Draft Road Investment Strategy 3 (RIS3)

Summary

- Freight must be prioritised as critical infrastructure, with strategic planning focused on key corridors, intermodal access, and driver welfare facilities.
- Decarbonisation goals are supported, but require bold infrastructure investment, realistic timelines, and targeted support for SMEs.
- Network performance and reliability must improve through proactive maintenance, climate resilience, and outcome-based KPIs tailored to freight.
- RIS3 must lay the groundwork for future capacity, despite no new major schemes, by developing a long-term strategy in collaboration with the logistics industry.

About Logistics UK

Logistics UK is one of the country's largest business groups, and the only trade association which represents all of logistics. Our mission is to support, shape and stand up for a safe, sustainable and efficient logistics sector. Our membership of more than 20,000 includes global, national and regional businesses and SMEs spanning road, rail, inland waterways, sea and air as well as the customers of freight services, such as retailers and manufacturers. We deliver services, representation and thought leadership, helping members and policymakers to seize new opportunities for the sector and the economy as a whole, right across the country.

Response to draft RIS3

Strategic Framework and Long-term Planning

Logistics UK recognises the economic and political climate in which RIS3 is being developed and welcomes the improved emphasis on maintenance and renewals given the Strategic Road Network's (SRN) ageing condition. The decision to prioritise maintaining existing assets over new major road-building projects reflects both fiscal constraints and feedback from the consultation process.

While we appreciate the requirement to develop detailed five-year plans, the absence of any new major road schemes in RIS3 makes it imperative that National Highways uses this period to develop a comprehensive long-term investment strategy. The logistics industry has expressed disappointment at both the delays to major schemes expected under RIS2 and the announcement that RIS3 will not commit to any new road-building projects. This stop-start nature of investment undermines industry confidence in infrastructure delivery and brings huge costs in terms of material and labour availability, planning delays and lost economic opportunities.

At a strategic level, National Highways must not let the RIS3 period go to waste but instead must develop a comprehensive plan for future capacity requirements in conjunction with the logistics industry. Freight movements on the SRN have been growing and will continue to do so, with road remaining the predominant mode for freight. There are already significant capacity constraints on parts of the network, and this increase will only lead to further pressure on overstretched corridors and junctions. Without planning for this growth now, the network will face severe capacity issues even when funding becomes available to address them.

National Freight Network

The previous government's *Future of Freight* strategy committed to developing a National Freight Network - a step intended to support better decisions on investment, planning and infrastructure. The government had made this

commitment as it recognised that the lack of visibility and understanding of the freight network as a cross-modal system was inhibiting efforts to address inefficiencies.

While that commitment has not yet been delivered by the government, the case for action remains overwhelming. There is a need to create a shared understanding across Whitehall, relevant arms-length bodies and the private sector of which of the UK's key corridors are vital for underpinning more efficient, productive and resilient supply chains, and therefore supporting the government's economic ambitions. From there, backed by improved infrastructure appraisal methods, the government and private sector would be able to better identify which infrastructure projects would deliver the most value.

It is therefore essential that this work is progressed to ensure that RIS3 and subsequent infrastructure strategies fit into a broader, cohesive context that seamlessly integrates different transport modes to enable modern, efficient supply chains.

Critical strategic infrastructure priorities

Lower Thames Crossing (LTC)

- While responsibility for delivering the LTC has now been brought into government, it must still be considered as integral to delivering the aims of RIS3. This is not merely a regional project but one of national economic significance affecting businesses across the entire country.
- The project will create essential resilience for one of the most critical freight corridors in the UK. The current single crossing point creates significant vulnerability, as demonstrated by the deployment of Operation Brock and the severe economic impacts when disruption occurs.
- We welcome the government's stated support for this project in the draft RIS3. However, the Department for Transport must ensure that finance and delivery plans are swiftly implemented. Any further delays will compound the economic damage and continue to undermine business confidence in UK infrastructure delivery.

Address capacity and reliability issues on routes to South East ports

- Beyond the LTC, the route to Dover and other Channel ports is of vital importance to businesses across the country, yet capacity and other problems create significant challenges for logistics. These routes carry international freight to and from the entire UK, making their resilience and reliability crucial for national supply chains.
- The A2/M2 corridor is of both critical importance to the economy of Kent and the wider South East, and as a means of accessing the Channel ports, yet it frequently struggles with congestion. The current scheme to improve Junction 5 access is welcome and must be delivered swiftly, while further plans to address issues on the rest of the route must be developed during RIS3.

Learn lessons from RIS2

- It is clear from the work of the National Audit Office and others that ineffective processes led to a number of schemes earmarked for RIS2 being significantly delayed, particularly at the planning stage. This has been a cause of significant frustration among freight operators, who are being forced to endure delays and disruption for far longer than they had anticipated based on the original RIS2 commitments.
- Logistics UK welcomes the measures outlined in National Highways' previous reports to address these procedural deficiencies. However, RIS3 must demonstrate that these lessons have been genuinely learned through the swift and efficient delivery of schemes. National Highways must maintain a relentless focus on delivering projects swiftly in order to maximise their benefits for road users.
- It is better to provide conservative delivery timescales that are met than optimistic ones that are repeatedly missed. The repeated delays undermine not only the business case for individual schemes (as benefits are delayed whilst costs escalate) but also damage the credibility of the entire Road Investment Strategy process and infrastructure planning more broadly.

HGV Parking and Driver Welfare Facilities

The critical shortage of safe, secure parking with adequate facilities is having a profound impact on driver welfare and the industry's ability to attract new talent.

Clean, secure sites with proper amenities are not a luxury, they are a fundamental requirement for supporting a professional, diverse, and resilient workforce. While some facility providers are setting a high standard, the overall provision remains insufficient. The industry cannot hope to tackle its skills shortages while drivers continue to face substandard conditions on the road. Inadequate parking forces drivers to park in unsuitable locations, extends journey times as they search for available spaces and creates safety risks when tired drivers cannot find legal parking. This

inefficiency costs the industry and the wider economy significantly, whilst also impacting local communities where illegal parking occurs.

Facilities must include adequate security measures to protect both drivers and the high value goods they carry. Freight crime remains a significant concern and secure parking facilities are an essential component of supply chain security.

Logistics UK has consistently called for freight needs to be given greater prominence from the very outset of scheme planning and we look forward to seeing this implemented in RIS3. From the beginning of any new road scheme, requirements for lorry parking/driver facilities must be included as fundamental elements, not afterthoughts.

There must be a requirement for an increased number of parking spaces alongside improved security and standards for lorry parking in all relevant schemes, with this prescribed in revised Government guidance.

Logistics UK supports National Highways to consider where it may become directly involved in the delivery of facilities, as well as where its existing estate could be utilised and repurposed to address the parking shortage. Where there is clear market failure to provide facilities in areas of demonstrable need, direct intervention is justified.

National Highways should actively facilitate the consideration of lorry parking during the planning process, using its influence to overcome local objections where facilities serve a clear strategic need. This includes advocating for dual use of sites, unused public land to be considered for lorry parking where suitably connected to the transport network and certainty and longevity on leases for truck stop operators on public sector land.

The draft RIS3 mentions a programme of approximately £3.3 million for improvements at lorry parking facilities. Whilst this investment is welcome, the scale must be significantly increased given the magnitude of the shortage. Funding should be prioritised based on current and forecast utilisation data and strategic location, with a focus on specific improvements that are known to be important to freight drivers: parking capacity, welfare facilities (including showers, toilets, food services), driver and site security, and increasingly, decarbonisation infrastructure such as electric charging points.

Given the longstanding nature of this issue, RIS3 should include clear, measurable targets for the number of parking spaces to be added, the quality standards to be met and interim milestones for delivery. Progress against these targets should be monitored by ORR and reported publicly.

Network performance and reliability

RIS3 must represent a step forward in the safety, condition and reliability of the SRN. Notwithstanding the financial constraints acknowledged elsewhere in this response, RIS3 will still represent a substantial investment in England's road network. It must therefore deliver significant benefits to road users, support more efficient freight movements and the economic growth that will bring and leave the SRN in a measurably better state at the end of the five-year period than at the beginning.

In the absence of new major road-building schemes, RIS3 will be assessed primarily on whether it achieves this improvement in network condition and performance. The performance specification must include robust, transparent metrics that allow industry and the public to track whether this improvement is being achieved, with interim milestones to ensure problems are identified and addressed early.

Transport Focus research consistently shows that road surface condition is users' top priority for improvement to SRN journeys. The resilience and reliability of the SRN is crucial to the success of the logistics industry and is one of our members' biggest frustrations. Poor road condition, overrunning works and capacity constraints all combine to make journey planning highly unpredictable.

The emphasis on better understanding SRN assets as set out in National Highways' previous reports is welcome and must be accompanied by an intelligent, proactive maintenance programme that identifies and remedies problems before they pose a threat to the safety or reliability of a route. This represents better value for money in the long term by avoiding more costly interventions later and reducing the cumulative impact of disruption on users.

In developing maintenance programmes, National Highways must strike the right balance between keeping interventions (and therefore disruption) to the minimum level needed to maintain the asset and ensuring that the whole asset lifecycle and broader economic impact are considered. There will be instances where a single, major asset renewal will have a smaller overall impact on freight users in the long term than several smaller interventions over the same period, even though the immediate disruption may be greater.

Achieving value for money is important, but any calculations must also consider impacts on the business models of critical freight users of particular routes. The current approach often focuses primarily on capital cost rather than whole-life economic, social and environmental value. This must change to properly account for the economic costs of disruption and the benefits of improved reliability.

Logistics UK appreciates that every road scheme is a delicate balancing act between delivery and minimising disruption. Roadworks are the inevitable cost of building the network we require, and their impact can be minimised through effective

working practices, modern design processes and continual engagement with the logistics industry to communicate and understand the consequences of closures, lane restrictions and diversions. The need for this engagement is even greater given RIS3's emphasis on improving existing assets rather than expanding capacity.

Prioritise key freight corridors

Logistics operators think in terms of routes between sites, suppliers and markets. They do not distinguish between the SRN and other roads they use. Therefore, when considering priorities and interventions, National Highways must take decisions that guarantee the best possible performance of the routes used by vital logistics businesses. This requires coordination with local highway authorities, particularly where the SRN intersects with major local routes or urban areas.

Despite the decision not to commit to any new major road schemes, Logistics UK is supportive of the focus on delivering more, smaller enhancements. As identified in the draft RIS3, the fringes of the SRN are often highly congested, which creates delays for the 'last mile' of freight journeys, as well as problems for operators who need to cross the SRN for local deliveries. There are also benefits of this approach for key logistics hubs such as ports and airports, which are often sited off the SRN. Effective coordination with local partners is critical to maximising the benefits of these schemes by ensuring that national and local investments align to reduce congestion, rather than simply moving the problem around.

Decarbonisation

The need to decarbonise and improve environmental outcomes is perhaps the biggest challenge logistics faces, and it is one that the industry is facing up to. New vehicles will all need reliable infrastructure to recharge and refuel.

Logistics UK members regularly raise concerns about the availability of en-route public charging points, either due to demand from other road users, not being viable for commercial vehicles, or them simply not working. We recognise the efforts made to date by National Highways to maximise the benefits of the Rapid Charging Fund, but significantly more needs to be done to support the shift away from internal combustion engines, in particular for commercial fleets.

To give operators confidence to invest in zero-emission fleets, we must ensure that there is a significant expansion of commercial vehicle compatible charging points and the associated infrastructure to power them. Infrastructure operators cannot simply wait for a certain level of industry demand to support alternative fuelling options. Businesses need confidence to invest, and in relation to zero-emission vehicles, a lack of infrastructure is a frequently cited reason as to why businesses have not yet made the transition. National Highways must be bold and innovative in providing, facilitating and incentivising energy, fuelling and digital infrastructure, which will encourage the logistics industry to follow suit.

Where there is clear market failure to provide charging points in an area of demonstrable need, Logistics UK would support direct interventions by National Highways to provide the necessary physical infrastructure. This is not about National Highways becoming an energy supplier but about ensuring the physical space, grid connections and enabling infrastructure are in place to allow the market to deliver charging services.

Logistics UK welcomes the objective to improve environmental outcomes in RIS3 and calls on National Highways to play a greater role in facilitating the decarbonisation of road transport. This includes supporting the provision of far more electric charge points for commercial vehicles, working with other infrastructure bodies to ensure that energy provision aligns effectively with the transport network, and recognising the impact a free-flowing Strategic Road Network can have on making the business case for investment in zero-emission vehicles (by improving efficiency and therefore reducing the range requirements).

Facilitate intermodal operations

While the road network will continue to support the majority of freight movements, the end-to-end journey of goods may involve one or more other forms of transport. It is therefore essential that National Highways strengthens its joint planning with Network Rail/Great British Railways to better support modal shift, as well as engaging with industry to understand their ambitions.

When planning SRN improvements, National Highways must consider the needs of intermodal freight terminals and ensure that road access to these facilities is adequate. Poor road connections to rail freight terminals undermine the business case for modal shift and reduce the attractiveness of rail freight.

Engagement with the logistics industry

National Highways must commit to continual engagement with the logistics industry to communicate and understand the consequences of closures, lane restrictions and diversions. This engagement should not be limited to major schemes but should be embedded in routine network management and maintenance planning. The need for this engagement is even greater given RIS3's emphasis on improving existing assets rather than expanding capacity.

Adequate notice of planned works (ideally several months for major interventions) allows operators to adjust routes, schedules and customer commitments. Short-notice changes can cause significant disruption and cost.

Engagement with operators is vital to understand the specific constraints they face, such as driver hours regulations, customer delivery windows, vehicle height and weight restrictions, and the need to access specific locations at specific times. This understanding should inform how closures and diversions are planned and managed.

Engagement should not end when a scheme is approved but should continue throughout construction and into operation. Real-time updates on progress, emerging issues and changes to traffic management arrangements are essential for operators to adjust plans as needed.

National Highways holds extensive data on traffic patterns, incident frequencies and network performance. Sharing appropriate insights with the logistics industry (in aggregated, anonymised form where necessary) would enable better planning and potentially identify problems or opportunities that National Highways alone might not recognise.

Climate resilience

Climate change adaptation is undoubtedly one of the biggest challenges facing the SRN. Extreme weather is already taking its toll on the asset base, with problems only likely to increase in the short term despite efforts to reduce carbon emissions. The main implications for the Strategic Road Network are likely to be increased severe weather: more rainfall, high winds and extreme heat. This will impact road surfaces and embankments, and create operational challenges caused by a higher number of flooding and high-wind events.

In maintaining SRN assets, logistics has two main priorities for National Highways: firstly, to conduct a proactive maintenance programme that improves resilience rather than waiting to repair issues that have already occurred, and secondly to take a whole-network approach that focuses on key corridors that are vulnerable to extreme weather, such as trans-Pennine crossings and routes susceptible to flooding.

Highways should use climate modelling and historical data to identify sections of the network particularly vulnerable to flooding, high winds, extreme heat or other climate impacts. Improving the resilience of these sections must be prioritised through enhanced drainage, strengthened structures, improved road surfaces and other appropriate interventions.

Where particular routes are critical for national or regional freight movements but vulnerable to climate impacts, National Highways should consider building redundancy, either through alternative routes or through ensuring that temporary closures can be managed without severe disruption. This might include pre-planned diversion routes that are maintained to high standards and clearly signed.

When renewing or improving infrastructure, it must be designed for the climate conditions expected over its life rather than historical conditions. This may mean more generous drainage provision, structures designed for higher wind loads or more resilient road surface materials.

Operational resilience

While preventing incidents should be the priority, when they do occur, rapid clearance is essential to minimising economic impacts. The RIS3 performance specification should maintain or enhance targets for incident clearance times, particularly on the most heavily used freight corridors.

National Highways should develop and regularly update contingency plans for major disruptions (whether from weather events, major incidents or planned works) on critical freight routes. These plans should be developed in consultation with freight operators and should identify alternative routing options, communication strategies and any temporary measures needed to manage diverted traffic.

When disruptions occur, timely, accurate information is crucial. This should be provided through multiple channels such as signage, digital platforms, direct communication with operators and via navigation systems. Information should include not just the nature and location of the problem but the expected duration and recommended alternative routes.

While maintenance is essential, poor planning or execution can cause more disruption than necessary. Modern materials and techniques that allow faster installation, work planned to minimise the number of separate interventions required, and overnight or weekend working where this allows roads to be fully open during peak periods will all help to alleviate this disruption.

Performance monitoring and accountability

The RIS3 performance framework should be weighted towards the outcomes that matter most to users. These encompass safety, journey reliability, road condition and information quality as top priorities. These should be reflected in ambitious Key Performance Indicators (KPIs).

The performance specification should include specific measures of relevance to freight operations, such as:

- Delay on key freight corridors.
- Journey time reliability on strategic routes connecting ports, airports and major distribution centres.
- HGV parking capacity and utilisation.
- Availability and functionality of electric vehicle charging at strategic locations.

While it is important to measure what National Highways delivers (e.g., miles of road resurfaced, number of structures renewed), it is more important to measure the outcomes for users (e.g., reduction in potholes per mile, improvement in journey time reliability, reduction in delays from unplanned incidents). The performance framework should focus on these outcomes.

Performance data should be published regularly in accessible formats, allowing industry, Transport Focus, ORR and the public to track progress against targets. When targets are missed, National Highways should be required to explain why.

Resource and delivery

The *Statement of Funds Available* totals £24.983 billion over five years. Whilst this represents substantial investment, it must be sufficient to achieve the ambitious objectives set out in the draft RIS3. The final RIS should clearly demonstrate how this funding will be allocated and why this allocation is sufficient to deliver the performance improvements expected.

While capital costs receive most attention, operational and maintenance costs are substantial and ongoing. Decisions about capital investment should consider whole-life costs. A more expensive but more durable solution may represent better value if it reduces maintenance costs over its life.

With substantial public investment comes responsibility to ensure value for money. National Highways must work with ORR to deliver maximum possible efficiency improvements consistent with achieving RIS requirements. However, value for money should be assessed on outcomes delivered, not just costs incurred. If spending slightly more achieves significantly better outcomes for users, that may represent better value.

Next steps

RIS3 comes at a critical time for the UK's strategic road infrastructure and for the logistics industry that depends upon it. The network faces mounting challenges from ageing assets, climate change, growing traffic and the imperative to support economic growth whilst enabling decarbonisation.

Logistics UK welcomes aspects of the draft RIS3, particularly the enhanced focus on maintenance and renewals, the recognition of freight's importance and the commitment to continue investing in driver facilities and safety. However, significant gaps and concerns remain that must be addressed in the final strategy.

Most critically, RIS3 must not exist in isolation. Without new major capacity schemes in this Road Period, it is imperative that National Highways uses these five years to develop a comprehensive long-term strategy for future network development. The logistics industry needs confidence that capacity constraints will be addressed before they become critical, and that the strategic planning to enable timely delivery is underway.

Network performance and reliability must demonstrably improve over the RIS3 period through proactive, intelligent maintenance, enhanced real-time information and prioritisation of key freight corridors. The transition to zero-emission vehicles must be enabled through substantial expansion of charging infrastructure, coordinated with energy network development.

Logistics UK stands ready to work constructively with the Department for Transport, National Highways and other stakeholders to ensure RIS3 delivers the best possible outcomes for freight and for the UK economy.

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