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Welsh Government

Consultation – summary of responses

Welsh Transport Appraisal Guidance (WelTAG)

Consultation on proposed revisions to the guidance

December 2023

**Overview**

This report summarises the feedback on the draft Welsh Transport Appraisal (WelTAG) Guidance, which was published for consultation in August 2022. Overall respondents were supportive, but there was feedback on specific issues in the guidance. These have been considered in the revised guidance and accompanying supplementary guidance.

**Action Required**

This document is for information only.

**Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

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**Additional copies**

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government’s website.

Link to the consultation documentation: [Welsh transport appraisal guidance (WelTAG) 2022 | GOV.WALES](https://www.gov.wales/welsh-transport-appraisal-guidance-weltag-2022)

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# Introduction

The Welsh Transport Appraisal Guidance (WelTAG) provides guidance on the development of Welsh transport policies, programmes and projects. It is based on HM Treasury Green Book and the United Kingdom Transport Appraisal Guidance and takes account of Welsh priorities and values including the Well-Being of Future Generations Act 2015.

In 2021 we published a new Wales Transport Strategy, placing greater emphasis on delivering well-being benefits through a vision of an accessible, sustainable and efficient transport system.

One of the actions to deliver the Wales Transport Strategy was to update the transport appraisal guidance to ensure that interventions funded by Welsh Government are aligned with the new strategy.

On 11 August 2022 we published the new draft Welsh Transport Appraisal Guidance (WelTAG 2022). A 12-week statutory consultation exercise took place, closing on the 2 November 2022. This report summarises the responses to that consultation.

# What was the consultation about?

The consultation sought feedback on the content and approach in the draft WelTAG 2022, and ideas on further development. A range of informal consultation had taken place during the development of the draft, including discussions with transport organisations, local authorities, transport policy makers and users of the guidance. The consultation asked 10 questions about the content of the guidance.

We also drew on feedback and consultation gathered during the drafting of the Wales Transport Strategy, including responses captured in the Mobility in Wales report.

# The responses

In total 24 responses were received of which 15 were blank. Of the 9 completed responses, 6 were from organisations and 3 from private individuals. The organisations who responded were AECOM Ltd and WSP (private sector consultancies), the Welsh Local Government Association (WLGA), Cycling UK, the trade union ASLEF and the North Wales Wildlife Trust.

Of those who responded, six lived in Wales and one did not. Five had business interests in Wales and three did not.

# Overview of responses to each question

The following analyses the 9 completed responses to the consultation.

## Question 1: Cost benefit ratios

**WelTAG 2022 places less emphasis on the use of cost-benefit ratios, and more emphasis on well-being appraisal based on the ambitions and targets in the Wales Transport Strategy. Do you have any comments on this approach?**

Each of the respondents was supportive or strongly supportive of this approach, welcoming the move to a more holistic approach where the cost-benefit ratio (BCR) was not the prime objective. This approach was also more appropriate for smaller projects where detailed cost-benefit analysis was not appropriate. There was also strong support for the Integrated Well-being Appraisal (IWBA).

Nevertheless, business cases needed to be evidence based and the need for well informed decision making, based on robust and clear appraisal methods. Whilst supportive, one respondent was concerned that quantified time savings were still important in transport decision making. Another noted the wider benefits of moving freight to rail despite higher upfront costs and hoped that this would be considered.

**Response:** the broad approach has been retained, but the guidance now emphasises the need for quantitative evidence.

## Question 2: Case for Change

**WelTAG 2022 introduces a new Stage 0 Case for Change and suggests that it should be done by the in-house team.  Do you have comments on this?**

The introduction of Stage 0 was welcomed but there were some concerns about that stage being completed in house, including:

* The potential lack of skills by internal teams
* The need for additional data and modelling
* The need for transparency and potentially external review by an established consultancy
* The need to focus on outcomes rather than pre-determined solutions.

The guidance should include provisions for support and external review. There were also specific recommendations on text around agreeing the case for change and adding in a requirement for public consultation.

**Response:** specific suggestions for wording have been considered in more detail. Issues around external support and review have been explored in relation to governance.

## Question 3: Strategic application

**Would it be beneficial to use WelTAG at a strategic or programme level? If so, what types of transport interventions might best benefit from a strategic WelTAG approach?**

All respondents were supportive of the use of WelTAG at a strategic or programme level. Suggestions for specific strategic approaches include national, regional or sub regional interventions that need to be addressed in specific geographical locations, such as Metros, park and ride hubs freight or public transport improvements, or where choices need to be made between investments in roads, railways, light rail or buses. It could also be used where there are opportunities for integration between different modes. Programme level WelTAG appraisals would be of most benefit where it would mean that individual project appraisals could be more light touch.

**Response**: the guidance has been revised to clarify the need for WelTAG to be applied at strategic and programme levels with opportunities to make individual appraisals more light touch.

## Question 4: Transport planning and land use planning

**WelTAG 2022 provides guidance on aligning transport planning and land use planning. What are the key issues and how could we address them in the guidance.**

This was seen as an important and long-standing issues. Key issues were around the location of new development in relation to transport or new transport schemes that circumvent the planning process through permitted development rights and are not considered in the planning process. Suggestions to address this included synchronising the timetable for Strategic Development Plan and Regional Transport Plan timetables or new legislative provision. TAN 18 is well out of date and needs to be updated.

## Response: further consideration will be given to addressing the need to update TAN 18 and to align timetables as part of the work of the Corporate Joint Committees

## Question 5: Proportionate approach

**WelTAG 2022 introduces a proportionate approach to appraisal through three levels of detail – WelTAG lite, WelTAG standard and WelTAG plus. Most projects in Wales, including most active travel projects, should use WelTAG lite. Do you have comments on this approach?**

Respondents were supportive of a proportional approach but asked for more clarity on when and in what circumstances this might be provided. There was a request for further guidance on how decisions will be made and how stakeholder engagement would be conducted, and the need for more transparency around stakeholder engagement. Given that WelTAG lite is largely qualitative would there be additional guidance on qualitative approaches in the technical guidance? There were specific suggestions for text particularly around Active Travel projects.

**Response:** supplementary guidance has been developed on when WelTAG lite, standard and plus should be used and around the need for stakeholder engagement. Suggested text amendments have been reviewed in more detail.

## Question 6: Technical guidance

**We are developing technical guidance to accompany the main guidance. Can you suggest specific tables or templates that would be helpful? Which particular topics would benefit from further guidance?**

This was welcomed but needs to be produced in a timely manner with opportunities to comment. Suggestions include guidance on:

* the need to walk through proposed routes on the ground
* the relationship between statutory /regulatory impacts and the IWBA
* appraisal worksheets on environment, economy, people communities, culture and Welsh language
* calculation of local air quality impacts, carbon and noise
* contents of reports
* worked examples
* Appraisal Summary Table
* engagement plans

**Response:** We have provided additional guidance on engagement plans and contents of reports. The main guidance has been updated to address the relationship between statutory and regulatory impacts and the IWBA. Other topics will be addressed as needed.

## Question 7: Other feedback

**Do you have any other comments or feedback on the draft WelTAG 2022 guidance?**

One respondent expressed concerns about overall Welsh transport policy arguing that the economy would be seriously damaged without addressing the issues relating to the M4 motorway and that people wanted the independence of personal vehicles and as the Welsh carbon impact was negligible other approaches should be considered. Other comments included:

* more attention should be given to freight.
* the technical guidance should be published at the same time
* guidance on when and where WelTAG lite was appropriate
* transport modelling is still important if carbon impacts are to be calculated
* more clarity on when IWBA is needed
* specific reference to relevant well-being indicators
* concerns about the revision of the Sustainable Transport Hierarchy as set out in the Welsh Transport Strategy
* consider the impact of the do-nothing option on meeting targets
* review groups should be mandatory

**Response:** overall feedback on Welsh Transport policy will be provided to Ministers. Other issues have been considered in the revised guidance and the supplementary guidance.

## Question 8: Governance

**Do you have any suggestions for how the governance of WelTAG might be improved to ensure that studies are high quality, meet the needs of users and represent good value for money?**

Feedback included:

* more coproduction and consultation with residents on the ground
* standard review templates for Gateway reviews with key assessment criteria and questions
* engage the review group early in the process
* workshops for scheme promoters to understand what good looks like
* a technical team in Welsh Government to advise on the application of the guidance and ensure consistency
* a process to maintain and develop WelTAG to ensure continual improvement
* oversight by a group of experts to review progress under new approach and offer feedback

**Response:** governance suggestions will be reviewed and have either been included in the revised guidance or subject to further consideration.

## Question 9: Welsh language

**We would like to know your views on the effects that WelTAG 2022 would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be?  How could positive effects be increased, or negative effects be mitigated?**

The impact could be positive by supporting Welsh speaking communities however local authorities already have duties in this area. One respondent felt that translating technical studies was unnecessary, but that simultaneous translation should be offered for stakeholder engagement.

**Response:** the feedback is noted

## Question 10: Other issues

**We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please note them.**

Feedback included:

* Further thought on how communities could live without personal cars including share schemes
* More attention to developing freight on rail.

**Response:** the feedback is noted will be included in overall review of the progress of the Wales Transport Strategy.

# Summary

Respondents were supportive of the new revised guidance and the approach taken. Suggested areas for improvement included more guidance on when and where different approaches should be used, more transparency and oversight, better public engagement, and clarification of specific issues of uncertainty. Other areas to be considered include the relationship between qualitative and quantitative approaches, and the continued need for robust data. More strategic points were made around Welsh transport policy overall, and the need to look again at the long-standing issues around the relationship between transport planning and land use planning.

# Next Steps

The guidance has been updated in light of the consultation responses. It has involved:

* considering specific changes to wording where suggested by respondents
* noting key issues around Welsh Transport policy in general and feeding those back to Ministers
* developing additional guidance incorporating suggestions from respondents
* putting forward proposals around improvements to WelTAG governance.

# References

Welsh Government (2022) Welsh Transport Appraisal Guidance (WelTAG) 2022

Welsh Government (2021) Llwybr Newydd, the Wales Transport Strategy 2021

Welsh Government (2020) Mobility in Wales

Welsh Government (2017) Welsh Transport Appraisal Guidance (WelTAG) 2017

Welsh Government (2015) Well-Being of Future Generations (Wales) Act 2015