

23 July 2019

FAO: Minister for Economy & Transport Ken Skates
cc: Deputy Minister for Economy & Transport Lee Waters

Dear Ken

Welsh Transport Appraisal Guidance (WelTAG) 2017

We were pleased to work with you and your officials to update the Welsh Transport Appraisal Guidance (WelTAG) which was published in December 2017. The Guidance ensures that the Well-being of Future Generations Act is considered throughout the WelTAG process, for example:

*“The purpose of Stage One is to understand the issues of concern, explore the context and to present a wide list of possible solutions, sufficient to be able to decide whether there are any solutions within the transport sector that are worth pursuing and to select a short list of options for more detailed consideration. The key feature of this step is the **application of the five ways of working** to the consideration of possible solutions, to ensure the **needs of future generations are considered**, and understand how well they help public bodies to **meet the well-being objectives and maximise their contribution to each of the seven goals**. It provides the opportunity to review whether there are non-transport or cross-cutting solutions”.*

Following publication, we agreed to work with your officials to support the implementation of the new Guidance, as updating the Guidance alone will not ensure the new ways of thinking and working are applied. We agreed that we would provide support to a small number of WelTAG schemes and provide constructive feedback on how the Guidance was being applied. To date my team has

- Contributed to the review group for Llandeilo WelTAG scheme (Stage 1);
- Provided advice on other WelTAG Stage 1 reports (Haverfordwest);
- Had discussions with Welsh Government officials, Vale of Glamorgan council and members of the local community about the M4-A48 scheme.

We wrote to WelTAG users including Welsh Government, local authorities and all the main consultants in April 2019 to ask for feedback on how the new Guidance is being used and I am very disappointed to say that we only received one response (from Mott McDonald). We supported two Welsh Government workshops that took place in May 2019 of this year to outline the expectations of the Guidance and to discuss any good practice and barriers around implementation.

During these workshops we also highlighted how Planning Policy Wales (PPW 10) has been updated to show how the planning system should facilitate the delivery, decarbonisation and improvement of transport infrastructure in a way which reduces the need to travel, particularly by private vehicles, and supports and increases the use of active and sustainable transport. And also the recent Welsh Government Plan [Prosperity for All: A Low Carbon Wales](#), which outlines how the Welsh Government has committed to decarbonise transport through reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. As you know delivering this

objective will not only make an important contribution to decarbonisation, but will also improve air quality, increase physical activity, improve the health of the nation and realise many of the goals of the Well-being of Future Generations Act. We also know this modal shift is essential if Welsh Government are to deliver their statutory targets on reducing carbon emissions in the transport Sector as set out in *Low Carbon Wales: a 79% decrease in the next 30 years* will require everyone to play their part, and as an area of focus for my office, I will be looking closely at what progress is being made.

We receive regular correspondence from members of the public about transport and the application of WelTAG, particularly on specific schemes (e.g. within the Vale of Glamorgan, but also in Caerphilly and north Wales).

During the last 12 months, based on feedback from a range of stakeholders and practitioners, it has become apparent that the Guidance is not being applied as intended and also there appears to be a significant lack of capacity within Welsh Government to support implementation and the capacity buildings that's required. The key issues for me are:

- The system in which WelTAG is being used is flawed: it is often used when specific schemes or solutions (e.g. roads or bypasses) have already been identified; when a WelTAG study is commissioned the Guidance is retrofitted, rather than allowing people to take a more holistic and integrated approach to seeking solutions to transport issues;
- Because the current Transport strategy has not been updated since 2008 those working in the transport profession are relying on documents such as the National Transport Finance Plan and the Wales Infrastructure Investment Plan which commit funding to specific schemes (e.g. WIIP project pipeline of infrastructure projects was updated in June 2018 and commits funding for approximately 15 road-based projects). This reinforces the view that the starting point for the WelTAG assessment is already defined and is usually road based which leads people to focus on road-based solution but also means that the Guidance cannot be applied properly;
- The Act and new Guidance requires a different way of thinking and way of working and I don't feel there has been sufficient support or capacity building for Public bodies and consultants to help them understand the new requirements;
- To this end, I have not seen sufficient evidence that Stage 1 is being applied properly
 - I have seen insufficient evidence that users are applying (which is different to just considering) the five ways of working when considering possible solutions and understand how well these solutions help public bodies to meet the well-being objectives and maximise their contribution to each of the seven goals.
 - Consultants are publishing separate "WFG reports" as part of the WelTAG process and these indicate that they are considering the impact of solutions on the ways of working and relevant well-being objectives, which is the wrong way round as the ways of working and objectives should be used to *generate* the solutions.



- Finally there doesn't seem to be a mechanism to share learning or best practice on implementing the new Guidance.

My advice on this particular point is that if WelTAG is not used properly and particularly at Stage 1 the Welsh Government should withhold funding for further stages.

As you know the Assembly Economy, Infrastructure and skills committee report (State of Roads, October 2018) included several recommendations on WelTAG which were accepted by Welsh Government. They highlighted the fact that ensuring the Guidance is understood and followed by public bodies, and their contractors, will be key to its success and recommended Welsh Government should ensure support is available for this.

In your response you mention that Welsh Government is already working with the Future Generation's office to develop a programme of support sessions to ensure the toolkit is understood and where necessary, is refined. We supported the design and delivery of two workshops for practitioners in May but my view is that this will not be sufficient to embed the cultural change required both within the public sector clients and private sector consultants. Ongoing capacity building is needed and whilst I am keen to support the ongoing roll out of this work due to the large remit and limited resources of my office we do not have capacity to continue to deliver this work on an ongoing basis without additional resources.

The second recommendation was to ensure that every new road project should be subject to challenge to ensure the Well-being of Future Generations Act has been rigorously applied in the scheme, and that Welsh Government should audit a small selection of projects to assess the extent to which is this happening. My office is not involved in this work and would be keen to receive further details of this audit. As I mentioned above I am keen to see the Government taking a systematic approach to auditing how WelTAG has been applied and refusing to allocate funding where it has not been applied effectively.

The new WelTAG guidance, if applied properly, can support Welsh Government and Public Bodies to achieve a whole range of outcomes that would improve the well-being of people and communities across Wales. I am concerned that as it currently stands the lack of understanding and robust monitoring of its application means that this is not happening. I would be keen to hear your views and discuss options you are putting forward to ensure the new Guidance is understood and applied correctly.

Yours sincerely,

Future Generations Commissioner for Wales
Comisiynydd Cenedlaethau'r Dyfodol Cymru