# Appendix 6.4 p61-76

# Housing Sites in Villages – Bampton to Chawleigh

	Bampt	ton					Bickl eigh	Bow					Bradni nch	Burles combe	Butter leigh	Chawl	eigh
	Prefer	red Sites	3	Alterna	itive Site	!S	Alt.	Preferr	ed	Alterna	itive Si	ites	Pref.	Alt.	Alt	Pref.	Alt.
Sustainability objective	BA1: Newton Square	BA2: Scotts Quarry (Mixed use)	BA3: Ashleigh Park	South Molton Rd	Land at Ball Hill	Bourchier Close (Mixed use)	Land South of Glen View	BO1: Land adjacent to Hollywell	BO2: West of Godfrey Gardens	Land adjacent Bow Mill Lane	East Langford Farm	Land adjacent Jackman car park	BR1: Hele Road	Churchyard Field	North West of Homefield	CH1: Barton	Tower Meadow
Α	0	0	0	-1/?	0	0	0	0	0	0	0	0	0	0	0	0	0
В	0/?	0	0	0	0	0	0	0/?	0/?	0/?	- 1/?	-1/?	0/?	-1/?	0	0/?	-2/?
С	+1	+1	+1	+1	+1	+1	+1/?	+1	0	+1	+1	+1	0	+1	+1	+1	+1
D	+2	+2	-1	-1	0	-1	-1	-2	-1	-1	-2	-1	-1	-1	-2	-1	-1
Е	0	+2	0	0	0	+2	0	0	0	0	0	0	0	0	0	0	0
F	+2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+1	+1	+1	+2	+1	+2	+2	+1	+1	+2	+2	+2	+1	+1	+1	+2	+1
Н	0	0	0	0	-1	0	-1	0	+1	0	0	0	0	-1	-1	0	0
1	0	0	0	-1/?	0	0	0/?	0	0	0	0	0	0	0	-1	0	0

# Housing Sites in Villages – Cheriton Bishop to Culmstock

		Che	riton Bis	hop			Cher	iton Fitz	paine		Coleb rooke	Co	opplesto	ne		Culm	stock	
	Pref.		Alternat	ive Sites		Prefere	ed Sites	Alte	rnative S	Sites	Alt.	Pref.	Alteri	native	Prefe	erred	Alteri	native
Sustainability objective	CB1: Land off Church Lane	Cheriton Bishop Glebe	Land near the Church	Land adjacent Woodleigh Hall	Land east of Hill View	CF1: Barnshill Close	CF2: Land adjacent school	Cheriton Fitzpaine Glebe	Landboat Farm	Poole Barton	Colebrooke Glebe	CO1: The Old Abattoir	Land adjoining Dulings Meadow	Bewsley Farm	CL1: Linhay Close	CL2: Hunters Hill	Culmstock Glebe and Rackfields	The Croft
Α	0	0	0	-1	0	0	0	0	0	0	0	0	-1	0	0	0	0	-1
В	+1	0	0/?	-1	0	0	+1	0	0	0/?	0	0	0	0	0	0/?	0/?	0/?
С	+1/?	+1/?	+1/?	+1/?	+1	+1	+1	+1	+1/?	+1	+1	+3	+1	+1/?	+1	+1	+1	+1/?
D	-1	-1	-1	-1	-1	-1	-1	-2	-1	-1	-2	+2	-2	-1	-1	-1	-1	-1
Е	0	0	0	+1	0	0	0	0	0	0	0	0	+1	0	0	0	0	0
F	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+2	+2	+2	+3	+1	+1	+2	+2	+2	+2	+1	+2	+3	+2	+1	+1	+2	+2
Н	+2	0	0	-1	0	0	+1	-2	0	0	-2	0	-1	0	0	0	0	0
ı	0/?	0	0/?	0/?	0	0	0	0	0	0/?	-1/?	+2	0/?	0/?	0	0	0/?	0/?

# Housing Sites in Villages – Halberton to Newton St Cyres

	Halbe	erton			Hemyock	<		Kentis beare	Lap	ford	Mo	rchard Bis	hop	Nev	wton St C	yres
	Pref.	Alt.	Pref.		Alterna	tive Sites		Alt.	Alterr	native	Pref.	Alteri	native	Pref.	Alteri	native
Sustainability objective	HA1: Land adj Fishers Way	Land at Blundells Road	HE1: Depot	Land South West of Conigar Close	Culmbridge Farm	Land north of Culmbridge Farm	Land adj cemetery	Land by Kentisbeare Village Hall (Mixed use)	Land between the Primary School and the Church	Land South of Sandhurst	MO1: Greenaway	Tatepath Farm	Church Street	NE1: Court Orchard	Land west of Tytheing Close	Land east of Tytheing Close
Α	0	0	0/?	-1/?	-1/?	-1/?	-1/?	0	0	0	0	0	0	0	0	0
В	0/?	0/?	+1/?	0/?	0/?	0/?	0/?	0/?	0	0	0/?	-1	0/?	0/?	0/?	0/?
С	+1	+1/?	+1	+1/?	+1/?	+1	+1/?	+1	+2	+2/?	+1	+1	+1	+2	+2	+2
D	-2	-2	+1	-1	-1	-1	-1	-2	-1	-1	-1	-1	-1	-2	-2	-2
E	0	0	-1	0	0	0	+1	+2	0	0	0	0	0	0	0	0
F	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+1	+2	+1	+2	+2	+2	+3	+2	+2	+1	+2	+1	+2	+2	+2	+2
Н	0	0	0	0	0	0	-1	0	0	0	+1	0	-2	+2	0	0
I	0	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0	0	0	0/?	+2	0	0

# Housing Sites in Villages – Oakford to Silverton

	Oakford			Sampfor	d Peverell			Sand	lford	Shilling ford			Silverton		
	Alt.	Pref.		Al	ternative S	Sites		Pref.	Alt.	Alt.	Pr	ef.	Alt	ernative S	ites
Sustainability objective	Land at Oakford	SP1: Former Tiverton Parkway Hotel (Mixed use)	Higher Town	Land off Whitnage Road	Land at Mountain Oak Farm	Morrells Farm(Mixed use)	Morrells Farm adj the main road	SA1: Fannys Lane	Land at Sandford (west)	Land off Bowdens Lane	SI1: Land at Old Butterleigh Road	SI2: The Garage	Glebe	Livinghayes Road	East of Hederman Close
А	0	0	0	0	-1	-1	0	0	-1	0	0	0	0	0	0
В	0/?	0	0/?	0/?	0/?	-1/?	-2	0	0/?	0	0	-1	0/?	0	0
С	+1/?	+2	+2	+2/?	+2/?	+2/?	+2/?	+1	+1	+1	0	+1	+1/?	+1/?	+1/?
D	-1	+2	-2	-1	-1	-2	-1	-2	-2	-1	-2	+2	-2	-1	-2
Е	0	+1	0	0	+1	+3	0	0	0	0	0	0	0	0	0
F	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+1	+1	+2	+2	+3	+3	+2	+2	+2	+2	+1	+1	+2	+1	+2
Н	-1	+2	0	-1	-1	-1	0	0	0	-1	0	0	0	0	0
ı	-2	0	-1/?	0	0/?	0/?	0/?	0	0/?	-1	0	0	0/?	-2	0/?

# Housing in Villages – Thorverton to Yeoford, including Junction 27 adjoining Willand

	Thorvert on			Uffculme					Willand			Yeoford	J27 adj Willand
	Pref. Site		Al	ternative Sit	tes		Pref. Site		Alternat	ive Sites		Alt. Site	Alt. Site
Sustainability objective	TH1: South of Broadlands	Land adjoining Poynings	Land adjacent Sunnydene	Land off Chapel Hill	Land off Ashley Road	Land west of Uffculme	WI1: Land east of M5	Quicks Farm	Dean Hill Road	Land NE of Four Crosses Roundabout	Lloyd Maunder Way	Land off Lower Road	Land at M5 J27 and adj Willand
А	0	-1	0	0	0	0	0	0	-1	-1	0	0	-2/?
В	0/?	0	0	0	0	-2/?	0	0/?	-1	-1/?	-1	0/?	0/?
С	0	+1	+1	+1	+1	+1	+1	+1	+1	+1	+1	+2	0/?
D	-2	-1	-1	-1	-1/?	-1	-1	-1	-2	-1	-1	-1	-2
Е	0	0	0	0	0	0	0	0	0	+1	0	0	+1
F	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+1	+2	+1	+2	+2	+2	+2	+2	+2	+3	+2	+1	+3
Н	+1	0	?	0	0	-1	+1	0	0	-2	0	0	-2
I	0	0	-1	0/?	0/?	0	0/?	0	0	0/?	0	0	+2/?

# Commercial Sites in Villages including Junction 27 adjoining Willand site

	Bam	pton	Вс	)W	Hemyock	Kentisbeare	Sampford	l Peverell	Uffculme	Will	and	J27 adj Willand
	Preferred	Alt. Site	Alternat	ive Sites	Alt. Site	Alt. Site	Pref. Site	Alt. Site	Alt. Site	Pref. Site	Alt. Site	Alt. Site
Sustainability objective	BA2: Scotts Quarry (Mixed use)	Bourchier Close (Mixed use)	South of Iter Cross	South West of Junction Road	Brookridge Timber	Land by Kentisbeare Village Hall (Mixed use)	SP1: Former Tiverton Parkway Hotel (Mixed use)	Morrells Farm (Mixed use)	Hill Head Quarry	WI2: Willand Industrial Estate	Lloyd Maunder	Land at M5 J27 and adj Willand
А	0	0	0	0	-1	0	0	-1	0/?	0	0/?	-2/?
В	0	0	0/?	0/?	0	0/?	0	-1/?	-1/?	+1/?	0/?	0/?
С	+1	+1	+1	+1	-1	+1	+2	+2/?	-1	+1	0/?	0/?
D	+2	-1	-2	-2	+2	-2	+2	-2	-3/?	0	-1	-3/?
Е	+2	+2	+2	+2	+2	+2	+1	+3	+3	+3	+2	+3
F	0	0	0	0	0	0	0	0	0	0	0	-3/?
G	+1	+2	0	0	0	+2	+1	+3	+2	0	0	0
Н	0	0	0	0	-1	0	+2	-1	-1	0	0	+2
1	0	0	0	0	0	0/?	0	0/?	0/?	0	0	+2/?

### **Managing Development Policies**

Reasons for selecting development management policy alternatives

- 4.149 The Local Plan Part 3: Development Management Policies (LP3) formed the latest set of adopted development management policies and the baseline position for the Local Plan Review. The Scoping Report consultation recognised that these policies would be newly adopted as the Local Plan Review progressed and that only minor adjustments would be required to amend policies in response to updates to national policy or guidance and any lessons learnt through implementation. This approach was widely supported through consultation.
- 4.150 The Options Consultation took forward this approach but sought to predict where changes would be required. The most notable changes anticipated would be from the Department for Communities and Local Government (DCLG) consultation on the Housing Standards Review which could impact on a range of policies including; AL/IN/6 Carbon Footprint Reduction (Merton Rule), DM2 High Quality Design (Building for Life), DM3 Sustainable Design (Code for Sustainable Homes), DM14 Design of Housing (Lifetime Homes) and DM15 Dwelling Sizes. Policy DM5 Renewable and Low Carbon Energy would need to be revised to reflect the new Government guidance in July 2013. Amendments were also proposed for DM9 to be replaced by a new Rural Exception sites policy and AL/DE/7 to reflect planning policy for traveller sites. The NPPF introduces the new designation of Local Green Spaces which should be reflected in policy. Self-build or custom build housing was also expected to warrant a new policy. Minor changes to DM16 Town Centre development and DM18 Development outside town centres would be needed to reflect Bampton's proposed change in status from a town to a village.
- 4.151 Proposed changes in the options consultation alongside other consistency issues have been addressed in the Local Plan Review. The presumption in favour of sustainable development has been deleted as it is no longer required by the Planning Inspectorate. Policy on Sustainable Design has been deleted alongside the Building for life component of Policy High Quality Design in response to the Housing Standards Review proposed by national government. The policy on Waste Management has been deleted at the request of DCC as it is replicated at a higher level within the Devon Waste Plan. The policy on Renewable and Low Carbon energy has been revised. A policy for the cross subsidy of affordable housing on exception sites is deleted. Rural exception sites, now includes low-cost housing. Policy on the Design of Housing has removed lifetime homes standard. The policy on Dwelling Sizes has been amended to reflect national standards. Bampton has been removed as a town from policies on Town centre development and Development outside town centres. Policy on the Protection of recreational land and buildings has been revised to include the protection of Local Green Spaces and makes reference to the role of neighbourhood plans as an alternative route for designation. Policy on Green Infrastructure in Major Development has been revised to remove reference to open space provision which is now included in Policy S5 Public open spaces. Policy on Other protected sites has been revised to make reference to priority protected habitats defined by UK and Devon Biodiversity Action Plans.
- 4.152 The remaining DM policies have been taken forward largely unaltered with no strategic alternatives identified as policies have generally been developed to reflect the NPPF position, locally or are written to reflect the Local Plan Reviews supporting evidence base. Please note

that the numbering of policies in the Local Plan Review have changed from the Local Plan Part 3: Development Management Policies document due to deletions and amendments of policies during the Local Plan Review process. Please see Appendix 2 for a more detailed description of the assessments.

# **Managing Development Policies**

> Sustainability Objective	DM1: High quality design	DM2: Renewable and low carbon energy	OM3: Transport and air quality	The DM4: Pollution	O DM5: Parking	DM6: Rural exception sites	DM7: Gypsy and traveller accommodation	DM8: Rural workers' dwellings	DM9:Conversion of rural buildings	DM10: Replacement dwellings in rural areas	DM11: Residential extensions and ancillary development	DM12: Design of housing	DM13: Dwelling sizes	OM14: Town centre development	DM15: Development outside town centres	OM16: Fronts of shops and business premises	OM17: Rural shopping	DM18: Rural employment development	OM19: Protection of employment land	OM20: Agricultural development	DM21: Equestrian development	OM22: Tourism and leisure development	DM23: Community facilities	DM24: Protection of Local Green Space and recreational land/buildings	DM25: Development affecting Heritage Assets	DM26: Green infrastructure in major development	ည် DM27: Protected landscapes	DM28: Other protected sites	
В	+3	+2	0	0	0	0	-1	0	0	+2	0	+3	+1	+2	0	+2	0	0	-1	+2	0	0	0	0	+3	+1	+2	0	+
С	+3	+3	+2	0	0	0	+1	-1	-1	0	-1	+2	0	+2	+2	0	-1	-1	+2	-1	-1	-1	0	0	0	+2	-2	0	İ
D	+1	+3	0	0	0	0	0	-1	0	0	+1	+1	0	0	0	0	0	0	+2	0	0	+1	+2	+2	0	+2	0	0	Ī
Е	0	+1	0	0	0	0	+1	+2	0	0	+2	0	0	+2	+2	0	+2	+2	+2	+2	+2	+2	+1	0	+2	-1	+2	0	Ī
F	0	0	+2	+2	0	0	0	0	0	0	0	0	0	+2	+2	+1	+2	0	0	0	0	0	+1	0	0	0	0	0	
G	+2	0	0	0	0	+3	+2	+2	+2	+2	0	+3	+1	+2	0	0	0	0	0	0	0	0	-1	0	-1	-1	-1	0	
Н	+2	0	+2	+2	+1	+1	+2	+1	0	0	0	+2	+1	0	0	0	0	0	0	0	0	0	+2	+1	0	+2	0	0	
																													-

### 5 Monitoring

- 5.1 Monitoring is important to understand the characteristics of the local area, assess the impact of policies and determine whether the strategy is delivering sustainable development so that the policies can be reviewed as appropriate. The Local Plan Review contains local indicators and targets to measure the Council's performance against relevant policies and legislation as well as any significant environmental effects. The monitoring outcomes are reported annually in Mid Devon District Councils' Monitoring Report which provides information on the following matters:
  - Progress of local plans including the timetable for completion, stage reached and reasons for any delay;
  - Any local plans or supplementary planning documents that have been approved or adopted, including relevant dates;
  - Decisions not to implement any Local Plan Review policy including reasons and steps to implement the policy in the future;
  - The number of market and affordable dwellings built in the reporting period and since the relevant Local Plan Review policy target was introduced;
  - Any neighbourhood plans or development orders made in the district;
  - Progress on the implementation of the Community Infrastructure Levy, if any; and
  - Actions taken to ensure cooperation with other local authorities and prescribed organisations under the 'duty to cooperate'.
- 5.2 For convenience the Local Plan Review monitoring indicators, relevant policies and targets are reproduced in the table below.

#### **Monitoring indicators**

Indicator	Relevant	Target	Implementation	Comments
	Policies		Agencies	
Housing				
		I	1	
Housing	S2; S3; S4;	Annual	Development	
trajectory	S10; S11;	completions of	industry, MDDC	
showing net	S12; S13	360 dwellings		
additional				
dwellings from				
2013-2033				
Affordable	S1; S3	Annual average	MDDC, development	
housing		completions 100	industry, registered	
completions;		per year.	providers, Housing	
number of			and Communities	
dwellings			Agency	

Indicator	Relevant	Target	Implementation	Comments
	Policies		Agencies	
Affordable	S3; DM6	>50% affordable	MDDC, development	Proportion of market
housing on rural		housing	industry, registered	housing on rural
exception sites			providers, Housing	exception sites should
			and Communities	be lower than that of
			Agency	affordable housing.
Net additional	S3; DM7		MDDC	
gypsy and				
traveller pitches				
Self-build	S3	5% on sites of	MDDC, development	
completions		20+ dwellings	industry	
Sizes and types	S1; S3;	No target	MDDC, development	
of dwellings	DM13		industry	
completed				
Net density of	S9; DM1	None	MDDC, development	Policies do not set
new residential			industry	minimum housing
development				densities but promote
				the efficient and
				effective use of land.
Availability of	S3; S4	>105% housing	MDDC, development	Target applied to
land for housing		supply against	industry	whole district. Target
		requirement		will be revised to
				>120% if persistent
				under-delivery of
				housing is proven.
Development of	S3	>50% of	MDDC, development	
housing on	S4	completions	industry	
allocated sites	All housing			
	allocations			
Total amount	S1	No target	MDDC, development	
and percentage			industry	
of housing				
development				
(including				
conversions) on				
previously				
developed land.				
Number of	DM5	≥1.7 car parking	MDDC, development	
parking spaces		per dwelling	industry	
provided in new				
residential				
developments				

Indicator	Relevant Policies	Target	Implementation Agencies	Comments
Commercial		I	I	l
Total amount of additional commercial floorspace for the whole district and individually for Tiverton, Cullompton, Crediton and rural areas	S2; S6; S10; S11; S12; S13; DM14; DM15, DM18	Average annual completions (square metres) Mid Devon 7700 Tiverton 1540 Cullompton 3850 Crediton 770 Rural Areas 1540	MDDC, development industry	Monitoring reports will break down the provision of use classes A1-A5, B1-B8, C1-C2, D1-D2 and sui generis uses.
Development of employment on allocated sites	S6; All commercial allocations	>50% of completions	MDDC, development industry	
Losses of commercial land in local authority area	S6; DM14; DM15; DM19	No Target	Mid Devon District Council, development industry, businesses	Loss of commercial land will be broken down according to use class.
Number of active businesses	S1; S2; S6	Maintain or increase number of active businesses.	MDDC, Heart of the South West Local Enterprise Partnership, private sector	
Job Seekers Allowance as a proportion of working age population each April	S1; S6	Remain below regional average	MDDC, development industry, business sector	Gives indictor for deprivation and employment.
Total amount of floorspace for town centre uses, in total and within town centres (Classes A1, A2, B1a and D2)	S6; S7	No target	MDDC, development industry, retail business sector, leisure industry.	

Indicator	Relevant	Target	Implementation	Comments
	Policies		Agencies	
Total amount of	S6; DM14;	No target	Mid Devon District	To monitor edge-of-
floorspace for	DM15		Council,	centre and out-of-
town centre uses			development	centre development,
out of town			industry, retail	mainly retail.
centres (Classes			business sector,	
A1, A2, B1a and			leisure industry.	
D2)				
A1 shops in	S7; DM14	>65%	Mid Devon District	
primary shopping			Council,	
frontages.			development	
			industry, retailers	
Total amount	S1	No target	MDDC, development	
and percentage			industry	
of commercial				
floorspace on				
previously				
developed land.				
Infrastructure				
Community	S8	No target.	MDDC, development	
Infrastructure			industry	
Levy. Monitor				
annual receipt of				
CIL.				
Public open	S1; S5; S8	No target	MDDC, development	Policy S5 sets out
space provision			industry, town and	standards for open
and accessibililty.			parish councils, Sport	space provision.
Applications			England, private and	Smaller sites may
complying/failing			voluntary	provide financial
to comply with			organisations.	contributions in lieu of
quantity and				onsite open space,
access standards				with these funds being
in Policy S5				directed to the
·				provision or
				improvement of public
				open space elsewhere.
Strategic Housing	S3; S4; S6	To review	MDDC, development	
and Commercial	, ,	SHLAA/SCLAA	industry,	
Land Availability		when the Local	infrastructure	
Assessment		Plan is reviewed	providers	
	<u> </u>	1	<u> </u>	

Indicator	Relevant	Target	Implementation	Comments
	Policies		Agencies	
Services available in towns and rural areas	S8; S10; S11, S12; S13; S14	No reduction in services	MDDC, Devon County Council, other organisations	Services include: Public transport, educational facilities, convenience stores, community halls
Loss of community facilities  Environment	S1; DM23	No total loss in settlement	MDDC, development industry	
			ı	
Number of Conservation Area Appraisals and Conservation Area Management Plans	S9	1 new or updated CAA/MP per year	MDDC	
Habitat surveys (where applicable) for consented developments demonstrate no loss in biodiversity.	S1; S9	100%	Natural England, MDDC, development industry	No loss may be achieved through avoidance, mitigation and compensation of impacts.
Developments permitted on protected sites (habitats)	S1; S9; DM28	No target	MDDC, Natural England, development industry	Policy directs development away from protected sites subject to criteria, so the number of consents should be low.
Ecological status of water bodies	S1; S9; DM4	No target	MDDC, development industry, Environment Agency.	Target in South West River Basin Management Plan is to achieve good ecological status for water bodies and protected areas by 2015. The Environment Agency monitors water quality.

Indicator	Relevant	Target	Implementation	Comments
	Policies		Agencies	
Consented	S1; S9	No target	Mid Devon District	
renewable	DM2		Council,	
energy			development	
development by			industry.	
type and				
megawatts.				
Number of	DM25	No target	Mid Devon District	
heritage assets			Council,	
added to the			development	
local register			industry, English	
			Heritage	
Air Quality	S1; S11;	Reduction in air	MDDC, development	
Management	S12; DM3;	pollutants	industry, Devon	
Areas	DM4	within AQMAs	County Council,	
			Highways Agency	
Enforcement				
Number of	DM29	No target	MDDC	
planning				
enforcement				
cases, notices				
and prosecutions				

#### 6 Conclusions

- 6.1 The policies and site allocations in the Local Plan Review and the reasonable alternatives considered during its preparation have been subject to a detailed appraisal against the SA objectives which were developed at the scoping stage of the SA process. The SA has played an integral role in the development on the Local Plan Review. It has been used to consider the various strategic options and inform the most sustainable approach for the District. The SA has led to the refinement of policies to minimise adverse impacts and has ensured that sustainability issues for the District are addressed. The wording of the specific site policies seeks to ensure that a potential negative effects resulting from the development of sites is addressed at masterplanning and/or planning application stage. In general, the emerging Local Plan Review has been found to have a wide range of positive and significant positive effects on the objectives both cumulatively and through individual policies, although a number of potentially adverse impacts still remain. Recommendations made in previous iterations of the SA report and this proposed submission SA report has generally been thoroughly addressed, which has provided mitigation for potential adverse effects for both individual policies/proposals and the Local Plan Review as a whole.
- 6.2 The SA Report will be available for consultation alongside the new Local Plan Review Proposed Submission (February 2015). Following this consultation, all responses will be fully reviewed and addressed where appropriate. Depending on the extent of any changes made to the Local Plan Review, further SA work may need to be undertaken in relation to the Submission version. Any such SA work will either be presented in a SA note, as an addendum to this report, or an updated version of the whole report (depending on the scale of changes to the Local Plan Review). Monitoring will be used to assess both the positive and negative effects of implementing the Local Plan Review.