

# Appendix 1

## Joint Spatial Plan for Oxfordshire (JSP): Business Case

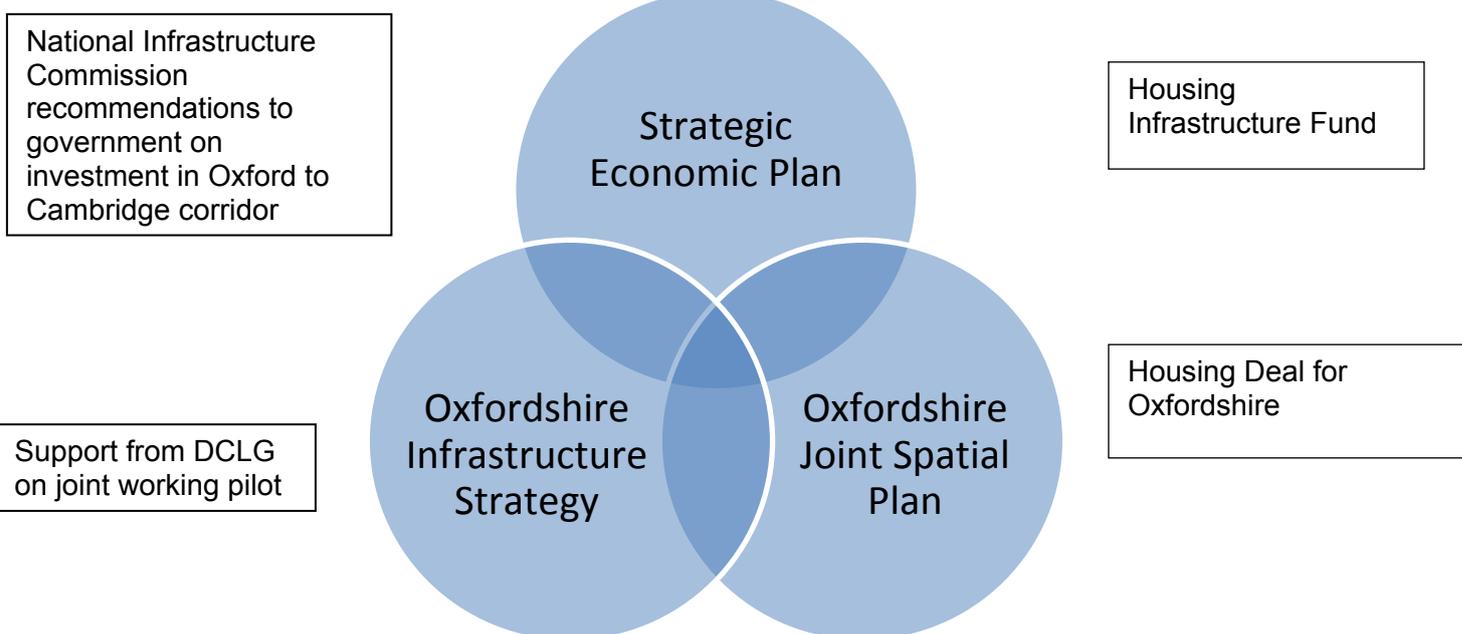
### Introduction

1. This document sets out the case for the preparing a joint spatial plan for Oxfordshire, and the financial case (both costs and savings) of preparing it. This business case is predicated upon the decision of the Oxfordshire Growth Board to commence the project without requiring a formal commitment to either a statutory or non-statutory route until the project reaches the critical milestone to do so.
2. This business case proposes that the Oxfordshire Growth Board recommends that Oxfordshire Authorities agree to the development of a Joint Spatial Plan (JSP) for Oxfordshire. The project is anticipated to take just over three years, from commencement in November 2017 to completion at the end of 2020.
3. The purpose of the JSP will be to provide an Oxfordshire-wide; integrated strategic planning framework to help support sustainable growth across the County, including the planned delivery of the new homes and economic development, and the anticipated supporting infrastructure needed.
4. The JSP will build on the existing joint work of the Oxfordshire Local Authorities through the Oxfordshire Growth Board that, amongst other matters, has led to the publication of the SHMA, a working agreement for the apportionment of Oxford's unmet housing need, and the Oxfordshire Infrastructure Study (OxIS).
5. The production of the JSP commences on a non-statutory basis, however supported by an evidence base and process that would enable it to take a statutory route at key decision points identified in the business case.

### The strategic context for the Plan

6. The Oxfordshire Authorities agreement through the Growth Board in March 2017 to work collectively on a strategic approach to planning for growth reflects a shared ambition to maximise the considerable potential for growth that Oxfordshire's unique knowledge economy offers. This will build on previous work through the Growth Board on agreeing the apportionment of unmet need; the shared vision expressed in the Strategic Economic Plan (SEP); and the Oxfordshire Infrastructure Strategy (OxIS). Together with OxIS and the SEP, a JSP will provide a strategic planning framework for sustainable growth for existing and new communities and a platform from which to secure funding for infrastructure needed to achieve the best outcomes for Oxfordshire.

## Sustainable Planned Growth for Oxfordshire



7. The strong progress that is being made toward the SEP targets of 85,600 jobs and 100,000 new homes by 2031 demonstrate the potential for economic and housing growth in Oxfordshire. The SEP will be followed by the development of an Economic Industrial Strategy that will consider the economic and productivity issues facing Oxfordshire through to 2050. There is a compelling case for progressing a JSP in a timely manner and considering the same period to plan for sustainable growth and to secure investment in the infrastructure required.

### The scope of the Plan

8. The JSP will create a framework to articulate Oxfordshire's growth ambitions to 2050 by:
- setting out an overarching vision including economic and housing growth.
  - identifying the scale of economic development and housing to be provided across Oxfordshire.
  - identifying broad spatial options for growth and the infrastructure requirements to support this broad spatial pattern.
  - potentially articulate a longer term single spatial strategy for the county
  - identifying longer- term infrastructure investment priorities.
  - aligning shared spatial, economic and infrastructure priorities
  - providing a robust evidence base for local plan preparation and reviews
  - fulfilling the requirements of the Duty to Cooperate in relation to joint working between local planning authorities
  - Set out a Statement of Common Ground (SoCG) between the Local Authorities
  - helping to enable the authorities collectively to contribute more collaboratively to the development of the Oxford-Cambridge Corridor and other national agendas
  - depending upon the scope of the JSP, provide a clear long-term strategy for all stakeholders to provide certainty and stimulate investment.
  - addressing environmental implications and potential for securing environmental gains.
  - addressing minerals needs
9. The JSP is intended to be a strategic plan for Oxfordshire, concerned with long-term strategic growth and infrastructure decisions. It will do this by firstly building on the current

planned growth within each local plan (up to 2031/36) and secondly by developing a set of longer-term strategic objectives and priorities for the period to 2050.

10. Plan preparation, whether it is statutory or non-statutory, needs to be based upon a robust evidence base. Proposals for the earlier part of the plan period are likely to be more detailed, whilst further into the future towards the end of the plan period (2050) the assumptions and evidence behind the plan will, of necessity, be more generalised.
11. Emerging government guidance (as proposed in the recent Housing White Paper and OAN consultation) would require a statutory plan to be reviewed every 5 years. As part of the current negotiations with CLG, we have asked for a 10 year freedom for the review period if the decision was taken to make this JSP a statutory plan.
12. Whilst the JSP will provide the strategic framework, it will not replace local plans. If the JSP was to become a statutory plan it would in effect operate as Part 1 of future local plans, setting out a high level long term strategic plan for sustainable development in Oxfordshire to 2050. More detail would then flow from local plans produced by each council. This coherent, strategic approach offered by the development of the JSP will provide each authority with the opportunity to have an informed countywide growth assessment underpinning its local plan and acting as a 'material consideration' for plan development. Equally, the JSP will be informed by the approach to local growth set out in the adopted local plans.
13. A potential element of the business plan is the development of a suite of common policies based on a common evidence base. If the JSP were to evolve into a statutory plan, then a common set of policies could help serve the wider area for development management purposes. However, if the plan remains non-statutory then these policies will help to provide a common framework for individual local plans.
14. It is intended that the JSP will be in place to frame the context for the first local plans that will approach their five-year review point; this is expected to be the Cherwell local plan in 2020. It needs to be appreciated however that all District Plans (local plans and neighbourhood plans) and county plans (minerals and waste) will be shaped by the JSP from the outset.
15. Included in the project at an early stage is the development of a Statement of Common Ground (SoCG) as proposed in the 'Planning for the Right Homes' DCLG consultation. This consultation document sets out the scope of these new statements to strengthen the Duty to Cooperate, including the headline housing need figures for each district and to establish a mechanism to address and identified unmet housing need. The SoCG will also set out the relevant strategic and cross-boundary matters for Oxfordshire and could, for example, include some high-level sustainability and infrastructure matters and be agreed by each Council.

## Programme / Project Milestones

16. A detailed programme is set out in an attached detailed Gantt chart. The key milestones however are set out in the table below.

<b>Milestone</b>	<b>Detail</b>	<b>Approximate timescale</b>
Endorsement of business case	Business case to be endorsed by Growth Board	End Oct 2017
Establishment of project governance systems	For agreement by the Chief Executives	Nov 2017
Establishment of JSP Project Team, project management and budget bids within councils	Recruitment and establishment of team operational by Dec 2017	Dec 2017
Communications strategy developed agreed through Growth Board	For approval by the Oxfordshire Authorities	Feb 2018
Prepare first Statement of Common Ground (SoCG)	High-level SoCG to cover Duty to Cooperate matters etc. For approval by Oxfordshire authorities (to be reviewed annually)	Feb 2018
Develop operating framework for plan including: Statement of Community Involvement (SCI); Local Development Scheme (LDS) or plan timeline; and Sustainability Appraisal (SA) scoping report/	Prepare supporting framework/documentation to guide the development of the plan	LDS & SCI by Feb 2018 SA scoping start Feb 2018
Commissioning of the early evidence base documents including SHMA, and economic modelling; scope other evidence base required for JSP	An updated SHMA to reflect updated government guidance (consultation issued Sept 2017)	Start commissioning Jan 2018 (actual SHMA or housing need evidence would need revised method confirmed in updated NPPF, estimated Spring 2018)
<b>Decision point 1 – Scope- is the JSP a broad spatial strategy for growth or will it include more detail about growth areas at a sub county level</b>		<b>April 2018</b>
Review and revise SoCG(if necessary)	A detailed SoCG to cover the next phase of JSP. For approval by the Oxfordshire Authorities	April-May 2018
Scoping of issues and Options – including public consultation	The preparation of an Issues and Options document. Identifying the key issues facing Oxfordshire and the options for addressing them, including public consultation.	publish for consultation upon completion of the SHMA/OAN- hopefully by August 2018

<b>Decision point 2 – If the JSP is to assess future growth potential at the sub-county level, should it go on to test and then allocate broad areas or specific strategic sites for development?</b>		<b>August 2018</b>
Testing and gathering of further evidence base	<p>Option 1: Option 1: Exploration of generic spatial distribution options including: concentration; dispersal; continuation of existing market towns strategy; , urban extensions; , new growth points; freestanding new settlements etc.</p> <p>Option 2: Additional level of detail, to include broad areas, or specific strategic sites for development.</p> <p>Both options require Para 46 work to assess capacity and constraints. Both relate to SEA process and include evidence like Strategic Flood Risk Assessment, call for sites and green belt assessment.</p>	During Autumn 2018 to Spring 2019
Dependent upon the above decision. The development of preferred options (and if applicable allocations) and public consultation	The preparation of preferred options including public consultation	Publish for consultation by May 2019- complete August/September 2019
<b>Decision point 3 – Should the JSP be statutory or non-statutory</b>		<b>July 2019</b>
Review and revise Statement of Common Ground (if necessary)	A detailed SoCG to cover the next phase of JSP. For approval by the Oxfordshire Authorities	Oct-Dec 2019
If statutory: Publication of draft Plan (Reg 19) and consultation	Consultation on submission plan required by Regulations	Consultation Jan 2020
If non-statutory: finalise plan and approve at Growth Board		Autumn/winter 2019
If statutory: submit plan to government for Examination		Spring 2020
If statutory: Public examination		Summer 2020
If statutory: Adoption by Joint Planning Committee if one has been agreed or individual authorities		End 2020

*\*The timeline for the project is based upon collective agreement through a joint committee if established for a statutory plan. If a statutory plan requires approval of individual Local Planning Authorities, timelines will need to be reviewed.*

17. The high-level project plan would also be set out in a Local Development Scheme (LDS)

## **Planned Communication & Consultation**

18. The business case proposes four consultation stages
  - The first is the scoping of evidence, in particular for the SEA
  - The second would be the consultation on issues and options
  - Dependent upon the route taken for the JSP, the third would be carried out on preferred options. If a decision were taken for the JSP to be a statutory plan, then these two rounds of consultation would be Regulation 18 consultations in accordance with the Development Plan Regulations 2012.
  - The fourth stage would only be required if the JSP were to be a statutory plan and would be the final Regulation 19 public consultation before the Joint Spatial Plan is submitted to the Planning Inspectorate for examination.
19. The detailed consultation plan for the JSP will be prepared and published as a Statement of Community Involvement (SCI) alongside a Statement of Common Ground during the early stages of the project. This will be subject to review at key decision points in the project.
20. Alongside this, the business case proposes that we develop a comprehensive communications plan for the project covering matters such as formal public engagement and social media strategies. The key stages of which would need to be included within the SCI.
21. Communication on progress with the project will be via reports from the steering group to the Growth Board and EOG. All ad-hoc communication will be governed by a Communications Protocol between the Councils, prepared at the outset of the project and designed to ensure consistency of message across partners.
22. A dedicated website would be needed and publicity for the stages and public ability to attend meetings. The SCI will need to set out clearly how the community, site promoters, developers and any other stakeholders are to be engaged and involved in developing the JSP.

## **Project Governance**

23. All partners note that oversight of the JSP project plan is essential to the project.
24. Production of the JSP will take place under the supervision of the Oxfordshire Growth Board and would not need new governance arrangements to be set up at this stage, allowing progress to be made on the initial commissioning of new evidence and studies
25. If the constituent councils decide to undertake a statutory plan this will require agreement from all of the authorities concerned and governance arrangements may need to be reviewed. The Planning and Compulsory Purchase Act 2004 includes provisions to enable local planning authorities to produce a joint plan either by creating joint local development documents (s28) or by establishing Joint Planning Committees (s29). The appropriate route would need to be considered and agreed by constituent authorities.
26. Previous partnership oversight at officer level has been provided by the Growth Board secretariat and this business case assumes this role continues.

## **Project Management Structures**

27. The table below sets out the proposed project management structure required.

<b>Responsible Owner</b>	<b>Name</b>	<b>Role and frequency</b>
<b>Project Sponsor</b>	Oxfordshire Growth Board	Recommendations to constituent authorities; endorsement of Business case, project initiation, budget, the Joint Spatial Plan documents, a Statement of Common Ground, Statement of Community Involvement and key milestones Quarterly progress reports from Strategic Project Board
<b>Chief Executive Group</b>	Chief Executive Group	Recommendations for decisions put to Growth Board
<b>Strategic Project Board</b>	Growth Board EOG sub group - comprising lead strategic directors of councils	Bi-Monthly progress reports from Project Board. Approval of key project milestones and attendance at check and challenge at key milestones
<b>Detailed Project Board</b>	Growth Board Planning Delivery Group comprising Heads of Planning from councils	Delivery of project. Monthly meetings and other key points to be agreed
<b>Joint Strategic Plan Team Manager</b>	Joint Strategic Plan Project Team	Dedicated team to lead and deliver the preparation of the Joint Strategic Plan Leads the project, reports to PDG, and manages project team, budget, commissions consultants, risk register etc. Leads the process to draw upon policy specialists as required.
<b>Host authority</b>	The Chair of the Oxfordshire Growth Board rotates each year in July	Chairmanship of Oxfordshire Growth Board and the various sub groups to secure collective agreement.
<b>OGB Programme Management</b>	Growth Board Programme Manager	Supports Oxfordshire Growth Board, EOG, PDG and lead officers. Coordinates within overall Board programme. Part of JSP Project Team
<b>Local Authorities</b>	Cherwell District Council Oxford City Council Oxfordshire County Council South Oxfordshire District Council Vale of White Horse District Council West Oxfordshire District Council	Role as Local Planning Authorities (Districts) in approving and adopting Local Development Plans Budget commitment to the project period Overall project management through attendance at Project Board Scrutiny arrangements as appropriate

## **Project costs main elements**

28. The requirement to keep local plans up-to-date and the timescales for review of the current adopted and emerging local plans across Oxfordshire has to assume a level of future financial commitment from all the councils. This business case is predicated upon there needing to be a future financial commitment, but seeks ways that the objective of delivering a different strategic planning approach with effective local plan-making can be combined with financial and procedural efficiencies for the benefit of all the councils.
29. The financial costs of the project fall into various categories:
- The costs of the joint project team (including accommodation, IT support etc.)
  - The costs of the evidence base, including a new housing need assessment, specialist consultant advice and expertise, legal advice and some transport modelling
  - Consultation and if statutory examination and adoption costs

### ***Project team & governance costs***

30. The length and complexity of the project coupled with the work still being undertaken on local plans across the districts means that the project cannot be undertaken alongside the current planning policy work being undertaken by the councils and additional resources and capacity will need to be put in place to deliver the JSP.
31. The business case pre-supposes that the level of resource required that the level of staffing would be similar for either the statutory or the non-statutory route with the costs differences mainly attributed to the longer project timeline for a statutory plan.

### ***Evidence base and specialist consultant advice***

32. The project will require a robust evidence base to withstand interrogation at examination, regardless of the statutory status of the JSP. Officers have calculated the costs including the production of a new SHMA and transport modelling. These costs would be incurred even if a JSP were not being pursued since Oxfordshire authorities will need to do this work collectively in light of national changes to calculating housing need.
33. The business case concludes that whilst the project team will complete the bulk of the work, specialists in preparing the evidence base and other specialist roles will be required to supplement the team resources.
34. In addition, a best practice approach would include the engagement of a critical friend who would provide a sounding board and independent technical advice as required by the project. This approach was used successfully during both the Green Belt review and the post SHMA project and assisted in ensuring a high quality product. If the Growth Board applied this approach to future joint work on a new SHMA and modelling, it is likely that a good proportion of these costs would be incurred even in the absence of a JSP.
35. There is no difference between the possible call on this budget dependent upon a statutory or non-statutory plan, so the costs are the same.

### ***Consultation and adoption costs***

36. Specialist consultation assistance will be required at key points in the JSP's development. This will include advertising, social media, the compilation and printing of all documents as well as workshops or presentations to key stakeholders and the public.
37. The business case assumes that the non-statutory route would exclude the final (Regulation 19) stage of consultation and the examination costs.

38. If the plan were to take the statutory route then there will be significant adoption costs, including the legal costs of preparing for examination and all associated costs including the examination programme officer in 2020/21, counsel, and venue costs that will occur in the latter stages of the Project. These costs however would result in subsequent savings to the districts in the preparation of the residual local plans because they would need less strategic level content as a result.

### **Total costs**

39. The estimated costs of a Statutory Plan are as follows:

	2017/18	2018/19	2019/20	2020/21	Total project costs
<b>Project team &amp; governance costs**</b>	200,000	815,000	830,000	690,000	2,535,000
<b>Evidence base costs*</b>	60,000	330,000	330,000	130,000	850,000
<b>Consultation and adoption costs**</b>	-	100,000	150,000	250,000	500,000
<b>Total project Costs</b>	<b>260,000</b>	<b>1,245,000</b>	<b>1,310,000</b>	<b>1,070,000</b>	<b>3,885,000</b>

*\* Costs which are likely to be incurred by the local authorities for required collective work regardless of whether there is a JSP*

*\*\*Costs would be offset in subsequent savings to the districts in the preparation of the residual local plans*

40. The costs of a Non-Statutory Plan are as follows:

	2017/18	2018/19	2019/20	2020/21	Total project costs
<b>Project team costs</b>	190,000	760,000	775,000	130,000	1,855,000
<b>Evidence base costs*</b>	60,000	330,000	330,000	130,000	850,000
<b>Consultation costs</b>	-	100,000	50,000	-	150,000
<b>Total project Costs</b>	<b>250,000</b>	<b>1,190,000</b>	<b>1,155,000</b>	<b>260,000</b>	<b>2,855,000</b>

41. If the JSP continues on a statutory route, the total estimated cost is approximately £3.9 million over the project period. If the project were to take a non-statutory route there would be no need for examination and associated legal costs and this, together with the reduced time for the project reduces the costs to £2.9 million over the project life.

42. Comparing the costs between the Statutory and Non-Statutory Plan. The costs up to and including 2019/20 are substantially the same whether it is a statutory or non-statutory plan.

	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>Total project costs</b>
Statutory Plan	<b>260,000</b>	<b>1,245,000</b>	<b>1,310,000</b>	<b>1,070,000</b>	<b>3,885,000</b>
1/6 ~	43,500	207,500	218,500	178,500	648,000
Non-Statutory Plan	<b>250,000</b>	<b>1,190,000</b>	<b>1,155,000</b>	<b>260,000</b>	<b>2,855,000</b>
1/6 ~	41,500	198,500	192,500	43,500	476,000

### **Predicted savings**

43. It is proposed that the cost of the JSP, whether statutory or non-statutory, are split 6 ways between the 5 District Councils and the County Council. The production of the JSP will either replace or reduce the requirement for significant elements of this work at future local plan stages and result in efficiencies as a result of a single process. Senior planning advisors view is that the approach could deliver significant savings depending on scope.
44. These costs will depend heavily upon whether the JSP follows a non-statutory or statutory route with the former requiring less cost, but the latter offering greater potential cost savings to individual authorities in terms of their future individual local plan work. Because of the need to build in flexibility to allow for future decisions about the status of the JSP the costs up to and including 2019/20 are substantially the same whether it is a statutory or non-statutory plan.
45. Officers at each of the Local Authorities have estimated cost of delivering five new adopted local plans is circa £5,000,000 per plan (including the staffing inputs, evidence base, consultation, legal and examination costs). Costs of delivering local plans across Oxfordshire would amount to £25 million. Investing in the production of a JSP would reduce costs of developing these plans in future, resulting in savings for all the authorities overall. There will also be savings in the costs of producing the county-wide mineral and waste plans and the Local Transport Plan.
46. Officers have estimated that the production of a JSP would lead to a 10% saving in the production of their own local plans and the county-wide plans, equating to £500,000 per authority. This would lead to a saving of £3,000,000.
47. A significant part of the costs is the commissioning of the evidence base and specialist consultant advice on an Oxfordshire-wide basis. This amounts to approximately £900,000 of the total costs. This cost would be incurred whether there is joint spatial plan or individual local plans.

## **Risks, Constraints, Dependencies and Exclusions**

48. The key areas of risk are as follows:

<b>Description of areas or sources of risk and impact on project</b>	<b>Mitigation</b>	<b>Owner</b>
If statutory, the Joint Spatial Plan will need to come into force at or close to the review date of the earliest local plan, any delays in the completion of the project will impact upon the ability of that authority to control growth within its district	The district will need to maintain their 5-year land supply after the review date to be able to contest speculative applications or have successfully negotiated a bespoke arrangement with DCLG that has legal force.	Project Board
Councils are not willing/able to delegate key decisions to the growth board, Instead each individual authority needing to agree its own position at each of the key stages.	The timeline for the project is based upon collective agreement through the Growth board, either using leaders delegated authority for the non-statutory route or via the establishment of an executive joint committee if established for a statutory plan. If a statutory plan requires approval of individual Local Planning Authorities, timelines will need to be reviewed. An early decision on appropriate governance arrangements will be required of the Board and the project timeline adjusted as appropriate	Growth Board
Not all councils are willing to take part in the plans preparation.	The plan is prepared county- wide in terms of infrastructure and strategic growth areas/sites. In areas not taking part in the project relevant information to inform the JSP is drawn from local plan information	Growth Board/Project Board
The spatial plan will diminish the primacy of district Local Plans still in use before their review dates	The Joint Spatial Plan will set only set the high level strategic direction and potentially, broad growth areas, thus leaving detailed site allocations to local plans	Project Board
Partner councils are not content with the preparation of a statutory plan in advance of a government requirement to do so	The JSP will be evidence based and this will need to be robust and sound notwithstanding the statutory basis of the plan as it will in any event be a key document in statutory local plans and therefore subject to examination and challenge. The need therefore will be for the processes and evidence that underpin the JSP to be as if it was a statutory plan.	Project Board
The partners will not be able to offer the resources to complete the project from within their officer base	Partners offer to second officers dedicated to the project where possible, contractors can be used in	Project Board

	other circumstances. The three-year period could also enable graduate planning apprenticeships to be set up which would be beneficial to the development of much needed planning skills across Oxfordshire. Technical project lead appointed on a secondment or fixed term basis	
The Programme is not able to secure sufficient consultancy expertise to carry out the projects	Plan for those elements of the project that could be tendered out and commission early to have an alternative plan if it fails	Project Board
Partners are not willing to commit to the project as it unfolds	Continued dialogue and commitment to discuss implications openly at EOG at the outset. Partners need to commit funds to do the project in full recognising that bids to DCLG and any other funding sources will also be pursued.	Project Board
Partners are not willing to agree to the testing of all scenarios within the plan and therefore not willing to fully engage with the project	The SoCG will set out how the partners will consider and resolve areas of disagreement and continued dialogue and commitment to discuss implications openly at EOG,	Project Board
Partners are not willing to share confidential information	Confidentiality agreement signed as part of the project inception	Project Board
Partners are unable to offer a consistent message to the public and media over the progress of the plan	Communication protocol drawn up and agreed as part of the project inception	Project Board
Spatial Plan is challenged and fails at Examination	Adopt a best practice approach and engage PAS/specialist consultant to offer professional advice and act as critical friend at key points of the project	Project Board

Appendix one- Summary Timeline	2017				2018				DP1	2019				DP2	2020				DP3	2021										
	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar		Apr	May	June	July		Aug	Sept	Oct	Nov		Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct
Establishing project team and governance and building high level evidence base				Blue	Blue	Blue	Blue	Blue	Yellow	Blue	Blue	Blue	Blue	Yellow																
High level scoping of JSP content and evidence required					Blue	Blue	Blue	Blue	Yellow	Blue	Blue	Blue	Blue	Yellow																
Decision point 1 – Scope- is the JSP a broad spatial strategy for growth or will it include more detail about growth areas at a sub county level									Yellow					Yellow																
Scoping options for JSP strategy / spatial distribution of growth, and 1st consultation									Yellow	Blue	Blue	Blue	Blue	Yellow																
Decision point 2 – If the JSP is to assess future growth potential at the sub-county level, should it go on to test and then allocate broad areas or									Yellow					Yellow																
Testing and gathering evidence for allocating broad areas or specific strategic sites									Yellow					Yellow	Red	Red	Red	Red	Red	Red										
or Testing and gathering evidence for broad DM policies / strategy and for local plans									Yellow					Yellow	Green	Green	Green	Green	Green											
Develop preferred options and consultation on emerging strategy and strategic sites/ areas									Yellow					Yellow					Green	Green	Green	Green	Green	Green						
Decision point 3 - Is the JSP statutory or non-stat									Yellow					Yellow																
For statutory: Regulation 19 - write submission plan & consultation									Yellow					Yellow																
For stat: submit plan, examination and adoption (assuming successful examination)									Yellow					Yellow																
For non-stat: finalise plan and approve									Yellow					Yellow																
Actions common to both plans	Blue																													
Actions for a statutory plan	Red																													
Actions for a non-statutory plan	Green																													

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