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Analysis



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Copied to:
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Via email

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Dear Mike

ORR's assessment of National Highways' performance against its RIS2 and Interim Period safety target to reduce the number of people killed or seriously injured on the strategic road network

I am writing to share ORR's assessment of National Highways' performance against its safety key performance indicator (KPI) for the second road period (RP2) and the interim period (IP) in advance of our more detailed annual safety report that we will publish in January 2027. This letter also sets out areas for improvement to support the company in further reducing road casualties and achieving its safety targets in the third road period (RP3), and beyond.

On 30 July 2026, the Department for Transport (the department) published road casualty statistics for 2025. This included figures for the strategic road network (SRN) that confirmed that National Highways did not meet its safety KPI as specified in the second road investment strategy (RIS2) and the interim settlement for the IP to reduce the number of people killed or seriously injured on the SRN by at least 50%, compared to the 2005-2009 average baseline.

Therefore, I am satisfied that under sections 11(1)(a) and 11(1)(b) of the Infrastructure Act 2015 National Highways has contravened sections 3(6) and 6(3) by being non-compliant with RIS2 and the statutory directions and guidance that constituted the interim settlement, respectively. As set out in our holding to account policy (March 2026), we approach matters of compliance and enforcement in a proportionate and targeted way to ensure the best outcome for road users, taxpayers and the wider public. We have therefore considered the wider context of the company's performance against this target, and relevant supporting evidence, in deciding whether to take regulatory action.

Performance against the KPI

The statistics show that 1,875 people were killed or seriously injured (KSI) on the SRN in 2025. This is 37.5% below the 2005-2009 average baseline and falls short of the KPI target for RIS2 and the interim settlement of a 50% reduction in KSIs by the end of December 2025.

Further analysis of road casualty data on the SRN highlights areas where National Highways has made progress. In particular:

- in 2025, the KSI casualty rate per mile travelled on the SRN was the lowest on record (excluding 2020, when travel patterns were affected by the pandemic); and
- KSI casualty rates improved by more on the SRN than on local roads in England over RP2. This is also true since the start of Roads Reform in 2015.

While it is difficult to fully quantify the extent to which these improvements are a result of actions taken by National Highways, and how much can be attributed to external factors, such as advances in vehicle safety, the statistics are consistent with interventions having contributed to improved safety outcomes.

Delivery across RP2 and the IP

An important aspect of our assessment is National Highways' performance in delivering its plans to improve safety on the SRN, and the extent to which it has taken reasonable action in the circumstances to achieve this. As part of this, we recognise that the RP2 safety KPI was set as a stretch target for National Highways and that to meet it, the company needed to achieve reductions in the number of people killed or seriously injured beyond what it was funded for.

The start of RP2, in April 2020, coincided with lockdowns associated with the COVID-19 pandemic. This made it more difficult to plan for the future as traffic, and casualties, on the SRN were significantly reduced and it was unclear if, or when, they would return to pre-pandemic levels.

As COVID restrictions eased in the early part of RP2 we consistently identified that the safety KPI would be at risk from increasing traffic levels. However, National Highways did not immediately flag that the target was at risk through its internal governance and reporting. If the company had escalated this issue earlier, it would have given itself the opportunity to put in place a more developed pipeline of safety schemes, enabling it to have made more progress in the earlier years of RP2.

As the risk to the safety KPI crystallised, we were concerned that National Highways was not taking any additional actions, beyond its pre-existing safety plans, that would increase the likelihood of the target being met. ORR therefore set out its expectation in its safety report in December 2023 that the company should identify additional actions that it could take to improve performance. In response, the company developed an enhanced safety plan for delivery in 2024 and 2025.

From this point onwards, National Highways delivered its safety plans for RP2, including the additional actions identified in the enhanced safety plan, and the IP safety action plan. By the end of RP2 and throughout the IP, the evidence provided by the company indicated that it was taking reasonable and proportionate actions to improve safety on the SRN.

National Highways has started RP3 with improved governance and reporting arrangements and a stronger pipeline of schemes. It appears on track to deliver its year 1 safety commitments. However, the company must now demonstrate greater maturity in its long-term planning by rapidly developing and publishing robust, detailed plans for the remainder of the road period. The current level of detail beyond year 1 does not provide sufficient confidence in the effectiveness of the company's plans for years 2-5 of RP3. This should be strengthened as a priority.

Understanding the effect of safety improvements

Of the KSI savings required to achieve the level of performance that National Highways considered achievable in its draft strategic business plan for RP2, the company's modelling showed that approximately half would be delivered by its planned interventions. The other half would be delivered through external factors that were outside of the company's direct control, such as improvements in vehicle safety.

During RP2 and the IP there were two tailwinds that should have supported National Highways in delivering the KSI reductions that were within its control:

- traffic growth was lower than expected due to the pandemic; and
- National Highways delivered more safety interventions than it originally planned as a result of the enhanced safety plan.

Despite this, the 2025 road casualty statistics confirm that the reduction in the number of people killed or seriously injured was less than National Highways expected when the target was set.

National Highways has been unable to fully quantify the effect of its actions to reduce KSIs during RP2 or explain why these actions did not deliver the expected reduction. The evidence provided by the company demonstrates that it was doing what it reasonably could to improve safety in the latter half of RP2 and the IP, including through delivery of additional interventions under the enhanced safety plan. However, it is important that the company improves its ability to assess the effect of its interventions in reducing KSIs on the SRN.

We recognise that this is an ambitious and complex undertaking. However, there are significant benefits for road users to be gained from improved capability in this area. This will enable National Highways to demonstrate that it is making the most effective use of public money to reduce the number of people killed or seriously injured, while improving its ability to identify and prioritise interventions that deliver the greatest benefits for road users.

Lessons to be learnt for RP3

Throughout RP2 and the IP, ORR maintained a strong focus on National Highways' performance against the safety target, providing challenge where appropriate. As a result, the company strengthened its approach, learned lessons and has implemented a number of improvements. For example:

- National Highways established a dedicated road safety division in 2023 that strengthened its ability to deliver and coordinate safety improvements;
- National Highways has embedded the iRAP methodology into scheme development and as a result is able to take a more evidence-led approach to planning interventions on the network;
- at the start of RP3, National Highways has a more robust pipeline of safety interventions than was the case at the start of RP2; and
- National Highways has improved its oversight through better forecasting of safety performance and identifying how related risks are reported internally within the business.

These improvements have helped National Highways to embed Safe System principles within the company, putting it in a better position to succeed in RP3.

However, there are areas where we expect National Highways to make further progress and improvements. In particular, we expect the company to:

- rapidly develop and publish, as part of its annual safety action plan, a robust plan of the activities required in years 2-5 to meet the RIS3 safety KPI. This should be in place to a timescale that aligns with production of the 2027-28 delivery plan update. The safety action plan should then be maintained on a rolling basis, with annual updates reflecting increased certainty and detail on planned interventions over the remainder of the road period; and
- strengthen its capability to understand, measure and quantify the effectiveness of interventions on the SRN where possible, ensuring that future investment decisions are underpinned by a robust evidence base. Progress should be clearly demonstrated through quarterly reporting to ORR.

Our assessment of National Highways' performance against the safety KPI for RP2 and IP has identified that the company is non-compliant with the RIS and interim settlement. On balance, based on the evidence provided, we do not consider that this warrants further action by us at this time. In reaching this conclusion, account has been taken of the exceptional circumstances in which RP2 commenced, including the disruption and uncertainty arising from the COVID-19 pandemic, as well as the improvements the company has made to its approach to safety over recent years.

Nevertheless, continued improvement will be critical if National Highways is to achieve its RP3 safety target. The areas for improvement identified in this letter should be addressed as a priority. ORR will continue to closely monitor the company's performance and delivery in this area and, should sufficient progress not be demonstrated, will consider whether regulatory intervention is necessary.

We will publish this letter on our website at a suitable opportunity.

Yours sincerely

Graham Richards