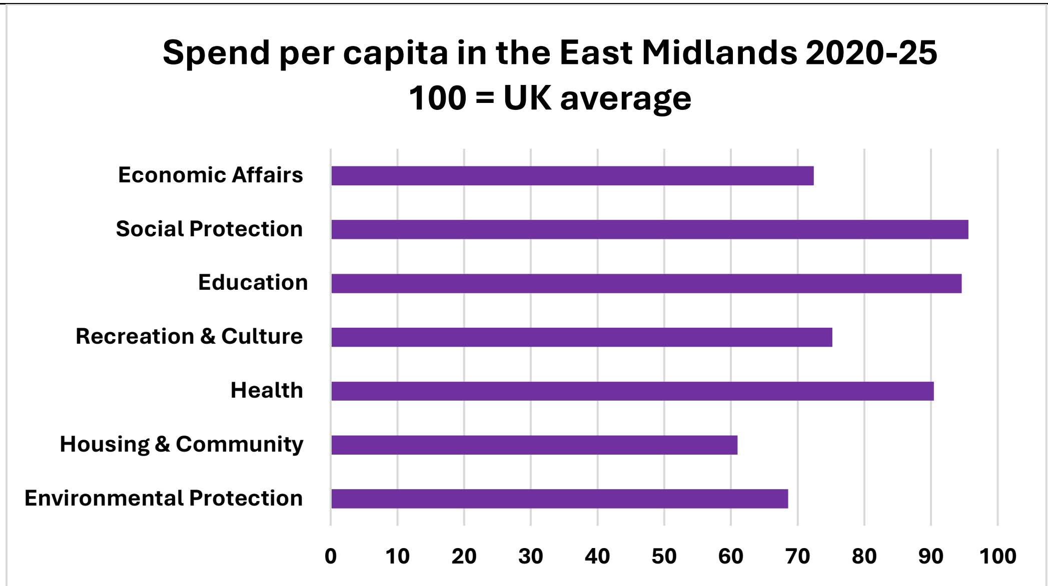
RIS3 Variation Consultation

Consultation Question	EMC/TfEM Response
Do you support or oppose the changes to RIS3 outlined above, including the overall £428 million reduction proposed and the specific areas for savings proposed to achieve it? Please let us know the reasons for your response and any other comments you have on the proposals or any alternatives.	East Midlands Councils & Transport for the East Midlands (TfEM) strongly **oppose** the proposal to cancel the A46 Newark Bypass and the A38 Derby Junctions SRN enhancement schemes. The A46 plays a critical role within the Strategic Road Network (SRN), connecting major manufacturing clusters, key ports, the UK Food Valley and forming part of the strategic 'Trans Midlands Trade Corridor' between the M5 in the south-west and the Humber Ports (& Freeport). The stretch of A46 between the Farndon Junction, to the west of Newark and the A1 to the east of the town is the last remaining section of single carriageway between the M1 and A1 which impacts on journey time reliability, congestion and results in high incidences of shunts and collisions. Congestion on the key A1/A46 Winthorpe junction results in mainline queuing on the A1. Lack of grade separation at the Cattle Market junction is compounded by queuing on Great North Road (B6326) within Newark because of frequent rail level crossing downtimes. Congestion in and around Newark is also undermining ambitious plans for new housing and economic development around the town and more broadly across Nottinghamshire and Lincolnshire. The A46 Newark Bypass has been TfEM's top SRN investment priority for the last 10 years. The A38 provides the SRN connection between Birmingham and the M1 at J28, thereby providing a route for north-south long-distance journeys, particularly for freight. Where the A38 passes through the western and northern parts of Derby, intra-urban trips cross the A38 into Derby or use the A38 to travel around the city. The interaction between strategic and local trips results in delays and queues at the Kingsway, Markeaton and Little Eaton junctions. These are the only three roundabouts remaining on the 63km (39 miles) length of the A38 between Lichfield and the M1. The A38 Derby Junctions enhancement remains vital to the free flow of traffic along the A38 corridor, reducing serious congestion in Derby and enabling major planned housing growth in Derby, Amber Valley and South Derbyshire. Neither Government nor National Highways have identified any viable 'Plan B' to reduce congestion, improve safety or enable development if these schemes do not proceed. No viable alternative proposals were identified through either Development Consent Order processes.

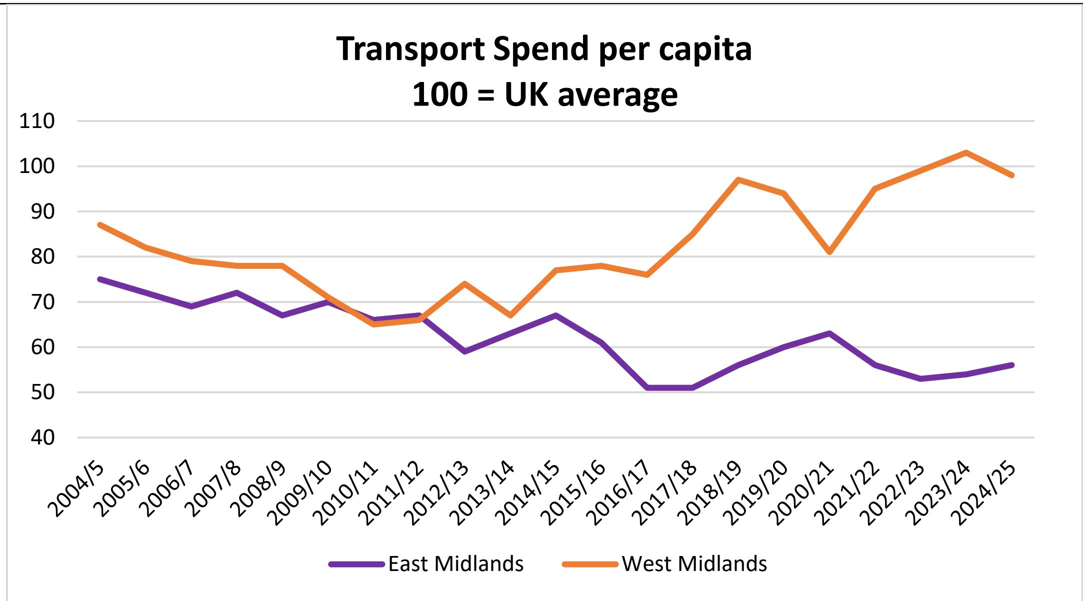
	Both schemes have been in development by National Highways (and its predecessor bodies) for many years and have incurred significant sunk costs (estimated to be c£145m to Government alone). They have also been subject to procedural errors and administrative delays exacerbated by cost overruns in schemes elsewhere - which has in turn resulted in further delay and cost inflation. The A46 Newark Bypass was programmed for delivery in RIS2 (2020-25) but slipped for no publicly stated reason into RIS3 with a start date of 2027, which was subsequently put back to 2030 with delivery largely in RIS4 (2031-36). The A38 Derby Junctions was originally planned for construction in the 2000's following a 'Roads Based Study' completed in 2002, but the scheme stalled following the then Highways Agency's failure to consult an impacted land owner. In July 2021 a DCO for a revised scheme was quashed in the High Court because the Secretary of State had failed properly to assess the cumulative greenhouse gas impacts of the scheme and failed to provide a reasoned conclusion as to those impacts. The justification that both schemes are currently 'not in contract' is entirely a result of procedural delays and flawed decision making by Government and National Highways. The Development Consent Order (DCO) for the A38 Derby Junctions was eventually granted on the 17th August 2023 and the DCO for the A46 Newark Bypass granted on the 1st October 2025. The design & build contract with Skanska for the A46 Newark Bypass was cancelled by National Highways **just 2 days before** the Government announced its intention to cancel the scheme itself to fund the Defence Investment Plan (DIP) Contract worth £297m for road upgrade in Nottinghamshire cancelled - BBC News More broadly, cancelling these schemes represents a further escalation of the apparent strategy of successive Governments to 'de-fund' the East Midlands and divert investment to other parts of England. Figures from annual releases of the Treasury's Public Expenditure Survey Analysis (PESA) demonstrate that the Region has been funded at below the UK average per-head across all major Government functions for many years. Public Expenditure Statistical Analyses 2026 – CP 1624

	 Source: PESA 2026 Release Transport spend per head has been very significantly below the UK average level for all of the last 5 years, and previous PESA releases show this to have been the trend for the past 20 years. In 2024/5 (the latest figures available), transport spending in the East Midlands was just **56% of the UK average**, by far the lowest level of any UK region or nation.

Expenditure on Transport (£ per head)						Per head (indexed)
	2020-21	2021-22	2022-23	2023-24	2024-25	
London	1,410	1,244	1,279	1,313	1,195	178
West Midlands	592	626	468	706	656	98
UK	**729**	**656**	**655**	**687**	**670**	**100**
England	736	652	651	693	669	100
North West	595	629	676	729	711	106
South East	479	646	584	628	626	93
East	692	609	556	599	628	94
North East	568	469	541	541	496	74
Yorks & Humber	525	419	432	495	475	71
South West	479	405	387	429	450	67
East Midlands	**459**	**369**	**349**	**368**	**376**	**56**

Source: PESA

The disparity in levels of investment spend per head between the East Midlands (£376) and the West Midlands (£656) is significant and has grown markedly over the last 10 years.



Source: PESA

The latest figures for 2024/25 **do not** include the financial impact of the 'pausing' of Midland Main Line Electrification announced in July 2025 or the proposed cancellation of the A46 Newark Bypass and the A38 Derby Junctions. Together these schemes total around £2.5 billion of lost infrastructure investment for the East Midlands over the last 12 months.

Successive governments have undertaken to address regional investment inequalities but have failed to do so. In a debate on 'Regional Transport Inequality' led by Catherine Atkinson MP (Derby North) which took place on the 11th September 2025, DfT Minister Simon Lightwood MP promised to do better, and in respect of the East Midlands said: *"We are investing in the region, including…progressing the A38 Derby Junctions scheme, which will improve safety, reduce delays and support house building. We are also committed to delivering the A46 Newark bypass…"* *Source:* [Regional Transport Inequality - Hansard - UK Parliament]

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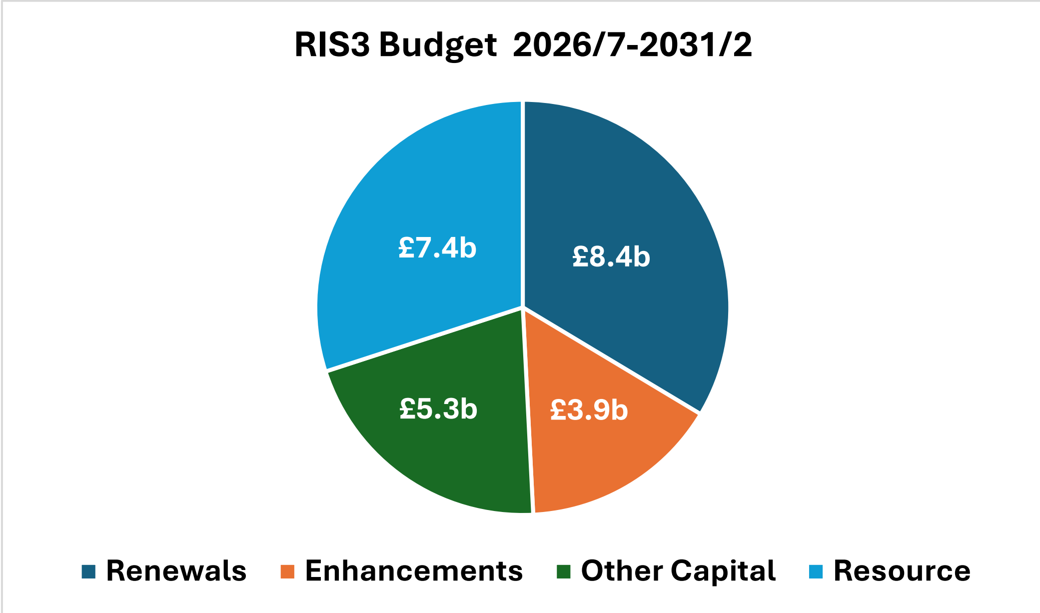
	The Government should make good on that promise and re-instate these schemes to the RIS3 program and accelerate their delivery. **Alternatives** The consultation highlights that the Government has 'ringfenced' RIS3 funding for the Lower Thames Crossing - but provides no justification. The Government has already committed £3.1billion to this scheme, with over £1billion spent before construction. In June 2026 the Government committed a further £174m which it said would be "*found from existing budgets*" (Lower Thames Crossing receives additional £174m Government funding). The cost per-mile of this scheme already exceeds that for the HS2 rail line between London and Birmingham, prompting the National Audit Office to investigate. Rather than repeat the mistakes of HS2, Government should switch RIS3 funding from the Lower Thames Crossing (LTC) to support priority schemes in the East Midlands which can deliver economic, social and environmental benefits more quickly. Public funding for LTC could instead be made in the form of loan guarantees from the National Wealth Fund (formerly the UK Infrastructure Bank). Alternatively, Parliament's Public Accounts Committee has issued a series of reports over the last 12 months highlighting serious instances of fraud and mismanagement of public expenditure across Government which if only partially addressed, would fund the DIP without cutting the RIS3 budget at all. In particular: • £55-£81billion is lost every year due to fraud and error: Taxpayer losing tens of billions to fraud as government still lacks modernising ambition to fight it - Committees - UK Parliament • £1.93 billion is still owed from fraudulent claims to the Covid Loans Guarantee Scheme: COVID-19 loan guarantee schemes repayment data: September 2025 - GOV.UK • £6.6 billion 'written off' by Government in 2024/5 alone: £6.6 billion wasted in '24-'25: Egregiously poor value for public money highlighted by PAC - Committees - UK Parliament • £1.5 billion of MoD spending at risk of fraud: MoD's lack of focus and leadership leaves valuable public funds exposed to fraud - Committees - UK Parliament • £21billion tax risk resulting from multinationals shifting profits across borders: HMRC must better tackle large tax risk of multinationals diverting profits across borders - Committees - UK Parliament

Do you agree or disagree with the prioritisation of capital funding for maintenance and renewals? Please let us know the reasons for your response	The RIS3 settlement currently identifies £3.9 billion for enhancements – approximately 15% of the total RIS budget available to National Highways and less than half that to be spent on renewals.  Whilst it is reasonable for enhancements to form the smallest element the RIS budget given the age and condition of the SRN it is not clear why the Government is proposing to meet almost all the savings required to fund the DIP from this element alone. The Government has presented no evidence to suggest that at least some efficiency savings cannot be made from renewals or resource funding, which together comprise over 63% of the RIS3 budget.
Do you have any views on how the RIS3 objectives may be prioritised in any capital funding reductions?	RIS3 sets out six key objectives: • Objective 1: Grow the economy • Objective 2: Improve safety for all • Objective 3: A level of network performance that meets customers' needs

	• Objective 4: A technology enabled and enabling network • Objective 5: A resilient network that is planned and managed for the long-term • Objective 6: Deliver improved environmental outcomes It is clear from the evidence presented in the consultation and tested through the DCO process that both schemes would contribute to all six of these objectives, and in particular economic growth (Objective 1), safety (Objective 2) and network resilience (Objective 5). Focussing available resources on these objectives would be consistent with the core objectives of the new Government and the recently published Road Safety Strategy.
Regarding the two enhancement schemes, is there any further information or evidence you can provide to supplement the assessment information provided in Annex A?	**The East Midlands Economy** The Government apparently fails to understand the nature of the East Midlands regional economy and its fundamental reliance on a functioning transport network (see: Routes to Prosperity – an economic and transport evidence base for the East Midlands). Transport, logistics, and associated engineering sectors have formed a cornerstone of the East Midlands economy for decades, employing tens of thousands of people across warehousing, haulage, rail operations, maintenance, and advanced manufacturing. Supply chains serving retail, healthcare, automotive, and aerospace have historically sustained both urban centres and rural communities. Locally based companies such as Alstom, Rolls-Royce, and Toyota continue this legacy today, whilst the newly formed Great British Railways will have its headquarters in Derby. East Midlands Airport anchors one of the UK's busiest air cargo clusters, hosting express parcel integrators, dedicated freight operations, and extensive airside warehousing. Surrounding logistics parks integrate seamlessly with motorway and rail freight interchanges, enabling late cut-off, next-day delivery nationwide, and has positioned the East Midlands as a critical part of the UK's goods and e-commerce system. Greater Lincolnshire is home to Europe's largest Agri-food Tech automation and robotics cluster, attracting a variety of businesses which are investing heavily in automation, with around 30% of the nation's food

	moving through the area. Newark is also home to British Sugar, which processes beet from growers across Lincolnshire and Nottinghamshire transported by HGV and supplies 60% of the UK market. Located at the geographic heart of England, the East Midlands sits at the crossroads of the nation's road and rail corridors. The M1, A1, and A46 link the region swiftly to London, the North, and the East Coast, while intercity rail services connect Nottingham, Derby, Leicester, and beyond to Birmingham and London. This centrality has long enabled efficient distribution and market access, underpinning investment and clustering in transport-intensive industries - but it is being fatally undermined by the Government's consistent failure to invest in strategic road and rail schemes in the region. **Defence Capability & Capacity** Cancelling these schemes to boost investment in defence (less than a year after the 2025 Spending Review) will also be counterproductive. The East Midlands is a defence industry powerhouse with key sector strengths in military aerospace and nuclear propulsion. It has an established national capability base that designs, engineers, manufactures, tests, integrates, upgrades, sustains and scales the systems, technologies, logistics networks and supply chains that the Armed Forces need now and, in the future (see Midlands-Defence-Prospectus). But this capability requires a reliable and resilient transport network to function, including on key routes like the A46 and the A38. Nottinghamshire and Lincolnshire are home to strategically important military bases including a large RAF presence. Quick reaction Alert at RAF Coningsby and the Surveillance & Reconnaissance at RAF Waddington are key defence capabilities that will have vital roles combating escalating threats, such as that posed by Russia. The A46 at Newark is a critical transport and logistics connection on to the A1 that will have an ongoing role in supporting defence capabilities. 20% of all UK defence aerospace manufacturers are located on the A38 corridor between Mansfield and Birmingham with a significant cluster around Derby. The importance of Derby is underlined by the Government's investment in Rolls Royce as part of the strengthening of the AUKUS partnership with the USA and Australia.

	A46 Newark Bypass In relation to the A46 Newark Bypass, the Secretary of State's Decision letter (1st October 2025, para 106) highlights that: *"In addition to the quantified benefits captured in the BCR, the Secretary of State also considered wider economic benefits that are not readily monetised, including the strategic role of the A46 in improving access to the Humber Ports, supporting exports, and contributing to national productivity..."* But these benefits are not considered in the consultation. It should be noted that worker productivity across the East Midlands has declined to just 84.6% of the UK average in 2023 and that economic growth in the Region has been largely fuelled by a rapidly growing population. Evidence from Midlands Connect highlights that around 23,000 SRN dependant jobs are located within 10km of the A46 Newark Bypass in key sectors such as manufacturing, logistics and distribution. HGVs comprise a high proportion of weight of traffic causing congestion which undermines worker productivity. Almost 30ha of employment land has been delivered in and around Newark since 2019, including large areas of unallocated land close the A46 which now has planning consent for employment. For example, Tritax Park close to the A46/A17 junction is already home to Currys National Distribution Centre (16ha) and has a further 39ha available for development. In total there is 73ha of employment land committed for delivery in the Newark area. The 2019 Local Plan allocated three large urban extensions to Newark totalling 7,350 homes, requiring the construction of a new Southern Link Road connecting to the A46 at the Farndon roundabout. Since the DCO was issued the Government has published significantly higher housing targets which over the next 20 years will require over 14,000 new homes across Newark & Sherwood, 87,000 across the Greater Nottingham Housing Market Area and 31,000 across the Central Lincolnshire Housing Market Area. It is worth noting the consultation makes no reference to the Government's target of building 1.5 million new homes by the end of the Parliament. Finally, Nottinghamshire County Council has undertaken a manual review of crash records from www.crashmap.co.uk for the A46 Newark bypass and the eight-mile-long stretch of the A1 where mainline queueing is regular occurrence. As a result of traffic accidents, over the five-year period of 2021 to 2025, there have been 5 people killed and 68 seriously injured.

	A38 Derby Junctions In relation to the A38 Derby Junctions, the Secretary of State's Decision Letter (17th August 2023, para 20) highlights that: *"The Secretary of State has had regard to the Derby City Core Strategy ("DCCS") and the Local Transport Plans that consider future development would be severely restricted if the Proposed Development cannot be funded and delivered...The Secretary of State has had further regard to the DCCS that makes a provision for a minimum of 11,000 new homes and 199ha (gross) of new employment land. Without the additional highway capacity provided to these areas the Secretary of State notes that the planned growth would be adversely affected..."* Evidence from Midlands Connect highlights that 48% of jobs within 10km of the A38 Derby junctions are 'SRN Dependant' (including the national significant aerospace cluster focussed on Rolls Royce in Derby) and that 25% of the traffic between the Kingsway and Markeaton Junctions comprise HGVs. The figures for housing and employment quoted in the consultation are inconsistent with this assessment, which also does not take account of the scale of housing development planned across the wider Housing Market Area including Amber Valley and South Derbyshire: STATEMENT OF COMMON GROUND DERBY HMA October 2025. New NPPF targets require over 41,000 homes across Derby and surrounding authorities by 2041. Around 3,000 homes have already been built and thousands more approved on the basis that A38 Derby Junctions scheme was committed and would relive the corridor. National Highways has previously objected to housing development on the basis that scheme has yet to be completed. Finally, there have been 219 collisions between 2015 and 2023 in the Derby Junctions area, including 5 fatalities and 25 serious injuries. There have been 31 critical (NILO) incidents between 2019 and 2024.