



11 November 2013

Dear Sheila

Please find below the response from CEF to the consultation on the Local Government Reorganisation Bill. Please note that our comments are specifically restricted to those clauses dealing with the transfer of planning powers.

- **Clause 69 Community Planning**
CEF is seeking details of how community planning is to be implemented and under what circumstances. We would request clarification on how long term objectives for determining economic, social and environmental well-being will be identified.
- **Clause 70 Community Planning Partners**
 - CEF requires confirmation of which bodies will be identified by the Department as community planning partners of a council.
- **Clause 71 Production of Community Plan**
CEF proposes that the production of a community plan should be within a specific time period and not “as soon as is practicable” as this will allow too much potential for slippage.
- **Clauses 72 and 73 Review of Community Plan**
CEF fully supports the proposal that a community plan should be reviewed every four years. We also support the proposal to identify what actions are to be taken following a review.
- **Clause 74 Monitoring**
CEF fully supports the proposal to monitor progress made on meeting the community planning objectives at least every two years. This will avoid the risk of challenges that the plans are out of date and will reduce potential delays in processing planning applications that may need to take the community planning process into consideration.
- **Clause 92 Performance Indicators and Performance Standards**
CEF welcomes the provision to establish performance indicators but we feel that some form of remedy or sanction should also be available if a council consistently under performs.
- **Clauses 93 to 95 Improvement Planning**
The provision to collect and assess improvements or otherwise must be set against a robust time line in order to prevent consistent under performance from not being addressed quickly. Accountability needs to be introduced for any underperformance with suitable remedies or sanctions.
- **Clauses 107 and 109 Power of a Department seek reports and Intervene**
CEF fully supports the proposal to require councils to make reports on its activities if so directed by any Department and, if considered appropriate, such a Department has the right to intervene in the work of a council to ensure the proper discharge of its duties.

I trust you find this response helpful.

Yours sincerely
Nigel Lucas
Deputy Secretary