

**From:** Stephen Groome [REDACTED]  
**Sent:** 09 November 2017 17:24  
**To:** National Planning Framework  
**Subject:** Re: National Planning Framework Submission

To Whom it may concern,

In response to the draft National Planning Framework, I would like to raise a point around how the timescale of the making of development plans at present will align with the finalisation of the NPF.

Under the 2014 Local Government Reform Act, re-organisation of local government took place which saw the abolition of smaller urban authorities. However, as planning authorities, all had their own development plans which were reviewed according to their various 6 yearly cycles. These did not coincide with the life-cycles of the county development plans.

To enable the newly amalgamated local government units to adopt a coherent unitary development plan, the Electoral, Local Government and Planning and Development Act of the previous year (2013) had contained provisions for coordination. Planning authorities proposed for abolition or merger were given a discretionary power to extend the life of existing development plans until the reorganisation was complete and new regional planning guidelines were made. Then they could make a single plan for the entire functional area of the authority.

This type of approach would allow development plans align consistently with the NPF. We could end up putting the cart before the horse if development plans continue to follow the current Regional Planning Guidelines and the National Spatial Strategy, but I understand that is what the legislation requires at present.

As noted, the NPF is to be statutory and perhaps the act implementing it should contain a provision similar to the 2013 Act.

Regards,

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