

# WelTAG 2022: Welsh Transport Appraisal Guidance

**Q1: 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?**

Cycling UK strongly supports the concept of the proposed Integrated Well-Being Appraisal Framework (IWBAF). This is an excellent idea which will ensure that transport interventions more closely fit with the Wales Transport Strategy and Net Zero Wales.

The emphasis on cost-benefit ratios in transport appraisal has long been criticised for overlooking and underselling the wider environmental, well-being (and other) benefits of proposed active travel schemes (as discussed, for example, in *Valuing the Small: Counting the Benefits, 2004\**). We therefore welcome plans to move away from a rigid BCR process, while accepting that using BCR data should not be subject to a blanket ban.

We agree, for instance, that factoring in improved journey times for sustainable and active travel through BCR may legitimately justify projects designed to encourage modal shift (as noted on p56 of the consultation document).

It is vital, of course, that placing less emphasis on BCR does not compromise well-informed decision-making, guided by the findings of robust and clear appraisal methods.

\*[https://discovery.ucl.ac.uk/id/eprint/1263/1/2004\\_27.pdf](https://discovery.ucl.ac.uk/id/eprint/1263/1/2004_27.pdf)

**Q2: 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?**

Cycling UK warmly welcomes the introduction of Stage 0, requiring a clear statement of the case for change at the outset.

We also generally support the idea that the Stage 0 'case for change' should be produced exclusively by the in-house team, without the use of external consultants. This will be a useful discipline, motivating the proposer to think through their rationale at the outset, own and invest in it. At the same time, it should trigger a much-needed boost for active travel expertise within local authorities.

**RECOMMENDATION:** Nevertheless, it is inevitable that some proposers will find it a challenge to make a persuasive case for change in-house without any access at all to external and independent advice, especially in the early days of the new WelTAG approach. We therefore suggest that clear provision is made to support and guide them upon request, so that they are not left completely to their own devices during Stage 0.

**RECOMMENDATION:** The consultation states (p31) that: "In most situations the case for change should be agreed with key partners before progressing further". This instruction is unhelpfully vague. There should be a requirement that the 'case for change' be agreed with key partners before progressing further; either that, or the wording changed to explain that proposers will always be expected to aim for agreement with key partners but that, if this fails to happen, they must clearly explain what the points of contention are.

**Q3: 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?**

Cycling UK believes that WelTAG 2022 is best suited as a tactical tool for individual schemes, but we can see a case for its use at strategic level for major cross-border projects and/or when choices have to be made between investments in roads, railways, light rail or buses.

**Q4: WeITAG 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?**

Cycling UK is pleased to see the clear and useful guidance on the integration of WeITAG and land use planning presented at p68.

The proposed text states that TAN 18 provides detailed planning guidance supporting the policy of new developments improving quality of place, creating safe, social and attractive streets where people want to walk, cycle and enjoy themselves.

Unfortunately, however, TAN 18 is very badly out of date, and does not in fact now provide appropriate guidance. 'Llwybr Newydd: The Wales Transport Strategy' committed Welsh Government to updating TAN 18 for this very reason, but we were dismayed to note that the draft National Transport Delivery Plan waters this commitment down.

**RECOMMENDATION:** TAN 18 is a vitally important document, so its review and update should be treated as a priority, in line with the commitment made in 'Llwybr Newydd'. For the time being, any reference to TAN 18 in WeITAG 2022 needs to be made with care to ensure that the current badly inadequate TAN 18 is not unintentionally endorsed.

**Q5: WeITAG 2022 introduces a proportionate approach to appraisal through three levels of detail, WeITAG lite, WeITAG standard and WeITAG plus. Most projects in Wales, including most active travel projects, should use WeITAG lite. Do you have comments on this approach?**

Cycling UK strongly supports the proportionate approach to appraisal proposed, and agrees that most active travel projects should use WeITAG Lite.

We also note (text box on p69) the proposal that where a project is already identified elsewhere, including on an Active Travel Network Map, "there may be no need for a complex options appraisal process". We think this is an excellent innovation for active travel infrastructure which we very strongly support because it is, in effect, an exemption from some of the WeITAG bureaucracy.

**RECOMMENDATION:** That said, we suggest some qualification is necessary, and recommend that the text box refer to an "approved" ATNM to make clear that the route has already been approved in principle by Welsh Ministers. In reality, many routes shown on approved ATNMs are actually no more than desire lines, meaning that there is a danger of this exemption being used to avoid detailed planning work which is absolutely necessary.

We therefore suggest that the Guidance should make explicit that, if a WeITAG options appraisal has not taken place, then justification for this decision should be an integral part of an Active Travel Fund application. Proposers should, for example, be expected to supply a transparent record of who authorised the decision, the grounds for doing so and the criteria behind it. The TfW assessment process for ATF bids will provide a necessary quality check.

The 'exemption' should be clearly stated in the main text, not just in the text box on p69 as at present.

**Q6: 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?**

Cycling UK is pleased to see 'WeITAG 2022 Section 5: engaging with people'.

WeITAG 2017 has been bedevilled in operation by a lack of clarity about what degree of engagement is expected, and with whom. Unfortunately, the draft WeITAG 2022 does not fully resolve this problem.

Cycling UK notes and welcomes the proposal to produce further Technical Guidance on engagement plans but, until this has been seen, we are not able to be more definite. We also hope that the draft Technical Guidance will itself be subject to consultation in due course.

We are dismayed to note that the section on Review Groups (p61, line 1) states that a Review Group is optional. This is a seriously retrograde step from WeITAG 2017, and we do not understand the rationale. This is because our lengthy experience clearly demonstrates that independent review is an absolutely vital part of WeITAG, and of effective and convincing engagement with people.

In our view, not only should Review Groups be mandatory, but their composition is critical. Most importantly, stakeholder involvement must be arranged in such a way as to ensure transparency and promote public confidence in WeITAG outcomes. This means appointing genuinely independent and objective representatives, not simply people from TfW, local authorities and organisations contracted to the Government.

**RECOMMENDATION:** We strongly recommend that WeITAG 2022 makes a Review Group, with stakeholder involvement, an absolute requirement of all WeITAG projects. This can easily be achieved in the text of the consultation document by replacing "may" with "must" at p61, first sentence. Figure 2 (p9) will need to be consistently amended, by deleting "if needed" in the section 'Scope the programme or project'.

**RECOMMENDATION:** Review Groups should not be composed simply of delegates from TfW, local authorities and paid contractors. Instead, they should appoint stakeholders with a genuinely independent voice, including Cycling UK representatives.

**RECOMMENDATION:** The proposed technical Guidance on engagement should further expand on the purpose and composition of Review Groups, in line with our recommendations above.

**Q7: Do you have any other comments or feedback on the draft WelTAG 2022 guidance?**

(i) On a point of detail, we note that the draft Guidance (see p12) refers to 46 National Well-being Indicators. There are in fact 50 indicators at present, one of which (No 48) is highly relevant to WelTAG 2022: "Percentage of journeys by walking, cycling or public transport".

RECOMMENDATION: We think this concise indicator (No 48) deserves to be quoted in full in WelTAG 2022, most suitably at page 12. It might also be referred to in conjunction with the Sustainable Transport Hierarchy (STH, see next point) on page 13.

(ii) We are extremely concerned to see the substantial misrepresentation of the agreed and published STH on page 13, which we note is in itself inconsistent with Figure 3 (p15). This misrepresentation is not trivial - it rewrites the basis of the STH.

The same fundamental misunderstanding has also appeared in the draft National Transport Delivery Plan (NTDP). Indeed, we have already commented in full on the point in our response to the draft NTDP.

In brief, however, the STH absolutely does NOT give priority to maintaining, managing and future-proofing existing infrastructure.

RECOMMENDATION: All reference to the STH in all Welsh Government documents must be consistent so, once the NTDP text has been finalised, the same wording should be used in WelTAG 2022 as a subsidiary of the NDTP. All references to the STH in WelTAG 2022 need to reflect the true nature and use of the STH.

(iii) The draft Guidance refers on p27 and p33 to the option to "do nothing" or "do minimum". Although it is clear from the WelTAG lite checklist (p79) that, when investigating this option, proposers should consider the impact that doing nothing would have on meeting targets on modal shift, we feel that this does not come across at all clearly in the earlier references.

RECOMMENDATION: The current wording on doing nothing, we feel, seems overly forgiving and should instead clearly emphasise the imperative to do something proactively to change the status quo by increasing levels of active travel and, in doing so, enjoy high returns on investment. We therefore recommend re-writing the text in question to reflect this.

**Q8: Do you have any suggestions for how the governance of WelTAG might be improved in order to ensure that studies are high quality, meet the needs of users and represent good value for money?**

As already stated, we strongly believe that a formal Review Group, including Stakeholders, is absolutely vital in ensuring studies are high quality and transparent - a key point in securing public acceptance. (Please also see our response to Q6).

Q9: 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?

Cycling UK believes that WelTAG 2022 should in principle have a neutral impact on the Welsh language and the ability of people to use Welsh. In practice, however, WelTAG 2017 has tended to be an exclusively English language process.

The WelTAG procedure is necessarily a very detailed and bureaucratic one. Lengthy, detailed and complicated supporting documentation is required, often using highly technical language; it is always in English.

RECOMMENDATION: Providing Welsh translations for everything will be a costly and time-consuming process but could be countered to some extent by requiring a Welsh summary of key documents.

RECOMMENDATION: All stakeholder engagement should provide simultaneous translation.

## Submit your response

Do you live in Wales?

No

Do you have a business interest in Wales?

Yes

Please provide the first part of your home postcode e.g. CF10

GU2 9JX

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

**Name** Cherry Allan

**Organisation (if applicable)** Cycling UK

If you want to receive a receipt of your response, please provide an email address.

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