

Alwen Williams
Chief Executive
Ambition North Wales
Government Buildings
Sarn Mynach
Llandudno Junction
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Your Ref: AW/ls
2nd September 2025

Dear Ms Williams,

RE: The North Wales Regional Transport Strategy

Thank you for your letter of 9th July 2025. We would like to make the following points in relation to it:

We welcome the removal of the Red Route from the draft North Wales Regional Transport Plan (dNWRTP), in conjunction with your confirmation that the dNWRTP is not pursuing its re-emergence. We further welcome removal of the term "paused" as set out in your letter.

However, we remain concerned at your statement that one of the duties of the dNWRTP is to set out "regional aspirations" for the strategic road network (SRN). We have examined Welsh Government statutory advice to CJC's with regard to the formulation of RTPs, and the secondary legislation relating to the establishment, roles, and powers of CJC's with regard to transport, and we can find no reference to this purported "aspirational" role of RTPs. Indeed, points 1 and 9 in the Welsh Government statutory guidance state:

1. We DO want the RTPs to be firmly focused on achieving modal shift.

9. We DO want you to include disincentives for car use as well as incentives for more sustainable travel.

We would be grateful if you could inform us as to where reference to the supposed aspirational role of RTPs occurs in the guidance and/or legislation.

Whilst the above may seem somewhat academic, "aspirational" statements in statutory documents are a bad practice example of the phenomenon of "creeping validation". This is the process whereby references to policy or project initiatives, where such references are made by authorities acting beyond their remit, gather materiality to themselves, by being subsequently cited by the authority to whom the powers to pursue such initiatives fall. Thus the dNWRTP's statement at new SRN3 that the CJC ***"Supports the Welsh Government reviewing the case for strategic highway schemes where these can provide wider benefits and enhance facilities for sustainable travel"***, being aspirational, should have no materiality, because in making such a statement, the CJC is acting beyond its remit and against statutory guidance and legislation. Indeed, and in support of this, the SEA of the dNWRTP explicitly declines to assess the environmental implications of such statements on the grounds that they are aspirational, stating that they are ***"for others to decide upon"***, thus confirming that they have no materiality.



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However, you state on page 2 of your letter that it is ***"important that the Regional Transport Plan sets out options to address transport related problems on the SRN and highlight regional aspirations for strategic roads"***. This is illogical. Such statements cannot be so important as to merit inclusion in the dNWRTP, whilst at the same time being not important enough to merit being subject to statutory SEA.

We therefore advocate that, at a minimum:

1. The final version of the dNWRTP to be sent to the Welsh Ministers should include a paragraph to the effect that its aspirational statements in relation to project development have no materiality in project/policy formulation, and
2. Aspirational statements at SRN3, for example, are re-formatted and redesigned to clearly distinguish them from statutory RTP policies.

Does the dNWRTP support new highway construction schemes?

Whilst we welcome several of the changes set out in the July 2025 version of the dNWRTP and subsequent additional changes set out in your letter, it is still not clear whether or not the CJC supports making the case for new highway schemes as part of the strategic road network in general or at any particular location on it in particular.

The amended text of SRN3 set out in your letter states:

"SRN Aspiration 3: The case for delivering selected paused strategic highway schemes should be reviewed, particularly where these can provide wider benefits and enhance facilities for sustainable travel. Priority routes are the A494/A55/Flintshire Corridor"

However, this appears to us to be contradicted by the consultants' report into responses to objectors' representations that the CJC does not support re-examining the case for the Red Route (and as an aside, we have received communication from the Cabinet Secretary for Transport that this is also the Welsh Government's approach).

One interpretation of the new text set out in your letter is that the CJC supports the re-examination of transport-related problems at certain locations/corridors on the strategic road network, but, crucially that that re-examination would not result in a recommendation for completely new major highway construction on the part of the CJC. The implication of this interpretation is that the CJC supports the examination of the full gamut of possible solutions to transport-related problems on the strategic road network, including on- or near-line upgrade-related solutions, public and active travel-related solutions and non-physical works-related solutions (SMART measures). This approach would appear to us to be reasonable, and to be in conformity with the Wales Transport Strategy Y Llwybr Newydd, in accordance with which the NWRTP must act.

In the light of the above, and on the understanding that we are broadly in agreement in relation to this matter, we respectfully advocate that, in the interest of clarity, SRN 3 be amended as follows. Our suggested amendments below are in red:

"SRN Aspiration 3: The case for delivering selected paused strategic highway schemes should be reviewed, particularly

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where these can provide wider benefits and enhance facilities for sustainable travel, and are in conformity with the transport mode hierarchy set out in the Wales Transport Strategy Y Llwybr Newydd. Priority routes are the A494/A55/Flintshire Corridor and the A483 Wrexham.

However, it should be noted that aspirational statement SRN3 cannot be delivered by the RTP, as the strategic highway network is the responsibility of the Welsh Government, not local authorities. Thus, SRN3 is not a Regional Transport Plan policy.

The CJC's Ongoing Discussions with the Welsh Government with Regard to the Strategic Road Network:

We note at page 3 of your letter the statement that:

"we have engaged with the Trunk Road Agent and the Welsh Government to help understand their priorities and plans, to inform the Regional Transport Plan's 'strategic road network aspirations'"

We would be most grateful if you could inform us whether such discussions are in the public domain, and if so, how they can be accessed by us and others.

The Version of the dNWRTP to be Submitted to the Welsh Ministers:

Notwithstanding our suggested changes set out in this letter, and in the interests of clarity, we would be most grateful if you could confirm in writing that it is the July 2025 version of the dNWRTP, amended by the changes set out in your letter of July 9th which will be submitted to the Welsh Ministers, and that no further changes in relation to highways will be proposed or made to the dNWRTP.

We would be most grateful if you could keep us informed of developments in relation to the NWRTP.

We would further be grateful if you could acknowledge receipt via email.

Yours sincerely,



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