

P/CPO/HR

Paul Kirk
Local Government Pensions Division
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Mr M Woodall
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28 April 2004

Dear Mr Kirk

The Local Government Pension Scheme (Amendments) (Number 2) Regulations 2004
- Consultation Draft

I refer to your letter dated 31 March 2004 in which you seek comments on the above-mentioned Draft Regulations which will amend the Local Government Pension Scheme Regulations with effect from 1 April 2005.

I set out below this Fund's response to the proposed amendments.

1. We support raising the minimum age to qualify for an immediate payment of benefits, other than on the grounds of ill-health, from 50 to 55 years.
2. We support the withdrawal of the "85 year rule" and the proposal to increase the normal retirement date for all members to age 65.
3. We support the proposal to raise the earliest age for payment of deferred benefits to 55 with appropriate actuarial reductions for any benefits paid prior to achieving NRD.
4. We support the proposed transitional protections for those who will have achieved age 50 by 1 April 2005. We are, however, experiencing a significant volume of correspondence from Scheme members who will miss the protection by a matter of days and there seems to be some support for "stepping" arrangements.

I trust that you find the above-mentioned comments helpful and will assist you in determining the outcome of the consultation process.

Yours sincerely

Mike Woodall
Chief Pensions Officer

cfi: Brian Bailey Director for Finance and Physical Resources
Councillor T Singh Chair - Superannuation Committee
Councillor F Docherty Vice-Chair - Superannuation Committee
Mark Crutchley