

REGULATORY APPRAISAL

LOCAL GOVERNMENT, WALES

THE BUSINESS IMPROVEMENT DISTRICTS (WALES) REGULATIONS 2005

Purpose and intended effect

1. The intention to introduce Business Improvement Districts (BIDs) in Wales was announced in response to the consultation on the future of business rates in Wales and proposals set out in the Welsh Assembly Government policy statement "Freedom and Responsibility in Local Government". At the Local Government Partnership Meeting on the 15 July 2002, the previous Minister for Finance announced her intention to work with local government and business to develop the Business Improvement Districts (BIDS) model in Wales. BID schemes will provide local authorities and local businesses with the opportunity of working together to put in place projects to improve their local area.
2. The BID would consist of a partnership between local authorities and local business for additional services and improvements. These would be funded by a levy raised through an additional levy on the business rate, which is for the BID to decide. The details of each BID scheme, including the nature of the improvements and the size of the addition to the rates, will be for the businesses affected to agree upon. They would vote in a referendum upon the agreed proposal. BIDs will, therefore, reflect the concerns of business. Much of the detail of individual BIDs will be left to be agreed between local councils and businesses. This will provide each local area with the flexibility to introduce improvements suited to their local needs. All businesses within the BID area which would be liable for the BID levy would have a vote to decide whether or not the scheme went ahead. This vote would be conducted through a dual voting mechanism. A majority in a vote would constitute a majority of businesses voting and a majority of the total rateable value of those businesses. If a majority were in favour all ratepayers in the area would contribute to the cost of the scheme. If the majority were against, then the scheme would not go ahead.

Risks

3. Business Improvement Districts (BID's) encourage businesses to participate in improving their local area in partnership with local authorities. The Local Government Act 2003 introduced legislation allowing money to be levied on the business rate for these purposes.

Options

4. Before provision was made to include Business Improvement Districts in the policy statement "Freedom and Responsibility in Local Government", the option of introducing a supplementary business rate was considered.

Option 1

5. The supplementary rate was a proposal, which would have allowed the local authority to raise a levy on its ratepayers equal to no more than 5 per cent of the business rate. But before the levy could be raised the authority would first have had to establish an agreed partnership arrangement with local businesses, and the decisions on the spending of the income from the levy would have been made through this partnership arrangement.

Option 2

6. Business Improvement Districts is a scheme, which can be initiated by businesses, the local authority or any stakeholder in a local community. The levy to be raised is approved by business and the way in which the money is spent is agreed on in advance.
7. Full details of the benefits and costs of each of these options are set out below.

The Supplementary Rate

8. The Green Paper "Simplifying the System: Local Government Finance in Wales" (September 2000) set out proposals for a supplementary rate which could be levied in addition to the business rate. The aim was to encourage local authorities to form partnerships with local businesses as well as giving local authorities the freedom to vary the rate. This was intended to allow local authorities greater scope to invest in community projects. It was also aimed at encouraging partnership between local authorities and local businesses.
9. However, from their responses to the Green Paper it was clear that many local authorities saw the supplementary rate as primarily a means of raising revenue, and the requirement to have a partnership agreement was seen as a burden on the resources of local authorities. The 'cost' seemed disproportionate to the additional revenue the supplementary rate would generate. Businesses felt that they would have no means of avoiding the supplementary rate once they had entered into partnership agreements. They therefore, thought that businesses would vote against the partnership arrangements and thus the supplementary rate could become an obstacle to partnership working, rather than facilitating it. There was also a real risk that the supplementary rate powers would not be used in many areas of the country.

Business Improvement Districts

10. Business Improvement Districts (BID's) address these problems. BIDs can be driven by the business community to effect changes that will benefit them in their local community. BIDs give businesses the opportunity to agree on the projects for which they are contributing, the amount of money they are prepared to raise, and can be involved in the administration of the schemes themselves. Similarly, local authorities will no longer have the onus of organising and administering partnership arrangements, as BIDs will be voluntary and may be initiated entirely by the business community or other stakeholders in the area. The costs of setting up and

implementing each BID can be agreed as part of the BID levy. Local authorities will not contribute to the costs of BIDs unless they choose to do so. It will therefore be far more cost effective, from the point of view of local authorities, to implement BIDs than the supplementary rate.

11. BID projects are likely to have benefits for the community and the local authority as well as the business community. For example, the installation of a Closed Circuit TV system in a town centre benefits businesses who are the victims of crime and vandalism, but also protects the local community and provides security for individuals.
12. More widely a BID will be able to contribute towards urban regeneration. Coventry City Company has successfully implemented a scheme in which businesses make voluntary contributions towards the enhancement of the city centre. This has already led to a significant increase in the number of visitors in the city centre, demonstrating that consumers have noticed an improvement in their environment and business will benefit from a greater number of consumers. In this way BIDs are intended to give businesses the opportunity to be involved in their local communities and direct their contributions far more precisely than a supplement on the business rate would have allowed. The number of successful voluntary schemes throughout Wales also demonstrates that BIDs could help to produce significant local improvements. Voluntary schemes have worked well but at present some businesses benefit from improvements paid for by others, refusing to make a contribution themselves. This problem of “free-riding” is one of the key reasons for introducing BIDs legislation.
13. The legislation will state that as long as a majority of the ratepayers in the area who vote are in favour of the BID, other ratepayers will be obliged to contribute to receive the same benefits. The introduction of BIDs legislation will ensure that all businesses in an area pay to receive benefits from the BID. However, the provision made for the flexibility of BIDs in each local area means that it is impossible to quantify the benefits that may arise from each scheme to each section of the community. The fact that each BID will be tailor-made means that the impact it will have on its community could well be unique. Nevertheless, without the aforementioned benefits to business and local communities, the BID would be unlikely to find support.

Costs

14. The cost of BIDs is difficult to quantify. The projects and services that businesses choose to support through BIDs will be paid for by businesses through the rating system. However, the cost of each BID scheme depends once again on the individual businesses participating. The legislation will give businesses the opportunity to vote on each proposal put forward, and this will include the amount that they are prepared to pay. Under a BID, those who benefit from the improvement will contribute to the cost, even though they may not have been in favour of establishing the BID. This will only occur when the majority of business

ratepayers have voted in favour of the proposal. This majority must be both a majority of businesses voting and represent more than 50 per cent of the rateable value of those businesses. In these circumstances it is inappropriate to legislate on the scope or cost of a BID. It can be as modest or as ambitious as local businesses want, but whatever is proposed, all ratepayers will have a vote on the proposed BID.

15. Local authorities are not required to finance BID schemes. They will merely have to administer the ballot (for which they can charge if it is unsuccessful), open a BID Revenue Account, collect the BID Levy (which will be paid into the BID Revenue Account) and pay the money over to the BID. Any costs that may occur from implementing and enforcing the BID can be anticipated by the local authority and covered by the levy received from the businesses involved. These costs should be minimal to the local authority as the BID model mirrors the Non Domestic Rating system for which the Assembly already pays local authorities to administer in Wales. This is known as the Cost of Collection Allowance and Local authorities in Wales currently receive £5.12m. However, authorities may choose to make a direct contribution to individual BID schemes from their existing resources, either through expenditure or grants or by the provision of services. Any administrative costs incurred in drawing up proposals to be voted upon can also be met retrospectively by the BID levy, should the proposal be accepted. The administrative costs of proposals that are not successful at the vote will be met by the BID, whether it is the business community or the local authority. However, these administrative costs should also be minimal, as neither local authorities nor members of the business community are likely to bring a proposal to the vote if they think it will not be successful. The Regulations stipulate that the BID will pay for the ballot if the vote is unsuccessful and less than 20% voted in favour. The BID will have to show in the proposals that they have consulted with businesses and that they have general support for those proposals before going to the ballot. We anticipate that businesses and local authorities will be able to establish whether or not their idea is likely to be supported before the proposal is officially drawn up to be considered for the vote. The best practice guidance to be issued alongside the legislation on BIDs will fully address the issue of how to form successful partnerships.
16. BIDs will vary in size enormously, and their budgets will vary accordingly. Voluntary schemes in Wales have been funded in many different ways and therefore cannot be used as an accurate representation of the way in which many BIDs would work in practice. The London Circle Initiative, which set up 5 pilot BID-style schemes around London was funded by £4.6 million of the Single Regeneration Budget from the London Development Agency. Although some public sector funding may be available for BIDs, it is unlikely that the majority would have a budget of this scale. Many voluntary area-based initiatives have operated on a far smaller budget, for example, the regeneration partnership for Morpeth – Morpeth Pride are looking at the possibility of raising £150,000 annually as an absolute maximum, to make changes to their town centre. Morpeth is a small market town, and BIDs will apply to these places on a small scale, rather than on the scale of the Circle Initiative.

The fact that such disparity in size and location of Business Improvement Districts will exist, and the fact that there is no way of anticipating the amount of money businesses will be prepared to devote to BIDs, makes any further estimate of the total cost of BIDs impossible. Inevitably, businesses will refuse to endorse any BID, which requires them to pay a sum they cannot afford. There are currently no BIDs in Wales, but a pilot scheme is taking place in Swansea. It is anticipated there will be 800 plus businesses in the BID area, which will cover the main shopping area in Swansea Town Centre.

Securing Compliance

17. BIDs are intended to be versatile. As such each proposal will be agreed by businesses as detailed above and so the issue of cost will be regulated by those who are paying. The costs of billing, collection and enforcement of BIDs will be the responsibility of the local authority. Once again the additional costs faced by the local authority can be met out of the BID levy.

Impact on small businesses

18. Businesses have welcomed BIDs as a useful development on the original proposal to introduce a supplementary rate, which had been set out in the Green Paper "Simplifying the System: Local Government Finance in Wales" (September 2000). The interests of small businesses have been considered carefully in relation to BIDs. The dual voting mechanism is designed to ensure that the interests of small businesses are represented in the BID mechanism. First a majority of all ratepayers voting must vote in favour. Secondly, a majority weighted by the rateable values of the hereditaments of those ratepayers must be in favour of the proposal. This means that a few large businesses cannot secure the establishment of a BID against the wishes of a larger number of small businesses, while maintaining protection for large businesses themselves. The amount that small businesses chose to contribute to a BID scheme will be left to each BID area to decide, and this voting system should ensure that their interests will be effectively represented. It will be possible for smaller businesses to contribute at a lower rate than larger businesses, if that is agreed locally.

Competition Assessment

19. The competition assessment was introduced jointly by the Office of Fair Trading and the Cabinet Office to ensure that new legislation will not make a change in the competitive environment which could lead to a negative effect on the working of markets. In order to ascertain whether there were any competition effects, the competition filter was carried out and found no markets where serious competition concerns were identified. As participation in BIDs is voluntary and will be implemented and voted on by the whole business community, firms can decide if it is in their interest to join. It is, therefore, highly unlikely that this legislation will change the number or size of businesses. While one firm could choose to contribute more to a BID than others in the area, they will do this voluntarily. The legislation itself will apply equally to all businesses and will not have a disproportionate effect on new entrants vis-à-vis incumbents. Welsh Assembly

Government therefore believes that this measure will not have any significant effect on competition.

Consultation

With Stakeholders

20. An 8-week consultation on the draft Regulations was held with stakeholders between 8 November 2004 and 31 January 2005. Those consulted included all Welsh local unitary authorities, local business and its representatives and the Welsh Local Government Association.

21. A total of 12 responses to the consultation paper were received, which all welcomed the general principles of the initiative. No changes to the Regulations have resulted from these responses, as most of the suggestions have already been covered in the BID regulations or will be in the best practice guidance as we do not want the regulations to be too prescriptive. They try to strike a balance between allowing flexibility to the BID proposers but also enough protection to ratepayers and the BID money raised. Although some matters are sound suggestions it was felt they would make the regulations too prescriptive for BID proposers. A brief summary of these responses is attached at Annex 1. A list of all consultees is also attached at Annex 2.

With Subject Committee

22. These Regulations were notified to the Local Government and Public Services Committee on 22 October 2003, via the list of forthcoming legislation, (Item Number 12) put to Committee (LGPS 04-03(p7)) and has appeared on the list ever since. The Committee subsequently identified this Instrument for detailed scrutiny in its meeting of 25 February 2004.

23. A summary of the consultation responses and the draft Regulations were put before the Committee at its meeting on 13 October 2004.

24. The Committee also scrutinised the final draft of the Regulations at its meeting on 9 February 2005. At the meeting they identified that the date on the Regulations was incorrect, as it showed 2004 instead of 2005. This has since been amended. They also queried for clarification the definition of hereditament. There was no change to make in this respect.

Monitoring and evaluation

25. Businesses will want to monitor and evaluate BIDs to ensure that they are delivering the expected benefits. We expect that measures for monitoring and evaluation will form part of the BID proposal on which businesses will vote initially. In addition, after no more than five years businesses will have to vote for the BID to continue. They will only do so if they are happy with the results of the BID. It will also be possible to make BIDs subject to more frequent review: when setting up a BID it could be agreed that it will be subject to review after perhaps three or four

years, or be subject to annual reviews. However, these are not likely to be appropriate in the case of long term schemes requiring significant capital investment.

Review

26. The Swansea pilot scheme will be the first to test the effectiveness of the provisions in the Regulations. They will be reviewed at each stage of the process in Swansea, including the ballot, the business plan, drawing up proposals and the levy charge. If the need arises, subsequent amendments will then be made to the regulations based on the lessons learned from the pilot.

Summary

27. These proposals were set out in the Assembly's Policy Statement "Freedom and Responsibility in Local Government", in March 2002 which stated it was the Assembly's intention to consider options for encouraging stronger partnerships between local government and business.

BID Responses – Main Points raised

Regulation 1 – Application, name, commencement and interpretation

1. Is the definition of the BID body adequate are any other definitions needed?

It was suggested that definitions of the types of BIDs (i.e. town centre partnership etc) could be included in the guidance. It could also include a suggestion of the ideal sector weighting of membership. There is also need for guidance for forming a company limited by guarantee.

2. Should the BID body include at least 50% from the private sector?

Although the majority agreed 50% was reasonable, other problems consultees felt may arise were, whether there should be alternative arrangements for small businesses, and what to do if the situation should arise where a local authority comprises 20% or more of a BID Body.

Regulation 2 – Obtaining Information from the billing authority for the purpose of developing BID proposals

3. Do you feel it is essential for BID proposers to have access to this information?

All were in agreement with this proposal, but some felt there needs to be more guidance on data protection issues i.e. personal info. An additional suggestion was for guidance on what is a 'reasonable' charge for obtaining information from the billing authorities and whether billing authorities should be required to provide a breakdown of charges in writing and that it should be made clear that local authorities can have access to both hereditament and head office addresses.

Regulation 3 – BID Proposer

4. Do you think anyone else should be included in the definition?

Suggestions include voluntary sector representatives and that it should not include property owners.

Schedule 1 – Content of BID Proposals, renewal proposals or alteration proposals

5. Do you agree that schedule 1 contains sufficient information for the ratepayer to be able to decide how to vote on the proposals in the ballot?

6. If not what additional information do you think the proposal should contain?

Yes on the whole, but it should be made clear that BID proposals should include costings and details of how it will be monitored and evaluated and reviewed. It could include a list of those responsible for drawing up a BID proposal/state Board membership and the composition (i.e. number from private sector etc) as well as information on possible slippage due to rateable value levels, debt collection levels etc. It could also be noted how the proposal links with Unitary Development Plan/Local Development Plans or other strategic plans.

7. Should there be a threshold of support in the ballot below which the BID proposer pays for the cost of the ballot rather than the billing authority?

Some felt a threshold would be too prescriptive whilst others felt a 20% threshold is reasonable.

Regulation 5 – Instructions to hold a ballot, renewal ballot, alteration ballot or re ballot

8. Do you have any comment on regulation 5?

The only comments were that terms need to be set out clearly in the proposal (i.e. is it a ballot or a renewal ballot. There was a suggestion that this should be a stage at which the level of support for the BID needs to be assessed more stringently before it moves into formal ballot procedure. Again, it was suggested there is a need to refer to how proposals fit into wider plans such as Unitary Development Plan/Local Development Plans.

Regulation 6– the Ballot Holder

9. Do you have any comments on Regulation 6?

10. Is there anyone else who could carry out the ballot procedures?

There were suggestions that the BID ballot be contracted out to independent agencies such as Electoral Reform Service or Groundwork. Also, that there needs to be safeguards in place so that the BID does not appear to be under Local Authority control.

Regulation 7 and Schedule 2 – Arrangements for Holding the Ballot and Conduct of the Ballot.

11. Do you agree with the timescales?

12. Are the ballot procedures fair and transparent?

Overall, the timescales were accepted. However, there were a number of suggestions for amending timescales, especially for replacement ballot papers. Another suggestion was to consider coinciding the timescales with retailer timescales (i.e. quarterly). There was also a request for clarification whether or not the issue of notice is the cut off point for changes to the list of people eligible to vote.

Other suggestions included use of Recorded Delivery for ballot papers and other BID documents and that ballot papers should go to billing addresses, not the Head Office.

Regulation 8 – person entitled to vote

13. Do you agree that the definition of the person entitled to vote in the ballot is reasonable?

The vast majority answered yes, although some concerns were raised regarding proxy voters.

Regulation 9 – declaring a ballot void

14. Is the 28 day time limit appropriate?

All were in general agreement with the time limit.

Regulation 10 – Payment of cost of a ballot

15. Is it reasonable that the BID proposers only pay for the ballot under these specific conditions?

The majority were in agreement. Suggestions included ensuring the financial amount being charged for administering the ballot is clearly stated and that Local Authority charges should not be profitable.

Regulation 11 – inspection of billing authority records and restrictions on use

16. Do you feel that it is essential for the BID proposers to have access to this information?

17. Do you feel it is appropriate that this regulation allows the billing authority to make available this information?

All were in general agreement, and any suggestions are covered under question 3.

Regulation 12 - Veto of BID proposals

18. Is the criteria set out in this regulation sufficient to enable the local authority to make the right decision in exercising the veto?

All were in agreement, but this should be a last resort.

19. Is the timescale sufficient?

All were in agreement.

20. What do you think should happen if the BID spans more than one local authority area, which local authority should have the power of veto?

Most suggest the authority with the highest rateable values should have veto power. Another suggestion was that reference should be made to the Wales Spatial Plan in considering this.

Regulation 13 – Appeal against the Veto

21. Do you think that this is fair?

Vast majority were in agreement.

22. Do you think that the timescales are sufficient?

Majority agree this was reasonable. One suggestion was for a finite timescale with regard to the Welsh Assembly Government response.

Regulation 14 – BID Revenue Account

23. Do you think that regulation 14 makes adequate provision for the management of the BID revenue account?

24. Should any other matters be considered?

Although the majority were in favour, a few disagreed with £5 per person being credited to billing authorities as this could add up to a substantial amount if a large number of businesses were involved. Other suggestions were for greater clarity on how the local authorities would transfer money to the BID Body and how funds could be carried over to other BID projects. There was also one suggestion of increasing the amount to £10 to cover administrative costs.

Regulation 15 – Administration of BID Levy etc

25. Does regulation 15 give sufficient power to the billing authority to administer the BID levy effectively?

The majority were in agreement.

26. Should any other issues be included?

Suggestions included more information on what happens to accrued interest on the account, how the Revaluation is to be dealt with and that BIDs may not coincide with the financial year so separate demands being issued would increase administrative costs.

Regulation 16 – Alteration of BID arrangements without an alteration ballot

27. Does regulation 16 give enough flexibility to alter a BID in response to changing circumstances without an alteration ballot being needed and without compromising the BID arrangements?

All were in agreement, but suggestions included clarification on how to deal with amalgamated properties that straddled a BID boundary, how new businesses would be treated and more information on amendments to BID arrangements post ballot.

One concern raised was on the precise nature of changes post-ballot as they could change goals and levels of service provision.

Regulation 17- Alteration of BID arrangements following a Ballot

28. Does this regulation offer enough protection for ratepayers?

Yes, all were in agreement.

Regulation 18 – Termination of the BID arrangements

29. Do you agree with regulation 18?

30. If not what alternative method should be available to satisfy the ratepayers, the local authority and the BID?

All were in agreement, as long as it was used with care. One suggestion was that the power should be extended to ratepayers, under certain circumstances.

Regulation 19 – Information

31. Do you agree with regulation 19?

All were in agreement

Regulation 20 – Expenses of the ballot holder

32. Are you content with the arrangements for the costs of the ballot?

All were in agreement. One suggestion was that to show a breakdown of costs from the outset would be beneficial.

Regulation 21 - Electronic communication of requests, applications or notices

33. Do you agree with regulation 21?

All were in agreement, but one suggestion was a need to develop templates and reaffirm confidentiality protocols.

Other issues

- Should be need for express agreement with voluntary sector that they would pay a levy, not imposition.

- Need for a certain amount of outside funding.
- Toolkits needed for smaller BIDs.
- How would void properties be treated.
- More work needed on the role of property owners.
- Empty properties – should property owners contribute.
- BID should be integrated with strategic plans.
- Should be a 60% turnout threshold.
- More clarification regarding split/merged properties and new businesses.

BIDs Consultation Distribution List

1. Director British Holiday and Home Parks Association
2. Director CBI
3. Director Chambers Wales
4. Director Chwarae Teg (Anchor Court)
5. Director Consortium Local Authorities Wales (CLAW)
6. Director Cooke and Arkwright
7. David Cattermoul CIPFA
8. Director District Audit
9. Director DTZ Debenham Thorpe
10. Director Federation of Small Businesses
11. Director Forum of Private Business
12. Director Gerald Eve. Chartered Surveyors
13. Director GVA Grimley
14. Director Institute of Directors
15. Ms J Alexander Institute of Revenues Rating and Valuation
16. Director National Association of Local Councils
17. Director The National Association of Local Councils Wales
18. Director The North Wales Association of Town Councils
19. Director The Welsh Administration Ombudsman
20. Director Wales Association of Community and Town Councils
21. Director Royal Institute of Chartered Surveyors
22. Director Welsh Association of Community and Town Councils
23. Director National Association of Citizens Advice Bureau
24. Director Chartered Institute of Housing in Wales
25. Director Welsh Federation of Housing Associations
26. Director Audit Commission Wales
27. Mr S Benton Office of the Deputy Prime Minister
28. Mr I Duncan Scottish Executive
29. Mr P Clement Valuation Office Agency
30. Director Swift Credit Services
31. Director B & S Bailiff Services
32. Director Rossendales Ltd
33. Director Menai Collect Ltd (Swansea)
34. Director AM Investigation Service Ltd
35. Director Menai Collect Ltd (Gwynedd)
36. Director D A Williams
37. Director Martin Leyshon and Co - Cardiff
38. Director Martin Leyshon and Co - Swansea
39. Mr I Lewis Jones North West Commercial Services

40. David Rosser CBI Wales
41. Victoria Lloyd Chamber Wales
42. Martin Bibey EEF Wales
43. Russell Lawson FSB
44. Jill Shuker Merthyr Tydfil County Borough Council
45. Dave Brown Welsh Local Government Association
46. Derek Woolley City and County of Swansea
47. Ben Cottam WPDO Federation of Small Businesses
48. Nick James The British Retail Consortium

49. Simon Hill East Wales Valuation Tribunal

50. S Lynn	Handy	East Wales Valuation Tribunal
51. J Chris	Owen	North Wales Valuation Tribunal
52. R David	Owens	North Wales Valuation Tribunal
53. Bernard	McCarthy	South Wales Valuation Tribunal
54. Clive	Lewis	South Wales Valuation Tribunal
55. Ann	Smith	West Wales Valuation Tribunal
56. Wendy	Beynon	West Wales Valuation Tribunal
57. Geraint	Jones	Anglesey County Council
58. Mail Box		Blaenau Gwent County Borough Council
59. David	Elias	Blaenau Gwent County Borough Council
60. Emma	Nelson	Bridgend County Borough Council
61. John	Carpenter	Caerphilly County Borough Council
62. Trevor	Lucas	Caerphilly County Borough Council
63. Glen	Edwards	Caerphilly County Borough Council
64. Gary	Watkins	Cardiff County Council
65. Phil	Higgins*	Cardiff County Council
66. Mailbox		Carmarthenshire County Council
67. John	Gravelle	Carmarthenshire County Council
68. Richard	Pugh	Carmarthenshire County Council
69. Arwyn	Evans	Carmarthenshire County Council
70. Kathy	Ellis	Ceredigion County Council
71. Robert	Thomas	Ceredigion County Council
72. Dave	Thomas	Conwy County Council
73. Colin	Bailey	Conwy County Council
74. Eryl	Rowlands	Conwy County Council
75. Mark	Davies	Denbighshire County Council
76. David	Barnes	Flintshire County Council
77. Martyn	Jarvis	Flintshire County Council
78. Lynne	Blake*	Flintshire County Council
79. Lesley	Price	Flintshire County Council
80. Euryl	Jones	Gwynedd Council
81. Geraint	Evans	Gwynedd Council
82. Anthony	Jones	Gwynedd Council
83. Dafydd	Edwards	Gwynedd Council
84. David	Simpson	Merthyr Tydfil County Borough Council
85. Jaci	John	Merthyr Tydfil County Borough Council
86. Janet	Smith	Merthyr Tydfil County Borough Council
87. Sue	Deacy	Monmouthshire County Council
88. Wendy	Woods	Monmouthshire County Council
89. Mail Box		Monmouthshire County Council
90. Phillipa	Hill	Neath Port Talbot County Borough Council
91. Steve	Jones	Neath Port Talbot County Borough Council
92. Martin	Jones	Neath Port Talbot County Borough Council
93. John	Byard	Newport County Borough Council
94. Steve	Hendon	Newport County Borough Council
95. Kerry	MacDermott	Pembrokeshire County Council
96. Andrew	Durrant	Powys County Council
97. Julie	Morgan	Powys County Council
98. Tony	Price	Powys County Council
99. Nick	Jones	Rhondda Cynon Taff CBC
100.	Peter Milbourn	Rhondda Cynon Taff CBC
101.	Derek Woolley	City and County of Swansea
102.	Steve Evans	City and County of Swansea
103.	Andrew Taylor	City and County of Swansea
104.	Deb Smith	Torfaen County Council
105.	Lynda Quigley	Torfaen County Council

106.	Richard Davies	Torfaen County Council
107.	Nigel Smith	Vale of Glamorgan CBC
108.	Aneurin Hughes	Vale of Glamorgan CBC
109.	Jan Nibblett	Vale of Glamorgan CBC
110.	Phil Round	Wrexham County Borough Council
111.	Ray Martin	Wrexham County Borough Council
112.	Brenda Edwards (Benefits)	Wrexham County Borough Council
113.	Del Huckridge	Wrexham County Borough Council
114.	Joanne Pitt	CIPFA
115.	Brian Langan	CIPFA
116.	Colin Wilmott	Torfaen County Borough Council
117.	Brian McCormick	VOA
118.	Trevor Lucas	Caerphilly County Borough Council
119.	R Browne	VOA
120.	Janet Alexander	IRRV
121.	Sandra Corfield	VOA
122.	A Thomas	VOA
123.	Robert Thomas	VOA
124.	Linda Stagg	Blaenau-Gwent County Borough Council
125.	Rob Ounsley	Anite Public Sector
126.	C White	acadInfo
127.	Liz kaskow	corpoflondon
128.	G Shambrook	tinyworld
129.	Roger Leadbetter	Blaenau Gwent County Borough Council
130.	I Keri Lewis	Bridgend County Borough Council
131.	Malgwyn Davies	Caerphilly County Borough Council
132.	Byron Davies	Cardiff County Council
133.	Owen Watkin	Ceredigion County Council
134.	Vivienne Sugar	City and County of Swansea
135.	C Derek Barker LLB (Hons)	Conwy County Borough Council
136.	Geraint Edwards	Cyngor Sir Ynys Mon
137.	Philip McGreevy	Flinthshire County Council
138.	Garry W Meredith	CPFA Merthyr Tydfil County Borough Council
139.	Colin Berg	Monmouthshire County Council
140.	Ken R Sawyers	Neath Port Talbot County Borough Council
141.	Chris Freegard	Newport County Borough Council
142.	Bryn Parry-Jones	Pembrokeshire County Council
143.	Jacky Tonge	Powys County Council
144.	Geraint R Jones	Prif Weithredwr
145.	Kim Ryley	Rhondda Cynon Taff CBC
146.	John Maitland-Evans	The Vale of Glamorgan Council
147.	Sandra Harris	Torfaen County Borough Council
148.	Derek Griffin	Wrexham County Borough Council
149.	Sheri Marshall	Conwy County Council
150.	Kelvin Jones	Conwy County Council
151.	L Hill	Cardiff County Council
152.	N Harvey	CIA
153.	FSB	FSB
154.	Richard Browne	VOA
155.	David Shawley	Anite Public Sector Ltd
156.	Geoff Newns	Anite Public Sector Ltd
157.	David Tretton	VOA
158.	Mary Hardman	VOA
159.	Joanne Moth	Wrexham County Borough Council
160.	David Elias	Blaenau Gwent
161.	C Breddy	Academy Information

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| 162. | Ken Jones | Denbighshire County Council |
| 163. | David Cattermoul | CIPFA |
| 164. | James Meyrick | Forum of Private Business |
| 165. | Diane Leggo | VOA |
| 166. | Robert Thomas | VOA |
| 167. | Nick Chatterley | Price Waterhouse Coopers |
| 168. | Kathy Barbrook | VOA |
| 169. | Tony Capp | VOA |
| 170. | Clive Daniels | VOA |
| 171. | Tim Day | CIPFA |
| 172. | | Anglesey David Elis Williams, Director of Finance |
| 173. | | Blaenau Gwent David Waggett, County Borough Treasurer |
| 174. | | Bridgend Lyn James, Director of Corporate Services |
| 175. | | Caerphilly Mr Stuart Rosser, Director of Resources |
| 176. | | Cardiff Mr Phil Higgins, Corporate Manager |
| 177. | | Carmarthenshire Mr Roger Jones, Acting Director of Resources |
| 178. | | Ceredigion Mr W Gwyn Jones, Director of Finance |
| 179. | | Conwy Ken Finch, Director of Finance & Property Services |
| 180. | | Paulette Saturley |
| 181. | | Denbighshire Mr Alan Evans, Director of Resources |
| 182. | | Flintshire Lynne Blake, Director of Finance |
| 183. | | Gwynedd Mr Dafydd Edwards, Head of Finance |
| 184. | | Merthyr Tydfil Hugh O'Sullivan, County Borough Treasurer |
| 185. | | Monmouthshire Mr Steve Greenslade, Director of Finance & IT |
| 186. | | Neath Port-Talbot Mr Derek Davies, Director of Finance & Corporate Services |
| 187. | | Newport Ms Joyce Steven, Head of Finance & Scrutiny |
| 188. | | Pembrokeshire Mr Mark Lewis, Director of Finance |
| 189. | | Powys John McNeil, Head of Financial Services |
| 190. | | Rhondda Cynon Taff Mr Steve Merritt, Director of Finance |
| 191. | | Mr Keith Griffiths, Director of Finance & IT |
| 192. | | Swansea Bob Carter, Director of Finance |
| 193. | | Torfaen Mr Phil Nash, Director of Finance & Corporate Services |
| 194. | | Vale of Glamorgan Ms Sian Davies, Director of Finance |
| 195. | | Wrexham Mr Martyn Scholes, Director of Finance and Information Services |
| 196. | Farmers Union of Wales | |
| 197. | The National Farmers Union | |
| 198. | Welsh Office of the Country Landowners Association | |
| 199. | Welsh Consumer Council | |
| 200. | RSPCA Wales | |
| 201. | Young Farmers Clubs - Wales | |
| 202. | Wales FRCA | |
| 203. | Country side Council for Wales | |
| 204. | VOA | |
| 205. | British Horse Riding Society | |
| 206. | Welsh National Parks | |
| 207. | Association of Chartered and Certified Accountants | |
| 208. | Association of Chief Estates Surveyors & Property Managers in Local Government | |

209. Chadwyck-Healey
210. Chartered Institute of Public Finance and Accountability
211. Chemical Industries Association
212. Chris Stewart and Associates
213. ELWa
214. GVA Grimley
215. Ian Christie
216. Incorporated Society of Valuers and Auctioneers
217. KGMG
218. King Sturge
219. Lawrence Graham (Solicitors)
220. Licensed Victuallers (Wales) Ltd
221. M A C Higgin BSc (Hons) MRICS – Montagu Evans
222. The Rating Surveyors Association
223. MOD
224. Parliamentary Ombudsman
225. Pensioners Forum Wales
226. Property Advisors to the Civil Estate (PACE)
227. Sean Langley
228. The Company Secretary - Hyder
229. The National Trust
230. Wales Council for Voluntary Action
231. Wales Division Of British Hospitality
232. Wales TUC
233. Welsh Funding Councils
234. Welsh Health Estates
235. Welsh Language Board
236. John O'Reilly ICL
237. David Eagle ICL
238. G Bennett acadInfo
239. R Urquhar acadInfo
240. G Shambrook tinyworld
241. NB Lair firstsoftware
242. C Breedy Acad info
243. David Shawley Anite
244. The Secretary Manweb Plc
245. Mr George Coleman Midlands Electricity Plc
246. Mr David Roberts Western Power Distribution (South Wales) Plc
247. Mr Paul Roberts The National Grid Company
248. The Secretary Dwr Cymru Cyfngedig
249. The Secretary Severn Trent Ltd
250. The Secretary Dee Valley Water Plc
251. Mr David Tripper North West Water Plc
252. The Secretary Railtrack Plc
253. The Secretary The British Waterways Board
254. Mr George Northall Taxation and Rating Manager Transco Plc
255. Mr David Mallone British Telecom
256. Julie CurtisSecretary Global Crossing (UK) Telecommunications Ltd
257. The Secretary Energis Communications Ltd
258. Mr Trevor Reynolds Cable and Wireless Communications (Mercury) Ltd
259. Ms Theresa Martins Rent/Rates MP7 22 Mainline Pipelines
260. Sue Lane PA to MD The Gas Transportatiom Company
261. The Secretary British Gas Connection Ltd
262. The Secretary Independent Pipelines Ltd

263. The Secretary	SP Gas Limited
264. The Secretary	GTC Pipelines Limited
265. The Secretary	ESP Networks Limited
266. The Secretary	Central Networks West
267. Lisa Wells	Swansea BID pilot
268. Felicity Workman	Swansea BID pilot
269. Elizabeth Szabo	ATCM
270. Ms Kay Powell	Planning Division, Welsh Assembly Government