

ECONOMIC DEVELOPMENT & TRANSPORT COMMITTEE

Date: 8 June 2005
Time: 9.00 - 12:30
Venue: National Assembly, Cardiff Bay
Title: CBI WALES PAPER FOR THE ECONOMIC DEVELOPMENT & TRANSPORT COMMITTEE, JUNE 8TH 2005 - THE VIEWS OF THE CBI ON THE ASPB MERGER



CBI WALES PAPER FOR THE ECONOMIC DEVELOPMENT & TRANSPORT COMMITTEE
JUNE 8TH 2005
THE VIEWS OF THE CBI ON THE ASPB MERGER

1. The decision by the Welsh Assembly Government to abolish the independent status of the Welsh Development Agency, the Wales Tourist Board and ELWa raised widespread concerns amongst CBI members in Wales.
2. Following the announcement the CBI submitted an initial paper to the Assembly detailing the principles by which the new organisation should operate and be judged (attached at Annex 1). The paper concentrated primarily on outcomes, rather than structures, as it is these which are key to the business community, and to the economic development of Wales. The paper referred primarily to the WDA, as this is by far the ASPB with which our members have had most contact to date, and the one that most affects them.
3. Some of the areas highlighted include:
 - Accountability to customers, i.e. business.
 - Proper scrutiny and transparency measures – both externally as well as internally.
 - The need for a proper evaluation of services to establish a baseline against which intended improvements can be measured.
 - The need to obtain quality business input into the Assembly Government's activities.
 - A recognition that delivery of services must recognise the reality of economic areas for business, and not take place across artificial local boundaries which are meaningless to business.
4. The CBI has responded both formally and informally to the Assembly consultation on the future of the ASPBs – our response to the Assembly Government's consultation on the mergers with ELWa, the WDA and WTB, "Making the Connections: Delivering Better Services for Wales" is attached at Annex 2.

EDT2 08-05 (p2) e-CBI WALES PAPER FOR EDT COMMITTEE



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5. We have also held discussions on this with other business organisations and have written a joint letter to Assembly Ministers (First Minister and the Minister for Economic Development and Transport), accompanying our individual consultation responses, in which we reinforced joint concerns and expressed a desire for continued involvement from the business community moving forward (Annex 3).
6. Much of the CBI's response to the official consultation centres on the services and outcomes of the new merged organisation. The principal areas of most concern to CBI members are advice (composition/formulation of the panels), measures/indicators (KPIs), and service delivery (customer service and regional service delivery).
7. Whilst it is crucial that the Assembly obtains business input into the merged organisation, reservations have been expressed at the number, composition, purpose, and quality of these panels. The CBI believes that there should be few panels, and that they should have a clearly defined purpose, set out through agreed terms of reference, and with clear outcomes. It is also important that advice given by panel members is heeded, so that they feel their participation is worthwhile.
8. The second area requiring further thought is the way in which the effectiveness of the new organisation will be measured. The merged organisation should be measured on its service to customers, i.e. business, as well as its actual outcomes, in terms of the value added to business for example, as well as wider economic objectives such as raising GDP levels.
9. Many companies, particularly those in the service and corporate sectors, possess a series of key performance indicators (KPIs) by which they measure their effectiveness. We believe the private sector has much to contribute to this area in particular and are happy to work with the Assembly in obtaining and sharing this best practice.
10. The merged organisation should also be evaluated on its contribution to the wider economic development of Wales, in both the short and long term, and we would encourage the Assembly to devise a series of markers to enable this. We would encourage the Economic Development and Transport Committee to consider what their role is in scrutinising the effectiveness of these arrangements, and what information they will require to perform this role.
11. Our third concern relates to the issue of **regional service delivery** within the new organisation. Services should be delivered at the level most appropriate to customer needs, consistent with speedy and accountable decision-making, and the degree of specialism inherent in the particular service.
12. CBI members are disappointed that the process to date **lacks the commercial focus** ordinarily afforded to mergers. We would have expected to see a business plan for the merger, giving details of costings, a cost-benefit analysis, VFM etc.
13. We appreciate the open way in which Ministers and officials are engaging with business throughout this process. We look forward to continuing to work with them as we head towards April 2006 and beyond to ensure that the structures and services which will be put in place are those which can deliver the best possible outcome for the customers – the people of Wales, the Welsh economy as a whole, and the individual businesses of Wales without whom economic growth cannot be achieved.

ESW
June 1st 2005

ANNEX 1 THE FUTURE DELIVERY OF PUBLIC SERVICES – AFTER THE BONFIRE

1. The decision of the Welsh Assembly Government to abolish the independent status of the Welsh Development Agency, Wales Tourist Board and ELWa has raised concerns amongst CBI members in Wales.
2. In particular the lack of consultation with the business community, before announcing the decision to abolish these three bodies, is disappointing and calls into question the nature of the Assembly's partnership with business. We do not understand how this sits alongside the requirements of s.115 of the Government of Wales Act.
3. Nevertheless we recognise that the current structures which, certainly as regards the WDA, have worked reasonably well, will be changed. This now gives the Assembly Government and the business community an opportunity to create structures and services which can deliver a better outcome for the customers – the people of Wales, the Welsh economy as a whole and the individual businesses of Wales without whom economic growth cannot be achieved.
4. We have focused our deliberations not on devising new structures, but on determining by what measures the new arrangements will be judged by their customers to have succeeded – to have improved on the current structures. These measures should be used to test the soundness of any structures proposed for consideration and should underpin WAG's commitment to better delivery and clear accountability.
5. Equally, we have not focused on what the products of these new structures – the individual services, programmes etc - should be, though there is a need for a quality in-depth examination of this. The current economic development budget is spent in delivering a diverse range of services aimed at a widely disparate customer base. This portfolio of services has developed in a piecemeal fashion and warrants a thorough review. However, this should be done to a different timescale, and with extensive involvement by the business community as to what it values, and should also include those services currently contained within the Assembly administration and in other public sector bodies.

Evaluation

6. In order to establish that the new arrangements will have delivered improvement it is necessary first to establish a baseline. A full review of current services is needed to establish what is being delivered, to whom, by whom, and most importantly to what effect.
7. In so doing the Assembly must move away from simplistic quantitative measures (jobs created/safeguarded, number of businesses "advised" etc). Such measures are no longer appropriate in a full-employment economy, and are widely mistrusted. They say nothing about whether the inputs were valued by the recipients – particularly important in the case of business advice – or about the quality of the impact.
8. Having established a baseline, the Assembly must then discuss with the business community what improvements it wishes to see brought about.

Principles

9. These improvements should be delivered by structures which are underpinned by the following principles.
10. **Accountability** must be key, and it needs to be demonstrated how this will be achieved. Political accountability has been quoted as one of the main reasons for introducing new arrangements. However, of greater importance is accountability to the customers – for the service standards and delivery. All services to be delivered must clearly identify the organisation and individual responsible for delivery, who will have the authority to take the necessary decisions, and set out the timescales for dealing with customers.

11. Accountability can be further enhanced by setting out how decision making can be escalated – the **right of appeal** by customers when it is decided to refuse a service or when the delivery standards are not adhered to. This is necessary in the absence of a competitive market and to gain the confidence of customers.
12. There must be proper **scrutiny** measures in place and not just to an Assembly committee. **Transparency** of what is delivered and the outcomes will be key. Currently the ASPBs are required to publish their business plans, budget allocations and output monitoring. We must ensure that the absorption of these functions into the Assembly administration does not result in less clarity and opportunity for scrutiny by customers.
13. To properly **evaluate the quality of the services**, and the service delivery, a wide scale survey of customer experiences should be undertaken on an annual basis. Such surveys are routine in most large service sector companies. This should be independently undertaken with the results published. This will allow the Assembly Government, other Assembly Members and most importantly the tax paying customers to judge progress from the original benchmark, and on a regular ongoing basis.
14. It will be necessary for the Assembly Government to establish some method of obtaining **business input** to its activities to ensure that it maintains an understanding of an ever-changing market driven economy, and the key issues affecting business performance in Wales. It will need to establish a structure that allows business involvement to be valued and demonstrably acted upon. It is unclear whether a purely advisory role will fulfil this requirement. At the very least any supervisory board with business representation must be able to publish its own **annual report** on the service standards achieved and the impact of its activities.
15. It is likely that **separation of delivery** from the policy making function will be necessary, and that in many areas delivery should take place outside the civil service administration, to pre-published measurable criteria agreed with the business community. The key economic development functions were originally separated from the civil service as it was widely felt that the civil service culture, with its understandable tendency to risk-aversion and its proper commitment to process, was not best suited to the more commercial activities required to deliver market focused economic development.
16. The delivery of services must recognise **the reality of economic areas** for business, employment and markets. At all costs delivery must not take place according to the artificial local authority boundaries which are meaningless to business. In particular investment decisions must be taken on economic rather than political grounds.
17. The Assembly must agree its **communication links** between the new structures and the business community – individual companies, representative organisations and sector bodies. In particular CBI members have commented on the strength of the WDA brand name, particularly outside Wales, and are concerned that this should not be lost.
18. In the **medium term** there must be a commitment to a root and branch review of Assembly spending aimed at growing the economy of Wales, both the quantum of the spend and the specific areas and programmes. In addition there must be a fundamental review of the structures of the Assembly Government, of ministerial portfolios and departments, to determine whether the current divisions are appropriate for the needs of Wales.

Conclusion

19. The CBI recognises that the coming months represent a time of challenge but also of opportunity. We have the chance to shape the key public service delivery programmes in Wales to deliver for the changing needs of Wales in the 21st century. To maximise the benefits of this opportunity we need to build on the best of what currently exists, but make it more accountable – to politicians, civic society, and importantly to its various customer bases.

20. Customers, whether businesses or individuals, need to have the chance to inform and shape what is delivered, need to know what services they can expect, what they have to do to access them, and where they can turn if service standards fall below agreed standards. Ministers have agreed to hold themselves accountable for these services and their outcomes. The CBI looks forward to working with them to help deliver what business and the Welsh economy requires for a prosperous future.

August 2004

1. This paper is the response of the membership of CBI Wales to the Welsh Assembly Government consultation on the merger with the Welsh Development Agency (WDA), ELWa, and the Wales Tourist Board (WTB).
2. The CBI is the UK’s foremost business representative body dealing principally with cross-sector issues which affect the business environment in which all companies operate. The CBI’s strength lies in its breadth of membership, which includes companies of every size, including over 200 trade associations and academic institutions, and from all sectors of the economy – manufacturing, construction, retailing, financial services, e-commerce, leisure, transport and so on. The CBI represents companies employing about 50% of the private sector workforce in Wales.
3. CBI Wales is pleased to respond to this consultation on the mergers. This response is the result of extensive consultation with members from across Wales, from all sectors of industry, and has been discussed and approved by the CBI Wales Council.

INTRODUCTION

4. This response follows on from the initial paper submitted to the Assembly by the CBI on August 13th 2004 detailing the principles by which the new organisation should operate and be judged. The paper concentrated primarily on outcomes, rather than structures, as it is these which are key to the business community, and to the economic development of Wales. We are pleased that many of the premises within that paper seem to have been reflected in the consultation document.
5. Despite our initial concerns and comments – which still stand - we recognise that the decision to absorb the WDA, ELWa and the WTB into the Welsh Assembly Government has been taken, and that the current structures will change from April 2006, and we are anxious to move forward. The CBI is keen to work with the Assembly Government, as well as other business organisations, to ensure that the structures and services which will be put in place post-April 2006 are those which can deliver the best possible outcome for the customers – the people of Wales, the Welsh economy as a whole, and the individual businesses of Wales without whom economic growth cannot be achieved.
6. We have held discussions with other business organisations, primarily the Institute of Directors, Cardiff Chamber of Commerce, and the Federation of Small Businesses. We have submitted a joint letter to stand alongside our individual responses, reinforcing joint concerns and expressing a desire for continued involvement from the business community as these developments move forward.
7. Much of our response centres around the services and outcomes of the new merged organisation, and our comments refer primarily to the WDA, as this is by far the ASPB with which our members have had most contact to date, and the one which affects them the greatest.
8. The principal areas of most concern to CBI Wales members within this document, centre on advice (composition/formulation of the panels), measures/indicators (KPIs), and service delivery (customer service and regional service delivery).
9. CBI members are disappointed that the process to date lacks the commercial focus ordinarily afforded to mergers. We would have expected to see a business plan for the merger, giving details of costings, a cost-benefit analysis, VFM etc.

10. Setting aside the manner in which the original decision was taken and announced, we acknowledge and appreciate the ongoing informal consultation taking place around this process, and the frequent opportunities to communicate directly with Assembly Ministers and senior officials as part of this.

CONSULTATION QUESTIONS

11. The CBI welcomes the Welsh Assembly Government's aspiration to create a Welsh public service which is more commercial and innovative, simpler, more streamlined, and with more resources for front line services. Our response to the first "Making the Connections" consultation on the future of public services for Wales, refers to our support for the Assembly's aim of creating a more efficient public service in Wales, which is both flexible and responsive, and these comments provide a continued context for this response. Our concern lies in how this can be achieved in practice.

ACCOUNTABILITY & EXTERNAL ADVICE

12. The CBI acknowledges the greater emphasis placed upon accountability within the new organisation. Customers do want clearer lines of accountability, particularly in terms of service and outcomes.
13. We welcome the intention to publish information about plans and outcomes, allowing wider scrutiny both internally from Assembly committees, and from wider civil society, and would appreciate further details as to how this will be achieved.
14. We are concerned that the direct accountability to the Minister does not hamper the efficient service delivery the Assembly is seeking to achieve. The document refers to the need for robust delegations. This is absolutely vital, and civil servants at all levels should feel empowered to take decisions without the need to refer upwards constantly. Traditional civil service procedures are not always compatible with businesses requirements of swift and clear decisions.
15. The CBI would stress that there should not be just political accountability, but also accountability to the customer – for both service standards and delivery. Indeed CBI Wales members believe that accountability and transparency to business as customers, either directly or indirectly, is the more important issue. It is not fully apparent how this customer accountability will be achieved and measured as yet, and we would urge that the Assembly revisit this.
16. The Minister should set the framework for the economic development of Wales, and should be accountable for overall delivery in all parts of Wales. The practitioners – those responsible for delivery – should be accountable to customers for service delivery levels to individual users.
17. Accountability can be enhanced by setting out how decision making can be escalated – the right of appeal by customers when it is decided to refuse a service or when the delivery standards are not adhered to, for example. This is necessary in the absence of a competitive market and to gain the confidence of customers.
18. We welcome the Assembly's intention to maintain the use of external advice, and to continue its engagement with "high calibre individuals" who will "play a substantive role in the advice and challenge function".
19. It is crucial that the Assembly Government establishes some method of obtaining business input to its activities to ensure that it maintains an understanding of an ever-changing market driven economy, and the key issues affecting business performance in Wales. It will need to establish a structure that allows business involvement to be valued and demonstrably acted upon.
20. The CBI's primary concern in this area relates specifically to the proposed mechanisms by which external advice can be obtained within the new structures, namely through the creation of the advisory panels. Whilst it is crucial that the Assembly obtain business input into the new

organisation, nevertheless members have expressed reservations at the number, composition, purpose, and quality of these panels. We believe that there should be fewer panels, and that they should have a clearly defined purpose, set out through agreed terms of reference, and with clear outcomes.

21. It is also important that any advice or opinions given by panel members is heeded, so that they feel their participation is worthwhile. At the very least, any supervisory board with business representation must be able to produce its own annual report on the service standards achieved and the impact of its activities.
22. We would also question the level of expertise likely within these panels should their membership be decided solely through an external advertisement. We would encourage the Assembly to identify individuals with particular expertise and contact them directly to participate in the panels.

IMPROVING CUSTOMER AND STAKEHOLDER SERVICE

23. It is imperative that service levels to business are improved and delivery against economic development objectives is enhanced, or the cost and effort involved in the merger process will have been of no value.
24. There should be proper account management of key businesses – a skill which staff will need to be trained to deliver. Staff throughout the new merged organisation should be given appropriate training on this, and where possible should maintain up to date business plans with key customers – plans which have been signed off by both the customer and the Assembly.
25. To properly evaluate the quality of the services, and the service delivery, a wide scale survey of customer experiences should be undertaken on an annual basis. Such surveys are routine in most large service sector companies. This should be independently undertaken with the results published. Detailed annual reports could be produced, incorporating some of the customer-based evidence, and should be presented for public scrutiny, by both politicians and service users alike. This will allow the Assembly Government, other Assembly Members and most importantly the tax paying customers to judge progress from the original benchmark, and on a regular ongoing basis.

DEMONSTRATING RESULTS AND APPLYING BEST PRACTICE

26. One major area of interest to CBI members across Wales is how the new merged organisation will be judged and measured. It is fundamental that the new organisation delivers, and important that this improvement in delivery can be identified by all stakeholders.
27. The document refers to the need to focus on outcomes and suggests drawing up Statements of Service and Commitment – suggestions initially put forward by the CBI – and this is to be welcomed. These should include quantifiable measures and should be similar in nature to the Service Level Agreements that are common between service providers and their customers. We would be interested to learn what contribution, if any, businesses and other customers could make in drawing up these Service Level Agreements.
28. A series of Key Performance Indicators (KPIs) should be developed to monitor progress and compare performance, including on an international level.
29. These should cover two main areas – service delivery to the customer, and contribution to the economic development of Wales.
30. Customer-related KPIs should include guaranteeing a response within a set number of days, and publication of results for the speed at which decisions are taken. For example, an application for grant assistance should receive an acknowledgement within a set number of working days; a decision within a guaranteed number of weeks; and completion within a defined period.

31. A proper evaluation of the number and quality of initiatives delivered by the new organisation, as well as their effectiveness should be undertaken by April 2006. This could then be built into the measurements for the new organisation.
32. In wider economic terms, the Assembly could define its performance measures on a short and long-term basis, and derive a series of targets to measure achievement.
33. These could include average wage levels; net increase in and quality of new jobs; replacement of jobs lost within certain sectors, e.g. manufacturing.
34. Longer term strategic targets should include those outlined in A Winning Wales and the Wales Spatial Plan, e.g. improving GDP/GVA levels, reducing economic inactivity, and other wider economic aspirations.
35. CBI Wales members have many KPIs and performance measures that they use within their own companies, and scope exists here for sharing best practice between the public and private sectors. The CBI would be happy to assist in facilitating this.

STREAMLINED DELIVERY

36. The document rightly acknowledges the frustration business often feels at the way in which Government and its ASPBs operate, highlighting the length of the decision-making process as a key concern. The CBI hopes that the new organisation will fulfil its potential in speeding up the decision-making process.
37. Given that the Assembly would like to be "best in class" as a result of these changes, we would strongly suggest examining services provided elsewhere with the aim of sharing and learning from best practice.

OPPORTUNITIES FOR STAFF

38. The issue of staff development is principally one for those personnel involved directly in the merger, both in management and implementation terms, and it is thus not really appropriate for the CBI to comment in detail on this.
39. We would stress the need for continuity of service to the customer throughout this process, and that there should be as little disruption in service as possible.
40. Amongst the existing ASPB staff, there is considerable experience and expertise and it is crucial that this must not be threatened or lost by the process of merging the WDA, ELWa and the WTB into the Assembly machinery.
41. It is crucial that staff within the new merged organisation are encouraged to develop further, and we welcome the move to enable staff to develop as much for their delivery as for their policy skills.

ORGANISING TO DELIVER

42. We are glad the Assembly recognises that to achieve the full benefits of the mergers, Government Departments will need to be organised differently. However, the structures outlined within the consultation document merely seem to have transposed existing functions from the ASPBs.
43. The CBI believes there would have been merit in placing responsibility for skills within the Economic Development Department. A version of this model has been adopted in the Scottish Executive with the creation of its Enterprise and Lifelong Learning Department. If skills are to remain within

Education and Lifelong Learning, it will be vital that the joint working referred to within the document actually takes place in a meaningful way at all levels.

44. The delivery of services must recognise the reality of economic areas for business, employment and markets. Strategic decision-making and delivery should be regionally based if it is the right approach – adding value and fit for purpose. Where regionalisation does occur managers based in the regions should be given a high level of delegated authority on both financial spend and decision-making.
45. The document states that the Regional Economic Fora will have a clear role in providing advice and monitoring performance of the new organisation at the regional level. Whilst we support delivery of services at a regional level where appropriate, we would however question whether the Regional Economic Fora, as currently constructed, are the right way of achieving this. If this role is given to the Fora, the CBI would wish to see far stronger business representation on these groups, along with defined terms of reference – this is currently not the case.

BENEFITS AND INVESTMENTS

46. It is stated that this exercise will produce ongoing recurring savings of some £10 million per annum from 2009, but does not identify what percentage of running costs that represents. It is therefore not possible to judge whether these savings are meaningful or challenging. Of greater importance is what the rest of the budget is spent on delivering and its value for money. This evaluation must be undertaken as a matter of priority.
47. The CBI is concerned at the apparent lack of a costed business plan accompanying this process. Any private business undertaking such an exercise would have a clearly set out series of deliverables, including costs and benefits. Again there is much experience and expertise within the private sector on the issue of mergers and acquisitions, and the CBI would urge the Assembly to draw on this experience to assist it throughout this merger process.

CONCLUSION

48. The CBI believes the private sector has a valuable role to play in this exercise. Whilst we appreciate the opportunities for engagement afforded to the CBI thus far, nonetheless we would emphasise that this process should not be wholly internally-driven, and that the private sector should be more greatly involved in specifying services, and service levels.
49. We look forward to continuing our contribution to this process, and to ensuring the best outcomes for the people, and the economy of Wales.

ESW April 2005

ANNEX 3 **JOINT LETTER TO RHODRI MORGAN & ANDREW DAVIES FROM CBI, CARDIFF CHAMBER, INSTITUTE OF DIRECTORS, AND FEDERATION OF SMALL BUSINESSES**

Andrew Davies AM,
Minister for Economic Development & Transport,
Welsh Assembly Government,
Cardiff Bay,
Cardiff
CF99 1NA

April 15th 2005

Dear Andrew,

We welcome the opportunity to respond to the Welsh Assembly Government's consultation on the merger with the WDA, WTB and ELWa, as part of its Making the Connections: Delivering Better Services for Wales programme. We are keen to work with the Assembly to ensure that we put in place a new system focussed on delivering for business, and look forward to continuing our engagement with Ministers and senior officials throughout the merger process.

We have responded to the consultation as individual organisations, but as the main business representative organisations in Wales, we would like to take this opportunity to reinforce our principal shared concerns with regard to three specific areas of the merger process.

Our initial concern relates specifically to the proposed mechanisms by which external advice can be obtained within the new structures, namely through the creation of the advisory panels. Whilst it is crucial that the Assembly obtain business input into the new organisation, nevertheless members throughout our organisations have expressed reservations at the number, composition, purpose, and quality of these panels. We believe that there should be fewer panels, and that they should have a clearly defined purpose, set out through agreed terms of reference, and with clear outcomes. It is also important that any advice or opinions given by panel members is heeded, so that they feel their participation is worthwhile.

Our second concern relates to the way in which the new organisation will be judged. Members from across our organisations, particularly those in the service and corporate sectors, possess a series of key performance indicators (KPIs) by which they measure their services to their customers. As organisations, we would be happy to encourage our members to share this information with the Assembly to assist it in formulating customer service measures for the merged organisation. For example, KPIs could be set to measure the speed, clarity and quality of the response provided by the new organisation. We believe the private sector has much to contribute to this area in particular and are happy to work with the Assembly in obtaining and sharing this best practice.

The new organisation should also be judged on its contribution to the wider economic development of Wales, in both the short and long term, and we would encourage the Assembly to devise a series of markers - similar to those set out in A Winning Wales and the Wales Spatial Plan - to enable this. These economic measures could include the number of businesses sustained, number and quality of new jobs, and the average wage increases. GDP levels could also be used as a marker for the performance of the merged organisation.

Our final concern relates to the issue of regional service delivery within the new organisation. Whilst we appreciate the value of service delivery at the regional level, we believe this should only take place

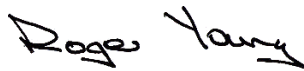
where appropriate, and where it is fit for purpose, rather than for purely political means. If the Regional Economic Fora are to be used as the vehicles for taking forward some of the proposals within this document, we believe their role and purpose should be revisited to wider reflect the economic base, and to ensure they are more representative of business. Member experience from across our four organisations, shows that the quality of the Regional Economic Fora is patchy, and that there appears to be a clear weighting in favour of local authorities.

We commend the Assembly Government, Ministers and officials, for the open way in which they are engaging with business throughout this process, and look forward to continuing to work with them as we head towards April 2006 and beyond, in ensuring the best result for the economy, and people, of Wales.

Yours sincerely,



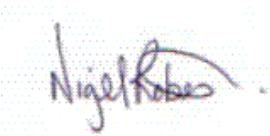
David Rosser, Director: CBI Wales



Roger Young, Executive Director: IoD Wales



Ben Cottam, Area Policy Development Officer: FSB Wales



Nigel Roberts, President: Cardiff Chamber of Commerce