

Philip Perry
The LGPS Pension Team
5/G6
Department of Communities and Local
Government
Eland House
Bressenden Place
London SW1E 5DU

Ask for: Alan South
Telephone: 01225 395283
Fax: 01225 395258
Email: alan_south@bathnes.gov.uk
Our ref.: Pens/AGS
Your ref.: Philip Perry
Date: 2 August 2013

Dear Philip,

**Local Government Pension Scheme Regulations 2013
Response to Consultation Letter 3rd Draft**

This is the response from Avon Pension Fund to the consultation document on the third draft of the benefit regulations issued in June 2013.

This part of the consultation again deals with the technical changes made to the draft regulations as a result of the initial consultations. It does however ask a number of specific questions and these have been considered and answered where appropriate.

The attached Annex 1 covers these questions and raises other issues that need considering.

It is still apparent even at draft 3 stage that adjustments are being made where it is not clear whether the result of the change is as intended or whether something has been missed out. Some of the notes lack clarity [e.g. see comment on Regulation 12].

As requested previously it would be useful to have some form of timescale of when other consultations are expected and the current expected date for actual regulations to be released.

The regulations are already several months overdue and it is extremely frustrating not having some indication of when DCLG expect the actual regulations to appear and what these will initially contain.

Avon Pension Fund will be making responses to both the governance consultation and the call for evidence in due course.

Yours sincerely

Alan South
Technical Manager
Avon Pension Fund