

Agenda – Economy, Infrastructure and Skills Committee

Meeting Venue:

Committee Room 1 – The Senedd

Meeting date: 21 June 2018

Meeting time: 09.00

For further information contact:

Gareth Price

Committee Clerk

0300 200 6565

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Private pre-meeting (09.00–09.15)

1 Introductions, apologies, substitutions and declarations of interest

2 Sustainability – State of Roads in Wales

(09.15–10.00)

(Pages 1 – 25)

Steve Brooks, National Director, Sustrans Wales

Bridget Fox, Sustainable Transport Campaigner, Campaign for Better Transport

Attached Documents:

Research brief

EIS(5)–16–18(p1) Sustrans

EIS(5)–16–18(p2) Campaign for Better Transport



3 Panel representing small businesses – State of Roads in Wales

(10.00–10.35)

(Pages 26 – 29)

Matt Williams, Policy Adviser, Federation of Small Businesses

Elgan Morgan, Policy & Public Affairs Manager, South Wales Chamber of Commerce

Attached Documents:

EIS(5)–16–18(p3) Federation of Small Businesses

Break (10.35–10.50)

4 Panel representing big businesses – State of Roads in Wales

(10.50–11.25)

Mike Plaut, Chair, CBI Wales

Chris Sutton, Vice Chair, CBI Wales

Leighton Jenkins, Assistant Director and Head of Policy, CBI Wales

Mike Colborne, Compliance Manager, Owens Group

5 Mutual Investment Model – State of Roads in Wales

(11.25–12.00)

Chris Nott, Senior partner, Capital Law

6 Paper(s) to note

6.1 Letter from the Welsh Language Commissioner to the Minister for Welsh Language and Lifelong Learning regarding the position of the Welsh language in Apprenticeship programmes in Wales

(Pages 30 – 32)

Attached Documents:

EIS(5)-16-18(p4) Letter from the Welsh Language Commissioner

6.2 Correspondence regarding the Apprenticeship Levy

(Pages 33 – 38)

Attached Documents:

EIS(5)-16-18(p5) Letter to the National Police Chiefs' Council

EIS(5)-16-18(p6) Letter from the Welsh Police Chief Officer Group

Private de-brief (12.00-12.15)

Agenda Item 2

Document is Restricted



Sustrans Cymru
123 Bute Street
Cardiff
CF10 5AE

Sustrans Cymru welcomes the opportunity to respond to the committee's inquiry on the State of Roads in Wales.

This letter outlines our overall response to the questions posed by the inquiry. The overall point we would emphasise is the impact limiting funding has had on the state of roads in Wales.

Whether the current condition of roads in Wales and whether the approach to funding and delivery of maintenance programmes for the local road, trunk road and motorway network in Wales is effective, managed so as to minimise disruption to road users, and provides value for money:

There are two main issues: general wear and tear, and repairs and the situation after road works.

First, on general wear and tear, the historic funding situation of local authorities has negatively impacted on the condition of roads, particularly on the minor road network. With limited budgets, local authorities have tended to prioritise major roads (above minor roads) for maintenance work. Cyclists generally preferred to use minor roads as they tend to be quieter, very often for safety reasons. Sustrans' Bike Life Cardiff (2017) report highlighted that safety is the major concern for people who either currently cycle, or would like to cycle more in the future.

This creates a situation where cyclists are more likely to favour using roads that have been poorly maintained (in relative terms). This applies to both active travel journeys (short, utility trips) as well as leisure and tourism trips on the National Cycle Network.

Second, on repairs and the situation after road works, the standard of repair can have a particularly impact on the safety of cycling. For example, if after road works have taken place, there is an uneven surface between the existing tarmac and the repaired area, an effect known as 'tram lining' can occur which creates road surface that leaves cyclists particularly vulnerable to significant accidents when travelling at speed. During the process of road works, cyclists and to a lesser extent pedestrians can often not be sufficiently catered for. Diversions and alternative arrangements during repair work prioritise the needs of motor vehicles, rather than cyclists and pedestrians.

Whether major enhancement projects on the local road, trunk road and motorway network are prioritised, funded, planned and delivered

effectively, and provide value for money. Relevant issues include the implementation of the Early Contractor Involvement approach and the opportunities offered by the Welsh Government's Mutual Investment Model:

Despite the passage of the Active Travel Act, active travel provision can still be marginalised within major infrastructure projects. The Newtown bypass project could have delivered active travel enhancements, but these elements have steadily been dropped as the costs of the de-trunking elements increase. Although some of these elements can be provided from alternative funding, these are often on different projects to the original plans and it is less cost effective to undertake these works separately (rather than as part of a major infrastructure scheme).

Sustrans Cymru remains concerned that larger schemes are still failing to take into account active travel provision effectively and, notably, seek to enhance it rather than just catering for the 'status quo'.

Our experience of Early Contractor Involvement on the A465 Heads of the Valleys duelling works had initially been positive, with early engagement on design of active travel elements. However, we note that in many cases the final build differs considerably from agreed designs and can be considered to be below current active travel guidance standards. For example providing only narrow footways where wider shared use paths were specified, or a footbridge where a shared cycle/footbridge was agreed. This often relates to the project requiring cost savings in its later stages, as stated in the above example, but this should not automatically result in active travel infrastructure being cut on the perception that it is "less important".

In principle, ECI should allow effective early engagement with a range of stakeholders and interested parties to influence the design effectively, but in practice it seems that overall project costs still dictate the final outcome, beyond the control of these inputs. It remains to be seen if the new Mutual Investment Model provides any improvement to this situation.

In terms of more local road networks, we consider that one option to save money would be for local authorities to share services and consider better maintenance of the existing road network with available funding, instead of focusing on building new roads.

Whether Wales is adopting a sustainable approach to the maintenance and enhancement of its road network in the context of key legislation such as the Well-being of Future Generations (Wales) Act 2015 and the Active Travel (Wales) Act 2013:

Sustrans is of the view that it is too early to comment fully, but early indications predict that this may not be the case. The Active Travel Act has been in existence since 2013 but 2018/19 will be the first year where significant funding for active

travel infrastructure has been provided. There still remains no central quality assurance over active travel schemes on the ground in terms of design details and therefore many schemes continue to receive Welsh Government funding despite the fact that they may be poorly designed, or that they utilise older design standards.

Short term single year or end of year funding puts too much pressure on local authorities to deliver schemes without appropriate preparation and effective design, leading to a continuation of infrastructure that does not meet the high standard of design guidance. Welsh Government funding programmes should be spread over multiple years and monitored effectively to ensure they deliver sustainable and cost effective infrastructure that actively encourages greater use.

The introduction of the 5 key ways of working under the WfGA is welcomed and should lead to improvements in sustainability of schemes over time. However this must be applied consistently and within the context of current design guidance and best practice.

Should the committee require further information, please don't hesitate to contact me.

Yours Sincerely,



Steve Brooks
National Director, Sustrans Cymru

Briefing note for the Welsh Assembly Economy, Infrastructure and Skills Committee inquiry into the State of Roads in Wales

June 2018

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment. We conduct research, develop policy, share best practice, lead campaigns and work with allies in support of these aims. We welcome the opportunity to contribute to the Committee's inquiry into the state of roads in Wales.

This briefing note presents evidence on priorities, impacts and trends in road investment to inform the Committee's deliberations. In summary, we argue that there is an urgent need for significant investment in road maintenance; that this should be part of a comprehensive programme of environmental, safety and integration improvements; and that this approach would be a better investment than building new roads.

1. The state of road maintenance

There is a well-documented crisis in the state of road maintenance across many parts of the UK road network, as reported in the Asphalt Industry Alliance's annual ALARM survey of local authorities across England and Wales.



More than
24,000
miles of local road
need repairing in
the next year

ALARM 2018 © Asphalt Industry Alliance



A one-time catch-up
would take
14 years
to complete
and cost **£9.31bn**

ALARM 2018 © Asphalt Industry Alliance

The 2018 reports an estimated £9.31 billion catch-up cost including £27.4 million for Wales, where 17 per cent of the road network is reported as being in a poor state of repair, and each road is resurfaced on average once every 71 years.¹ In Wales, an average local authority budget share of 3.5 per cent goes on road maintenance: about one in three reports a budget increase, with a total increase in spend to £8.1 million from £6.9 million. There is an average shortfall of £3.1 million per council of the budget needed to maintain acceptable standards of repair.

Potholes also come at a cost to road users in terms of safety and expense. The AA reports that the number of pothole claims received during the first 4 months of 2018 is more than for the whole of 2017 and, UK-wide, reflects a cost to motorists of £1 million a month.²

Research by Transport Focus³ confirms that road user priorities are safety, reliable journey times (supported by better information), and road surface maintenance, while the RAC annual survey found that motorists were concerned about maintenance of street lights and barriers as well as potholes.⁴

¹ Asphalt Industry Alliance: Annual Local Authority Road Maintenance Survey 2018

² The AA: Road pothole epidemic a national disgrace (May 2018)

³ Transport Focus: Road users' priorities for the Road Investment Strategy, 2020-25 (2017)

2. A more sustainable approach

The ALARM survey reports that nearly two thirds (63 per cent) of Welsh local authority highways maintenance budgets go on carriageway repairs and a quarter (25 per cent) on reactive surface maintenance. This leaves little or no funding for wider road maintenance and enhancement, yet major sums are committed for building new roads or providing further capacity increases, which will add to the future maintenance bill.

There is a real opportunity for the Welsh Government to refocus its roads investment programme and consolidate the network, prioritising maintenance, safety, environmental enhancements and resilience.

A more comprehensive maintenance programme could usefully go beyond traditional repair and resurfacing, to deliver a 'green retrofit', that is a programme of environmental enhancements that would make the road network better integrated, more attractive for the full range of road users and more resilient for the future.

Working with other NGOs, we have developed an approach to road investment based on four elements:

- Fix it first: improve the current network, including green retrofit, with new road capacity a last resort
- Integrated approach: corridor planning, join up with other modes and other networks
- Environmental leadership: a system-wide focus on low carbon future, air quality, biodiversity
- Committing the necessary resources to deliver greener roads.⁵

Our most recent report – 'Roads and the Environment' - draws on international best practice to explore the potential of greener road management to enhance the road user experience, deliver a more resilient network and reduce the adverse environmental impact of major roads.⁶

Green infrastructure brings not only environmental benefits, but also long term cost savings and resilience benefits. Traditional maintenance regimes, for example of verges, may be highly damaging to the roadside environment without in practice being more cost effective in the long term. Features such as sustainable drainage, tree barriers and natural stone walls, require less maintenance than man-made structures, and make a positive contribution to key Government targets on air quality, CO2 reduction, and biodiversity.

Case study: using recycled materials in road resurfacing (I)

Street works contractors Kier and Clancy Docwra have piloted use of the Roadmender onsite asphalt mixing machine. The use of this new technology enables hot mixing of asphalt on site, removing the need to travel to offsite plant, with reduced environmental impact and cost savings. The same machine can also recycle the old road surface, mixing it with rubber and bitumen to serve as the underlay for the resurfaced road.

Case study: using recycled materials in road resurfacing (II)

In the Netherlands, the standard road surfacing is open-graded asphalt friction course (OGFC), which is porous and water permeable but requires higher volumes of bitumen to bind the aggregate. A new project in Friesland, developed in partnership with the University of Utrecht, is retrieving cellulose from waste paper in the drainage system. The material is sterilised, bleached and dried, and then used in combination with bitumen to provide a cost effective OGFC product.

Case study: sustainable road verge management

Lincolnshire Wildlife Trust has been working with Highways England and partners on sustainable road verges these support biodiversity by providing connected habitats with new planting and natural drainage ditches. As part of the project, Peakhill Associates has investigated the potential to undertake biomass harvesting from the motorway verges to supply local anaerobic digestion facilities for electricity generation. Using the products of good verge and roadside woodland maintenance to sell on as feedstock for biomass is a positive example of the circular economy.

Case study: sustainable drainage, Lancaster, Pennsylvania

The city of Lancaster in Pennsylvania adopted a green infrastructure approach, using sustainable drainage, to manage greywater and storm water. This delivers energy and carbon emissions savings from reduced volumes entering the sewer system. The project is estimated to have reduced infrastructure capital costs by

⁴ RAC: Annual report on motoring 2017

⁵ Campaign for Better Transport: Rising to the Challenge (2017)

⁶ Campaign for Better Transport: Roads and the Environment (2018)

\$120 million and to reduce water pumping and treatment costs by \$661,000 per year. These benefits exceeded the costs of implementing green infrastructure, which were estimated at around \$51.6 million if integrated into planned improvement projects or up to \$94.5 million if implemented as standalone projects.⁷

Based on these positive examples, we recommend looking to all road maintenance projects to deliver environmental enhancements, making more use of green infrastructure, and reviewing contracts and specifications to embed a greener approach in business as usual. These approaches can be underpinned by using methods such as Natural Capital Accounting, payments for ecosystems services or resource rental, in cost-benefit analysis; and by including environmental quality in state of the network reports, scheme prioritisation and performance metrics.

A comprehensive approach to maintenance would improve safety and provision for all road users. Highways England has ring-fenced £250 million over five years for cycling, safety and integration, including cycle lanes, improved crossings, and bus provision. Dedicated bus lanes can reduce bus travel times by 7 to 9 minutes along a 10km high traffic route, and also improve their reliability. Buses play a vital role in reducing congestion: every three buses replace approximately 200 cars on the road: therefore investing in bus provision where appropriate as part of network maintenance will benefit all road users.

The World Health Organisation has highlighted the need for a cross-government approach to tackling the global health crisis caused by growing physical inactivity.⁸ Road improvements can play an important role. Investing in dedicated active travel (walking and cycling) routes across the network where these are lacking (for example across the A55 Britannia Bridge or along the A487 corridor) would help deliver the aims of the Active Travel (Wales) Act 2013 and would help reduce future road maintenance costs by enabling the shift to lower impact modes.

3. Improving existing roads should be a greater priority than building new road capacity

Reallocating resources from new road building to existing road maintenance would be a prudent investment. A very large proportion of future transport spend is still being allocated to building new roads. The proposed £1.4 billion M4 relief road remains highly controversial given its serious impact on the Gwent Levels, as is the proposed Cardiff Airport link road (c £81 million).

Other major road schemes such as the new A55 link road (c £200 million), the Caernarfon bypass (c £135 million) and the third Menai Crossing (c £200 million) are extremely costly compared to the budgets available for maintenance and make little or no provision for active travel, while the dualling of the A465 Heads of the Valley road has already gone significantly over budget.

The supposed benefits of new roads are often over-stated, while the adverse environmental impacts are significant. New roads add more traffic to the network, which will put more pressure on roads which are already congested or close to capacity. Not only does major road building take resources from current road maintenance and enhancement, it also adds to the asset that will need future maintenance.

A recent analysis of over 80 road schemes found they have not cut congestion: instead, traffic showed increases of up to 47% over 20 years. The environmental impacts included loss of ancient woodland, destruction of wildlife habitats and damage to the landscape. Nor had the promised economic benefits from new roads been delivered: of twenty-five road schemes that had been justified on the basis that they would benefit the local economy, only five had any direct evidence of economic effects, and even then there was no evidence the road was responsible for anything more than moving economic activity from elsewhere.⁹

It is a similar picture globally. An evidence review of around 2,300 evaluations of the local economic impact of transport projects from the UK and other OECD countries found only 17 robust studies of the effect of road schemes on the local economy. The main finding was that a majority of evaluations showed no (or at best mixed) effects on employment.¹⁰ The local authority area with the lowest GVA in the UK is Anglesey, despite the A55 dual carriageway having been built from Llanfair PG to Holyhead on the premise that it would boost Anglesey's economy.

⁷ EPA: The Economic Benefits of Green Infrastructure: A Case Study of Lancaster, PA (2014)

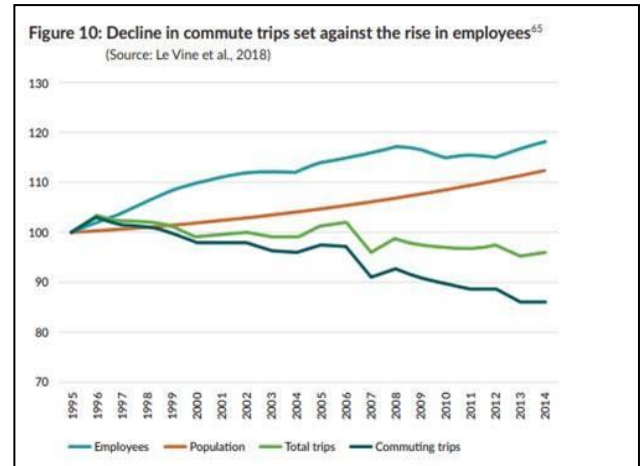
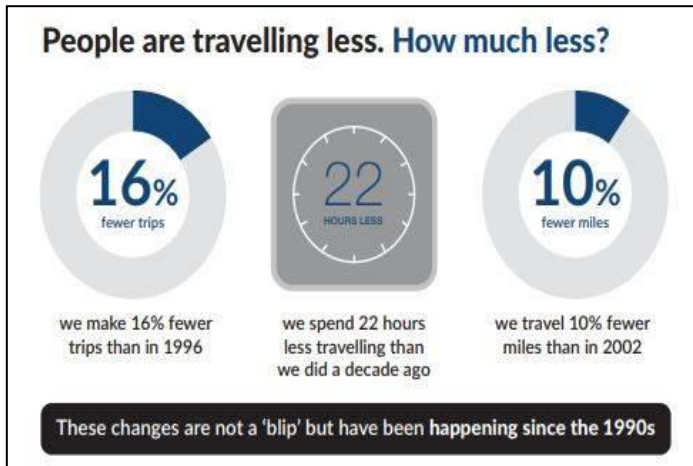
⁸ WHO: More active people for a healthier world The global action plan on physical activity 2018 – 2030 (2018)

⁹ Sloman L, Hopkinson L and Taylor I: The Impact of Road Projects in England, TfQL report for CPRE (2017)

¹⁰ What Works Centre for Local Economic Growth: Evidence Review 7 Transport (July 2015)

Public policy and trends in travel demand further strengthen the case for reallocating funds from new road building towards improvement of existing roads. The Welsh Government has committed to achieve at least a 40 per cent reduction in greenhouse gas emissions by 2020 from a 1990 baseline: transport accounts for around 14 per cent of greenhouse gas emissions in Wales. The Welsh Climate Change Strategy commits to “supporting transport investment which encourages a shift to low carbon modes of transport”, and to reducing the need to travel.¹¹

The Commission for Travel Demand recently reported on a consistent long-term decline in time spent and distance covered in travel: while there has been a growth in employment, there is a decline in commuting trips.¹²



There is a decline among young adults in take-up and use of driving licences. The number of young people with a driving licence peaked in 1992-94 at 48 per cent of 17 to 20-year-olds: by 2014 only 29 per cent of that age group had a licence. Among people aged 21 to 29, the number of licence holders dropped from 75 per cent to 63 per cent over the same period. There has also been a 10 per cent fall in the number of 17 to 29-year-olds driving a car in a typical week, from 46 per cent 1995-99 to 37 per cent 2010-2014.¹³

The growth in electric vehicles (EVs) will also have an impact, with a ban on new diesel and petrol sales by 2040. EVs are low noise and zero emission at tailpipe, removing many of the arguments for bypasses to address pollution. However EVs require a comprehensive accessible and robust charging network, which will also require investment in retrofitting existing roads.

In summary, a broad programme of maintenance, renewal and environmental enhancements, funded by switching resources from new road building, represents the best sustainable investment in Wales' road network.

June 2018

Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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¹¹ Welsh Government Climate Change Strategy, 2010

¹² Prof. Greg Marsden et al, University of Leeds "All Change? The future of travel demand and the implications for policy and planning" (May 2018)

¹³ Kiron Chatterjee et al, UWE/University of Oxford "Young People's Travel – What's Changed and Why? Review and Analysis" (Feb 2018)

Agenda Item 3



Arbenigwyr mewn Busnes
Experts in Business

23 April 2018

Dear Russell

FSB Wales is pleased to provide evidence to the Economy, Infrastructure and Skills Committee on the state of roads in Wales. As you will be aware, FSB Wales has published extensively on transport in Wales in recent years and this response is a synthesis of some of that work¹, taking into account some more recent developments in the area and work undertaken by colleagues elsewhere in the UK.

FSB Wales is the authoritative voice of businesses in Wales, with around 10,000 members. It campaigns for a better social, political and economic environment in which to work and do business. With a strong grassroots structure, a Wales Policy Unit and dedicated Welsh staff to deal with Welsh institutions, media and politicians, FSB Wales makes its members' voices heard at the heart of the decision-making process.

We have responded to the three points in the terms of reference in turn.

The current condition of roads in Wales and whether the approach to funding and delivery of maintenance programmes for the local road, trunk road and motorway network in Wales is effective, managed so as to minimise disruption to road users, and provides value for money;

FSB Wales draws a distinction between travel to work (i.e. commuting) and travel for work (travel for business purposes). We feel it is legitimate to target reducing commuter traffic in order to ease congestion for essential business travel. This might be done by increasing investment in public transport or by removing bottlenecks on the existing road network.

When questioned, our members frequently complain that the state of the roads is getting worse, and that congestion is hampering their business – anecdotally this is one of the most common complaints we hear from our members, and survey data suggests it is a problem across both rural and urban communities².

Most businesses in Wales rely primarily on road transport – with 80% of members identifying car transport as “crucial” to their business in 2014³. In this survey a distinction was not made between commuting/essential business travel, but it is clear that Welsh business are relying on the roads to get employees, customers and goods.

¹ FSB Wales has published a general paper on Transport by Professor Stuart Cole, a paper on the Metro by Dr Mark Lang; alongside a number of consultation responses to public bodies that are relevant in this area.

² FSB (2016) [Going the extra mile: connecting businesses and rural communities](#)

³ Cole, Stuart (2016) [Moving Wales Forward](#)



Arbenigwyr mewn Busnes
Experts in Business

When questioned, most businesses' priority for investment is in transport infrastructure. 70% identify investment in road infrastructure as their main priority for transport spend⁴. More recently, members in Cardiff and South East Wales identify congestion as their main issue in the city/capital region⁵.

Over 60% of members said that roadworks, congestion and the state of repair of roads was having a negative impact on their business in 2014. This is second only to fuel costs as the primary negative impact of transport on member businesses⁶.

Rural small businesses also report that potholes and frequent road works cause issues for their business, with 32% of business owners citing "potholes" as their main issue with roads in 2016. Similarly, 31% stated that frequent road works were their main issue⁷.

In this survey, whilst road works were viewed a necessary step to maintain the quality of the road network. The dissatisfaction with road works comes if works are not adequately advertised, causing disruption and confusion to businesses. Other business owners suggested that their frustration was driven by their perception that the quality of road repairs was often poor, necessitating costly and disruptive rework and causing more disruption.

The 2016 survey also suggested that congestion and the state of repair of local roads, as opposed to the strategic/trunk road network was of a more significant concern for business. Importantly, these roads are under the stewardship of Local Authorities, rather than direct control of Welsh Government.

In terms of nature of impact, most say that it is felt in terms of increased costs (or conversely, reduced profits)⁸ for their business. Poor roads are costing Welsh business, and hence the Welsh economy money.

Whether major enhancement projects on the local road, trunk road and motorway network are prioritised, funded, planned and delivered effectively, and provide value for money. Relevant issues include the implementation of the Early Contractor Involvement approach and the opportunities offered by the Welsh Government's Mutual Investment Model;

⁴ Ibid.

⁵ FSB Wales member survey 2018.

⁶ Ibid.

⁷ FSB (2016) [Going the extra mile: connecting businesses and rural communities](#)

⁸ Ibid



Arbenigwyr mewn Busnes
Experts in Business

Welsh Transport Appraisal Guidance (WeITAG) was substantially revised in 2017⁹, and is therefore largely untested. As far as we are aware there is only one project that has been taken forward under the new methodology - that is the proposed M4 J34 – a48 link road which is in the early stages of consultation¹⁰. We can't therefore comment on the efficacy of WeITAG, however we are pleased that new approaches have been embedded in the guidance, including approaches to considering public transport options over pure road solutions. However guidance still appears to rely too heavily on predictive traffic forecasts, evidence suggests that this has led to some poor investment choices in recent decades¹¹.

FSB Wales has not always been convinced that value for money from proposed investments has been clear. This is true either in terms of identifying the problems, or in terms of delivering benefits to Wales in general. For example on the M4 relief road, FSB Wales' objection has always been that it benefits a small area of Wales at relatively high cost, whilst effectively proscribing investment elsewhere in Wales. Available data shows that congestion from Margam to Swansea has a similar scale of impact¹², however no solution is currently proposed. Furthermore, our concern in the M4 relief road process was that the impact of other interventions, for instance the metro, were not properly taken into account.

Moving forward, FSB Wales considers that the National Infrastructure Commission (NICW) should have a key role in the prioritising, funding, planning and delivery of road investment and enhancement, and should also consider whether Welsh Government should invest in order to improve/maintain local roads, currently under the stewardship of Local Authorities. This is in line with best practice elsewhere; for example, Infrastructure Australia considers how existing infrastructure can be better utilised and enhanced¹³. NICW should also undertake "feasibility of delivery/implementation" studies, in line with recommendations made by the Institute for Government¹⁴.

In terms of our member's interaction with the operational side of the delivery of roads infrastructure delivery in Wales, we are pleased Welsh Government has recently begun to utilise project bank accounts. This helps protect small contractors from unethical actions by larger contractors, or from unexpected supply chain shocks.

⁹ Welsh Government (2017) [Welsh Transport Appraisal Guidance](#)

¹⁰ Vale of Glamorgan County Council (2018) [Consultation on proposed routes for a new road between junction 34 of the M4 and the Sycamore Cross junction of the A48](#)

¹¹ Cole, Stuart (2016)

¹² Inrix Data, 2017. Total impacts of congestion from junctions 38-42 M4 are significantly higher than impacts around junctions 23 & 23A, or at junctions 28-30. See: <https://www.walesonline.co.uk/news/wales-news/worst-parts-m4-traffic-jams-13819119>

¹³ Infrastructure Australia (2016) [Australian Infrastructure Plan Priorities and reforms for our nation's future.](#)

¹⁴ Institute for Government (2015) [Making the National Infrastructure Commission Work](#)



Arbenigwyr mewn Busnes
Experts in Business

Whether Wales is adopting a sustainable approach to the maintenance and enhancement of its road network in the context of key legislation such as the Well-being of Future Generations (Wales) Act 2015 and the Active Travel (Wales) Act 2013.

It must be clearer that in bringing forward new road projects, or in taking forward maintenance and enhancement that public agencies have used the “five ways of working” embedded in the Future Generations Act.

This should mean that the business community and wider stakeholders are consulted in the early stages of project conception and open and frank conversations about impacts and benefits can be had before fully formed projects are proposed.

This can apply to projects of all scales, from the very smallest street level improvements through to proposals for the construction of new roads in Wales. For example, FSB Wales first became aware of proposals for the M4 J34 – A48 link road from the pages of the Western Mail.

I hope our comments are of interest as the committee considers this important issue.

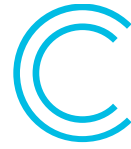
Yours sincerely

Ben Francis
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Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Eluned Morgan AM
Minister for Lifelong Learning and Welsh Language

05 June 2018

Dear Eluned,

The position of the Welsh language in apprenticeship programmes in Wales

I write to you following the debate on the Economy, Infrastructure and Skills Committee's report, 'Apprenticeships in Wales'¹ at the Assembly on 9 May and the discussion on the Welsh language in apprenticeship programmes.

It was noted in the report and during the debate that the use of Welsh in apprenticeships is low, and that factors such as a shortage of teaching staff prevent progress. Reference was also made to the fact that the Government chooses to combine data on Welsh medium learning, bilingual learning and with an element of Welsh when reporting on the use of Welsh in the sector. You said that it is possible to study any apprenticeship through the medium of Welsh if there is a demand, but that only a small number of learners access this opportunity. You also said that many learners choose to undertake apprenticeships bilingually.

In my briefing note², published in November last year, I highlighted the fact that many factors are likely to impact the use made of the Welsh language in apprenticeships. These include a lack of interest from learners as you noted but

¹ <http://senedd.assembly.wales/documents/s72280/Report%20PDF%201.4MB.pdf>

² <http://www.comisiynyddygymraeg.cymru/English/Publications%20List/20171114%20S%20Nodyn%20briffio%20Prentisiaethau%20FERSIWN%20TERFYNOL.pdf>

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Comisiynydd y
Gymraeg
Welsh Language
Commissioner

there are also other important factors. These include a lack of availability of Welsh medium and bilingual qualifications and assessments and a lack of education workforce who are able to teach and assess through the medium of Welsh. The Economy, Infrastructure and Skills Committee's report supported some of these points, noting that 'there remains a gap between the likely demand and ability to meet it'.³ In the context of all these conclusions, I therefore do not agree that it is possible to study any apprenticeship through the medium of Welsh if students wish to do so. Additionally, I would like to know the Government's view on the impact of the action taken to increase the use of Welsh in apprenticeships presented under the 'Aligning the Apprenticeship model to the needs of the Welsh economy' (February 2017) scheme; and also, whether you intend to develop further strategies to address the range of other factors which hinder progress.

I would also ask you to consider the practice of combining data for Welsh medium learning with data for learning bilingually and with an element of Welsh, a matter which was of course noted in the debate on 9 May. This was done, for example, when reporting on the position of the Welsh language in the work-based learning (and further education) sector in the Welsh Language Strategy Annual Report 2016/17. Combining these categories could undermine the reliability of the data; weaken the meaning of 'bilingual'; and lead to confusion regarding real progress in the sector. I raised similar concerns in correspondence to the Welsh Government's Chief Statistician on 21 February this year. Again, the Committee's report stated that a lack of accurate, publicly available data makes it difficult to address the issue of the gap between the likely demand for Welsh language apprenticeships and the ability to meet the demand⁴.

I trust that you will find my comments above useful. I would also welcome the opportunity to discuss the points in our next meeting.

Yours sincerely

Meri Huws
Welsh Language Commissioner

³ Ibid. p. 16

⁴ Ibid. p.16



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Copy to:

Kirsty Williams AM, Cabinet Secretary for Education

Bethan Sayed AM, Chair of the Culture, Welsh Language and Communications
Committee

Russell George AM, Chair of the Economy, Infrastructure and Skills Committee

Lynne Neagle AM, Chair of the Children, Young People and Education Committee

National Police Chiefs' Council

14 May 2018

Dear Chief Constables,

Apprenticeship Levy

The Economy, Infrastructure and Skills Committee of the National Assembly for Wales is currently reviewing the UK Apprenticeship Levy's impact on Wales.

As part of that review, the Committee took evidence from Eluned Morgan AM, Minister for Lifelong Learning and Skills. The Committee raised the issue of training for police in Wales. Police in Wales have previously told the Committee that the Levy costs them around £2 million a year, but they are not able to access funding for police apprenticeships.


The Committee understands that discussions between the Home Office, Welsh Government and Police in Wales are ongoing. In order to inform the Committee's consideration of this matter, I would be grateful if you could provide the following information:

- Details of your understanding of the ongoing negotiations between the Welsh Government and Home Office, including the anticipated timetable for resolution and your involvement in discussions, and;
- An outline of the resolution you are trying to seek with the Welsh Government.

I have also written to the Welsh Government and the Home Office to seek their views on this matter.



Yours sincerely,

A handwritten signature in black ink that reads "Russell George". The signature is written in a cursive style with a large, looping initial 'R' and a horizontal flourish underneath the name.

Russell George AM

Chair Economy, Infrastructure and Skills Committee





Our Reference: CC/MJ/GW/250518-2

Your Ref:

External Telephone: 01656 869200

Extension:

8th June/Mehefin 2018

Russell George AM
National Assembly for Wales
CARDIFF
CF99 1NA

Dear

Apprenticeship Levy

I write in response to your letter to Chief Constables of 14th May 2018 regarding the Apprenticeship Levy. I am responding on behalf of colleagues as the Chair of the Welsh Police Chief Officer Group. The Police and Crime Commissioners of Wales are also concerned with this issue and I have copied this letter to their current Chair Jeff Cuthbert.

I can confirm that the four police forces in Wales contribute circa £2million per annum towards the UK government apprenticeship levy. As it currently stands, Police forces in England are able to access funding for police apprenticeships direct from the Home Office, however, this is not currently the case in Wales. English forces will be able to draw £24,000 for each trainee officer over the three years, which, based on the number of planned officer intakes in Wales of 1,077 over three years is equivalent to £25.8million or £8.6million per annum, if the same funding was applied in Wales.

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However, we have worked hard to deliver a single collaborating scheme in Wales to achieve the same goal, but expect to deliver a police constable degree at an average fee cost across Wales of £2.8million per annum and this demonstrates the prudence in our approach

It is important to stress that all parties, including Chief Constables, recognise this position as an unintended consequence of a policy that was not intended to engage the devolution settlement in this way. Policing is not devolved to Wales and training and education is not the remit of the UK government, leaving our organisations somewhat between these two equally clear and rationale positions. None of which, however, has yet served to move us closer to resolution.

The mechanism by which the Levy is distributed from the UK government to Wales is not entirely transparent to us, but clear statements have been made by Welsh Government that it will not fund apprenticeships on non-devolved areas of public service. This has meant that the police in Wales, can not under the present arrangements, access any of the apprenticeship funding placing policing in Wales at a disadvantage to colleagues in England.

As I will describe later, degree-level apprenticeship will soon be a legal requirement for police officers in England and Wales and therefore, Welsh forces will be required to meet the associated costs from budget which have been reduced by £2m as a result of the Levy and at the cost of some other part of our service to communities.

This clearly concerning structure was to be the subject of two meetings arranged for 24th April and 8th May 2018 which would have included Whitehall departments, Welsh

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Government, Policing and the College of Policing. These meetings were cancelled at the request of the Home Office whilst they were working with other UK Government departments to develop a strategy for Wales. We understand these discussions are ongoing and that the Secretary of State for Wales has been engaged.

There has been considerable effort from Chief Constables and Police and Crime Commissioners across Wales over the last year to highlight this funding issue. This has included letters and meetings with both UK and Welsh Government Ministers and officials. We are grateful to both parties for the separate consideration of the position and our most recent discussions have given us some cause for hope.

It is our understanding that no meetings have taken place between the Home Office and Welsh Government to resolve this issue. All meetings that have taken place have been between the Welsh Police Forces and either Whitehall departments or Welsh Government.

There is an urgency to this question now upon us, the Police Constable Degree Apprenticeship and Degree Holder Programmes become the only viable option for Police Probationer training after 31st December 2019 as the Initial Police Learning Development Programme ceases to be validated by the College from this date. Forces are able to implement the new programme from the 1st April 2019, when the new curriculum became available and to ensure compliance, forces will have to award contracts in June 2018 and begin the recruitment process in July, with a requirement over the next three years to recruit and train 1,077 police officer posts.

If the Welsh Police Forces are unable to meet these dates due to the funding shortage, this will have an impact on the recruitment of officers and with there being no option to reduce the training, we have no choice but to run the risk of gaps in posts. The outcome of doing so will have an operational impact, with the inevitable public safety

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implications upon the communities of Wales that comes with reduced officer numbers. A different recruitment process, which will not financially penalise Welsh Forces, may have to be developed (and approved) which will result in different levels of training for officers between Wales and England which will cause issues for interoperability and hence the ability to police major events and move officers across the border more routinely.

Welsh Policing would like this funding issue to be resolved through dialogue between Welsh Government and the Home Office in order that the communities of Wales are not placed at a disadvantage. The new Home Secretary recently indicated, in response to a question at the Police Federation Conference, that the Apprenticeship Levy had been intended to be accessible by employers, once levied, for the training of their employees; This is the case for policing in England. We would hope for equity with the English forces, but as it stands, this is £2million tax per annum on policing and therefore our public services in Wales, that does not have the same effect in England.

I have alluded to an increasing sense of progress over recent weeks, with our understanding being that all parties recognise the imperative to find a resolution, whilst no detail has emerged. It may, therefore, be helpful if having laid out the position to date, I provide in further update at the end of June 2018.

Your interest in this significant issue is much appreciated.

Yours Sincerely

Matt Jukes
Chief Constable
Chair of Welsh Chief Officers Group