

21/00463/OUT

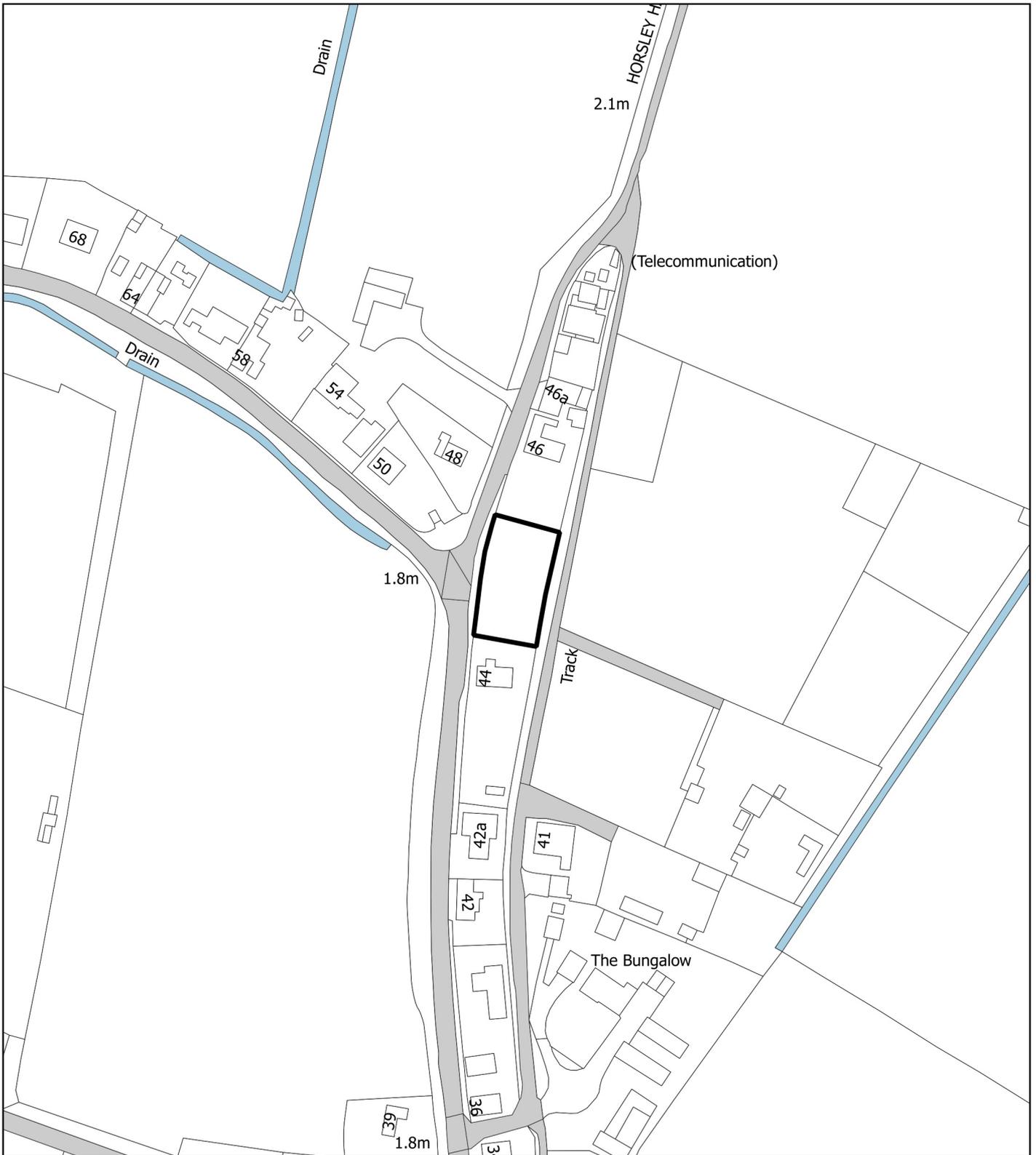
44 Camel Road
Littleport
Ely
Cambridgeshire
CB6 1PU

Outline application for 2no. detached dwellings

To view all of the public access documents relating to this application please use the following web address or scan the QR code:

<http://pa.eastcambs.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QQFI2TGG0CT00>





21/00463/OUT

44 Camel Road
Littleport



East Cambridgeshire
District Council

Date: 17/08/2021
Scale: 1:1,750



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MAIN CASE

Reference No: 21/00463/OUT

Proposal: Outline application for 2no. detached dwellings

Site Address: 44 Camel Road Littleport Ely Cambridgeshire CB6 1PU

Applicant: Mr Ian Clarey

Case Officer: Emma Barral Planning Officer

Parish: Littleport

Ward: Littleport
Ward Councillor/s: Christine Ambrose-Smith
David Ambrose-Smith
Jo Webber

Date Received: 23 March 2021 **Expiry Date:** 14th July 2021
Report Number W60

1.0 RECOMMENDATION

1.1 Members are recommended to **REFUSE** the application for the following reasons:

1. The proposed development is situated outside of the development envelope and is not an allocated site or an affordable housing exception site; on this basis fails to comply with policy GROWTH 2 of the East Cambridgeshire Local Plan, 2015 which restricts development outside of the defined development envelopes and does not meet any of the defined exceptions within that policy.

2. The proposed development is located in Flood Zones 2 and 3 and falls outside of the development envelope. The proposed dwellings are considered to be 'more vulnerable' for the purposes of Annex 3 'Flood risk vulnerability classification' of the NPPF 2021, and the Applicant has not submitted a Flood Risk Assessment with the application to demonstrate the acceptability of the proposals with regard to flood risk. Given their location within a flood zone and outside of the development envelope, and the absence of an FRA, the proposals are considered to fail both the sequential and the exception tests, and would be contrary to Policy ENV 8 of the ECDC Local Plan 2015 and the requirements of chapter 14 of the NPPF, which requires that all development contributes to an overall flood risk reduction.

2.0 SUMMARY OF APPLICATION

- 2.1 The application submitted relates to an Outline Planning Application with all matters reserved apart from layout for the construction of two dwellinghouses with 2 car parking spaces each and rear garden areas on the vacant parcel of land (garden land) to the north of Number 44 Camel Road and to the south of Number 46 Camel Road.
- 2.2 The application has been called to Planning Committee by Councillor David Ambrose Smith for the following reason- "I would like to 'Call In' this application for consideration by the planning committee. On the grounds that the site is on a broken boundary of the development envelope".
- 2.3 The full planning application, plans and documents submitted by the Applicant can be viewed online via East Cambridgeshire District Council's Public Access online service, via the following link <http://pa.eastcambs.gov.uk/online-applications/>.

3.0 PLANNING HISTORY

- 3.1 There is no relevant planning history associated with the application site.

4.0 THE SITE AND ITS ENVIRONMENT

- 4.1 The application site is located on the corner with Camel Road and Horsley Hale to the eastern wide of these public highways. The site consists of a vacant parcel of land to the north of Number 44 Camel Road and to the south of Number 46 Camel Road and has several kennels/sheds that are proposed to be removed on the southern edge of the application site. The application site is described as garden land to serve Number 44 Camel Road on the submitted application forms, and this was confirmed during the site visit. The application site is located outside the development envelope of Littleport due to a gap retained by the East Cambridgeshire Local Plan 2015 policies map. The extent of the development envelope finishes on the northern edge of the plot known as Number 44 Camel Road and continues on the western side of Camel Road and Horsley Hale to the north-west of the application site and includes Number 48 and 50 Camel Road. Numbers 45, 46a and 46b to the north of the application site also lie outside the development envelope. An extract from the East Cambridgeshire Local Plan 2015 policies map is given below for reference.

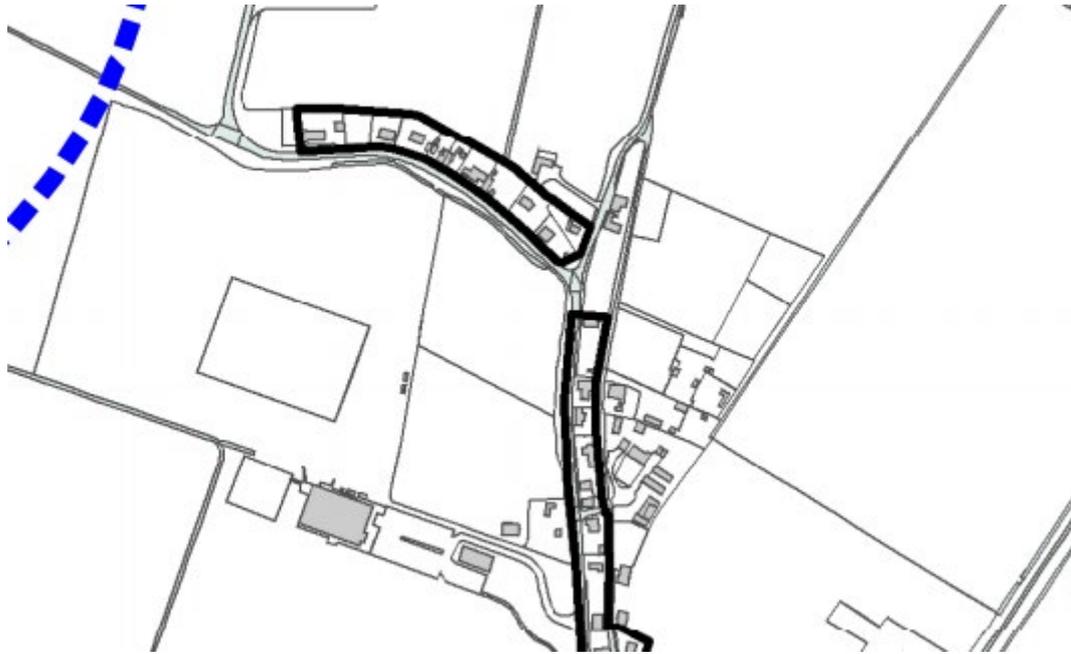


Figure 1 East Cambridgeshire Local Plan 2015 policies map (Littleport)

5.0 RESPONSES FROM CONSULTEES

5.1 Responses were received from the following consultees and these are summarised below. The full responses are available on the Council's web site.

Environmental Health - 30 March 2021- "Under section 14 of the Application Form the applicant has indicated 'no' in the 'proposed use that would be particularly vulnerable to the presence of contamination' box. As any residential property is classed as vulnerable to the presence of contamination I advise that contaminated land conditions 1 and 4, requiring an appropriate contamination assessment, to be attached to any planning permission granted.

In addition, due to the proposed number of dwellings and the close proximity of existing properties I would advise that construction times and deliveries during the construction phase are restricted to the following:

07:30 - 18:00 each day Monday - Friday
07:30 - 13:00 on Saturdays and
None on Sundays or Bank Holidays

If it is necessary to undertake ground piling I would request that a method statement be produced and agreed in writing with the Local Planning Authority (LPA) before work takes place. If there is no intention to utilise ground piling then I would request this be confirmed in writing and a condition which prevents it be attached until such time as a ground piling method statement is agreed with the LPA.

I note the planning permission for a silica sand arena to the site adjacent to this application (20/01463/FUL). Condition 5 of 20/01463/FUL prevents the installation of any external lighting without permission from the LA which means I will have no concerns to raise at this time.

No other comments to make at this time but please send out the environmental notes”.

Littleport Parish Council - 7 April 2021- “Concern expressed about access and egress from the parking spaces. Would prefer that a turning circle be included in the plan”.

Ward Councillor - Cllr. David Ambrose Smith – 01 June 2021

See above for call-in details

The Ely Group Of Internal Drainage Board - 12 April 2021- “The application states that surface water will be disposed of via soakaways. Provided that soakaways form an effective means of surface water disposal in this area, the Board will not object to this application. It is essential that any proposed soakaways does not cause flooding to neighbouring land. If soakaways are found not to be an effective means of surface water disposal, the Board must be re-consulted in this matter, as the applicant would need the consent of the Board to discharge into any watercourse within the District. If the proposed sewage treatment plant discharges into a watercourse, the consent of the Board is required”.

Waste Strategy (ECDC) - 20 April 2021-

- East Cambs District Council will not enter private property to collect waste or recycling, therefore it would be the responsibility of the owners/residents to take any sacks/bins to the public highway boundary on the relevant collection day and this should be made clear to any prospective purchasers in advance, this is especially the case where bins would need to be moved over long distances; the RECAP Waste Management Design Guide defines the maximum distance a resident should have to take a wheeled bin to the collection point as 30 metres (assuming a level smooth surface).
- Under Section 46 of The Environmental Protection Act 1990, East Cambridgeshire District Council as a Waste Collection Authority is permitted to make a charge for the provision of waste collection receptacles, this power being re-enforced in the Local Government Acts of 1972, 2000, and 2003, as well as the Localism Act of 2011.
- Each new property requires two bins; this contribution is currently set at £52 per property.
- Payment must be made in advance of bins being delivered; East Cambs District Council Account Number 43135897, Sort Code 52-41-19, reference should be the planning application number followed by (bins) i.e. 15/012345/FUL (bins) a separate e-mail should also be sent to waste@eastcambs.gov.uk detailing the payment amount and the planning reference number.

Local Highways Authority - 21 May 2021- “Subject to the following comments and recommendations: I have no objections. While this is an outline application for layout alone, this will have a clear influence on access arrangements for this site. I note that the northern driveway would access onto the unclassified Horsley Hale,

while the southern access joins Camel Road which is a C classified road, with both roads having a 30mph speed limit.

While I have some reservations regarding reversing onto the highway at this location, I note that this situation is not uncommon locally, with no history of recorded injury accidents. I also note that the Horsley Hale junction is lightly trafficked and that sight stopping distance across the bend to the southern access appears to be adequate for the posted speed limit. While I consider that turning within the southern plot would be beneficial, I have no objection to the layout proposed. The vehicular access from the existing carriageway edge within the public highway must be constructed in accordance with Cambridgeshire County Councils Housing Estate Road construction specification (HERCS) and should include the provision of a metalled/sealed surface within the site, for a minimum length of 5m from the existing carriageway edge. Both accesses should be ungated to prevent vehicles dwelling in the highway, unless the layout is amended to enable gates to be set back a minimum of 5m from the carriageway edge, with the gate set to swing clear of any parking areas.

In their full response, the LHA recommend conditions relating to the provision of further access details; closure of the existing access; restriction on the location of gates; provision of parking/serving/turning areas; and access drainage

In discussion with the LHA on the 17th August 2021, it was also confirmed that any future vehicular and pedestrian accesses serving the site could be constructed solely within highways owned land. The highway boundary extends up to the site's western boundary, and the LHA were content that any access points to serve the site could be constructed under separate highway legislation.

CCC Growth & Development - No Comments Received

- 5.2 A site notice was displayed near the site on 23 April 2021. A second site notice was displayed near the site on the 8th July 2021, advertising that the development proposals represented a departure from the ECDC Local Plan 2015. A press notice was published in the Cambridgeshire Evening News on the 1st July 2021.
- 5.3 Neighbours – Three neighbouring properties were notified, however no responses were received during the consultation process.

6.0 The Planning Policy Context

East Cambridgeshire Local Plan 2015

GROWTH 2	Locational strategy
GROWTH 3	Infrastructure requirements
GROWTH 5	Presumption in favour of sustainable development
HOU 2	Housing density
ENV 1	Landscape and settlement character
ENV 2	Design
ENV 4	Energy efficiency and renewable energy in construction
ENV 7	Biodiversity and geology
ENV 8	Flood risk

ENV 9	Pollution
COM 7	Transport impact
COM 8	Parking provision

Supplementary Planning Documents

Developer Contributions and Planning Obligations

Design Guide

Contaminated Land - Guidance on submitted Planning Application on land that may be contaminated

Flood and Water

Natural Environment

Climate Change

National Planning Policy Framework 2021

- 2 Achieving sustainable development
- 4 Decision-making
- 5 Delivering a sufficient supply of homes
- 9 Promoting sustainable transport
- 11 Making effective use of land
- 12 Achieving well-designed places
- 14 Meeting the challenge of climate change, flooding and coastal change
- 15 Conserving and enhancing the natural environment
- 16 Conserving & enhancing the historic environment

7.0 PLANNING COMMENTS

- 7.1 The main issues to consider in the determination of this application are the principle of development, the impact it may have on the residential amenity of nearby occupiers and the impact it may have on the visual appearance, parking provision, drainage and flood risk, biodiversity and climate change.
- 7.2 Principle of Development
- 7.3 The site is not within an established development envelope of Littleport and Local Plan policy GROWTH 2 restricts market housing in such locations. Since April 2020 the Council has been able to demonstrate an adequate 5 Year Housing Land Supply, as demonstrated first in its *Five Year Land Supply Report - 1 April 2019 to 31 March 2024* (published April 2020) and later in its updated *Five Year Land Supply Report - 1 April 2020 to 31 March 2025* (published December 2020). The latter report confirmed that from 1 January 2021 the Council had a 6.14 year supply of deliverable housing land. That calculation included a 20% buffer as required by paragraph 73 of the NPPF based on a 2019 Housing Delivery Test (HDT) result of 66%.
- 7.4 The 2020 HDT result (published in January 2021) indicates that housing delivery in the district has improved to 87%. As a result of the HDT exceeding 85%, the appropriate paragraph 73 buffer falls to 5% which has the effect of increasing the Council's housing land supply to 7.01 years. This adequate housing land supply

means that the Council considers its policies relating to housing delivery up-to-date and gives them full weight in the determination of this application.

- 7.5 The application site is located outside the development envelope of Littleport. Policy GROWTH2 states that the majority of development will be focused on the market towns of Ely, Soham and Littleport. Ely is the most significant service and population centre in the district, and will be a key focus for housing, employment and retail growth. More limited development will take place in villages which have a defined development envelope, thereby helping to support local services, shops and community needs. Policy GROWTH2 also states that outside defined development envelopes, development will be strictly controlled, having regard to the need to protect the countryside and the setting of towns and villages. Development will be restricted outside of development envelopes, and will only be permitted as an exception, providing there is no significant adverse impact on the character of the countryside and that other Local Plan policies are satisfied. The proposed development does not meet any of the identified exceptions, as stated in GROWTH 2, and therefore the development is unacceptable in principle. It is therefore considered that the proposed development would be contrary to policy GROWTH 2 of the East Cambridgeshire Local Plan and is unacceptable in principle.
- 7.6 Visual Amenity
- 7.7 Policy ENV2 of the East Cambridgeshire Local Plan 2015 requires that all development proposals are designed to a high quality, enhancing and complementing local distinctiveness and public amenity by relating well to existing features and introducing appropriate new designs. Additionally, Policy ENV2 of the East Cambridgeshire Local Plan 2015 makes it clear that all new development proposals will be expected to respect the density and character of the surrounding area, whilst ensuring that the location, layout, scale, form, massing, materials and colour of buildings relate sympathetically to the surrounding area and each other, as well as creating quality new schemes in their own right. Furthermore, the East Cambridgeshire Design Guide Supplementary Planning Document 2012 states that, in most cases, building plots should be approximately 300 square metres (c.3229sqft), the footprint of any proposed development should be no more than approximately one third of the plot size and rear private amenity space should be 50sqm (c.538sqft).
- 7.8 The details of scale, access, landscape and appearance have not been submitted as part of the outline application and would be considered at the Reserved Matters stage. On review of the submitted block plan that shows the proposed layout, the plots appear to be approximately 400sqm (4306sqft) with approximately 120sqm (1292sqft) of rear amenity space per dwellinghouse. Therefore, the extent of the proposed plot sizes and rear private amenity space is sufficient to comply with the requirements of the Design Guide SPD.
- 7.9 The full details of the visual appearance have not been included within the application and would need to be assessed at reserved matters stage, although the scale of the dwellings proposed has been shown indicatively as chalet bungalows. The scale and design of existing development along Camel Road and Horsley Hale is varied, and it is considered that two dwellings could be satisfactorily

accommodated on the site without being visually intrusive. There are other residential dwellings directly to the north and south of the application plot, which provide a context against which any prospective dwellings would be seen. Given the location of the development proposals within Flood Zone 2 and 3, it is also considered very unlikely that a single-storey dwelling would be acceptable within the site in terms of providing no means of escape in a flood event.

- 7.10 At this stage, the proposals are therefore considered to be in accordance with Policies ENV1 and ENV2 of the East Cambridgeshire District Council's adopted Local Plan 2015, which requires all developments to be of high quality design and be sympathetic to, and respect the distinctive character of the area, although this would be assessed fully once details of all of the matters have been submitted, with regard to their location and scale.
- 7.11 Residential Amenity
- 7.12 Although matters of appearance and scale are not being considered as part of this application, there is sufficient room within the site, and sufficient separation from neighbouring dwellings, to accommodate 2 dwellings with a high standard of amenity whilst ensuring there is no significant detrimental harm caused to the amenity of neighbouring properties. The proposed dwellinghouses are shown indicatively to be chalet style dwellinghouses and would therefore not be significantly taller than Number 46 Camel Road to the north, which is a two storey dwellinghouse. Number 44 Camel Road to the south is a bungalow, however the submitted layout proposes a gap of 7 metres (c.23 feet) to the common boundary with this neighbouring dwellinghouse, and given its orientation to the south of the proposed plots, no harmful overlooking or overshadowing would occur if dwellings with a modest height are submitted at reserved matters stage.
- 7.13 There is more than sufficient distance between the indicative footprint of the proposed dwelling and the neighbouring properties to the north and south of the application plot. These distances are considered sufficient to prevent overlooking or overshadowing impacts to neighbouring occupiers and it has been demonstrated that there is sufficient room to confirm the layout is acceptable. The full impact of the proposed dwellings on the residential amenity of nearby occupiers would be assessed at reserved matters stage once all of the details are submitted.
- 7.14 The proposed dwellings themselves are proposed to be sited parallel to one another with a c.2.5 metre (c.8 feet) separation distance between them. The proposed dwellings are also shown indicatively to both be chalet-bungalows in their style and scale. Whilst the residential amenity impacts of the proposed dwellings upon one another would be assessed in detail at the reserved matters stage, at this stage it is considered that, with appropriate fenestration arrangement, the proposed dwellings could be constructed within the site so as to provide a high level of residential amenity for prospective occupiers of the dwellings. The indicatively shown rear dormer windows within the proposed dwellings would likely give rise to a small degree of overlooking to the rear gardens of each of the proposed dwellings, but this is not considered to be uncommon or significantly harmful to warrant concern, and is often accepted in residential areas. For these reasons, it is considered that the proposed dwellings could be constructed without giving rise to overlooking, overshadowing, overbearing, loss of light or loss of privacy to one

another, and could be designed so as to provide a high level of internal amenity for prospective occupiers also.

7.15 The Environmental Health Officer has also requested that conditions be imposed upon any consent with regard to construction hours and ground piling, in the interests of residential amenity. It is considered that these measures would further protect the residential amenity of existing surrounding occupiers should consent be granted for the construction of the proposed dwellings.

7.16 It is therefore considered that the proposed development would provide acceptable residential amenity impacts which accord with policy ENV2 of the East Cambridgeshire Local Plan 2015 although this would be assessed fully once details of all of the matters have been submitted.

7.17 Highway Safety

The proposed development would create new vehicular access(es) on to the corner of Camel Road and Horsley Hale. While access is currently not a matter being considered, the Local Highway Authority has stated that:

“while this is an outline application for layout alone, this will have a clear influence on access arrangements for this site. I note that the northern driveway would access onto the unclassified Horsley Hale, while the southern access joins Camel Road which is a C classified road, with both roads having a 30mph speed limit.

While I have some reservations regarding reversing onto the highway at this location, I note that this situation is not uncommon locally, with no history of recorded injury accidents. I also note that the Horsley Hale junction is lightly trafficked and that sight stopping distance across the bend to the southern access appears to be adequate for the posted speed limit. While I consider that turning within the southern plot would be beneficial, I have no objection to the layout proposed. The vehicular access from the existing carriageway edge within the public highway must be constructed in accordance with Cambridgeshire County Councils Housing Estate Road construction specification (HERCS) and should include the provision of a metalled/sealed surface within the site, for a minimum length of 5m from the existing carriageway edge. Both accesses should be un gated to prevent vehicles dwelling in the highway, unless the layout is amended to enable gates to be set back a minimum of 5m from the carriageway edge, with the gate set to swing clear of any parking areas”.

7.18 It is recognised that the red line boundary for the application site is drawn tightly to the western edge of Camel Road and Horsley Hale, and that the fixing of the layout at this stage agrees in principle the position of the access points to the proposed parking areas serving the dwelling. Whilst details of access have not been sought at this stage, in discussion with the LHA on the 17th August 2021, the LHA accept that provision of two vehicular access points in the indicatively shown locations would be acceptable in principle. The LHA have also confirmed that the highway boundary adjoins the application site to the east, and that the provision of the vehicular (and any pedestrian) accesses along the site frontage could be constructed entirely within highway land and under separate highway legislation.

- 7.19 There is sufficient room within each plot to accommodate adequate parking for 2 cars, in accordance with the Council's parking standards. Whilst there is not space within the site for the turning of vehicles, the LHA accept that this would not give rise to detrimental harm upon highway safety. It is therefore considered that the proposed development would accord with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015, although this would be assessed fully once details of all of the matters have been submitted.
- 7.20 Ecology
- 7.21 Paragraph 170(d) of the NPPF advises that development proposals should minimise impacts on biodiversity and secure net gain. Additionally, the paragraph discusses the importance of establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 175(d) advise that opportunities to incorporate biodiversity improvements should be encouraged, stating that development should be supported where the primary objective is to conserve or enhance biodiversity. Policy ENV7 of the Local Plan 2015 seeks to maximise opportunities for creation, restoration, enhancement and connection of natural habitats as an integral part of development proposals. Furthermore, the Natural Environment SPD also seeks for biodiversity net gain under policy NE6.
- 7.22 There are no ponds within the application site that would support Great Crested Newts (GCN) and the site lies within a green (low risk) zone for GCNs. The application site comprises garden land to No.44 Camel Lane and the proposals would not result in the loss of any trees within the application site. Given the nature of the application site (residential garden), it is considered that the application site would unlikely support wintering birds, which Policy SPD.NE2 of the Natural Environment SPD seeks specifically to protect.
- 7.23 No relevant details relating to mitigation measures have been provided with the submission. A condition requiring a scheme of biodiversity improvements can be added if the application was approved. The request for biodiversity improvements is guided by the local plan policies which seek to deliver a net gain in biodiversity, proportionate to the scale of development proposed, by creating, restoring and enhancing habitats and enhancing them for the benefit of species. The proposed development therefore complies with Policy ENV7 of the East Cambridgeshire Local Plan 2015, and Policy NE6 of the Natural Environment SPD.
- 7.24 Flood Risk and Drainage
- 7.25 The application site is located within Flood Zone 2 and 3 (benefitting from flood defences) and is therefore at a higher risk of flooding in comparison to Flood Zone 1, where development should usually be focused. Policy ENV 8 of the ECDC Local Plan 2015 requires that the sequential and exception tests in relation to flooding are applied strictly so as to steer development towards the lowest areas of flooding. The application site falls outside of the defined development envelope, informed by the Strategic Flood Risk Assessment for the district, and on the basis of their location the proposals are not therefore considered to have passed the sequential test.

- 7.26 If the proposals were found to pass the exception test and were found to be sustainable in their location, it is considered that the proposals could satisfy the exception test if appropriate flood risk measures were submitted for consideration. The application site falls within an area of higher flood risk and the proposed dwellings are considered to be 'more vulnerable' for the purposes of Annex 3 'Flood risk vulnerability classification' of the NPPF 2021. Measures would therefore need to be submitted to demonstrate that the proposals were safe for their lifetime in terms of flood risk. The Applicant has however not submitted a Flood Risk Assessment to demonstrate that the proposals would be safe for their lifetime in terms of flood risk, or would not result in increased flood risk elsewhere.
- 7.27 The Environment Agency were not consulted as part of the application. The EA do not provide comments on the sequential test, as this is determined at the Local Authority Level. The EA only provide comment on the exception test, and as the LPA consider that the sequential test has not been passed and in the absence of an FRA, the EA were not required to provide comments.
- 7.28 For the above reasons, the proposals would therefore be contrary to Policy ENV 8 of the ECDC Local Plan 2015, the Flood and Water SPD and the NPPF on the basis of flood risk.
- 7.29 Policy ENV8 of the Local Plan 2015 also makes it clear that all applications for new development must demonstrate that appropriate surface water drainage arrangements for dealing with surface water run-off can be accommodated within the site; the IDB have raised no objection to the use of soakaways, and should the application be approved, these details could be secured via a condition.
- 7.30 Climate Change
- 7.31 East Cambridgeshire District Council (ECDC) declared a Climate Emergency at its Full Council meeting on 17 October 2019. ECDC has joined over 200 Councils around the UK in declaring such an emergency. In declaring a Climate Emergency, the Council committed to producing an Environment Plan, which it subsequently did so (adopted June 2020). One action within that Plan was to prepare a Climate Change Supplementary Planning Document (SPD). The SPD has become a material consideration for the purpose of determining planning applications. The agent was invited to address the Climate change SPD that requests applicants may wish to look at minimising demand through design and maximising energy efficiency. The agent was informed of the requirements in the SPD, however no further details have been provided at the time of determination, which weighs against the proposed development but would not result in the application being refused on this basis alone.
- 7.32 Other Material Matters
- 7.33 As this application is for a particularly sensitive end use (residential), it is recommended that conditions are appended to any grant of planning permission requiring a contamination assessment to be submitted to and agreed by the Local Planning Authority prior to commencement of any development and also to

address any unexpected contamination which may be found when carrying out the development in accordance with the comments raised by Environmental Health.

- 7.34 The proposed dwelling is not a great distance from the existing highway and it is considered that waste could be collected from the application site in accordance with principles of the RECAP guidance.
- 7.35 Planning Balance
- 7.36 The application site for the proposed dwellinghouse is located outside the development envelope of Littleport and therefore the principle of development is not acceptable. It is therefore considered that the proposed development would be contrary to policy GROWTH 2 of the East Cambridgeshire Local Plan 2015. The application is therefore recommended for refusal for this reason.

<u>Background Documents</u>	<u>Location</u>	<u>Contact Officer(s)</u>
21/00463/OUT	Emma Barral Room No. 011 The Grange Ely	Emma Barral Planning Officer 01353 665555 emma.barral@eastcambs.gov.uk

National Planning Policy Framework -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

East Cambridgeshire Local Plan 2015 -

<http://www.eastcambs.gov.uk/sites/default/files/Local%20Plan%20April%202015%20-%20front%20cover%20and%20inside%20front%20cover.pdf>