

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

14 September 2026

Dear Sir / Madam,

Re: Variation to the third Road Investment Strategy following the recently published Defence Investment Plan

We welcome the opportunity to respond to the Government's consultation on proposed changes to the third Road Investment Strategy (RIS3).

The Association for Consultancy and Engineering (ACE) is the business association for the UK's professional consultancies and engineering companies operating in the social and economic infrastructure sectors. As the leading voice for the sector, we foster collaboration to propel the industry to fulfil its ambitions.

We champion infrastructure and the built environment – helping our sector to build a safe, prosperous and sustainable future.

Our sector is highly skilled, productive, and forward-looking – employing over 470,000 people and contributing more than £39bn to the UK economy. It competes on a global stage, exporting over £11.1bn providing solutions to the world's pressing issues and holds the key to a brighter future.

Our response has been structured thematically, focusing on the areas where we are best placed to add value. This approach reflects discussion with members and prioritises the key issues arising from professional practice.

We trust our response is helpful and would be pleased to engage further if required.

Yours faithfully

Marie-Claude Hemming, Director of Policy, Association for Consultancy and Engineering

ACE response to the RIS3 variation consultation

ACE recognises that Government must be able to change its infrastructure investment priorities in response to changing economic, fiscal and strategic circumstances. We also recognise the need to ensure that public investment delivers value for money and supports the Government's wider priorities.

Our concern is not with the principle of reprioritising investment, but with the implications of changes to RIS3 and wider roads capital investment for infrastructure delivery, the businesses that support it and confidence in the future investment pipeline.

The impact on delivery capability

Changes to infrastructure investment have consequences across the supply chain. Our sector invests in skills, apprenticeships, specialist expertise, technology and innovation based on a reasonable expectation of future demand. Significant changes to an established programme can therefore affect investment decisions, particularly where projects are sufficiently advanced for businesses to have committed people and resources.

This does not mean every project must proceed as originally planned. It does mean that the wider consequences of significant programme changes must be understood. Uncertainty can lead businesses to defer investment, redeploy capability to other sectors or markets, or become more cautious about developing specialist capacity. Once lost, some of that capability can take years to rebuild.

The cancellation of the A38 Derby Junctions and A46 Newark Bypass illustrates this issue. ACE is not arguing that either scheme must proceed. However, both are relatively advanced projects on which significant planning, design, environmental, technical and consenting work has already been undertaken. Their cancellation raises questions about the value of work already completed, the impact on the businesses and people involved, and how the underlying transport needs will now be addressed. Where alternative solutions are developed, Government must consider whether work already undertaken can be retained or reused, rather than losing value and capability that has already been invested.

The way changes are managed also matters. There is a significant difference for industry between a project being cancelled, paused, rephased or replaced by an alternative investment. Greater clarity on the status and likely timescales of affected schemes would enable businesses to make informed decisions about people, resources and investment, while reducing unnecessary disruption.

The cumulative effect of cancellations, reductions, rephasing and uncertainty across the programme may be more significant than any individual decision. This is particularly important for a sector whose ability to respond to future demand depends on having sufficient confidence to invest ahead of it.

Maintaining confidence in the pipeline

A credible and sufficiently stable investment pipeline is essential to maintaining delivery capability.

Strategic roads support economic growth and deliver a wide range of social and place-based benefits, including improving access to employment, education, healthcare, supporting social mobility and unlocking investment and regeneration in more deprived areas. The strategic road network therefore plays a key enabling role in delivering the Government's wider devolution and regional growth objectives. Beyond economic and social benefits, the importance of strategic roads lies in their role in improving network resilience and reliability, playing a critical role in supporting defence logistics, emergency response, freight movements and wider national connectivity. Changes to the investment programme should be assessed against all of these outcomes as well as against efforts to encourage private investment.

ACE encourages a wider review of the roads programme to identify projects, routes or packages of investment that may be suitable for alternative funding and financing approaches. Whilst the Lower Thames Crossing is already being progressed on this basis, there may be other opportunities elsewhere in the programme. In some cases, bundling schemes at a corridor or route level could create a scale and risk profile that is more attractive to private investors, potentially freeing up public capital for projects which are less suited to alternative financing. Whilst traditional PFI models may not be suitable for all schemes, there is scope to explore a range of alternative approaches, including revenue-supported models.

ACE recognises the case for prioritising maintenance and renewals where necessary. However, this must be considered alongside the longer-term strategic objectives of RIS3.

Government must of course retain the ability to change priorities, but this needs to be balanced with clarity about the overall direction of travel. Before schemes are cancelled or significantly rephased, it may be beneficial to conduct a more holistic review of investment priorities, funding routes and programme affordability. Bodies such as the National Infrastructure and Service Transformation Authority (NISTA) can have a role to play in helping identify alternative investment pathways and assessing the bankability of schemes. In some cases, pausing schemes rather than cancelling them outright could provide additional time for assessing options while maintaining future delivery flexibility and preserving market confidence. Maintaining confidence among investors, suppliers and delivery partners is important, as repeated changes to infrastructure programmes can influence future investment decisions and participation in the market.

Where projects are cancelled or rephased, there must be sufficient clarity on alternative priorities and future opportunities to enable industry to plan and invest accordingly. This is particularly important where the underlying transport, economic or connectivity need remains and must be addressed through a different intervention. The future RIS4 programme will therefore be even more important in providing certainty about the longer-term direction of strategic road investment.

Conclusion

Changes to infrastructure investment have long-term consequences. The RIS3 variation must therefore be considered not only in terms of the projects affected, but its impact on delivery

capability, market confidence and the longer-term ability to deliver the Government's infrastructure ambitions.

A stable pipeline does not require every project to proceed unchanged. It requires clear strategic direction, effective communication and sufficient visibility for businesses to invest with confidence.

ACE encourages Government to take these wider impacts into account as it finalises the RIS3 variation and considers the future strategic roads programme. Where priorities change, Government must provide clarity on what comes next, enabling the supply chain to adapt, retain capability and continue supporting infrastructure delivery across the UK.