

1. Introduction

1.1 Lancaster City Council (the Council) submitted the Lancaster District Partial Review of the Local Plan comprising the Strategic Policies and Land Allocations Development Plan Document (DPD), and Development Management DPD (hereafter 'the Local Plan'), to the Secretary of State, for independent Examination on 31 March 2022. This was in accordance with Regulation 22 of the Town and Country Planning (T&CP) Regulations 2012. Following the examination hearings, the Local Plan was found sound by the Inspector in her report dated 2 December 2024. The Local Plan was subsequently endorsed by Cabinet on 14 January 2025 and Adopted by the Council on 22 January 2025.

1.2 The Partial Review was undertaken to consider matters relating to climate change only. This followed the Council's climate emergency declaration on 30 January 2019. At the time of declaring the emergency the Council were already well advanced in the preparation of its Local Plan so were not able to incorporate some of the actions and directions of the climate change emergency. The Council therefore entered an immediate review to ensure that additional climate change adaptation and mitigation could be incorporated into the Plan. The Partial Review relates to these measures. Areas not relating to climate change were not reviewed as part of this process.

1.3 The Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), of the Local Plan was undertaken by external consultants AECOM on behalf of the Council. This Post Adoption Statement is the final output of the SA/SEA process. It describes the way in which the Council has taken environmental and sustainability considerations and the views of consultees into account in the Partial Review. It also reports on the monitoring indicators that will be applied to check the accuracy of predicted effects and to monitor progress against sustainability objectives.

1.4 In the context of the requirements of the SEA Regulations, the SA Adoption Statement for the Local Plan must explain:

- How environmental (and sustainability) considerations have been integrated into the Plan;
- How the SA Report has been taken into account during preparation of the Plan;
- The reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with;
- How the opinions expressed by the public and consultation bodies during consultation on the Plan and SA Report have been taken into account; and
- The measures that are to be taken to monitor the significant effects identified for the Local Plan.

1.5 These sections will be discussed in turn through this Post Adoption Statement.

2. How Environmental and Sustainability Considerations have been integrated into the Local Plan.

2.1 The SA has considered environmental and sustainability issues in the Local Plan through an appraisal framework. The SA Framework is comprised of objectives and guide questions that are used to appraise the Local Plan (see Table 2.1). The objectives and guide questions are

informed by the SA framework established as part of the 2020 Local Plan; the review of other plans and programmes that may affect, or be affected by, the Local Plan; the current state of the environment and its evolution without the Local Plan and the key sustainability challenges and opportunities that are bespoke to the District.

- 2.2 An appraisal of policy amendments and new policies has been made against each of the SA objectives throughout the preparation of the Local Plan. This was undertaken at all stages of the Plan’s preparation.
- 2.3 Based on the appraisal results, the SA made recommendations to help avoid or mitigate adverse effects or further increase beneficial effects. These recommendations were considered by the Council and taken into consideration in the refining of the Local Plan. This is explained further in the next section of this report.

Table 2.1 – SA Objectives and assessment questions

SA Objective	Assessment Questions
Protect and improve air quality	Will the option/proposal help to: <ul style="list-style-type: none"> • Reduce emissions of pollutants from transport? • Improve air quality with AQMAs? • Promote and facilitate the use of low emission vehicles? • Promote and facilitate enhancements in sustainable transport modes of transport, including walking, cycling and public transport? • Promote and facilitate enhancements to green infrastructure networks to facilitate increased absorption and dissipation of NO2 and other pollutants?
To protect, restore and enhance biodiversity.	Will the option/proposal help to: <ul style="list-style-type: none"> • Protect and enhance the multi-functional green infrastructure network across, within and beyond the District? • Increase the resilience of Lancaster District’s biodiversity assets to the potential effects of climate change? • Protect the integrity of and enhance internationally, nationally and locally designated sites in the District? • Protect, restore and enhance the network of priority habitats, and the habitats of priority species? • Contribute to achieving a net gain in biodiversity?
To limit and adapt to climate change	Will the option/proposal help to: <ul style="list-style-type: none"> • Direct development away from areas of highest flood risk? • Implement multifunctional green infrastructure? • Increase the resilience of critical infrastructure to the potential effects of climate change? • Promote a co-ordinated approach to the management of flood risk across public infrastructure provision? • Improve and extend green infrastructure networks to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water run-off? • Reduce the impact of extreme weather events?

	<ul style="list-style-type: none"> • Increase the resilience of biodiversity in Lancaster District to the effects of climate change, including enhancements to ecological networks?
Increase energy efficiency, require the use of low carbon energy sources and reduce GHG emissions through sequestration	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Capitalise on the District's offshore wind energy generation capacity? • Reduce energy consumption from non-renewable resources? • Harness the potential of solar and onshore wind generated energy? • Protect and enhance the District's peatlands? • Limit the increase in carbon footprint resulting from new transport infrastructure provision? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Reduce the need to travel? • Support the energy efficiency of new and existing development? • Encourage the update of electric and alternatively fuelled vehicles?
Encourage thriving local economics, ensure key economic drivers are strong, ensure the workforce meets local economic needs and encourage economic inclusion	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support a transition to a low-carbon economy? • Support traditional and emerging sectors of Lancaster's economy, including the green energy sector? • Capitalise on the presence of the Walney offshore windfarm and other renewable energy sites to maximise the contribution of renewables? • Improve internet connectivity to support the digital economy and facilitate flexible working practices that reduce the need to travel and lead to a decrease in carbon emissions? • Enhance the vitality of the District's town and local centres? • Support rural diversification? • Improve accessibility to employment opportunities by sustainable modes of transport? • Enhance training and educational opportunities? • Support the environmental and low carbon technology sectors?
Improve physical and mental health for all and reduce health inequalities	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Enhance the provision of, and access to, open space and multifunctional green infrastructure in the District? • Encourage active travel modes, including walking and cycling? • Direct new growth to locations with walking and cycling access to healthcare? • Enable enhancements to existing healthcare facilities or delivery of new healthcare facilities?
Protect and enhance the historic environment and heritage assets	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting, including in relation to the effects of climate change?

	<ul style="list-style-type: none"> • Seek to improve energy efficiency and the provision of renewable energy generation through development without detriment to unique historic assets in the process? • Conserve and enhance the special interest, character and appearance of conservation areas and their settings? • Conserve and enhance the special interest, character and appearance of registered parks and gardens, and their settings? • Protect and where possible, enhance the wider historic environment, including historic landscapes? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Ensure that, where possible, development contributes to improved public understanding of assets and their settings?
Ensure the timely delivery of housing to meet local housing needs	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that affordable housing is delivered? • Ensure that high quality homes are built? • Ensure that the timely delivery of housing is enabled?
Ensure the sustainable use of land and material resources	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Direct new development and new energy generating development away from areas underlain by 'best and most versatile' land where possible? • Avoid sterilising winnable mineral resources? • Facilitate the use of previously developed land where possible? • Encourage the recycling of derelict land?
To protect and make efficient use of water resources	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce water consumption? • Improve the efficiency of water use?
To minimise waste, increase re-use and recycling and other forms of sustainable waste management	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage a circular economy? • Encourage recycling of materials and minimise consumption of resources during construction, operation and maintenance of new infrastructure? • Encourage the use of alternative transport methods for the movement of waste (which are less carbon intensive)? • Encourage the use of materials with higher recycled content?
To protect and enhance landscape and townscape character and quality	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Protect and where possible enhance peat bogs? • Conserve and enhance locally important townscape and landscape features in Lancaster District? • Preserve and enhance the integrity of the Forest of Bowland and Arnsdale and Silverdale AONBs?
Ensure good access to community services for all community groups, seeking to reduce deprivation and inequality.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Help to address deprivation and inequalities, particularly relating to energy provision? • Protect or enhance sustainable access to key community infrastructure for all groups in the community? • Maintain or enhance the quality of life of residents? • Reduce inequalities between community groups?

	<ul style="list-style-type: none"> • Foster good community relations?
To improve sustainable access to jobs, basic goods, services and amenities for all groups.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage active transport to improve the community's health in the longer term, whilst benefiting the environment? • Improve transport infrastructure throughout the District including active and public transport? • Meet future transport trends and service those of all abilities? • Improve transport to ensure sustainable and active modes are most used to connect people to places? • Ensure infrastructure is in place to support flexible working arrangements and positive changes in travel behaviours that emerge in response to crises such as Covid19?

3. How the SA findings have been taken into account.

3.1 The purpose of the SA is to integrate sustainability considerations into the Plan and to help it to achieve its key objectives. This is accomplished using a collaborative and iterative relationship between those carrying out the SA (AECOM) and the plan-makers (the Council), based on a phased approach at key stages throughout its development.

3.2 The National Planning Practice Guidance (NPPG) specifies five stages to the SA Process as follows:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope (Scoping)
- Stage B: Developing and refining alternatives and assessing effects
- Stage C: Prepare the SA Report
- Stage D: Seek representations on the SA Report from consultation bodies and the public (Consultation)
- Stage E: Post adoption reporting and monitoring The SA of the Local Plan was undertaken in accordance with this guidance. The following subsections set out how the SA has influenced the Local Plan at each of these key stages.

3.3 The SA of the Local Plan was undertaken in accordance with this guidance. The following subsections set out how the SA has influenced the Local Plan at each of these stages.

Stage A: Scoping

3.4 Scoping represents the initial stage in the SA process for the emerging Plan and sets the scope for the remainder of the process.

3.5 As noted, the Partial Review builds on elements of the already adopted Local Plan and reviews only matters relating to climate change. In this context it was determined appropriate for the SA of the 2020 Local Plan to form the starting point for the SA of the Partial Review. The SA of the 2020 Local Plan was undertaken by external consultants Arcadis.

- 3.6 Despite the linkages between the two plans, it was still considered necessary to undertake a new SA scoping exercise for the Partial Review. This ensured that the context and baseline information is up to date and that it reflects new evidence gathered during, and subsequent to, the preparation of the 2020 Local Plan. Additionally, it provided AECOM the opportunity to re-organise the framework of objectives to align with AECOM’s established report structure and appraisal process.
- 3.7 The SA Scoping Report for the partial Review therefore incorporated the existing Arcadis SA objectives into a new thematic framework of objectives, weaving in new sub-objectives where necessary to reflect the focus on climate change of the emerging CELPR (table 2.1).
- 3.8 The findings of this stage of the SA process are presented in the Scoping Report which was consulted upon for a five-week period in October 2020. Comments were received from Natural England, the Environment Agency and Historic England. These comments informed the SA approach and were incorporated into further iterations of the SA.

Stage B: Developing and refining alternatives and assessing effects

- 3.9 Stage B is the primary assessment stage of the SA process. Throughout this stage there has been a considerable degree of interaction between the plan-making and SA teams with SA being undertaken at draft, publication and submission stages of the Plan-making process. This has enabled potential adverse effects of the Local Plan to be avoided/minimised and potential sustainability benefits maximised. Assessment results and recommendations have been fed back to the plan-making team on an iterative basis.
- 3.10 As a starting point for those policies/topic areas scoped into the Partial Review, the Council considered what options there were for each policy and set out the decision-making rationale in a series of thematic topic papers. At the same time, consideration was given as to whether any of the options identified should be appraised through the SA process. In addition to the existing plan policies, five new policies were developed, which were also subject to the options consideration process.
- 3.11 The table below (table 3.1) lists the options considered for each policy that is scoped into the Plan Review. An explanation is given as to whether or not the options need to be appraised through the SA Process (i.e. whether the options constitute reasonable alternatives). Some policy names were amended by the Council through this work, the revised names are reflected in the table. The policy options are arranged according to the topic papers within which the options were presented.

Table 3.1 – Policy Options

Policies	Options considered	Reasonable alternatives for the purpose of SA?
Topic Paper 1: Water Management		
DM33 Development and flood risk	Not amending policy	No. The implications of doing nothing is essentially a continuation of the baseline

		position and will be identified through the appraisal of any changes.
DM34 Surface Water and Sustainable Drainage	A range of procedural options were identified relating to the implication of SUDs.	No. Whilst there are policy choices that could have implications, the choice essentially comes down to the trade-off between higher standards in relation to water management and how this affects viability.
DM35 Water Supply and Waste Water	Retain existing policy / Higher water efficiency standards / Expand BREEAM requirements.	No. Though the policy has been amended, the deleted content is still included within the Plan, under a different policy.
DM36 Protecting Water Resources, Water Quality and Infrastructure	No options identified.	None identified.
Topic Paper 2: Green and Blue Infrastructure		
DM43 Green and Blue Infrastructure	A range of specific policy options were identified such as removing reference to particular parts of the policy.	No. Options such as whether to remove specific reference to green infrastructure types are not necessary to test in the SA (or would be difficult to test given the lack of detailed evidence).
SP8 Protecting the Natural Environment	Do nothing	No. Procedural choices such as 'not changing the policy' would not lead to significantly different outcomes in terms of sustainability.
SC4 Green and Blue Corridors and Chains	Do nothing / make minor changes / retain existing networks only.	Widening identified networks is considered to be a choice that does not lend itself to meaningful SA. To not take account of the GBI strategy is considered unreasonable.
SC5 Recreation Opportunity Areas	A range of policy approaches relating to the classification or identification of opportunity areas.	Widening the identified networks is not considered to be a choice that lends itself to meaningful SA/SEA
DM27 Open Spaces, Sports and Recreational Facilities	Do nothing / set specific guidance	No. Procedural choices such as 'not changing the policy' would not lead to significantly different outcomes in terms of sustainability.
Policy DM45: Protection of Trees, Hedgerows and Woodland	Do nothing.	Procedural choices such as 'doing nothing' would not lead to significantly different outcomes in terms of sustainability.
Topic Paper 3: Strategic Transport		

T1 Lancaster Park and Ride	No changes proposed.	None identified.
T2 Developing the Cycling and Walking Network	The Council considered the listing of specific cycle network schemes and projects within the Policy.	Procedural choices such as whether to list projects or not are not necessary to test in the SA, as they would not lead to different outcomes in terms of sustainability.
T4 Public Transport Corridors	Considered the inclusion of bus rapid transit routes, but concluded it would be premature to set out in policy. Additional rail stations were considered under this policy but then ruled out.	None identified.
EN9 Air Quality Management Areas	No changes proposed.	None identified.
DM31 Air Quality Management and Pollution	No policy changes proposed.	None identified.
DM60 Enhancing Accessibility and Transport Linkages	Limited scope for change.	None identified.
DM61 Prioritising Walking and Cycling	None identified	None identified.
DM62 Vehicle Parking Provision and Electric Vehicle Charging Points	Do nothing. The council consider this to be unreasonable.	None identified.
DM63 Transport Efficiency and Travel Plans	Limited scope for change.	None identified.
DM64 Lancaster District Highways and Transport Masterplan	None identified	None identified.
SP10 Improving Transport Connectivity	Limited scope for change.	None identified.
SG12 Port of Heysham and Future Expansion Opportunities	Limited scope for change.	None identified.

Topic Paper 4: Heritage and Climate Change		
CCH1 Retrofit of Buildings of Traditional Construction for Energy Efficiency	Do nothing was considered but found unreasonable.	None identified.
CCH2 Micro Renewables in the Setting of Heritage Assets	Do nothing. Amend existing policy.	No. Procedural choices such as 'amending the existing heritage policy' are not necessary to test in the SA.
Topic Paper 5: Sustainable Design, Energy Efficiency and Renewable Energy		
DM2: Space and Accessibility Standards	No changes proposed.	None identified.
DM29: Key Design Principles	Procedural options relating to which policies details should be contained within.	No. The content of the plan would be the same regardless of which policies cover certain details.
DM30: Sustainable Design *Split into three separate policy areas covering a more comprehensive set of criteria	Several options identified relating to the extent to which standards could be improved (or not)	Whilst these are genuine options, they are not reasonable alternatives for the purpose of SA. Higher standards of design are inherently positive, with cost being the main barrier. Therefore the key determinant of the policy approach is viability (Which is addressed in a separate technical study).
DM53: Renewable and Low Carbon Energy Generation	Do nothing	No. Procedural choices such as 'not changing the policy' would not lead to significantly different outcomes in terms of sustainability.
Topic Paper 6: Miscellaneous policies		
SP4 Priorities for Sustainable Economic Prosperity	Do nothing was considered but found unreasonable.	None identified.
SP9 Maintaining Strong and Vibrant Communities	Do nothing was considered but found unreasonable.	None identified.
SG4 Lancaster City Centre	Do nothing was considered but found unreasonable.	None identified.
SG13 Heysham Gateway, South Heysham	Do nothing was considered but found unreasonable.	None identified.

DM57 Health and Wellbeing	Do nothing was considered but found unreasonable.	None identified.
DM58 Infrastructure Delivery and Funding	Do nothing was considered but found unreasonable.	None identified.
DM59 Telecommunications and Broadband Improvements	Do nothing was considered but found unreasonable.	None identified.
Policies not in topic papers		
DM3: The Delivery of Affordable Housing	Changes were for clarity only, so DM3 was not included in a topic paper, nor where options explored.	None identified
CC1 Responding to Climate Change and Creating Environmental Sustainability	Do nothing was considered but found unreasonable.	None identified.

3.12 This information was incorporated into 6 'Alternative Approaches to Policy' thematic evidence base policy papers (May 2021) which informed the Regulation 18 CELPR consultation between 23 July and 17 September 2021. SA recommendations were included within these Topic Papers. The recommendations made through the SA and the Council's response to these are detailed below (table 3.2).

Table 3.2 – Options assessment

Recommendations	SA topics likely to be affected	Council response
TOPIC PAPER 1: WATER MANAGEMENT		
DM33: Development and Flood Risk		
Where it is difficult to achieve a net improvement in terms of surface water run-off and flood storage, it might be beneficial to allow a contribution towards off-site flood protection and resilience works	Natural resources +ve	Such contributions would be acceptable where appropriate offsite schemes are available. Contributions however have not been tested for viability.
Application of the drainage hierarchy to support natural / soft measures ahead of hard engineered solutions.	Natural resources +ve Biodiversity +ve	Addressed in Policy DM34.

<p>Consider identifying locations that could be suitable for offsite flood mitigation and enhancement (alongside the requirement for biodiversity net gain).</p>	<p>Natural resources +ve Biodiversity +ve</p>	<p>Would require a more strategic approach and reviewed evidence base. This might be something explored through future work on Biodiversity Net Gain.</p>
<p>TOPIC PAPER 3: STRATEGIC TRANSPORT</p>		
<p>T2: Developing the Cycling and Walking Network</p>		
<p>Highlighting the protection of strategic pedestrian routes would help to mitigate potential negative impacts associated with the cycle superhighway not being a shared user space (acknowledged that this move away from shared spaces is in line with LTN1/20 cycle infrastructure design guidance).</p> <p>This could refer to pedestrian only routes, such as pavements or footpaths.</p>	<p>Transport +ve Health and wellbeing +ve Lowering carbon emissions +ve Air Quality potentially +ve Population and communities +ve</p>	<p>Wording to be amended to clarify that Cycle Superhighway would include segregated pedestrian and cycle provision.</p>
<p>Further policy wording could ensure appropriate supporting infrastructures (bicycle repair stations, locking facilities) are provided at key stopping locations along the strategic routes, as well as key services along the route and at key destinations.</p>	<p>Economy and employment +ve Transport +ve Population and communities +ve</p>	<p>Additional wording has been provided in the policy to include the provision of secure cycle parking as part of the development of the network.</p>
<p>T4: Public Transport Corridors</p>		
<p><i>Provide alternative flexible approaches which developers could help provide public transport for initial residents, whilst viability of new public transport schemes are questionable. This could be looked at in conjunction with the plan to look into adopting a flexible rural public transport offering.</i></p>	<p>Population and communities +ve Transport +ve</p>	<p>This can be explored with the Highways Authority and if necessary additional wording in the supporting text can be provided.</p>

<p><i>Provide bicycle locking infrastructure at public transport access nodes to help support intermodal and networked connectivity</i></p>	<p>Health and wellbeing +ve</p> <p>Transport +ve</p>	<p>The supporting text to the policy (para 24.29) has been amended to state that secure cycle parking must be provided at public transport nodes</p>
<p>DM31: Air Quality Management and Pollution</p>		
<p>Recommend specific planting within developments which help to mitigate issues relating to particulate matter. Example of Cotoneaster Franchetii.</p>	<p>Air quality +ve</p> <p>Biodiversity +ve</p> <p>Health and wellbeing +ve</p>	<p>Green and blue infrastructure is also recommended through the revised PPG wording as a mitigation measure. Supporting text has been amended to include the list of possible mitigation measures set out in the PPG which includes green infrastructure, such as trees, which can act as a barrier or maintain separation between sources of pollution and receptors.</p>
<p>Areas which have been identified as 'close' to the objective/limit value could be identified in order to ensure increased certainty in case of potential disputes. In this sense, the word 'close' could also benefit from a clearer definition.</p>	<p>Air quality +ve</p>	<p>Comments noted. Air quality levels vary year on year and so reference has been made to the Annual Status Report that Environmental Health produce each year. Proposals should undertake their own assessment/modelling work to determine levels, as it is rare that a monitoring site is located in the exact location of a development and pollution increase also needs to be ascertained, and so 'close to' cannot be determined from looking at Council monitoring data. In relation to nitrogen oxide levels 'close to' objective / limit value levels means that the nitrogen dioxide pollution levels are indicated to be at or above 85% of the air quality objective/ limit value. Have added in additional text to say 'which for the annual mean level is at or above 34ug/m3'</p>

DM61: Prioritising walking and Cycling		
<i>It would be beneficial to add wording which provides support to schemes which adopt the principles of low traffic neighbourhoods into their design from the outset.</i>	<p>Population and communities +ve</p> <p>Air quality +ve</p> <p>Health and wellbeing +ve</p> <p>Transport +ve</p>	Comments noted additional text has been included in the supporting text. It is something that can be explored further in the SLAAP
<i>Links to green/blue infrastructure should ensure that any biodiversity assets or designations along these spaces are not vulnerable to recreational pressures</i>	Biodiversity +ve	Comments noted. Additional amendments are not considered necessary. The development plan should be read as a whole with biodiversity assets and designations protected through other policies within the Plan.
<i>Wording which ensures any facilities (on or off site) likely to be used by residents of a development are provided with cycle locking facilities.</i>	<p>Economy and employment +ve</p> <p>Transport +ve</p> <p>Population and communities +ve</p>	Amendments have been made to policy T4 to reference this
DM62: Vehicle Parking Provision and Electric Vehicle Charging Points		
Specific cycle parking provisions could be detailed, for example a minimum number of locking facilities per dwelling, as well as a requirement of all facilities within the site to be complemented with cycle locking facilities.	<p>Economy and employment +ve</p> <p>Population and communities +ve</p> <p>Transport +ve</p>	This is already covered by Appendix E – this is being reviewed in the light of the standards contained in LTN 1/20.
SG12: The Port of Heysham and Future Expansion Opportunities		
Reference within this policy to whether the ‘bus corridors’ are in addition to the	Transport +ve	Text has been amended and clarified.

‘Bus Rapid Transit’ could strengthen the clarity of the policy.		
More specific reference to how proposals are expected to have fully considered the Council’s commitment to addressing climate change could be provided. This could be split between construction and operational phases as well as secondary effects (e.g. transport requirements, impact on flood risk etc).	Lowering carbon emissions +ve	The policy wording includes references to transport policies T2 and T4. Additional amendments are not considered necessary. The development plan should be read as a whole.
TOPIC PAPER 4: HERITAGE AND CLIMATE CHANGE		
CCH1: Retrofit Of Buildings of Traditional Construction for Energy Efficiency		
Add wording to strengthen links with policy CCH2 and encourage solutions where physical changes to sensitive parts of listed buildings cannot be altered. For example, support for the use of low carbon measures in historic buildings <i>‘and their curtilages’</i> .	Lowering carbon emissions +ve	Minor changes to the policy to strengthen links to CCH2 can be included. However the policy deals primarily with retrofit measures (e.g. insulation, replacement windows) rather than micro-renewables
CCH2: Micro-Renewables in the Setting or Curtilage of Heritage Assets		
Wording could include reference to screening/mitigation to reduce potential effects relating to effects upon the landscape surrounding the setting or curtilage of the historic asset/renewable scheme.	Landscape +ve	Comments noted. This is already part of the policy and can be strengthened with minor changes to wording.
Where heritage assets are commonly clustered, the wording could be expanded to include ‘assessment of the contribution the setting and/or curtilage make to the significance of the asset, surrounding heritage assets and the general historic character of the area’	Historic Environment +ve Lowering carbon emissions -ve?	The policy can be amended to accommodate this suggestion.
TOPIC PAPER 5: SUSTAINABLE DESIGN, ENERGY EFFICIENCY AND RENEWABLE ENERGY		
DM29: Key Design Principles		
A key principle of development should be to ensure connectivity and continuity between surrounding areas (in terms of green and blue infrastructure, active travel routes, ecological networks etc)	Transportation +ve Climate change adaptation +ve	The City Council believe that this is addressed under Policy DM43 without the need for additional reference.

	Biodiversity <i>+ve</i>	
DM30a Sustainable Design and Construction - New Development		
DM30b Sustainable Design and Construction - Water Efficiency		
DM30c Sustainable Design and Construction - Materials, Waste & Construction		
Consider setting up a carbon offset fund to enable emissions to be 'reduced' offsite should it be more cost effective and on-site measures make the scheme marginally viable	Lowering carbon emissions	The policy looks to promote the energy hierarchy prioritising a fabric first approach. The encouragement of off-site measures is not supported within this policy.
DM53: Renewable and Low Carbon Energy Generation		
Identify and allocate land to support <u>offshore</u> energy schemes – safeguarding of important infrastructure.	Lowering carbon emissions <i>+ve</i> Biodiversity <i>-ve?</i> Natural resources <i>-ve?</i>	Policy SG13 'Heysham Gateway' of the Strategic Policies and Land Allocations document looks to support the infrastructure requirements for offshore energy schemes. The policy recognises the opportunities that Heysham provides to support additional offshore energy deployment. Safeguarded land for the National Grid is already identified.
Identify land for energy storage facilities.	Lowering carbon emissions <i>+ve</i>	Whilst this is supported the City Council have not been made aware by stakeholders of the need to identify additional land. This will be kept under review as the Plan is prepared.
Consider safeguarding land that is identified as being suitable for strategic renewable energy opportunities (for example, do not allow housing / employment development in wind opportunity areas)	Lowering carbon emissions <i>+ve</i> Housing ?	The City Council have sought to provide a positive criteria-based approach to support the increased deployment of renewable energy. This is consistent with national planning policy. The policy is positively worded to support renewable energy schemes where appropriate on a case by case basis.

TOPIC PAPER 6: MISCELLANEOUS POLICIES		
SP4: Priorities for Sustainable Economic Growth		
Identify the importance of natural capital and ecosystem services when calculating the economic value of land and assets. Support economic activities such as land banks for biodiversity net gain and carbon sequestration	<p>Natural resources +ve</p> <p>Biodiversity +ve</p> <p>Economy and employment +ve</p> <p>Lowering carbon emissions +ve</p>	This is something to consider moving forward. It would require a significant evidence base.
SP9: Maintaining Strong and Vibrant Communities		
Discourage or prohibit new community facilities being located in areas that are at heightened risk of climate change effects (flooding on site, flooding on access routes, storm surges, excessive heat).	<p>Climate change adaptation +ve</p> <p>Health and Wellbeing +ve</p> <p>Population and Communities +ve</p>	These issues are addressed under Policy DM30.
Where facilities are in areas of risk, enhanced resilience measures need to be secured.		
SG4: Lancaster City Centre		
Consideration and protection for street trees could be made stronger by requiring all new developments to ensure a net gain in the number of street trees.	<p>Biodiversity +ve</p> <p>Natural resources +ve</p> <p>Climate change adaptation +ve</p>	Recommendation noted. The City Council will explore this with key partners including Lancashire County Council in their role as Highways Authority. Policy DM45 was amended to address this
SG13: Heysham Gateway, South Heysham		
Given the importance of the climate emergency, it is considered that the following text should be removed.	Lowering carbon emissions +ve	Policy amended accordingly.

<p><i>Where possible to do so development should explore opportunities aimed at minimising energy use and delivering low-carbon development..</i></p>		
<p>DM57: Health and Wellbeing</p>		
<p><i>Is there anything to say about retrofitting / refurb of existing homes and community facilities? In terms of making them more thermally comfortable and adaptable to climate change impacts? – For example, instead of contributing to new facilities, it might be appropriate to fund refurbishments that encourage energy efficient and resilience to climate change impacts.</i></p>	<p>Health and wellbeing +ve</p> <p>Population and communities +ve</p> <p>Lowering carbon emissions +ve</p> <p>Housing +ve</p> <p>Climate change adaptation +ve</p>	<p>Any expectations placed on new development must meet the obligation tests of national planning policy in terms of paragraph 56. For instance that obligations need to be directly related to development. It is not clear that the request for retrofitting existing policies meets such a test.</p>
<p>DM58: Infrastructure Delivery and Funding</p>		
<p><i>The creation of a carbon offset fund would help to ensure that carbon emissions reductions can be achieved if it is not feasible to do so on site.</i></p> <p><i>Carbon sequestration could be added to the list of potential infrastructure requirements in Table 15.</i></p>	<p>Lowering carbon emissions +ve</p>	<p>The policy looks to promote the energy hierarchy prioritising a fabric first approach. The encouragement of offsite measures is not supported within this policy. It is not clear how, under the current national planning policy how Carbon Sequestration can be demonstrated to be achievable.</p>
<p>DM59: Telecommunications and Broadband Improvements</p>		
<p><i>To provide a 'fallback position' it could be useful to state what the minimum acceptable standards for broadband provision would be where FTTP is not deemed practical. For example the most viable high speed connection.</i></p>	<p>Economy and infrastructure +ve</p> <p>Lowering carbon emissions +ve</p> <p>Housing +ve</p>	<p>Comments Noted and amendment made to Policy DM59.</p>

<p>The requirement for development to be 'future proofed' could be included where FTTP is not deemed practical. For example, the inclusion of ducting for future fibre.</p>	<p>Health and wellbeing +ve</p> <p>Transportation +ve</p>	<p>Comments Noted. Not clear that the requirements expected would pass the NPPF obligation tests therefore not included.</p>
---	---	--

3.13 Following consultation on the Local Plan Review Topic Papers and supporting evidence, the Council reviewed responses received. The comments below are directly related to the SA process, accompanied by the response/action taken by the Council.

Table 3.3 – Consultation Responses

Representation	Response / Action
<p>Gladmans</p> <p>The Council should ensure that the results of the SA process clearly justify it's policy choices. It is noted that at the present time a full SA of the Council's proposed Local Plan Review modifications is yet to undertaken.</p>	<p>SA is an iterative process. As detailed in Section 4 of this SA Report, recommendations and high level appraisals were undertaken in support of the emerging policies.</p> <p>The SA Report documents this process, as well as providing a more detailed appraisal of the proposed policy change.</p> <p>The role of the SA is to aid the decision making process, but other sources of evidence will be important.</p>
<p>H20 Urban</p> <p>There is no assessment of the potential implications of what the proposed new policies would have on for example any of the current site allocations in terms of viability or the scale and scope of development which should be achieved on them, or whether in order to address climate change an alternative strategy is required. The changes to the policies set out in the local plan review are not accompanied by any assessment of their potential impacts on wider delivery across the plan.</p> <p>The Plan review should be widened to address the under supply of homes.</p>	<p>The SA Report sets out an appraisal of the proposed new policies, recognising the potential for effects on the viability of development. It is beyond the scope of the SA to determine the exact effects in terms of viability for each of the site allocations.</p> <p>The scope of the Plan Review itself is a judgement for the Planning Authority to make.</p>
<p>Natural England</p> <p>Additional monitoring indicators may be required to assess the impact of the proposed</p>	<p>Monitoring measures are included within the SA Report at Section 6.</p>

revisions to the plan in connection with climate change	
---	--

- 3.14 The 6 ‘Alternative Approaches to Policy’ thematic evidence base policy papers (May 2021) which informed the Regulation 18 CELPR consultation included a column detailing what further changes were made to policies. These additional SA resulting changes were not shown in the policies in the topic papers but were instead shown in the strike through version of the Reg 18 Local Plan (Draft Plan), which is the document that the Council consulted on between 24 July to the 17 September 2021.
- 3.15 In preparing the Draft Plan the SA looked at the broad nature of effects for each policy and provided a table detailing whether the changes being proposed were likely to be positive, negative, or have limited implications. Combined effects of policies were also assessed.
- 3.16 The SA Report detailing the SA process was prepared as part of the Regulation 19 Publication Stage. This was subsequently built on further as part of the Main Modifications consultation, held 15 June 2023- 28 July 2023, in the SA Addendum (Appraisal of Modifications) (2023) which was published May 2023.
- Stage C: Prepare the SA Report
- 3.17 SA is an iterative process which has involved the preparation of numerous reports that sit alongside the different stages in the Local Plan’s development. The final SA Report was prepared as part of the Publication consultation. Further work was undertaken as part of the assessment of proposed modifications with this assessment documented in the SA Addendum.
- Stage D: Seek representations on the SA Report from consultation bodies and the public (Consultation)
- 3.18 Consultation with statutory bodies and the public was undertaken throughout the iterative Plan development process. Section 5 describes how the opinions expressed during consultation were taken into account and influenced the development of the Plan throughout the process.
- Stage E: Post adoption reporting and monitoring
- 3.19 The SEA Directive requires that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any undesirable environmental effects are identified, and remedial action is implemented accordingly.
- 3.20 Based on the assessment conducted on the options and identification of potential significant environmental effects, a monitoring framework has been prepared and is presented in Section 6.
- 4 The reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with**
- 4.1 This section explains the reasons for choosing the Local Plan, as adopted, in light of the other reasonable alternatives considered.

- 4.2 The SEA Regulation 12 (2) require the assessment of the likely significant effects on the environment of implementing the Local Plan and the 'reasonable alternatives' taking into account the objectives and the geographical scope of the Local Plan.
- 4.3 Government guidance advises that in considering 'reasonable alternatives', only realistic and relevant alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects. As any alternatives for the Local Plan need to be 'reasonable', alternatives that were not 'reasonable' were not considered through the SA appraisal.
- 4.4 Reasonable Alternatives were explored by the Council as part of the 6 'Alternative Approaches to Policy' thematic evidence base policy papers (May 2021). These papers explored what policy approaches were available to the Council. SA recommendations were included within these Topic Papers in respect of the reasonable alternatives assessments.

5 How Opinions expressed during consultation have been taken into account.

- 5.1 This section explains how the opinions expressed in response to the consultation on the SA reports have been taken into account in developing the Local Plan.
- 5.2 The Local Plan has been developed following consideration of consultation comments received as part of formal statutory consultation on the Local Plan and SA Report, in accordance with the SEA Regulations.
- 5.3 The following SA Reports were prepared and published for consultation at each of the key Local Plan development stages:
- Scoping Report (2020); document published 26 October 2020
 - SA of Topic Papers (2021); 24 July – 17 Sept 2021

The SA Scoping Report 2021 set out the context, SA objectives and established the baseline data. A minimum five-week consultation was undertaken with the three statutory environmental consultation bodies (Environment Agency, English Heritage (now Historic England) and Natural England). The consultation comments received were used to update the next iteration of the SA and fed into the Local Plan preparation and SA assessment framework.

- SA Report (2021) – Publication Draft; document published November 2021, consulted on 31 January 2022 – 14 March 2022.

SA commentary and assessment was included in a series of Topic Papers which were subject to consultation between 23rd July and 17 September 2021. Responses received as part of the consultation were considered as part of updating the SA and the Local Plan preparation.

The SA Report was produced in November 2021 and assessed the pre-publication draft of the Local Plan. The SA Report underwent a minimum six week consultation alongside the Publication draft Local Plan document in January -March 2022. Responses received as part of the consultation were considered by the Council, and where appropriate modifications to the Local Plan were proposed by the council and submitted with the Local Plan to the Secretary of State for Examination on 31st March 2022.

- SA Addendum (Appraisal of Modifications) (2023) – Published May 2023. Post Submission Main Modifications consulted on between 15 June 2023 - 28 July 2023.

Following the Local Plan examination hearing sessions, the Inspector recommended a number of Main Modifications i.e. changes to the Publication Draft Local Plan that she considered to be necessary for soundness. To consider the Main Modifications, an addendum to the SA Report was produced (May 2023). The report set out how the Council had explored whether there were any reasonable alternatives in relation to the proposed Main Modifications and concluded that no alternatives were reasonable or needed to be appraised through further SA work.

The appraisal concluded that the main modifications being proposed would lead to limited changes in the SA findings when considering the overall effects of the Plan ‘as a whole’. No further mitigation or enhancement measures were identified.

The SA Addendum and Modifications were consulted on for 6 weeks between 15 June 2023 - 28 July 2023

Following this consultation the Inspector proposed a number of further Main Modification (2024). Further consultation was undertaken on additional modifications between 22 Marh 2024 and 3 May 2024. Following consultation between the SA Team and the Council further SA assessment was not considered necessary as part of this modification consultation.

Responses received as part of the consultation were considered by the Inspector in preparing her report.

- 5.4 The comments received throughout the consultations outlined above have informed the scope of the SA, helping to in turn shape the development of the Local Plan from inception to adoption.

6 The measures that are to be taken to monitor the significant effects identified for the Local Plan.

- 6.1 This section requires a framework for monitoring the significant effects of implementing the plan. Monitoring is an ongoing process integral to the plan’s implementation and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the SA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

- 6.2 The SEA Regulations require that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any unforeseen, undesirable environmental effects are identified, and remedial action is implemented accordingly. Likewise, it is beneficial to check that the effects (including beneficial ones) occur as predicted by the SA.

6.3 The proposed monitoring framework looks to utilise the framework contained in the SA of the 2020 Local Plan. New indicators were only identified where it was considered necessary because:

- The existing framework not dealing with newly identified impacts
- The need to update / refresh indicators in light of the latest evidence and data collection practices.

6.4 The monitoring framework is set out in Appendix 1.

Appendix 1 – SA Monitoring Framework

<i>Air quality</i>	Number and distribution of Air Quality Management Areas (AQMAs).
	Local air quality monitoring results for nitrogen and particulates
	Complaints re odour/smell
	Incidences where thresholds for air quality are exceeded

	<i>New Indicator: Proportion of new developments built each year which fail to deliver electric vehicle charging point provision'</i>
	Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, NNR, LNR) and BHS – monitor change in area of the sites
	Condition of SSSIs (percentage in favourable condition)
<i>Biodiversity</i>	Number of Biological Heritage Sites under Active Management.
	Area of habitat created
	Length of undeveloped coast
	Areas of woodland, including ancient woodland Woodland/farmland bird populations
<i>Climate change adaptation</i>	Occurrence of coastal flooding events
	Distribution of areas at risk of fluvial flooding
	Developments where >10% of energy consumption is met by micro-generation
	Total CO2 emissions per capita per year.
	Annual average domestic gas and electricity consumption per consumer.
<i>Lowering Carbon Emissions</i>	Annual gas and electricity consumption in the commercial/industrial sector.
	Number of applications for renewable energy developments and details of their location.
	<i>New indicator: 'number of new homes built each year which fail to deliver the required carbon emission standards identified in Policy DM30a'</i>
	Economic activity rate
	Employment by sector and occupation
	Availability of employment land
<i>Economy and Employment</i>	Number of wards with LSOAs in bottom 10% most deprived for employment deprivation
	Percentage of working age population claiming jobseekers allowance
	Employment sqm (gross) by location

	<p>Retail sqm (gross) by location</p> <p>Facilities available in villages</p> <p>Visitor numbers and tourist revenue data</p>
	<p>Development in Regeneration Priority Areas</p> <p>Amount of new residential development within 1km of 5 basic services (GP, Food Store, Primary School, Bus Stop and Post Office)</p> <p>Life expectancy at birth</p> <p>Life expectancy at 65</p> <p>Premature mortality rates across the social gradient</p> <p>GPs per 1,000 population</p> <p>Village settlements with doctor's surgery</p> <p>Percentage of population with a long-term limiting illness</p> <p>Public open space per 1,000 population</p> <p>New public space delivered annually</p> <p>Children's playspace delivered annually</p> <p>Distribution of sports facilities</p> <p>Cycle route length</p> <p>Number of people cycling in Lancaster across the social gradient</p> <p>Number of people walking in Lancaster across the social gradient</p> <p>Number of children aged 5-10 years walking to school in Lancaster across the social gradient</p> <p>Proportion of new housing within 1km of a new/existing active travel route across the social gradient</p> <p>Proportion of new employment within 1km of a new/existing active travel route across the social gradient</p>
<i>Health and Wellbeing</i>	
	<p>Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs) Conservation Areas and Registered Parks and Gardens.</p> <p>Listed Buildings at risk</p> <p>Scheduled monuments at risk</p> <p>Registered Parks and Gardens at Risk</p>
<i>Historic Environment</i>	

New indicators:

Number of applications approved for sensitive retrofitting of energy efficiency measures and/or micro renewables in heritage assets or their settings, and in buildings which make a positive contribution to the character and appearance of the Carnforth Conservation Area.

Increase over a two-year period in the sensitive retrofitting of energy measures and/or micro renewables in heritage assets and/or their settings, and in buildings which make a positive contribution to the character and appearance of the Carnforth Conservation Area.

Ratio of relative housing affordability

Overall annual shortfall of affordable housing units

Percentage of housing stock classified as unfit

Average house prices

Gross affordable housing completions

Housing

New indicator: Gross housing completions compared with annual target.

Split by tenure to reflect Policy DM3 and supporting text

Secure delivery within 10% of the tenure mix contained within Policy DM3

Distribution of best and most versatile agricultural land.

Percentage of housing completions on previously developed land.

Percentage of employment development on previously developed land.

Number of grey water recycling and water minimisation schemes implemented.

Natural Resources

Percentage of rivers with good/fair chemical and biological water quality

Number of sustainable design schemes implemented.

Percentage use of secondary and recycled materials in construction of new developments

New indicators:

	<p><i>% of developments that make use of natural drainage solutions.</i></p> <p><i>number of new homes built each year which fail to deliver the required water efficiency standards identified in Policy DM30b'</i></p> <p><i>% of new developments implementing a site waste management plan</i></p>
<i>Landscape and Townscape</i>	<p>Landscape/townscape characterisation Number, location, size and character of Conservation Areas</p> <p>Number of Conservation Area Appraisals and Management Plans produced</p> <p>Conservation Areas at risk</p> <p>Development on greenfield land</p> <p>Amount of new greenspace created (ha)</p> <p>Percentage of the population within the urban area with access to public greenspace</p>
<i>Population and Communities</i>	<p>Number and distribution of wards with Lower Super Output Areas (LSOAs) in the bottom 10% most deprived for crime deprivation.</p> <p>Crime rates per 1,000 of the population for key offences.</p> <p>Percentage of people aged 16-74 achieving Level Four or Level Five qualifications</p> <p>Percentage of people aged 16-74 with no qualifications.</p> <p>Amount of new residential development within 1km of 5 basic services</p> <p>Facilities available in villages</p> <p>Village settlements with general stor</p> <p><i>New indicator: Number of community-led energy schemes. Walking and cycling scheme improvements in top 20% deprived areas</i></p>
<i>Transport</i>	<p>Local rail and bus patronage</p> <p>Cycle route length</p> <p>Population within 400m of a bus stop on a quality bus route</p> <p>New dwellings within 0.5km of the district cycle path network</p>

