

LOCAL GOVERNMENT BOUNDARY COMMISSION FOR WALES

**REVIEW OF PART OF THE BOUNDARY
BETWEEN THE COUNTY OF DENBIGHSHIRE
AND THE COUNTY BOROUGH OF WREXHAM IN
THE AREA OF THE COMMUNITIES OF
LLANGOLLEN AND LLANTYSILIO IN THE
COUNTY OF DENBIGHSHIRE AND THE
COMMUNITIES OF PENYCAE, CEFN,
LLANGOLLEN RURAL, CHIRK, GLYNTRAIAN
AND LLANSANTFFRAID GLYN CEIRIOG IN THE
COUNTY BOROUGH OF WREXHAM**

REPORT AND PROPOSALS

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REVIEW OF PART OF THE BOUNDARY BETWEEN THE COUNTY OF DENBIGHSHIRE AND THE COUNTY BOROUGH OF WREXHAM IN THE AREA OF THE COMMUNITIES OF LLANGOLLEN AND LLANTYSILIO IN THE COUNTY OF DENBIGHSHIRE AND THE COMMUNITIES OF PENYCAE, CEFN, LLANGOLLEN RURAL, CHIRK, GLYNTRAIAN AND LLANSANTFFRAID GLYN CEIRIOG IN THE COUNTY BOROUGH OF WREXHAM

REPORT AND PROPOSALS

1. INTRODUCTION

- 1.1 In accordance with the directions issued by the National Assembly for Wales on 17 July 2000, we, the Local Government Boundary Commission for Wales (the Commission), have completed the review of part of the boundary between the County of Denbighshire and the County Borough of Wrexham in the area of the Communities of Llangollen and Llantysilio in the County of Denbighshire and the Communities of Penycae, Cefn, Llangollen Rural, Chirk, Glyntraian and Llansantffraid Glyn Ceiriog in the County Borough of Wrexham and present our proposals for a new boundary.

2. EXECUTIVE SUMMARY

- 2.1 It is our view that the perceived benefits of the proposed change do not outweigh the perceived benefits of the existing arrangements taking into account the costs that will be incurred by the councils in administering the change. We are therefore unable to recommend a boundary change (paragraph 6.55).

3. SCOPE AND OBJECT OF THE REVIEW

- 3.1 Section 54(1) of the Local Government Act 1972 (the Act) provides that the Commission may in consequence of a review conducted by them make proposals to the National Assembly for Wales for effecting changes appearing to the Commission desirable in the interests of effective and convenient local government.

National Assembly for Wales' Directions

- 3.2 In accordance with Section 56(1) of the Act the National Assembly for Wales directed the Commission to conduct a review of the area comprising the Communities of Llangollen and Llantysilio in the County of Denbighshire and the Communities of Penycae, Cefn, Llangollen Rural, Chirk, Glyntraian and Llansantffraid Glyn Ceiriog in the County Borough

of Wrexham by 31 October 2001. In August 2001, we felt unable to complete the Review by this date, as a result of the delays encountered at the commencement of this work. We requested, and were granted, an extension to the timetable by the Minister until February 2002. Further to our decision to hold a public session in Llangollen to receive any further evidence, we requested and were granted a further extension to the end of March 2002.

- 3.3 The National Assembly for Wales has also given the Commission the following directions for their guidance in conducting the review in accordance with Section 59(1) of the Act:
- a) discrete settlements of human habitation should, wherever possible, be situated within one principal area;
 - b) boundaries between local government areas should, wherever possible, follow identifiable physical features such as rivers and roads; and
 - c) regard should be given to the effect of any proposals upon the County of Denbighshire.

Procedure

- 3.4 Section 60 of the Act lays down procedural guidelines which are to be followed in carrying out a review. In line with that guidance we wrote on 9 August 2000 to Denbighshire County Council and Wrexham County Borough Council, and on 15 August 2000 to Llangollen, Llantysilio Penycae, Cefn, Llangollen Rural, Chirk, Glyntraian and Llansantffraid Glyn Ceiriog Community Councils, the Members of Parliament for the local constituencies, the Assembly Members for the area, the local authority associations, the police authority for the area and political parties to inform them of our intention to conduct the review, to request their preliminary views and to provide them with a copy of the National Assembly for Wales' directions to the Commission. We invited Denbighshire County Council and Wrexham County Borough Council to submit any suggestions for changes to the boundary. We also publicised our intention to conduct the review in local newspapers circulating in the area and asked the councils to display public notices.

4. DRAFT PROPOSALS

- 4.1 We received representations from Denbighshire County Council; Wrexham County Borough Council; 24 town and community councils; Martyn Jones MP, Gareth Thomas MP; Dr John Marek AM, Karen Sinclair AM; councillors; and other interested bodies and residents. These representations were taken into consideration and summarised in our Draft Proposals published on 28 September 2001.
- 4.2 Having considered the initial representations made to us we concluded that the only change to be considered within the parameters of the review would be a change to the boundary to bring the Communities of Llangollen and Llantysilio within the area of the County Borough of Wrexham. In order to comply with the direction at paragraph 3.3(c) above, we considered the effect of this proposal upon the County of Denbighshire.
- 4.3 We considered that in order to form an informed and independent view of this important issue, the services of an expert in local government finances should be employed by the

Commission to conduct an investigation. A report was commissioned from Rita Hale & Associates Ltd. which concluded that the residual Denbighshire would be a viable unitary authority because it:

- would serve a bigger population than five of the other 21 unitary authorities in Wales;
- would be less sparsely populated than it is now – and less sparsely populated than eight of the other 21 unitary authorities in Wales;
- would, based on our analysis of the Authority’s budget data for 2000-01, be likely to have a bigger budget than at least five of the other 21 unitary authorities in Wales; and
- would be unlikely, based on the analysis of the SSA data for 2000-01, to face any increase in the Council Tax as a result of the boundary change.

4.4 We accepted the findings of this report and considered that the effect of the transfer of Llangollen and Llantysilio in budgetary terms would not have a significant impact on Denbighshire County Council and that the Council would remain a viable Unitary Authority in terms of population, economies of scale and geographical area.

4.5 Having considered the representations made to us and the findings of the Rita Hale report (including the representations made in relation to the report itself) we came to the view that the perceived benefits of the proposed change do not outweigh the perceived benefits of the existing arrangements taking into account the costs that would be incurred by the councils in administering the change. Our Draft Proposals therefore did not recommend a boundary change.

4.6 Copies of the Draft Proposals were sent to all the councils, bodies and individuals referred to in paragraph 3.4 seeking their views. A copy was also sent to anyone who had submitted preliminary comments. By public notice we also invited any other organisation or person with an interest in the review to submit their views. Copies of the Draft Proposals were made available for inspection at the offices of Denbighshire County Council, Wrexham County Borough Council and the Commission and were also deposited at the offices of the North Wales Police Authority.

5. SUMMARY OF REPRESENTATIONS RECEIVED IN RESPONSE TO THE DRAFT PROPOSALS

5.1 We received representations from Denbighshire County Council; Wrexham County Borough Council; 14 town and community councils; Martyn Jones MP; Gareth Thomas MP; Chris Ruane MP; Dr John Marek AM; Karen Sinclair AM; Eleanor Burnham AM; Alan Pugh AM; and other interested bodies and residents. All of these representations were considered carefully before formulating our proposals.

5.2 A representation received in response to the Draft Proposals report suggested that Llangollen residents be given a further opportunity to be able to give evidence directly to the Commission. We considered this request and accordingly organised a public session held at Llangollen Town Hall on 30 January 2002. A transcript was taken of the comments made at the public session and the points raised, and the points raised in subsequent

representations, are all included in the summary below and were given due consideration in the formulation of our proposals.

5.3 **Denbighshire County Council** made the following points in response to the Commission's Draft Proposals:

- As a point of political and local government continuity, Llangollen and Llantysilio have always been associated with Denbighshire.
- Although Llangollen would not lose its Objective One status, an administrative structure for Objective One would need to be set up in Wrexham following a transfer and would be several years behind such planning which exists in Denbighshire.
- All education services are provided in Denbighshire on an equal basis across the County. The Authority has developed a single link officer (i.e. a designated education officer) linking to all Denbighshire schools. This provides for a personal relationship between the local authority and schools over school management and school curriculum issues. There are also similarly personal relationships established with school governors.
- Schools are provided with the near maximum possible delegation of budgets to give them as much financial autonomy as possible.
- Denbighshire has been responsive to the cultural needs of the area through its development of Welsh medium provision.
- There is a substantially higher percentage of persons who speak the Welsh language in Denbighshire compared to Wrexham. An authority which has a profile similar to the area in question has a greater likelihood of being sensitive to the area's cultural needs. In Denbighshire's case this likelihood is reinforced by the political structure of the County in which there is a substantial Welsh speaking contingent within the Council who feel strongly on issues concerning the Welsh Language and Culture.
- The referendums in 1993 and 2000 show a move by residents to stay in Denbighshire (there has been a swing of more than 8% against inclusion in Wrexham.). The 2000 referendum provided a clear majority of 19 in favour of there being no boundary review.
- The issue of coterminosity and Health Service provision seems over stated. There is no particular reason why Health Services need to be provided in the locality of a local authority where people live or that there are any particular advantages deriving from this. Acute services provision has no particular relationship to local authority boundaries.
- Primary care provision in Llangollen and Llantysilio is physically based in Llangollen.
- Llangollen is pivotal to the cultural tourism and therefore the economic base of Denbighshire. The foundation of Denbighshire Cultural Tourism Strategy is predicated on Llangollen as Denbighshire's tourism gateway to the county. A new voluntary/statutory partnership has been established between Denbighshire and the Llangollen International Eisteddfod, resulting in a new joint Chief Executive appointment and a repositioning of the Eisteddfod to realise its potential in promoting Wales and the county.
- There would be an adverse financial effect upon Denbighshire arising from a transfer. The largest difference between the Rita Hale and Council figures relates to education central overheads. The argument is that whilst the Commission accepts that education central services costs would not necessarily be split pro-rata across schools, the Council would in fact expect to be able to reduce budgets, given that just under 15% of the service would be transferring. There are several reasons why this would not necessarily be achievable in the short to medium term:

- i) firstly, many of these central costs are of a nature that renders them fixed, at least in the short-term. Aside from support service recharges, staff budget areas such as strategic management and advisory staff, for example, could not be reduced in the short term. The Authority has identified that £142,000 of the difference between the Council and Rita Hale figures relates to Strategic Management, and £48,000 to Advisory staff. Strategic Management includes the costs of the Director, Heads of Service, their PAs, and other strategic support staff who undertake specific jobs (e.g., property specialists), and whose roles could not be made more generic in the short term due to the specialist skills required to perform these roles. The Council's Advisory staff are subject specific rather than generic advisors, so again, staffing expenditure in this area could not be reduced in the short-term without having an adverse impact on subject coverage. The Council's ability to reduce overhead costs in the short term is therefore limited without affecting the support provided to the remainder of its schools;
- ii) secondly, some of the education central services costs, for example Special Educational Needs (£102,000 difference between Denbighshire and Commission figures), relate to particular pupils. The vast majority of statemented pupils in the Denbighshire area live in the north of the county, with very few in the transfer area. Therefore most of the costs relating to Special Educational Needs will be retained by Denbighshire; and
- iii) thirdly, a significant proportion of the budget (£124,000) relates to Transport. Much of this spend relates to children who live outside the review area, but who attend Ysgol Dinas Brân. The responsibility and cost of transporting these children would remain with Denbighshire County Council.

The same arguments would apply in respect of primary schools.

- In terms of Special Education and Social Services provision, most of the budget in these areas is site specific. There are no Special Schools in the transfer area, for example. Most of the Social Services costs relate to service delivery centres outside the review area (there are no older people's homes in the review area), and to out-of-county children's EBD (Emotional and Behavioural Disabilities) placements (none of which relate to children who live within the review area).
- The Commission refers to the amounts classed as unapportionable overheads or unallocated admin. and support services and suggest that the fact that the overheads are not attributable to services does not imply savings cannot be made if population and area size changes. However, a breakdown provided by the Authority shows that the unapportioned overheads included in the RA (Revenue Account) form relate to pension back funding and increases. These costs would not necessarily be transferred to Wrexham.
- The Commission quotes statistics for a selection of Welsh authorities demonstrating that Denbighshire's unapportionable/unallocable costs are relatively high in cash terms and that smaller authorities in terms of population have lower spending against these headings. However, this may be a result of the fact that Denbighshire was one of the few authorities to apply the BVACOP (The Code of Practice on Local Authority Accounting in Great Britain) rules when completing the RA form, which resulted in the classification of pension back funding and increases as "unapportionable". Denbighshire's corporate management costs are in fact lower than all but one of the other Welsh authorities.

- The Commission then questions the inevitability of incurring large and irreducible overheads that are unrelated to the size of the Authority, although it accepts that there may be difficulty in reducing these in the short term. Whilst it is admitted that all overheads are capable of being changed in the long term, the ability to reduce costs in the short or even medium term will depend upon:
 - i) whether staff structures are such that workloads of discrete employee groups will be significantly affected (as opposed to an average reduction on a f.t.e basis); and
 - ii) the proportion of fixed (i.e. Head of Education, computer systems, central establishment recharges) overheads as compared with variable (stationery, mileage) overheads.

Thus the comparison with lower costs in smaller authorities is irrelevant - workloads and duties may be different, the accounting methodologies for recharging central overheads may also be different. The issue is one of whether Denbighshire could easily make a marginal change to its costs. Denbighshire would need to analyse these costs in further detail and at the expense of other duties in order to do this.

5.4 In a further representation made at the Commission's Public Session at Llangollen Town Hall on 30 January 2002 **Denbighshire County Council** made the following additional points:

- The relationship of Llangollen and Llantysilio with the Dee Valley communities, especially Corwen, is one that forms a cornerstone in the very structure of Dee Valley and its culture and its history.
- For the county it will make it more, not less, difficult to deliver on its responsibilities should Llangollen be transferred to Wrexham. It is Denbighshire's fundamental case that any change must satisfy the need to secure convenient and effective local government and it must be a change that the people of the community want.
- Denbighshire County Council has gone through a very difficult financial period over these last six years and could easily have tried to compensate for this by making cuts in the non-statutory services of culture, leisure and tourism. However, this was not done which has been very important because whereas most things might have survived that period, they would not have developed in the way they have developed in Denbighshire without the strong commitment of members and officers.
- The Council has worked for six years to develop Denbighshire as the leading cultural county in North Wales. The knowledge and expertise and commitment of council officers has been invaluable in successfully attracting Heritage Lottery support second only to Cardiff.
- Denbighshire Council has received lottery funding of three-quarters of a million for the maintenance of Plas Newydd. This has been matched by the Council with a quarter of a million from its own budget, substantial expenditure on non-statutory services.
- The Council has set up a new tourism group which received £90,000 in response to the foot and mouth crisis. Members of that group were part of a successful delegation to the Wales Tourist Board. Three quarters of a million for Llangollen and the Dee Valley was achieved with the Gateway to Wales.

- Denbighshire Council has worked very enthusiastically with the Eisteddfod and joint funded a new Chief Executive's post which will take the Eisteddfod forward.
- The Council has plans for the conservation of the Chapel in Castle Street which will be used as a cultural centre and will also have a new library which will be part of Denbighshire's learning stream linked to all the libraries in the County.
- The Council has developed three strategy documents which are key to developing their cultural tourism and leisure facilities and there are various other projects and services in Denbighshire which have been developed with Llangollen as part of Denbighshire. To remove Llangollen from Denbighshire would mean having to abandon these schemes and strategies and start again. The Council has always appreciated the importance of Llangollen and what happens there and have always made developments in the Town as part of Denbighshire.
- The Council supports youth movements within the countryside, in particular the Young Farmers. Unfortunately, that does not happen in Wrexham where young people in the countryside would miss out. Llangollen is a focal point for youth activity.
- Denbighshire now has in place its own Community Consortia for Education and Training (CCET) which will be taking care of the funding and application of all post-16 education throughout the county. This has brought about the working together of the partnerships that Denbighshire has created in terms of private, public and further education provision within the county, so it has linked those three things together for this provision and is well advanced in ensuring that provision takes place equally and fairly across the county.
- Within Denbighshire there is one Headteachers' Federation which allows for a great deal of partnership to take place between the head teachers, and the officers of the county council and the members of the county council in the formation of the strategy and policy which is adopted across the whole of the county.
- All Denbighshire schools are linked by two megabit per second paths and then linked to a hub which gives them access to the Internet. Denbighshire is the only county in Wales which has this technology and it gives the County an advantage in as much as the funding allocated now and in the near future by the National Assembly for increasing the capacity of that link.
- Those involved with the education system within Denbighshire have expressed their desire to stay in Denbighshire. The primary schools and the secondary schools have said they wish to stay where they are. The governing bodies of these schools have also expressed that wish. The education system in Denbighshire, particularly Llangollen, would have nothing to gain by being moved but they may have a lot to lose.
- The Council's situation has changed in respect of parity between spend and SSA since the publication of the Rita Hale Report. The whole of Wales is now working on the revised SSA calculation. This year it is a little less generous for Denbighshire, certainly than the projections in Rita Hale. The comparison year was one of Denbighshire's last years in debt. The Council are no longer in debt, are no longer over spending and are about to set the budget for next year which means that they can spend up to its SSAs. The relevance of that in terms of the Rita Hale Report suggests that there is now much more parity between the Council's spend and SSA.
- There are very real problems of demography in Denbighshire, particularly the non-uniform spread of population, with 53 per cent living in the five-mile coastal belt. That would increase to 57 per cent if Llangollen and Llantysilio were to transfer to Wrexham. This would be detrimental to the remainder of Denbighshire and therefore

opposed to one of the Commission's criteria in that any change should not be of detriment to the remainder of Denbighshire.

- The medium-term difficulties arising from a transfer arise from the dis-economies of size but the long-term ones are these demographic issues. One example is personal social services, where the Council has five budget heads. The transfer will not affect the Council's spend although it will affect their income creating both medium and long-term problems. On front-line services Denbighshire has a North organisation and a South organisation. Some aspects of that organisation can be rapidly altered to reduce costs, but there will be a certain element of team management and organisation which cannot be reduced because of the organisation and the six per cent cut in income will actually affect that into the medium term.
- Other areas are strategic planning and providing services in the same area. Again, adjustments can be made but not in the medium term. They give the Council quite dramatic problems long term because of the demography and because of the residential homes' issues and the sort of posts that exist in strategic planning, which are still needed regardless of Denbighshire's size.
- Denbighshire Council has a decentralised equality policy; there are four civic centres throughout the County. There are civic centres at Prestatyn and Rhyl on the coastal strip and also at Denbigh and Ruthin. The demography change resulting from a transfer would mean that the Council would have two southern centres actually requiring a lot of additional travel time and effort on behalf of officers and on behalf of members. The Council would be unable to alter this situation as it would not be financially viable to sell the civic centre buildings in the south and move north.
- The Council estimate that the short to medium-term difference on their calculation is by £½ million or just over. Some attempts have been made to estimate by how much that can be reduced in the long term and clearly there are some reductions that could be made. However, these are not easy to estimate, they will not be easy to achieve, and it is felt that the residual part of Denbighshire, were the Commission to transfer this area out, will actually suffer.
- Denbighshire passes all the tests set by the Commission. It provides convenient and effective services throughout the county. The existing arrangement does not divide settlements. The current boundary can be identified and removing Llangollen and Llantysilio from Denbighshire would have a significant adverse impact on the remainder of the county. Denbighshire provide the full range of services to the town and do not experience, as an authority, any difficulty in providing these services. There are no special costs of service delivery to Llangollen which are not also true of other rural areas.
- Denbighshire has got well under way on its Objective 1 programme and has established a strategic partnership for Objective 1. This work has taken three years and is now producing good results. There is no doubt that creating another partnership with any other authority will cause considerable delays in project development in Llangollen. The Denbighshire partnership is leading the other local partnerships in Wales in delivering projects, business support schemes, grants for businesses, as well as major new tourism and marketing schemes which are now being implemented in Llangollen and the rest of Denbighshire. Denbighshire is now working on its 2006 European programmes. Long-term structures are in place in which Denbighshire have invested a lot of time, resources and energies.

5.5 **Mr I Miller, Chief Executive of Denbighshire County Council** made several points in writing concerning evidence which he felt gave a misleading impression, given at the Commission's Public Session:

The suggestion was made that residents of Llangollen and Llantysilio have to travel to Rhyl in order to receive services from the Council and also that decisions affecting Llangollen and Llantysilio are not made locally. He considered the true position to be as follows:

- Residents can contact council officials by telephone free of charge at the One Stop Shop.
- Cabinet meetings of the Council are held in Llangollen every two months. These meetings are open to the public and press.
- Full Council meetings are held in Ruthin not Rhyl. Llangollen is closer than Rhyl is to Ruthin. Therefore, decisions are taken closer to Llangollen than to Rhyl.
- Whilst Committees of the Council do not meet in Llangollen they are not all held in Rhyl. A large proportion are held in Ruthin.
- The Council have staff available for services that require face to face contact with residents of Llangollen in their homes. Services requiring individuals to travel to council offices are specialist services which only affect the minority of the population.

Concerning the point raised about cuts in services provided by the Conwy and Denbighshire NHS Trust he pointed out that as the proposed Local Health Boards are to be based on local authority boundaries then should the existing boundary be retained Llangollen GPs will come under the Denbighshire Local Health Board. The Boards will commission health services for people living in each local authority area. The services provided to Llangollen and Llantysilio residents from Wrexham Maelor Hospital are likely to continue whilst Local Health Boards for other areas such as Gwynedd will also commission services from this Hospital.

5.6 **Wrexham County Borough Council** made the following points in response to the Commission's Draft Proposals:

- The initial costs of administration for both Councils associated with the proposed change in the boundary would be minimal, short-term and more than offset in the medium term by economies of scale. There would be no detrimental affect to provision of services such as highway maintenance and social services in the event of a boundary change.
- Many representations submitted to the Commission express the view that Llangollen and Llantysilio suffer problems with local government services and County sports facilities and events due to their distance from Council offices north of the Horseshoe Pass.
- There is no reason why in the event of a change to the boundary the Youth Services in Corwen, if it were felt appropriate by Denbighshire, could not continue to be linked with the services in Llangollen by agreement.
- The assertion that Llangollen has more affinity with Denbighshire than Wrexham is not substantiated. Llangollen has great affinity with the Wrexham County Borough Council area from a tourism point of view.
- There are strong well-known links between Llangollen and the Welsh speaking areas of Wrexham, particularly those within the southern part of Wrexham. In addition to areas

such as the Ceiriog Valley, there are other more populous areas of Wrexham where the Welsh Language and culture is very strong, namely Rhosllannerchrugog. It is worthy of note that Wrexham's new Welsh Medium Secondary School, Ysgol Morgan Llwyd, is recognised as being one of the finest facilities for Welsh medium sector education up to the age of 18 in the whole of Wales.

- The significance of where individuals from Llangollen travel to work should not be overlooked. It is to the Wrexham area.
- The reference to links between Llangollen and the Shropshire border towns, seems to ignore the evidence which suggests that just like Llangollen, the border towns of Shropshire, such as Oswestry, look to Wrexham.
- In terms of geography and transport it is clear that the greater linkage is with Wrexham, rather than the northern parts of Denbighshire. Indeed, it could be said that there are few links with that part of Denbighshire to the north of the Horseshoe Pass, whereas there are links to most parts of Wrexham County Borough.
- The assertion that five small primary schools in the Llangollen Rural area were given notice in April 2001 of plans by Wrexham for closure is not true. Furthermore, the assertion that surplus secondary places in Wrexham would be filled with children from Llangollen is wrong and misleading.
- The assertion and impression given concerning Sixth Form provision in Wrexham is wrong. Wrexham has not restricted post 16 education to Yale College as has been suggested. Wrexham has not closed any Sixth Form provision and there is no foundation whatsoever to the assumption made that Sixth Form provision at Dinas Brân would remain under Denbighshire's plans but not under Wrexham's.
- The suggestion that there would be the possible loss of the option of Ysgol Dinas Brân for post 16 education is not accepted. Wrexham has three schools with post 16 education and has not closed any Sixth form provision. There is no evidence to suggest that Ysgol Dinas Brân would be treated any differently.
- The comments made concerning the possible savings in the area of school transport are misleading. Significant savings could accrue as a consequence of having a "single authority" approach to contracts. The Commission accepts that there is a problem caused by the distance travelled by pupils from Ysgol Dinas Brân taking part in inter-school and County based activities. However, even though it accepts that the problem could be solved it goes on to dismiss the issue as of no importance, the reason put forward being that pupils elsewhere "have to endure the same problems". This reasoning is not credible when considered within the context of the purpose of the report i.e. to consider what is effective and convenient for Llangollen and Llantysilio – not other parts of Wales.
- The report notes that the administrative arrangements and matched funding for Objective 1 projects is already in place within Denbighshire and that Wrexham would need to put them in place. However, to an extent the arrangements would be transferred with the Communities. It is wholly inappropriate to assume that this would have any detrimental effect on Llangollen.
- The suggestion that there may be additional administrative costs to Wrexham County Borough Council associated with Objective 1 is a minor issue. Wrexham already has a European Officer and several project officers involved in Objective 3, LEADER plus and the European Urban II Project etc. The County Borough has a strong and comprehensive European service which would be able to integrate and manage project work associated with Llangollen's Objective 1 status without difficulty.

- Objective 1 eligibility ends in 2006, this issue is therefore short-term and should not cloud a view as to what is in the long-term interests of Llangollen and Llantysilio.
- The point being made about the Dee Valley Area Partnership does not seem to argue for the retention of Llangollen within Denbighshire. Wrexham has a more substantial economic development function than Denbighshire County Council and does in fact run a Small Towns and Villages Initiative which now extends to the boundary with Llangollen with the inclusion of Llangollen Rural.
- A joint scheme exists for developing Llangollen and Wrexham supported by the Wales Tourist Board known as the Wrexham and Dee Valley (including Llangollen) Regional Tourism Growth Area. This is another example of the strong tourism and economic linkages between Wrexham and Llangollen and which has identified a single coherent marketable area as “Wrexham and the Dee Valley”.
- That a change in boundary would affect Denbighshire’s proposals for an Area Partnership on the Dee Valley needs to be set within the context of the partnership between Wrexham and Llangollen referred to above. There is also no reason why a cross-border Area Partnership could not work. The assertion that there could be an adverse economic affect on the development of the area is unfounded.
- It is of particular note that the Tourist Board have recently agreed to group Llangollen and Wrexham together under the Regional Tourism Growth Area initiative for joint promotion and joint investment.
- The suggestion that there would be initial costs for Denbighshire and Wrexham to cover changes to literature is equally invalid as literature is produced on an annual basis for the purpose of marketing and this is largely promoting the “Borderlands” of which Wrexham and Llangollen are a part.
- Reference is made to Llangollen and Llantysilio residents using the Wrexham leisure facilities because of their proximity and cost. The report suggests that the question of which Authority runs (existing) facilities is not a consideration. Surely this misses the point. Denbighshire has not provided facilities in the area whereas Wrexham has. In addition leisure facilities in Wrexham are “subsidised” and this might raise the issue of fairness with Llangollen residents paying for facilities that they do not use, whilst using subsidised facilities in Wrexham.
- The suggestion that ICT grants to libraries would be affected by a boundary change is considered erroneous.
- So far as the Corwen issue is concerned, boundary changes inevitably result in a transfer of staff and other resources which require authorities to reconsider service provision issues. However, it is equally possible that a review by Denbighshire following a boundary change, could see improvements to services in Corwen. Denbighshire has argued that for Llangollen the distance from North Denbighshire is not an issue in service delivery terms. Therefore, it should not be for Corwen.
- If Llantysilio and Llangollen remain in Denbighshire the Local Health Group will have to work with two Local Authorities - in respect of the whole of Wrexham and a small part of an area of Denbighshire. This will seriously hinder the strategic agenda associated with Social and Health care integration and co-ordination.
- The Police, the Court and the Health Services view Llangollen and Llantysilio as within the Wrexham area reflecting the natural linkages which occur on an everyday basis.
- Regarding crime and disorder issues, the assertion that “these functions are not carried out by the local government authorities” is evidence of an uninformed view and takes no account of the Council’s submission at Appendix 2, page 5, paragraph (e)(i) to the draft proposals report. Local Crime and Disorder Partnerships, within which local authorities

are key players, are the statutory bodies for co-ordinating crime reduction. Current arrangements mean that there is a "fault line" in the natural area for dealing with crime and disorder issues.

5.7 In a further representation **Wrexham County Borough Council** made the following points in order to address what they felt were inaccuracies and misrepresentations made at the Commission's Public Session at Llangollen Town Hall on 30 January 2002:

- The impression was given at the Session that Wrexham County Borough is a wholly urban authority. In fact over 75% of the authority's area is rural.
- The implication was made that Wrexham Council favoured its town centre at the expense of outlying areas. In fact the Council has made considerable investment in the rural areas and villages of the County Borough. It also supported the farmers during the foot and mouth crisis by establishing a farmer's market in the town centre. The Council's Rural Development Programme established specific schemes in rural villages. Major investment and regeneration activity has taken place in areas such as Rhosllannerchrugog and Cefn Mawr. The Council has been working incessantly since its inception to regenerate such areas.
- Criticism of the Council's Countryside Service was made during the Public Session. The Council refute this and consider that the reputation and delivery of their Countryside Service is of the highest standard. The Council are also leading a Joint Countryside Project (including Denbighshire) to provide customers with online details of countryside facilities.
- Reference was made to the disruption which would occur to Objective 1 schemes in the event of a change. However, the Council are well able to manage economic development and European projects because of their dedicated European and Rural Development Officers within the Economic Development Team whose experience and performance is second to none.
- Reference was made to Llangollen's Welsh culture being more in keeping with Denbighshire than Wrexham. However, this ignores Wrexham's Welsh culture and heritage and the support given by the Council to Welsh Medium Secondary Education. The claim that Welsh material was lacking in Wrexham libraries was also refuted by the Council. All libraries in the County Borough have Welsh material available with a comprehensive range of Welsh titles being acquired each year.
- The Council felt that unjustifiable indirect criticism was made of their Education Service including erroneous statements about school closures. No plans exist for any mergers or closures of primary schools in rural areas, although all education authorities have a duty to keep under review the provision and management of school places. Many council schools in rural areas have had extensive remodelling programmes collectively costing millions of pounds.
- It was insinuated that there are no sixth forms in Wrexham because of Yale College. In fact there are sixth forms in Ysgol Rhiwabon, The Maelor School, Penley and Ysgol Morgan Llwyd.
- City status, if granted, would not change the character of Wrexham County Borough and lead to urban spread as claimed at the Session.
- It was claimed that the wheelie bin system operated by Wrexham would not suit Llangollen because of the characteristics of its housing. However, such characteristics are not unique to Llangollen and can be found in areas of Wrexham where the wheelie bin system operates perfectly well. A survey has shown that the wheelie bin service is

valued more highly by residents who use it than the bin bag service which exists elsewhere.

- There appeared to be some confusion over the position regarding health issues. The Local Health Boards which are to be newly established will be responsible for establishing health care. It is understood that the Llangollen GP Practice have chosen to come under Wrexham.

5.8 **Llantysilio Community Council** felt that the services provided to their Community by Denbighshire County Council were adequate. They could see no benefit in the transfer of their Community to Wrexham.

5.9 **Denbigh Community Council, Corwen Community Council, Llandyrnog Community Council, Llanarmon Yn Iâl Community Council, Rhuddlan Town Council, Dyserth Community Council, Henllan Community Council, Ruthin Community Council, St Asaph Town Council, Tremeirchion Cwm & Waen Community Council, Llanrhaedr Y.C. Community Council, Cefn Meiriadog Community Council and Bodfari Community Council** supported the Commission's Draft proposals. They felt that transferring Llangollen to Wrexham would mean the loss of a valuable Denbighshire community, result in increased financial burden on the rest of Denbighshire and create uncertainty and instability.

5.10 **Martyn Jones MP** made the following points:

- effective and convenient local government can only be delivered from Wrexham. The cost to Denbighshire County Council of providing services at such a distance over such difficult terrain, over the Horseshoe Pass, cannot be economic or economically outweighed by Council Tax being paid in that area;
- discrete settlements of human habitation would be situated far more logically in one principal area;
- the geographical boundary of the Horseshoe Pass would be a very clear and identifiable physical feature between Llangollen and Denbighshire;
- given that the Commission's report suggests that there would be very little adverse effect on Denbighshire, for the draft proposal to find ultimate favour would be an unacceptable decision;
- The Justices' Clerk, the local doctors, local solicitors, the Member of Parliament for the area, the Assembly Member for the area, and the Assembly Member for Wrexham are all in favour of transferring Llangollen to Wrexham;
- the Commission's independent study showed that there would be no or very little disbenefit to either council if the change were to take place.

5.11 **Gareth Thomas MP** supported the Commission's Draft Proposals. He felt that the benefits of the proposed change did not outweigh the benefits of the existing arrangements when taking into account the cost of administering the change by the local authority. Retaining the existing boundary, whilst not an entirely expedient course, was justified by the weight of evidence. He felt that those advocating a change to the boundary had not made a persuasive case that would justify the disruption such a change would cause.

5.12 **Chris Ruane MP**, supported the Commission's Draft Proposals. He felt that there had been no convincing arguments put forward in favour of a change to the boundary and that the

detrimental effects of such a change on Denbighshire had been well documented and strongly expressed.

5.13 **Dr John Marek AM** said that he placed high value on the wishes of the local people affected. He believed that another poll should be held as the previous poll was not seen by some to be important or significant. He felt that should a further poll be held in which the result would be binding it would motivate every voter to take part. Another alternative would be to organise a public meeting where local people could give oral evidence. He did not consider the question of the cost of any change to be relevant since he felt that it was more important to do what was right for Llangollen. He believed that there would be considerable benefits for Llangollen if it were transferred to Wrexham as the two areas are linked economically and that the essentially tourist area of Llangollen would complement very well the industrial and commercial area of Wrexham.

5.14 **Karen Sinclair AM** made the following points concerning the Commission's Draft Proposals:

- Denbighshire would be viable without Llangollen and would be unlikely to face any increase in the Council Tax as a result of the Boundary change;
- The present boundary at Trevor is a natural break and historically the villages of Trevor, Froncysllte and Garth were previously known collectively within the old district of Glyndŵr as Llangollen Rural Community, also taking in the hamlets of Llantysilio and Pentredwr.
- The link identified between Llangollen and Corwen is a new link forged by the new Denbighshire County Council purely for delivery of services of the One Stop Shop. Pre 1974, Corwen was within the old Merioneth Council catchment and had little or no financial connection with Llangollen. The transfer of Llangollen to Wrexham would not be to the detriment of Corwen.
- The One Stop Shop has done little to alleviate the isolation from service providers in the Llangollen area and that the level of enquiries and complaints that went through her office specifically about problems within the area substantiated this.
- A large percentage of pupils attending Dinas Brân come from the abutting Wrexham County. If, due to the falling rolls with the secondary schools in Ruabon and Rhos, Wrexham were to redraw its catchment areas based on nearest schools rather than on traditional travel to school areas, Llangollen Schools would be decimated;
- Wrexham Council are equally committed to the provision of Welsh Medium Education as Denbighshire.
- The situation regarding Registrars (of births, marriages and deaths) is not a satisfactory arrangement especially in bad weather when the chances of the Horseshoe Pass road being closed are high, also it is not satisfactory for Llangollen to have to rely on a "visiting" registrar
- The proposed structural changes within the NHS will further compound the problems in Llangollen and Llantysilio. The new LHG's and LHB's will be based on county boundaries. The National Assembly's plans for reform are well advanced and she argued that the Commission is duty bound to pay due regard to these reforms.
- In respect of Objective 1 transfer, Wrexham would have no problem in working with these Structural Funds to the betterment of Llangollen.
- The Initial costs of a change to the boundary would be justified in view of the ease of long-term service delivery.

- 5.15 In a further representation **Karen Sinclair AM** expressed concern regarding the Commission's Public Session held at Llangollen Town Hall on 30 January 2002. She said she had been informed that the first two hours of the meeting had been taken up by officers and members of Denbighshire County Council, leaving only the last hour free for local people to give evidence. Some residents had also been intimidated by the format of the meeting and did not feel able to give evidence into a microphone in front of a hall full of people.
- 5.16 **Eleanor Burnham AM** said that she appreciated that the findings of the Commission's Draft Proposals were welcomed by Denbighshire County Council who valued the review as having a positive outcome.
- 5.17 **Alun Pugh AM** said that he agreed entirely with the conclusions of Denbighshire County Council and believed that his constituents in the Ruthin area would be adversely affected by the disruption caused by reorganisation after a change to the boundary.
- 5.18 **Chief Constable R Brunstrom, North Wales Police**, writing in his capacity as Chief Constable and as such responsible for operational deployment, said that North Wales Police have a policy of coterminosity with local authority boundaries. Llangollen is an anomaly to this policy as it is policed from outside its local authority area. This is the only anomaly of its kind within the North Wales Police Authority. He said that it was his intention that this anomaly be corrected after the Commission's review regardless of outcome. He did not agree with the argument that the Horseshoe Pass prevented an adequate service from the Central Division and said that Llangollen would receive a satisfactory police service, with the police boundary coterminous with the local authority boundary, whatever the outcome of the boundary review.
- 5.19 **The Head Teacher of a local school** made the following points:
- The school has just been provided with a high-quality teaching block with toilets and classrooms by Denbighshire and have been promised that that will be extended to provide 16 classrooms, which will give the children of Llangollen and the area the accommodation which they deserve.
 - Denbighshire provided the school with a sports hall which has enabled the school to be awarded a Sports Mark Award.
 - Denbighshire has improved the schools catering facilities.
 - The school has International Beacon status which it could not have without its links into ECTARC and into the International Eisteddfod.
 - The school has been granted a substantial sum of money from Denbighshire to build on the excellent work which is going on in the feeder junior schools. It has been designated bi-lingual and gives a full bi-lingual provision for local children.
- 5.20 **A Non-Executive Director of the Conwy and Denbighshire NHS Trust** made the following points:
- The Trust wish to retain the status quo and can see no advantage to a change in the boundary. Good health care should know no boundaries. In relation to secondary

health care, the people of Llangollen, the Dee Valley and Bala look to Wrexham and will continue to do so. The emergence of three trusts in North Wales has not changed that. Therefore, from the Trust's perspective there is no reason to change. The Trust has developed particularly good relationships with the Social Services Department of Denbighshire County Council.

- The Commission's Draft Proposals (page 6, bullet point number 9) state that: "Acute health care for Llangollen is provided by Wrexham Maelor Hospital" - "It is felt that GPs in Llangollen would support secondary health care being provided by the North East Wales NHT ..." The terminology of this statement should be looked at as "secondary" health care in modern parlance is "acute" health care. The non executive director was sure that GPs in Llangollen would not recognise that currently secondary health care is provided by North East Wales rather than Conwy and Denbigh.
- A change to the local authority boundary will be of no benefit as the commissioning of health care will be in the hands of local health groups but they will commission from the resource that is the most appropriate regardless of local authority boundaries.

5.21 **The Chief Executive of ECTARC** made the following points:

- Since 1996 Denbighshire County Council has provided ECTARC with the same support that was previously provided by the County of Clwyd. Without this support ECTARC would not have continued to function as a company.
- ECTARC has worked closely with departments and the specialist staff of Denbighshire in developing a number of inter-regional projects and is currently working with Denbighshire officers in progressing a range of proposals to access Objective 1 funding and to provide a range of services focused on business advice, youth and training and lifelong training for the Dee Valley area of the county.
- A change to a new host local authority would mean that ECTARC would have to re-create and redevelop those special relationships with the departments and the officers of a new authority which would inevitably lead to delay in realising many of the imminent Objective 1 and Leader II projects and proposals and thus jeopardise, certainly in the short to medium term, the programme funding and the forecasts of the company. ECTARC's business plan for the next three years would have to be rewritten, significantly amended, particularly in relation to those projects and proposals designed for South Denbighshire in general and the Dee Valley in particular.
- The resulting hiatus in ECTARC's work programme over the next two to three years could have significant financial consequences and the viability of ECTARC to continue in business during this period could be seriously compromised.

5.22 **A Health Professional and resident of Llangollen** said that when the health authority is abolished and local health boards are set up to commission health care, Llangollen could be disenfranchised by being part of Denbighshire when its health care is being delivered by Wrexham and Flintshire. These health boards will be drawn from the social services' and health personnel of the counties which they are commissioning for, and so the Maelor Hospital will be served by the health board drawn from Wrexham and Flintshire. If Llangollen remains in Denbighshire it will continue to receive acute services from Maelor Hospital but will have no influence in the development of services provided or any representation on the health board governing it.

5.23 **A local businessman** said both he and his company's employees were opposed to the transfer of Llangollen to Wrexham. He said that his company had benefited from Llangollen's Objective One status having secured funding and that the Company's success arising from this had in turn benefited the community. He felt this should not be put at risk by a change to the existing boundary.

5.24 **A Local Association Secretary of NASUWT** was opposed to the transfer of Llangollen to Wrexham. As Negotiating Secretary for NASUWT and member of the Denbighshire Teachers Joint Negotiating Committee (DTJNC) she felt able to make a judgement on the work of the local education authority. She found them to be receptive and constructive with genuine concern to make improvements to the conditions of service of her members. She stated that she would be concerned if Ysgol Dinas Brân was not able to benefit from the negotiations in which DTJNC had been involved to improve the educational opportunities of pupils in Denbighshire. As the representative of sixty members of NASUWT at Ysgol Dinas Brân she hoped to be able to continue to work with Denbighshire County Council.

5.25 **A former Headmaster of a local school** supported the transfer of Llangollen to Wrexham for the following reasons:

- Policing and Magistrates Court services are provided from Wrexham.
- Health and Ambulance services are provided from Wrexham.
- Llangollen's tourist industry is marketed by The Wales Tourist Board in Wrexham not by Denbighshire's Borderlands brochure.
- 70% of pupils at Ysgol Dinas Brân come from Wrexham schools. Further education, Secondary Welsh Medium education and Secondary Roman Catholic education for the area is almost all provided from Wrexham. School activities and staff training have high travel costs due to the distances involved in Denbighshire.
- Road repairs, maintenance and snow clearing in Llangollen are given low priority. Refuse is taken to Wrexham for disposal and the refuse lorry is garaged and serviced in Wrexham.
- Llangollen is included in the Clwyd South Parliamentary constituency linked with Wrexham not Denbighshire.
- The telephone code for Llangollen is the Wrexham code. The Llangollen postal address is Wrexham. Water is supplied by Dee Valley Water based in Wrexham.
- Many villages in Wrexham such as Cefnmawr, Acrefair and Llanarmon together with Llangollen Rural have close links with Llangollen and Wrexham for shopping, entertainment and recreation. Llangollen churches share clergy with Wrexham churches.
- The distance from Llangollen to Denbigh, Rhyl and Prestatyn is at least 24 miles whilst Wrexham is only 12 miles away. This means the cost of providing services to Llangollen from Denbighshire is more than it would be provide them from Wrexham.

5.26 Several **residents of Llangollen and neighbouring areas** made the following points supporting the transfer of Llangollen from Denbighshire to Wrexham:

- The cost of delivering services to the Town of Llangollen is felt to be a major issue. In view of Llangollen's geographic location and transport links the most cost effective services to residents would be provided by Wrexham County Borough Council.

- Llangollen is geographically much more closely linked to Wrexham County Borough than to Denbighshire; virtually all of Llangollen's natural links are towards Wrexham, Chirk and the Ceiriog Valley. There are more frequent public transport services with shorter journey times to Wrexham than to towns in Denbighshire such as Rhyl, Ruthin and Prestatyn etc. Wrexham is far easier to reach than Denbighshire by both private and public transport, especially during the winter when the Horseshoe Pass and road to Corwen are often cut off.
- Llangollen and Wrexham complement each other and have many strong connections whilst Llangollen's natural beauty and individuality would ensure that it was not swamped by Wrexham Town and would retain its rural identity.
- Llangollen residents regularly use Wrexham for shopping, employment and other public facilities such as the swimming pool. Llangollen residents rarely use facilities in Denbighshire due to the distance and travelling time involved.
- The long distances and poor road links between Llangollen and other towns in Denbighshire cause problems for school pupils travelling to county based inter-school events and extracurricular activities and result in high travel costs. This would not be a problem if Llangollen were transferred to Wrexham because of the good road links which exist between Llangollen and the Wrexham area.
- Residents are referred to the Wrexham Maelor Hospital for treatment and not to Bodelwyddan Hospital in Denbighshire and current arrangements for local health services such as the Llangollen GPs fall within the Wrexham Health Group. However, this may alter in the near future as current proposals being put in place by the National Assembly are for all health issues to be closely aligned with Social Services and kept within unitary authority boundaries. This would totally alter the service delivery for the people of Llangollen to their disadvantage.
- A large proportion of the pupils at Ysgol Dinas Brân are "bussed in" from villages that are now in the Wrexham County Borough area i.e. Froncysyllte, Trevor and Garth.
- Although Bryn Collen School has a special needs unit, it is only able to cope with children who have minor difficulties. The unit is unable to deal with children with serious learning difficulties resulting in parents of these children having to consider a special needs unit in Johnstown School, Wrexham.
- The argument that Denbighshire would suffer by the loss of council tax income had been refuted by the Commission's own independent report on the impact of the loss of Llangollen, which has shown that this is not the case. Denbighshire would be financially secure without Llangollen.
- Wrexham County Borough Council have an excellent record of using European funds and the suggestion that they would be unable to administer Llangollen's Objective 1 status is wrong.
- The way the referendum on the boundary review was conducted led to confusion and disinterest resulting in a low turnout. It was not advertised and no literature was produced by the local authorities.
- Llangollen would be the only major tourist town in Wrexham, whereas under Denbighshire it has to share the tourist budget with Rhyl, Prestatyn Ruthin, Denbigh and Rhuddlan.
- Denbighshire County Council have failed to maintain Plas Newydd and Riverside Park in Llangollen which are important tourist attractions. Several residents felt that Denbighshire County Council had failed to provide facilities for young people in Llangollen.

- The Home Care Service for the elderly in the Community of Llangollen has been seriously affected by the recent privatisation of the service by Denbighshire County Council; and
- Several residents felt that the Commission's Public Session had been inadequately publicised making it difficult for Wrexham supporters to organise themselves. They were also disappointed that many Llangollen residents were unable to speak due to the large number of Denbighshire County Council representatives present and the time they had taken giving their evidence.

5.27 Several **residents of Llangollen and neighbouring areas** made the following points opposing the transfer of Llangollen from Denbighshire to Wrexham:

- Wrexham is not the only town outside Denbighshire which is used for shopping by Llangollen residents - many travel to Oswestry, Chester and Shrewsbury for this purpose.
- Llangollen is situated at the boundary of Wrexham and Denbighshire and as such will always be on the periphery of whichever of these authorities it is in.
- Retaining Llangollen within Denbighshire would be in keeping with the result of the 2000 referendum which showed that the majority of residents were content to remain in Denbighshire. This democratic decision should be adhered to.
- Many residents expressed their satisfaction with the services delivered by Denbighshire County Council such as waste disposal, street cleaning, road maintenance, education and library services, health facilities, and maintenance of public areas. Denbighshire County Council have demonstrated that they are able to provide efficient and cost effective services to Llangollen and a change to the boundary would incur administration costs for both authorities.
- Wrexham County Borough Council has adopted the wheelie bin system of refuse collection which is unsuited to the small terraced houses and narrow pavements of Llangollen.
- The services provided by the One Stop Shop are effective and efficient. Residents can contact county departments and officers with speed and efficiency which means many residents can solve their problems without having to travel to council offices in Denbighshire.
- Llangollen residents have a good choice of sixth form opportunities for their children under Denbighshire. There are limited choices for sixth form opportunities outside of the town of Wrexham.
- Llangollen and Llantysilio are rural communities with strong cultural ties to the Upper Dee Valley and the rest of Denbighshire. Denbighshire County Council has considerable experience and expertise in dealing with the needs of rural communities.
- Denbighshire County Council's Countryside Service has a lot of local expertise to provide an excellent service to Llangollen.
- Wrexham has never had anything to do with the running of Llangollen. Prior to the formation of the unitary authorities Llangollen had been part of the Glyndŵr authority which had its headquarters in Ruthin.
- Wrexham County Borough Council is largely concerned with obtaining city status for Wrexham Town and as a result may not be able to allocate enough resources to Llangollen and Llantysilio should they be transferred.

- Denbighshire County Council are trying to have Llangollen designated an Area of Outstanding Natural Beauty (AONB) which will safeguard the area from being spoilt and will benefit the tourist industry.
- Llangollen is beginning to see the benefits of being an Objective 1 area under Denbighshire. Although Objective 1 money would move with Llangollen to Wrexham there is no infrastructure in place in Wrexham County Borough Council to deal with it. Putting the infrastructure in place in Wrexham would require time and resources to achieve something which already exists in Denbighshire.
- Denbighshire County Council have provided Llangollen with financial support and are striving to extend the economic activity of the town. A Small Towns and Villages Initiative (STVI) has been put in place to develop economic partnerships throughout the Dee Valley and provide grants for small businesses. If Llangollen were transferred to Wrexham it would have an adverse affect on the developing economic and tourism initiatives taking place in the Dee Valley through the STVI.
- Denbighshire Council have invested money in Llangollen including the new Welsh Unit at Bryn Collen School and have given financial support to the tourist industry during the Foot and Mouth crisis.
- A lot of local expertise has been built up by officers of Denbighshire County Council. Most of this will be lost if Llangollen were transferred to Wrexham Council, as many of these officers would remain with Denbighshire County Council.
- Denbighshire County Council have forged links with, are arranging funding for and working closely with, local groups. There is a projected refurbishment of the Riverside Park and a partnership has been forged between the Council the Pengwern Residents Association to improve and provide facilities for their estate.
- Denbighshire County Council now have the finances available to begin implementing the plans they have drawn up for the enhancement of Llangollen and Llantysilio. They have undertaken many conservation projects in the area such as the Old Chapel in Castle Street which it is planned to make the first cultural tourism centre in Denbigh. There is also an important on-going project with Plas Newydd Gardens.
- Denbighshire County Council have maintained that high level of commitment to the International Eisteddfod and are beginning to work out a strategy for developing the Eisteddfod Pavilion to ensure its long-term future and as a means of economic development in the town.

6. ASSESSMENT

- 6.1 In our Draft Proposals report we stated that having considered the initial representations made to us we concluded that the only change to be considered within the parameters of the review would be a change to the boundary to bring the Communities of Llangollen and Llantysilio within the area of the County Borough of Wrexham.
- 6.2 In order to comply with the direction at paragraph 3.3(c) above and indeed in the interests of convenient and effective local government, we are required to consider the effect of the proposed change upon the County of Denbighshire. We considered that in order to form an informed and independent view of this important issue, the services of an expert in local government finances should be employed by the Commission to conduct an investigation. The resultant report of this investigation, along with the report prepared by Denbighshire

County Council and a number of representations received with regard to this issue, were considered before we made our Draft Proposals.

- 6.3 Our detailed consideration of this issue was contained in section 5 of our Draft Proposals report. In the concluding paragraph of the section (5.24) we stated:

We are of the opinion that the effect of the transfer of Llangollen and Llantysilio in budgetary terms would not have a significant impact on Denbighshire County Council and that the Council would remain a viable Unitary Authority in terms of population, economies of scale and geographical area.

- 6.4 In response to our Draft Proposals, Denbighshire County Council maintained that there would be an adverse financial effect upon Denbighshire arising from the transfer. They considered that the latest SSA calculations confirm that there is now much more parity between the Council's spend and their SSA and that this gives no advantage to either the review area or the residue area. The Council have also provided further details of their central overheads in the Education budget which they maintain could not be reduced in the short to medium term. The Council have also drawn the Commission's attention to the problems relating to the demographic organisation of the Council's services which they considered a long-term issue that is not illustrated by the cost model.
- 6.5 Having given careful consideration to Denbighshire County Council's comments we are however, still of the opinion that the financial effect of a transfer would not have a significant impact on Denbighshire County Council.
- 6.6 In our Draft Proposals report, having concluded that the financial effect of the transfer would not have a significant impact on Denbighshire County Council, we turned to other factors which we considered to be significant in the consideration of the suggested change to the boundary in terms of its desirability in the interests of effective and convenient local government. Following the receipt of further information provided to us by those submitting representations, we have given further consideration of these factors.

Geography

- 6.7 In our Draft Proposals report we considered the points raised with regard to the position of Llangollen and Llantysilio in terms of the geography of the area and their relative proximity to areas of Denbighshire and Wrexham.
- 6.8 The representations in favour of the boundary change made the point that Llangollen is in the Dee Valley, which is separated from the Vale of Clwyd to the north and the administrative offices of Denbighshire County Council at Ruthin, Rhyl and Prestatyn by the Horseshoe Pass. The representations point to the good road connections and the regular and convenient public transport between Llangollen and Wrexham.
- 6.9 Those in favour of retaining the existing boundary consider that Llangollen and Llantysilio are rural areas that have much in common with the rural areas of Glyndyfrdwy, Carrog and Corwen further up the Dee Valley. They consider that the present boundary at Trevor is a natural break between Wrexham's urban conurbation and the rural Dee Valley.

- 6.10 In our Draft Proposals report we considered that Llangollen and Llantysilio are linked geographically both to parts of Wrexham and to other parts of Denbighshire. It is clear however, that those facilities generally related to larger urban areas (such as shopping centres, leisure facilities, etc.) are more accessible within Wrexham in comparison to other parts of Denbighshire.

History

- 6.11 A number of the representations suggest that Llangollen relates more to the present County of Wrexham rather than the present County of Denbighshire as almost all of the area encompassed by Wrexham County Borough was part of the old (pre 1974) Denbighshire County whereas Ruthin and Denbigh are the only large towns in the current Denbighshire County which were previously within the old County of Denbighshire. Before 1974 the Parishes of Llangollen Rural and Llantysilio were within the area of Wrexham Rural District Council.
- 6.12 It was also noted from the representations that, before the 1996 reorganisation of local government, Llangollen came under Glyndŵr District Council which had its headquarters in Ruthin. Denbighshire County Council have also pointed out that Llangollen and Llantysilio have never been part of an authority at district level that has included Wrexham Town.
- 6.13 It is clear that in local government terms, Llangollen and Llantysilio have historical links with both parts of the area that is now Denbighshire and parts of the area that is now Wrexham. We have noted however, that since 1974 there have been no local government links at district council level between Llangollen and Llantysilio and Wrexham.

Service Provision

- 6.14 In our Draft Proposals report we noted that a number of the representations in support of a boundary change pointed to the distances between Llangollen and Denbighshire's main Council offices in Ruthin, Rhyl and Prestatyn in comparison with the distance between Llangollen and Wrexham. The representations from Denbighshire County Council and others pointed out however that many of the local government services provided to Llangollen and Llantysilio are locally based. We noted that because of the topographic and demographic composition of the County, Denbighshire County Council had organised the provision of and access to local government services on a de-centralised model. We considered that this has meant that Llangollen and Llantysilio have not suffered any significant problems, in terms of local government services, due to their distance from the County Council offices in Denbighshire.

Economic Development

- 6.15 We confirmed in our Draft Proposals report that should the boundary change, Llangollen would retain its Objective One funding eligibility and that the obligation to provide match funding would transfer. Denbighshire County Council have made the point that Wrexham would need to set up the administrative and partnership structures for the Objective One projects and that the difficulties of this should not be understated.

- 6.16 Wrexham County Borough Council considered that the additional administrative costs associated with Objective One was a minor issue as they already have a European Officer and several project officers involved in Objective Three and other European funding arrangements. They pointed out that the Objective One issue is short-term as eligibility ends in 2006. Denbighshire County Council have however pointed out that there are both transitional and possibly continuation funding issues up to 2010 and beyond.
- 6.17 Llangollen and Llantysilio are included within Denbighshire's economic strategy for the Dee Valley area and the Council considers that a change to the boundary would have an adverse effect on the continuity of economic development of the area.
- 6.18 Wrexham County Borough Council also run a Small Towns and Villages Initiative which includes Llangollen Rural Community. In terms of the Dee Valley Area Partnership, they can see no reason why a cross-border Area Partnership could not work and therefore consider the assertion that there would be an adverse economic effect on the development of the area to be unfounded.
- 6.19 We consider that, provided the appropriate cross-border arrangements are put in place and maintained, a change to the boundary would not adversely affect the economic development of the area. We also consider however that even without changing the boundary such arrangements may be put in place to benefit the economic development of the general area that includes all of the Communities included in the directions for this review.

Education

- 6.20 In our Draft Proposals report we considered the representations we had received regarding the effect of a change to the boundary on the provision of education services to the area of Llangollen and Llantysilio. We identified inter-school activities and school transport as two areas which may be affected by a change to the boundary.
- 6.21 We have received a number of further representations concerning the general standards and range of education services and we are content that both Denbighshire and Wrexham have the necessary capability and willingness to ensure that these are maintained regardless of the outcome of this review.
- 6.22 In our Draft Proposals report (paragraph 7.22) we considered it likely that Wrexham County Borough Council would be required to continue with the provision of free school transport to Ysgol Dinas Brân from the areas where it currently provides transport and that the same would be true for Denbighshire County Council. We considered it unlikely therefore that there would be any savings made with regard to the provision of school transport as a result of a boundary change.
- 6.23 Wrexham County Borough Council in their representation consider this not to be correct as significant savings could be made as a consequence of having a 'single authority' approach to contracts. At present 60% of Ysgol Dinas Brân pupils live in the Wrexham county area with 39% living in Denbighshire (with 1% from other counties). A change to the boundary would result in 86% of the pupils living in Wrexham and only 13% living in Denbighshire. As a number of those pupils transferring to Wrexham are unlikely to be provided with free

school transport as they live within Llangollen, we are not sure how significant the suggested savings would be. We also consider that, if significant savings are to be made, then some form of joint working arrangement could be considered by the Councils regardless of the outcome of this review.

- 6.24 The problems caused by the distances travelled by pupils taking part in inter-school and county-based activities was considered in our Draft Proposals report (paragraph 7.23) and was raised again by Wrexham County Borough Council and others in subsequent representations. We sympathised with the difficulties faced by the parents and staff involved and accepted that these problems would be alleviated if the school were within the area administered by Wrexham County Borough Council. We consider that the problems relating to inter-school activities are separate from county-based activities. Prior to the 1996 local government changes, the inter-school activities would have been arranged in conjunction with convenient schools within the County of Clwyd. In effect this would have involved a number of schools that are now within the Wrexham County Borough area. The county-based activities would have taken place at various centres such as Wrexham, Deeside, Rhyl, Colwyn Bay etc. We consider therefore that the problems faced by Llangollen pupils of travelling long distances for county-based activities are of long-standing although we concede that with the smaller post-1996 counties, statistically more Llangollen pupils are now likely to take part in these activities. As regards inter-school activities we consider that the problems could be alleviated by a cross-border arrangement between Denbighshire and Wrexham.

Welsh Language

- 6.25 We consider the maintenance and development of a Welsh language based culture to be an important factor in the consideration of changes to local government areas. In our Draft Proposals report we considered that the language cultural profile of Llangollen/Llantysilio more closely fits that of Denbighshire, although we noted that there are areas of Wrexham, such as the Ceiriog Valley that have a similar profile to that of Llangollen/Llantysilio. We considered therefore that, provided that proper recognition is given to the development of the Welsh language in Llangollen and Llantysilio by Wrexham County Borough Council, a suggested change to the boundary need not have a detrimental effect.
- 6.26 In response, Denbighshire County Council stated that they considered the Commission's observations in the Draft Proposals report to be wrongly focussed in that comparisons between the extremes of the percentage of Welsh speakers in the Counties of Wales were not relevant when making a local comparison. They consider the fact that there is a substantially higher percentage of persons who speak the Welsh language in Denbighshire in comparison to Wrexham to be a significant issue.
- 6.27 Wrexham County Borough Council have asked the Commission to note that in addition to areas such as the Ceiriog Valley, there are other more populous areas of Wrexham where the Welsh Language and culture is very strong, namely Rhosllannerchrugog. The Council make the further point that students from Llangollen and Llantysilio who wish to be taught in the Welsh medium travel to Ysgol Morgan Llwyd a new Welsh Medium Secondary School which is recognised as being one of the finest facilities for Welsh medium sector education up to the age of 18 in the whole of Wales.

- 6.28 We have given careful consideration to all the representations who have made comments on the likely effects on the Welsh language based culture of Llangollen and Llantysilio and we maintain our position in our Draft Proposals report that a change to the boundary need not have a detrimental effect.

Registrars

- 6.29 A number of representations received at the initial stage of the review were concerned about the distances travelled to register births, marriages and deaths. We noted in our Draft Proposals report however that there is an arrangement whereby residents can make an appointment for a Registrar to visit Llangollen which we considered be an effective solution to the problem.
- 6.30 In response, Wrexham County Borough Council pointed out that two of the initial representations referred to the need to travel to Ruthin for this service and consider that this is evidence that the appointment arrangement is not working. They also pointed out that they currently provide a service to Chirk whereby the Registrar attends on 3 mornings each week and that a similar arrangement could be made for Llangollen.
- 6.31 In the recently published White Paper ‘civil registration: vital change’ are proposals for registration to be done over the telephone or over the Internet and that by using a central database, registration can be done from any office. The White Paper anticipates that many of these proposals will be in place by the end of 2005.
- 6.32 We consider that the solution of a visiting Registrar to be a generally effective solution to the problem of Llangollen and Llantysilio residents visiting the Registrar’s office in Ruthin although we note that some difficulties have been encountered with this system. We have noted the proposals for changes to the process of registration and consider that, in the long-term, these will provide a more comprehensive solution to the problem.

Leisure Facilities

- 6.33 In the initial representations we received, several residents of Llangollen and Llantysilio stated that where facilities do not exist in Llangollen (such as a swimming pool) they travel to facilities within Wrexham rather than making a longer journey to facilities in Denbighshire. In our Draft Proposals report we considered that residents’ use of leisure facilities are generally determined by proximity and cost and the question of which local authority runs the facility was not a consideration (unless a residents’ discount scheme applies). We stated that we were not aware that the numbers involved in the use of out-of county facilities are so significant that they constituted a problem in terms of effective and convenient local government.
- 6.34 In their response, Wrexham County Borough Council considered that the question of which local authority runs the leisure facilities was a consideration in that Wrexham have provided facilities in the area whereas Denbighshire have not. As the facilities in Wrexham are ‘subsidised’ this raises the issue of fairness with Llangollen residents paying for facilities they do not use whilst using subsidised facilities in Wrexham. They consider that a

boundary change could result in an improved complementary position rather than the retention of the current, competitive and uncoordinated approach.

- 6.35 Whilst we take the point that Wrexham have made, we again state that we are not aware that the numbers of Llangollen and Llantysilio residents using Wrexham's facilities constitute a significant problem. We are aware that the practice of using out-of-county facilities is not unique to the review area. Local examples of this practice are facilities such as the ice rink and Theatre Clwyd which are situated in Flintshire but are also used by residents of both Wrexham and Denbighshire. We are of the view that an improved complementary position in the provision and use of leisure facilities can be achieved by additional cooperation between the Councils without the need for to change the boundary.

Youth Services

- 6.36 In their initial representation, Denbighshire County Council considered that there would be greater isolation of Youth Services in Corwen as links to a network of Clubs and transport arrangements would be severed. In our Draft proposals report, we considered that the suggested boundary change would cause difficulties in the organisation of Youth Services in Corwen, certainly in the short term.
- 6.37 In their response, Wrexham County Borough Council considered that should the boundary be changed, the Youth Services in Corwen could still be linked to those in Llangollen by agreement between the two Councils. They consider that the totality of the services would benefit from links with other youth support in the southern part of Wrexham.
- 6.38 We are of the view that a change to the boundary need not be detrimental to the provision of Youth Services given the cooperation of the two Councils.

Library Services

- 6.39 In their initial representation, Denbighshire County Council informed the Commission that Corwen Library and One Stop Shop and Llangollen Library and One Stop Shop are linked for staffing purposes. The Council considered that diseconomies of scale would arise through the loss of Llangollen library.
- 6.40 In our Draft Proposals report we considered that the suggested change to the boundary would require Denbighshire County Council to review the staffing arrangements for Corwen Library and One Stop Shop and Wrexham County Borough Council would similarly review the administration of the Llangollen Library and One Stop Shop.
- 6.41 In their response, Wrexham County Borough Council considered the language of paragraphs 7.31 and 7.32 of our Draft proposals report to be negative in tone in that they considered that a review by Denbighshire following a boundary change could equally see improvements to services in Corwen.
- 6.42 The Commission did however take the view that there was some substance to Denbighshire County Council's concerns about this issue and that it was appropriate to draw attention to them. We note that Wrexham County Borough Council will be implementing changes in

response to e-government and the development of facilities and arrangements around the County Borough. This would, in their view, potentially assist in the administrative arrangements for Llangollen Library and One Stop Shop in the event of a boundary change.

- 6.43 We remain of the view that a change to the boundary would require Denbighshire County Council to reorganise the administrative arrangements in Corwen and Wrexham County Borough Council to consider the arrangements in Llangollen, either separately or as part of a wider consideration.

Tourism

- 6.44 In our Draft Proposals report, we noted that Tourism is an important economic activity for Llangollen and Llantysilio which is promoted both on a county basis and by the Borderlands initiative which is run jointly between Denbighshire, Flintshire and Wrexham. We considered that with the prominence Denbighshire has given to the Llangollen area in its tourism promotion, the suggested change to the boundary would cause an initial confusion of identity. We also considered that the change would involve initial costs for both Denbighshire and Wrexham to cover changes to literature and other administrative overheads.
- 6.45 In response, Wrexham County Borough Council disputed the view that the change in boundary would cause an initial confusion of identity. They pointed out that the Tourist Board have recently agreed to group Llangollen and Wrexham together under the Regional Tourism Growth Area initiative for joint promotion and joint investment. They also considered that the suggestion that there would be initial costs for Denbighshire and Wrexham to cover changes to literature was equally invalid as literature is produced on an annual basis for the purpose of marketing and this is largely promoting the “Borderlands” of which Wrexham and Llangollen are a part. In addition, they made the point that the Tourism Growth Area brings with it additional funding support from the Wales Tourist Board.
- 6.46 Denbighshire County Council, in their response, considered that our view that the suggested change to the boundary would cause an initial confusion of identity understates the case and insufficiently acknowledges that Llangollen is pivotal to the cultural tourism and economic base of Denbighshire. They considered that the promotion of tourism in Denbighshire is inseparably linked with the cultural development in Llangollen. They pointed to the planning and investment that has taken place to develop a Cultural Tourism Centre in Llangollen which will provide an integrated tourism, arts, countryside and learning centre that would signpost visitors to all cultural facilities within the county. The Council considered that Denbighshire's strength lies within the niche market of cultural tourism.
- 6.47 Having considered all the representations made by both authorities on this issue, we have come to the conclusion that a change to the boundary would have a significant effect on Denbighshire County Council’s cultural tourism initiative.

Public Support

- 6.48 In our Draft Proposals report we noted that the referendum in 1993 resulted in 58.7% of Llangollen residents voting to join Wrexham and the more recent referendum in May 2000

resulted in 50.7% voting against a boundary review. From the results of these referenda and from the representations we received from residents, we were of the view that opinion was divided as to whether Llangollen and Llantysilio should remain in Denbighshire or should be transferred to Wrexham. It was also evident to us that there is no convincing majority in favour of one option or the other. We were satisfied that no useful purpose would be served by a further referendum.

- 6.49 The further representations we have received and the views expressed at the public meeting in Llangollen have confirmed our view that local opinion is divided and that there is no decisive majority in favour of either to transfer to Wrexham or to remain in Denbighshire.

Health

- 6.50 In our Draft Proposals report, at paragraph 7.36, we discussed healthcare arrangements for the area. Several of the initial representations we received suggested that these existing arrangements perpetuate the split of healthcare provision and create a barrier to the development of effective and efficient services. In paragraphs 7.38 and 7.39 of our Draft Proposals report we considered the implications of the National Assembly consultation document entitled “Structural Change in the NHS in Wales”. We concluded, in paragraph 7.40 that there are issues for the longer term concerning the local healthcare services within Llangollen. We were of the view that the National Assembly’s reference in their consultation document to the question of coterminosity between health and local authority services may be of relevance to the local situation should this occur, but the timescales for such an event are beyond those of this Review.
- 6.51 Wrexham County Borough Council and others in their representations consider that it makes sense for service integration purposes for Llangollen and Llantysilio to be part of Wrexham County Borough, so that the intention to bring together the Health Care and Social Services boundaries, in a way which provides a continuous service to the public, can be effected in a rational manner.
- 6.52 Denbighshire County Council and others considered that the point concerning coterminosity and Health Service provision is over stated, as acute services provision has no particular relationship to local authority boundaries and the primary care that is provided locally will not change whatever the new administrative arrangements. The Council pointed out that there are examples across all unitary authorities in Wales where at their boundaries GP services are provided by GPs whose practices extend across Local Authority boundaries. They consider therefore that it would not be appropriate to base a decision on the transfer of local government areas on the coterminosity between Local Authorities and Local Health Boards.
- 6.53 We consider that whilst the coterminosity between Health boundaries and Local Authority boundaries may have advantages, it is not essential for the effective provision of Health or local government services. We consider that cross-boundary health issues can be effectively managed co-operatively by the bodies concerned and this should not be a determining factor in the consideration of local government boundaries.

Police, Fire, Ambulance and Courts

- 6.54 In our Draft Proposals report we stated that as these functions are not carried out by the local government authorities, the consideration of their organisation and operations are outside the remit of the Commission. In respect of the Police, we noted the comment of the Chief Constable of North Wales Police that it was his intention to correct the anomaly of Llangollen being policed from outside its local authority area. We also noted the point made by Wrexham County Borough Council that The National Assembly for Wales and Central Government is urging joined-up thinking and working between agencies and that it is therefore important that there is an alignment of boundaries wherever possible. We remain however of the view that whilst we take account of any advantages or disadvantages that may arise from a proposed rearrangement of the boundary these cannot be considered as primary reasons for change.

Conclusion

- 6.55 In our Draft Proposals report, having considered the issues relating to the consideration of the proposed change in terms of effective and convenient local government, it appeared, in most cases, to be finely balanced. Having given careful consideration to the representations received following the publication of our Draft Proposals we are still of that view. It remains our view that the perceived benefits of the proposed change do not outweigh the perceived benefits of the existing arrangements taking into account the costs that will be incurred by the councils in administering the change. We therefore confirm our Draft Proposals conclusion that we are unable to recommend a boundary change.
- 6.56 In considering the representations we have received, we have noted the strong feelings that have been expressed by those on both sides of the argument. A number of the comments made to us have been emotive and have expressed matters of opinion that were not substantiated by facts. We are grateful to both Denbighshire County Council and Wrexham County Borough Council for clarifying the facts behind a number of these issues.
- 6.57 We have received a number of comments in respect to the public session we held at Llangollen Town Hall on 30 January 2002 and would wish to take this opportunity to respond. Concerns were expressed that the session was not well publicised and that local people had little opportunity to speak. In terms of publicising the session we made efforts to ensure members of the public and interested parties were aware that it was being held and that they were welcome to attend. On the day the Commission made the decision to hold a public session a press notice was issued giving the information that the meeting would be held in Llangollen in January on a date to be announced. This was reported in the press. As soon as the arrangements for the public session had been made a further press statement was issued giving the date and time of the meeting and inviting interested parties to attend. This again was reported in the press. We also issued copies of a public notice to Llangollen Town Council and Llantysilio Community Council with a request that the meeting be publicised. Copies of the public notice were also sent to Denbighshire County Council, Wrexham County Borough Council and the Assembly Members and Members of Parliament for the area. Finally a further press notice was issued and an advertisement was placed in the local newspaper on the day before the meeting. In addition the details of the meeting were advertised on our web site. In the circumstances we are satisfied that we followed procedures that should have ensured that the public session was well publicised.

- 6.58 In respect of the criticisms of the speaking arrangements at the public session, as we could not anticipate how many people would wish to give evidence, the arrangement we made was to allow individuals to advise us of their intention to speak and we allocated a speaking number on a first come, first served basis. Those who spoke to us during this session were called on this basis and we also allowed written evidence to be given to us during the session and have allowed for those who were present to give further evidence in writing to us by 6th February 2002. We noted that there was some time left at the end of the session for further speakers if there had been anyone left wishing to speak. If there were individuals who felt that they were unable to give their evidence in public, they were offered the opportunity to send their observations in writing to the Commission and some residents took this opportunity. Moreover we believe that we would have attracted even greater criticism if the session had been held in private. In conclusion, we believe that we gave a reasonable opportunity for local residents to be heard.

7. PROPOSALS

- 7.1 We have undertaken the review in accordance with the directions issued by the National Assembly for Wales and having considered all the evidence available to us we have no proposals for changing the boundary between the County of Denbighshire and the County Borough of Wrexham in the area of the Communities of Llangollen and Llantysilio in the County of Denbighshire and the Communities of Penycae, Cefn, Llangollen Rural, Chirk, Glyntraian and Llansantffraid Glyn Ceiriog in the County Borough of Wrexham.

8. ACKNOWLEDGEMENTS

- 8.1 We wish to express our gratitude to the principal councils and all the community councils for their assistance during the course of the review and to all bodies and persons who made representations to us.

9. RESPONSES TO THIS REPORT

- 9.1 Having completed our review of part of the boundary between the County of Denbighshire and the County Borough of Wrexham in the area of The Communities of Llangollen and Llantysilio in the County of Denbighshire and the Communities of Penycae, Cefn, Llangollen Rural, Chirk, Glyntraian and Llansantffraid Glyn Ceiriog in the County Borough of Wrexham and submitted our recommendations to the National Assembly for Wales, we have fulfilled our statutory obligation under the directions issued by the National Assembly for Wales.
- 9.2 It now falls to the National Assembly for Wales, if it thinks fit, to implement them with or without modifications by means of an Order or to direct the Commission to conduct a further review. Such an Order will not be made earlier than a period of six weeks from the date that the Commission's recommendations are submitted to the National Assembly for Wales.

- 9.3 Any further representations concerning the matters in the report should be addressed to the National Assembly for Wales. They should be made as soon as possible, and in any event not later than six weeks from the date that the Commission's recommendations are submitted to the National Assembly for Wales. Representations should be addressed to:

Local Government Modernisation 2 Division
National Assembly for Wales
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MRS S G SMITH LLB (Chair)

J DAVIES ICSA IPFA (Deputy Chair)

D H ROBERTS BSc. DMS MBCS MIMgt (Member)

E H LEWIS BSc. DPM FRSA FCIPD (Secretary)

March 2002