 tree planting<sup>19</sup>. With an increasing frequency of extreme weather events, this is becoming ever more urgent to address. Too often we read in the POPE studies that monitoring reports for environmental mitigation were not available. National Highways needs to be held to account for this failure. There is a strong argument that monitoring of environmental mitigation should occur ten and fifteen years after scheme opening, to ensure it has been successful, has fully established, and has generated the sequestration and biodiversity benefits claimed.

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<sup>19</sup> [Half a million trees have died next to one 21-mile stretch of road, National Highways admits](#), Sky News, 18 March 2023

The Office for Environmental Protection (OEP) highlighted earlier this year that most Environment Act targets were off track<sup>20</sup>. While the NAO DfT report highlighted breach of environmental laws as one of DfT's biggest risks<sup>21</sup>, noting the significant effects of infrastructure. Yet nowhere are any of these concerns addressed in the dRIS3, setting it up for future conflict.

Nature recovery is much more than simply Biodiversity Net Gain (BNG), as noise, NOx and water runoff pollution, alongside mortality of wildlife ('roadkill') and disturbance from SRN all have huge impacts on nature. This needs addressing in the final RIS3.

Regarding noise, the only aspect that is addressed is the noise from the SRN on people's homes. One of the most common interventions used is to install low noise road surfaces, even though this is dismissed as a solution by some within National Highways, and there are question marks as to how well these surfaces endure. At the other end of the problem, National Highways installs double glazing into people's homes and while that is welcome, it does nothing for people wanting to enjoy their gardens or needing the windows open on hotter days.

However, the elephant in the room is the impact that the SRN has on nationally protected landscapes, which are valued for their tranquillity, and are increasingly important for mental well-being. Despite the huge impact caused by the SRN, with significant lengths of road within or adjacent to National Parks and National Landscapes, little or no effort is made to understand the impact and how it might be reduced.

This all requires a major culture and funding shift in the RIS3, within National Highways and in the wider supply chain, rather than just warm words and attractive photos. Without this happening and being set out in RIS3, there are serious questions as to how these issues will be addressed.

We welcome the inclusion of litter as a PI in the Interim Settlement to monitor the "percentage of the SRN where litter is graded at B or above under the Litter Code of Practice". However, tackling litter has been a PI throughout RIS1 and RIS2, with little progress made by National Highways. Tackling litter should be given adequate funding under the maintenance budget in RIS3, and should be made a KPI to reflect its importance, and should be included in the Environmental National Programme, to ensure effective monitoring by DfT.

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<sup>20</sup> [Progress in improving the natural environment in England 2023-2024](#), Office for Environmental Protection, January 2025

<sup>21</sup> Page 7, [Department for Transport \(DfT\): Departmental Overview 2022-23](#), National Audit Office, November 2023



## Reassessing tail RIS2 schemes

Tail RIS2 schemes to be reassessed to see if cheaper options or alternative non-road based solutions would deliver. Given that many have seen huge cost increases and given the fact that congestion was predicted to worsen with RIS2 schemes, i.e. they would not help reduce it, more thought needs to go into whether it makes sense to continue with them.

## Clarity on funding reporting

Spending on Operations, Renewals and Maintenance (ORM) is often reported in different ways, but never completely broken down to enable full transparency. These different elements should be split into separate budgets to provide this clarity and to ensure National Highways remains accountable to taxpayers for everything it spends.

## Designated Funds

We have previously outlined our concerns about the abuse of the Designated Funds (DFs)<sup>22</sup>, including in a letter to the Office of Rail and Road<sup>23</sup>. DFs should be spent on rectifying problems on the existing SRN, not used to pay for mitigation to reduce enhancement scheme costs, or to buy local support for enhancements.

To prevent further abuse, the DfT needs to be proscriptive about the use of DFs, to prevent them being frittered away. TAN is concerned that there is evidence the DFs have been used by National Highways for PR purposes (greenwashing), and to buy the silence of influential and cash strapped environmental organisations.

The wording in the dRIS3 on DFs says:

*"We also want to ensure that funds remain focused on their core purpose: improving the experience for all users of the SRN, supporting innovation, and addressing the impacts of the SRN on neighbouring communities and the local, natural and historic environments, including dealing with legacy network issues."*

We agree this wording is very clear, however what is missing are details of monitoring how the DFs are spent. We are not convinced the Office of Rail and Road are doing this monitoring effectively, and appear too easily persuaded by National Highways, and do not look beyond National Highways' claims.

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<sup>22</sup> [Highway robbery – abusing Designated Funds](#), TAN, 22 August 2025

<sup>23</sup> [Letter to Office of Rail and Road regarding National Highways misuse of Designated Funds](#), 26 August 2025

## Reducing RIS future funding

The NAO recently identified a £534m cost from cancelling unviable and unaffordable schemes in RIS2<sup>24</sup>, with an additional £225.3m spent on the now cancelled A12 Chelmsford<sup>25</sup>, meaning at least £759m has been wasted by National Highways progressing unaffordable projects during RIS2. There is a real risk that previous mistakes will be repeated in RIS3 with a long list of enhancements being developed for RIS4 with little likelihood of implementation.

A reset of the Road Investment Strategy is needed due to the adoption of PAS2080:2023 to reduce carbon emissions, with its shift away from the build first approach. Also, the reality is that the public finances will remain constrained according to growth forecasts. A reset will be further required due to devolution and the need to integrate with any emerging transport plans at the new strategic authority level.

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<sup>24</sup> [An Overview for the Department of Transport 2024-25](#), Figure 10, National Audit Office, November 2025

<sup>25</sup> [The 'wasted' money spent on scrapped A12 widening project](#), Essex Live, 12 November 2025

## Conclusion

The setting of RIS3 will come at a time of tight fiscal restraints and it is therefore imperative that money allocated to this programme of work is well spent. From what we have seen in the dRIS3, while there are a few things to welcome, there is much to cause concern. From a lack of justification for enhancement schemes, to a lack of clarity around allocation of resources, and a lack of confidence as to how the current proposals will deliver on the many government priorities and legal requirements.

This is of concern, and in a world of increasing turbulence, the strategy seems remarkably underprepared for an increasingly uncertain future. This requires both a rethink and a reset and we hope that in context you will find this submission helpful in navigating a way forward.

14 November, 2025

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Transport Action Network supports local communities seeking better and more sustainable transport and opposing damaging road schemes and large unsustainable developments

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