RIS3 Variation Consultation

Consultation Question	Proposed 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?	Nottinghamshire County Council Opposes the proposed changes
Please let us know the reasons for your response and any other comments you have on the proposals or any alternatives.	**Executive Position Statement** The Nottinghamshire County Council (the Council) opposes, in the strongest possible terms, the proposed cancellation of the A46 Newark Bypass scheme. The Government has already accepted the strategic need and benefits of the scheme; the underlying congestion, safety, housing and economic problems have not disappeared; substantial public resources have already been invested in securing development consent and preparing delivery; and the consultation has not demonstrated either that cancellation is preferable to deferral or how the Government intends to address the problems the scheme was designed to solve. The Council requests that: • National Highways reconsiders cancellation and retains the A46 scheme in RIS3 • If immediate delivery cannot be funded, formally defer it rather than cancel • Protect the DCO and development work done to date so that it isn't wasted • Publish comparative prioritisation evidence that justifies the decision-making • Identify and assess alternative funding or phasing options The following sections provide further detail on our reasons for opposition. **Reason 1: Cancellation is not justified on the evidence, and the scheme remains strategically necessary** The A46 plays a critical role within the Strategic Road Network (SRN), connecting major manufacturing clusters and key ports and forming part of the strategic 'Trans Midlands Trade Corridor' between the M5 in the south-west and the Humber Ports. 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 road traffic accidents. 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 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 Transport for East Midland's (TfEM) top Strategic Road Network investment priority for the last 10 years. 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. The Secretary of State's A46 Newark Bypass 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. 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. The consultation leaves many unanswered questions, including, if the A46 scheme is cancelled: • What is the strategy for addressing congestion at Newark? • What is the strategy for improving safety? • How will A1 mainline queuing be addressed? • How will the interaction between the A46, A1 and Newark's local road network be managed? • How will planned housing growth be accommodated?

	• What alternative intervention has been assessed? • What is its cost? • When could it be delivered? • Has it been subjected to equivalent environmental and statutory assessment? If the A46 Scheme is cancelled, then National Highways and the Government should demonstrate clearly how they intend to solve the problems for which the scheme was originally developed. **Cancellation undermines Government policy objectives and is inconsistent with its own past decisions** Since the Development Control Order (DCO) was issued the Government has published new 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. The Newark bypass dualling and A1 junction improvements are among several strategic highway infrastructure projects listed in the Newark and Sherwood Core Strategy (adopted 2019) which, at the time of adoption, supported the planned development of 4,735 homes over the period to 2033 on strategic sites in the Newark urban area and 52ha of employment land in the Newark Urban Area. The delivery of the Government's housing and infrastructure ambitions will also depend upon the availability and efficient distribution of the raw materials required to construct new homes, employment development and supporting infrastructure. The Nottinghamshire Minerals Local Plan and associated Local Aggregate Assessment recognise the importance of maintaining a steady and adequate supply of aggregate minerals to meet construction demand. Aggregates extracted and produced in Nottinghamshire form an essential part of the construction supply chain, providing materials for concrete, mortar, foundations, drainage, earthworks and transport infrastructure. Their economic value is therefore dependent not only on the availability of mineral resources but also on the ability to transport substantial volumes of material efficiently and reliably to processing facilities, construction sites and wider markets.

	The Nottinghamshire and Nottingham Local Aggregate Assessment identifies the A46 Newark Bypass amongst potential infrastructure projects that could affect future demand for aggregates as Nottinghamshire continues to expand its transport network and accommodate housing and other development. The proposed bypass would itself require significant volumes of construction materials, while its longer-term benefit would be to improve the capacity and reliability of a strategically important route serving the wider East Midlands. The proposed cancellation of the A46 Newark Bypass should therefore be considered not only in terms of the movement of people and general traffic. It also has implications for the freight and construction supply chains required to deliver future housing and infrastructure growth. If the Government expects local authorities and the construction industry to deliver substantial additional development, the strategic networks that support the movement of the materials required to build that development must also be capable of accommodating that growth. Cancellation would consequently create a further tension between the Government's objectives for housing and infrastructure delivery and the removal of investment intended to improve the capacity and resilience of the strategic transport network upon which those supply chains depend. Government cannot signal a material increase in housing expectations and simultaneously remove the strategic infrastructure necessary to accommodate the resulting traffic and economic growth without increasing pressure on local authorities, developers and existing communities. Our view is that cancellation of the scheme will create identifiable barriers to delivering Government housing policy. The consultation should therefore explain how the Government expects the relevant local planning authorities to accommodate this level of planned growth if the strategic infrastructure identified as necessary to support it is removed from the investment programme. Similarly, in January 2026, the Government published a new road safety strategy that aims to reduce the number of people killed or seriously injured on roads in Great Britain by 65%. This is a material step-change compared to the previous 2011 national strategy which refrained from setting quantitative targets. The national road safety strategy notes that the cost of police and ambulance attendance, as well as the lost economic output costs due to traffic collisions was circa £10.3 billion. This is a material monetary cost in addition to the devastating human cost experienced by families who loose loved ones on our nation’s roads.

	One of the four key themes of the strategy is "Ensuring infrastructure is safe". The Case for the Scheme submitted by National Highways in support of their Development Control Order application predicts that the A46 Newark Bypass scheme will prevent approximately 494 accidents resulting in 685 fewer casualties over the 60-year appraisal period. This was estimated to have a monetary benefit of £29 million. We have manually reviewed the 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[1]. 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 Transport infrastructure acts as the foundational physical and economic backbone required to deliver the Government's Modern Industrial Strategy (MIS). This strategy is intended to work in tandem with the 10-year Infrastructure Strategy and the Road Investment Strategy (RIS3). To quote the aims of the MIS, the government cannot cut investment into enabling transport infrastructure whilst also aspiring to: • Strengthen connections between city regions and clusters, • Bring forward investible sites across the UK • Support Mayors and local authorities deliver local growth plans • Increase access to talent • Strengthen the resilience of IS-8 industries and their supporting supply chains • Use government procurement to strengthen domestic supply chains. Again, referencing the National Highways Case for the Scheme documentation, the direct and indirect economic benefits associated with the A46 scheme were estimated to have a monetary value of: • Transport economic efficiency £248.5 million • Wider economic benefits £67.5 million

[1] Manual assessment based on the A1 from Shire Dyke to the Main Street, North Muskham junction, the A46 from the Farndon Roundabout to the roundabout with the A17 and includes adjoining slip-roads along these routes. Figures are a manual count of the number of casualties involved derived from publicly available STATS19 records as presented through CrashMap for the years 2021 to 2025.

	• Journey Time Reliability £29.4 million With a total monetised benefit of £823.2 million and a cost benefit ratio of £1.20 for every £1.00 spent we ask National Highways and the Government: What confidence should local authorities, businesses and investors have in nationally promoted infrastructure programmes if schemes can proceed through years of development and statutory approval before being cancelled immediately prior to delivery? **Cancellation of the A46 & A38 schemes undermines the significant role the Midlands has in the defence industry and will be counterproductive to the proposed increase in defence investment.** The Council supports defence investment; however, the proposition that national defence should be strengthened by cancelling infrastructure supporting one of the UK's significant defence-industrial regions requires much stronger justification than provided by the consultation documentation. 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. Equally, Nottinghamshire and Lincolnshire are home to a large number of military bases including the 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. **Cancellation is poor value for public money** Cancellation does not avoid the full cost of the scheme—it crystallises years of expenditure while leaving the underlying problems unresolved. This scheme has been in development by National Highways (and its predecessor bodies) for many years and has incurred significant sunk costs. It has also been subject to procedural and administrative delays exacerbated by cost overruns in schemes elsewhere, which has in turn resulted in further delay and cost inflation.

	The next realistic opportunity to resolve the Newark constraint may be decades away. During this time, the missed opportunity costs associated with the unaddressed problems will continue to mount. Furthermore, the DCO is currently a major asset, but its value will diminish in time as it loses currency and underlying data and assumptions age. Cancellation risks wasting the investment in: • environmental assessments • design development • consultation • land and property work • procurement effort 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 fact that the scheme is currently not in contract should not be interpreted as evidence that it was insufficiently developed or unsuitable for delivery. Its programme position has been affected by procedural delays and changes in programme and investment decisions. The scheme nevertheless received Development Consent on 1 October 2025 and had progressed to the point at which a design and build contract had been procured. 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. Placing reliance on the scheme not being under contract is not sufficient justification for the schemes cancellation. In addition to the sunk costs being wasted, the financial consequences of cancellation will include: • Remobilisation costs to restart the project in the future, • Repeating/reworking technical and planning assessments that have become dated • Re-negotiating land acquisition deals • likely inflationary uplift cost of future delivery **The Government has not demonstrated that cancellation is the least damaging option**

	The Council is also deeply concerned that deferral of the scheme does not appear to have been considered before jumping straight to the terminal decision to cancel. The consultation does not demonstrate that alternatives to permanent cancellation, including deferral, rephasing, scope optimisation or alternative financing, have been robustly assessed. The Council recognises and supports the need to strengthen national defence capability. However, the need for additional defence investment does not, in itself, demonstrate that cancelling strategically important transport infrastructure in the East Midlands is the most effective or equitable means of funding that investment. Furthermore, the consultation has not demonstrated why the full burden of the proposed savings should fall disproportionately on enhancement schemes, rather than being distributed through a broader programme of efficiency, rephasing and prioritisation across relevant Government capital expenditure. We pose the following questions: • What has changed in traffic conditions? • What has changed in the safety case? • What has changed in housing requirements? • What has changed in the economic case? • What has changed in the strategic importance of the A46? • What has changed since the DCO was granted? If the answer is principally that the Government now wishes to reallocate capital funding to defence, then we challenge National Highways and the government to explain why the economic and strategic costs of cancelling this particular scheme are proportionate, and to table a credible alternative to resolving Newark's transport challenges. The Council requests publication of the full comparative prioritisation methodology, including the criteria, weightings, evidence sources and assumptions used to determine which schemes should proceed, be deferred or cancelled. It should demonstrate how the economic, safety, deliverability, regional development and value-for-money characteristics of the A46 Newark Bypass compare with all other schemes that remain funded in the RIS3.

	If value for money has been a material factor in the cancellation decision, the Government should explain how the A46's value-for-money characteristics were comparatively assessed against those of other enhancement schemes retained in the programme. We highlight the independent analysis by the Office of Rail and Road (ORR) that highlighted a "deteriorating trend in the Benefit Cost Ratios (BCR) for major enhancement schemes carried over into RIS3 as costs increase over time. A significant number of schemes have BCRs rated as having low/poor value for money. As examples: • Lower Thames Crossing BCR: £1.22 benefit for every £1.00 spent • A66 Northern Trans-Pennine BCR: £0.92 for every £1.00 spent. • M60 Junction 18 Simister Island BCR: £1.17 for every £1.00 spent. We ask National Highways to confirm exactly how the A46 Newark Bypass Scheme was assessed against other schemes with comparable or lower BCRs. **Conclusion** The Council considers that the proposed cancellation of the A46 Newark Bypass has not been adequately justified by the evidence presented in the consultation. The strategic need for the scheme remains; the congestion, safety, housing and economic challenges it was developed to address have not disappeared; substantial public resources have already been invested in securing development consent and preparing the scheme for delivery; and no credible alternative strategy has been identified for resolving the underlying transport challenges at Newark. The Council supports the need for investment in national defence and recognises the importance of maintaining and renewing the Strategic Road Network. However, neither objective demonstrates that permanent cancellation of the A46 Newark Bypass is the most proportionate, equitable or value-for-money response to the identified funding pressures. The Council therefore requests that the Government and National Highways reconsider the proposed cancellation; retain the scheme within the RIS3 investment pipeline; and, if immediate delivery cannot be funded, pursue deferral, rephasing, scope optimisation or alternative funding arrangements rather than permanent cancellation. The Government should also publish the comparative prioritisation evidence and methodology used to reach its decision and set out how it intends to address the congestion, safety, resilience and development challenges at Newark if the scheme does not proceed.

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<tr><td></td><td></td></tr>
<tr><td>Do you agree or disagree with the prioritisation of capital funding for maintenance and renewals?</td><td>Agree</td></tr>
<tr><td>Please let us know the reasons for your response</td><td>It is well documented that the Department for Transport pivoted its funding allocations for RIS3 in favour of greater investment into maintenance and renewals schemes because of their consistently and significant higher Benefit Cost ratios compared to those of major enhancement schemes. typical maintenance schemes yield a BCR of roughly 7:1. Therefore, prioritising investment in maintenance and renewals offers maximum value for money for public investment and the Council supports this.

We want to be clear that our support for prioritising maintenance and renewals investment is not a tacit endorsement in the defunding of RIS3 major enhancement schemes. The Council considers that prioritising maintenance and renewals should not be interpreted as requiring the wholesale cancellation of strategically important enhancement schemes that have already completed substantial development and statutory processes. Prioritisation should instead be based on the marginal value of additional investment and the consequences of cancelling or deferring individual schemes.</td></tr>
<tr><td>Do you have any views on how the RIS3 objectives may be prioritised in any capital funding reductions?</td><td>It is clear from the evidence presented in the consultation and tested through the DCO process that The A46 Newark Bypass Scheme 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.

<table>
<tr><th>RIS3 objective</th><th>A46 Newark Bypass contribution</th><th>Consequence of cancellation</th></tr>
<tr><td>Grow the economy</td><td>Improved reliability and freight connectivity</td><td>Continued constraints on productivity and growth</td></tr>
<tr><td>Improve safety</td><td>Removes conflict and congestion points</td><td>Safety issues remain unresolved</td></tr>
<tr><td>Network performance</td><td>Reduces congestion and unreliable journey times</td><td>Existing bottleneck remains</td></tr>
<tr><td>Technology-enabled network</td><td>An opportunity to incorporate modern network management and technology as part of delivery.</td><td>Opportunity deferred/lost</td></tr>
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<tr><td>Resilience</td><td>Improves strategic route resilience</td><td>Continued vulnerability at a critical bottleneck</td></tr>
<tr><td>Environmental outcomes</td><td>Reduction in noise pollution.</td><td>Continued congestion and stop-start traffic</td></tr>
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<tr><td>Regarding the two enhancement schemes, is there any further information or evidence you can provide to supplement the assessment information provided in Annex A?</td><td>Yes</td></tr>
<tr><td>If you ticked 'Yes', please provide any information or evidence here. Should you wish to attach any files, please email these to 'RIS3Variation@dft.gov.uk' along with your name and organisation so these can be linked to your response</td><td>The East Midlands Economy
The consultation appears to understate the particular importance of reliable strategic transport connectivity to the East Midlands economy and its concentration of transport-intensive industries (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.

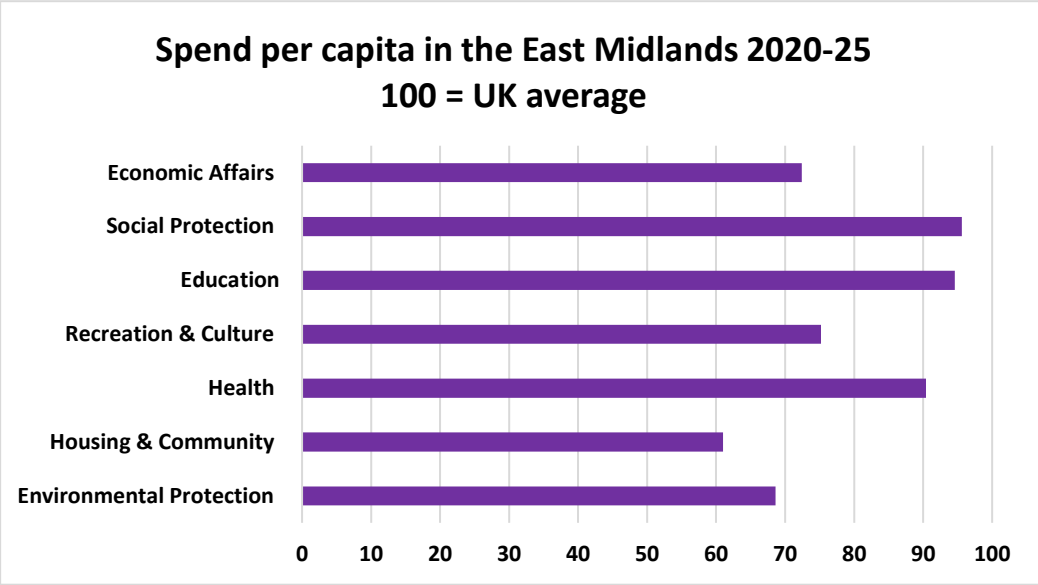
East Midlands Airport anchors one of the UK’s busiest air cargo clusters, hosting express parcel integrators, dedicated freight operations, and extensive airside warehousing. Surrounding logistics parks integrate seamlessly with motorway and rail freight interchanges, enabling late cut-off, next-day delivery nationwide, and has positioned the East Midlands as a critical part of the UK’s goods and e-commerce system.

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.</td></tr>
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This centrality has long enabled efficient distribution and market access, underpinning investment and clustering in transport-intensive industries - but it is being progressively undermined by the longstanding relative underinvestment in strategic road and rail infrastructure in the region.

The proposed approach risks perpetuating regional underinvestment and runs counter to the new Prime Minister's promise of "growth in every postcode"

The proposed cancellation also risks perpetuating a longstanding pattern of comparatively low public investment in the East Midlands. It will also fall short of the new Prime Minister's vision of delivering growth in every postcode. The Treasury's Public Expenditure Survey Analysis (PESA) data indicates that public expenditure and transport expenditure in particular have been consistently below the UK average.



Source: PESA 2026 Release

Transport spend per capita 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.

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 latest figures for 2024/25 **do not** include the financial impact of 'indefinitely pausing' Midland Main Line Electrification announced in July 2025 or the proposed cancellation of A46 Newark Bypass and the A38 Derby Junctions. Together these schemes total around £2.5 billion of infrastructure investment that has been cancelled, paused or removed from the region's expected investment pipeline over the last 12 months.

Governments of all colours have claimed they are addressing regional inequalities in investment 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*

	The Government should make good on that promise and re-instate these schemes to the RIS3 program and accelerate their delivery.